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Response to Submissions Report

State Significant Development – SSD 18_9095

Armidale High School Redevelopment

Butler Street, Armidale

Prepared for: School Infrastructure NSW
March 2019

Printed: 15 March 2019
File Name: https://dfpplanningptyltd.sharepoint.com/Shared Documents/Projects/20072A Armidale High School/Reports/~RTS Comments/20072A.RTS.docx
Project Manager: Stephen Earp
Client: School Infrastructure NSW
Project Number: 20072A

Document Control

Version	Prepared By	Reviewed By	Issued To	Date
Draft	S. Earp	S. Earp	GHD / SINSW	21 February 2019
Final	S. Earp	S. Earp	DPE	26 February 2019
Final	S. Earp	S. Earp	DPE	15 March 2019

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1 Introduction

The NSW Department of Education proposes to amalgamate Duval High School and Armidale High School into a single enlarged school campus to be known as Armidale Secondary College. This will involve the construction of new facilities and refurbishment of existing buildings to increase the capacity of the school up to 1,580 students and 110 Full Time Equivalent staff at 158 – 182 Butler Street, Armidale (the Site).

A State Significant Development Application (SSDA) was submitted to the Department of Planning and Environment (DPE) in November 2018. The SSDA was placed on public exhibition from 15 November 2018 to 12 December 2018 inclusive in accordance with DPE's policy. Within this time submissions were received from:

- Department of Planning and Environment (DPE);
- Environmental Protection Authority (EPA);
- Office of Environment and Heritage – Conservation and Regional Delivery – Coffs Harbour (OEH);
- Office of Environment and Heritage – Heritage Division– Parramatta;
- Roads and Maritime Services (RMS);
- Transport for New South Wales (TfNSW);
- Armidale Regional Council;
- Government Architect New South Wales (GANSW);
- Essential Energy (EE); and
- Public Submissions.

The project team has reviewed these submissions, carried out further consultation, updated documentation (where relevant) and has responded to each item raised. The following document summarises the responses and directs DPE to the relevant report/document where each item has been addressed.

In addition to the information required to address the submissions, the following minor changes have also been accommodated into the proposal:

1. Minor changes to the building footprints/layouts to reflect design feedback from the Education Facilities Standards and Guidelines (EFSG) team;
2. Minor changes to the height of some buildings to reflect the inclusion of air conditioning to all teaching spaces (involving an increase of 300mm to building height); and
3. Additional tree removal required through the increase in car parking provided in response to submissions received.

These changes are detailed in the updated Architectural Plans (**Appendix 1**), View Analysis (**Appendix 2**), Landscape Plans (**Appendix 3**) and Arborist Report (**Appendix 4**) which are included the package supporting this RTS Report.

Following changes to these reports, the Preliminary Construction Management Plan (PCMP) has also been updated (**Appendix 14**) to reflect the relevant information required for assessment.

2 NSW Department of Planning and Environment

2.1 Key Issues

Issue	Response	Reference
Traffic, Transport and Parking 1. Council advised there are road safety concerns with the accuracy of the data provided within the Traffic Impact Assessment (TIA), particularly with regard to the AADT in Kentucky Street, and road safety of the Butler/Kentucky Streets intersection and the vehicle/pedestrian conflict at the Butler Street / Lambs Avenue intersection. Further information is required addressing the traffic volumes and road safety concerns.	The Traffic Impact Assessment (TIA) has been updated in response to the comments raised by Council, RMS and TfNSW. The TIA includes additional assessment and in particular looks at traffic volume and road safety matters. Further, TTM has prepared a Road Safety Audit which further addresses concerns raised by Council and RMS. SINSW has then provided a response to the matters raised in the RSA.	Traffic Impact Assessment Appendix 5 Road Safety Audit Appendix 11 SINSW Response to RSA Appendix 12
2. The proposal is a traffic generating development and should therefore provide adequate on-site parking, and not rely on parking availability on the surrounding road network. It is noted that Council has raised concerns with regard to the parking assessment, particularly in relation to the provision of parking for Year 11 and Year 12 students, and the inconsistency between the Environmental Impact Statement (EIS) and the TIA. Additional information is required addressing the inconsistencies between the EIS and the TIA, and the provision of adequate on-site parking for traffic that would be generated by the proposal.	SINSW understands the need for adequate on-site parking to minimise the impact on the local traffic network. Under the original proposal, three (3) parking areas provided a total of 164 parking spaces. Following review of opportunities for parking on the site, additional parking will be provided adjacent to the existing gymnasium (Den), increasing the parking there from 35 spaces to 56 spaces (being 21 additional spaces). Therefore, the site will provide a total of 185 car parking spaces, which is in excess of Council's DCP requirements. This revised car parking arrangement has been endorsed by Council. The inconsistencies between the EIS and TIS have been rectified through amendment of the TIA.	Architectural Plans Appendix 1 Traffic Impact Assessment Appendix 5
3. The draft Green Travel Plan (GTP) has not provided incentives for staff to utilise alternative travel modes and reduce private vehicle use. An updated draft GTP is required to be provided demonstrating incentives for staff to use alternative modes of transport.	The TIA has been amended at Section 6 (Green Travel Plan) to address DPE comments, in particular additional bicycle parking and end of trip facilities have been provided as incentives for using alternative modes of transport. Further incentives have been considered, such as tangible rewards for students riding to school each term, and even services such as free bicycle servicing. However these have not been implemented as the reward system is inequitable in its delivery to only favour able-bodied students, as well as setting a precedent for all public schools for on-going costs to each school which are not part of any project or school budget. In this regard, it is considered that the provision of suitable bicycle storage and end of trip facilities provides sufficient incentive for students to adopt alternative modes of transport such as riding, running and walking. In general terms, the proposal provides a number of overall benefits to the community and environment which serve as incentives to utilise alternate modes of transport to private car use, such as:	Traffic Impact Assessment Appendix 5

2 NSW Department of Planning and Environment

Issue	Response	Reference
	- Improved health and fitness for GTP users through increased exercise; walking or cycling; - Reduced general living expenses due to costs of private car use; - Improved school community moral and increase opportunity for social interaction due to students or staff walking, cycling or carpooling together; - Increased school community engagement in events such as Ride2Work Day and Walk Safely to School Day etc.; - Ability for the school to promote themselves as an innovative and environmentally aware school to school and broader community; - Decreased greenhouse gas emissions; and - Reduced traffic congestion and car parking in surrounding streets or school car parking by GTP options (car-pooling, walking, cycling, public transport).	
4. The TIA indicates that only 20 bicycle parking spaces are proposed to be provided. Council's Development Control Plan (DCP) identifies a minimum bicycle parking requirement of 1 space per 5 pupils above Year 4. The Department concurs with Council that adequate staff and student bicycle parking has not been provided. With a total student population of 1,580, 316 bicycle parking spaces are required in accordance with Council's DCP, which results in a deficit of 296 spaces. The proposal is required to be amended to make up the shortfall in bicycle parking. Where the shortfall is not provided in full, information should be submitted demonstrating why a total of 316 spaces is either unnecessary or unreasonable.	The proposal has been amended to increase the on-site bicycle parking from 20 to 100 bicycle spaces over two (2) locations, together with the provision of suitable space for extension should demand necessitate in the future. This approach has been discussed with Council who are supportive of the strategy, noting that the bicycle parking provision is "a good option and location". The current supply of car parking is proposed to respond to the number of students who typically ride bikes at both Armidale High School and Duval High School. This indicates that sufficient supply of bicycle parking facilities will be available for the students of the future Armidale Secondary College. The location of the proposed bicycle parking facilities can be easily extended in the future should use/interest grow.	Architectural Plans Appendix 1 Traffic Impact Assessment Appendix 5
5. Clarification should be provided whether end-of-trip facilities would be provided on site and that these facilities would be adequate having regard to the proposed staff and student bicycle parking provision.	End of trip facilities are provided and are suitable to meet Building Code of Australia (BCA) / National Construction Code (NCC) requirements, including facilities for: - Students in the Gymnasium change room, including: - 4 x male showers and 5 x WC's; - 4 x female showers and 13 WC's;	Architectural Plans Appendix 1

2 NSW Department of Planning and Environment

Issue	Response	Reference
	- Teachers in the administration area and staff study facilities, including: - Admin: 4 x unisex WC's and 1 x accessible WC + shower; and - Staff Study: 4 x unisex WC's and 1 x accessible WC + shower.	
Heritage 6. A Historical Archaeological Assessment is required to be prepared by a suitably qualified and experienced Historical Archaeologist. The Historical Archaeological assessment should identify what relics, if any, are likely to be present within the site or in the vicinity, assess their significance and consider the impacts from the proposal on this potential resource. Where harm is likely to occur, it is recommended that the significance of the relics be considered in determining an appropriate mitigation strategy. If harm cannot be avoided in whole or part, an appropriate Research Design and Excavation Methodology should also be prepared to guide any proposed excavations.	The Heritage Impact Statement (HIS) prepared by NBRS and submitted with the EIS indicates that an Archaeological Watching Brief will be implemented during the early works being carried out as 'development without consent' pursuant to an authorised Review of Environmental Factors (REF). The early works assessed under the REF appropriately mitigate the risks of archaeological finds, and this approach is endorsed by the Heritage Council in their comments regarding the EIS. A copy of the Archaeological Watching Brief is included with this RTS Report.	Archaeological Watching Brief Appendix 6
7. While it is acknowledged the Council did not raise concerns with regard to the proposed development, the Heritage Council has raised concern with regard to the impact of the proposal on significant views to the locally listed heritage item. Additional information is required addressing the impact of the proposal on the significant views.	The View Analysis provided as part of the original DA submission (refer Appendix 16 of the EIS) has been updated to provide additional information, including: - Comparison between existing and proposed views at significant viewpoints around the site; - Demonstration as to how these views would be maintained with the construction of the proposed buildings; and - Consideration of the impact the proposed buildings would have on significant views, including potential improvement to views or prominence of visual settings within the site. Further, it is noted that the design change to accommodate air conditioning (resulting in an increase in building height by 300mm) has been incorporated into the expanded View Analysis.	View Analysis Appendix 2
Noise and Vibration 8. The Construction Noise and Vibration Management Plan (CNVMP) indicates that construction works would occur outside the standard construction hours in the Interim Construction Noise Guideline on Saturdays. The Department does not support the undertaking of works outside standard construction hours and requires the Applicant to update the proposed construction hours in accordance with the Interim Construction Noise Guideline.	The Construction Noise and Vibration Management Plan (CNVMP) by Day Design has been updated to reflect the undertaking of works on Saturdays in accordance with the Interim Construction Noise Guideline, being 8am – 1pm. It is noted that the PCMP has also been updated to reflect these working hours.	Construction Noise and Vibration Management Plan Appendix 9 Preliminary Construction Management Plan

2 NSW Department of Planning and Environment

Issue	Response	Reference
		Appendix 14

2.2 Other Issues

Issue	Response	Reference
Ecologically Sustainable Development 9. The EIS indicates that the proposed development targets an equivalent a Three-Star Green Star rating, which is less than the minimum four-star rating as recommended for school developments. The development should endeavour to achieve the equivalent of a Four-Star Green-Star rating. Justification is required as to why the minimum four-star rating has not be targeted to be achieved by the proposed development.	Following recent discussions between SINSW and DPE regarding Green Star, it is confirmed that for the Armidale project SINSW will register for a 4-Star rating.	Nil
Design and Built Form 10. The proposed development has not addressed the concerns raised during the State Design Review Panel (SDRP) meeting in July 2018. Specifically: a. Community diversity and Indigenous learning b. The Master Plan c. Building form and internal planning d. Accessibility and landscaping. The Department requires the SDRP correspondence dated 6 July 2018 to be addressed.	Appendix 29 of the EIS submitted to DPE was a document prepared by NBRS as a direct response to the matters raised by the SDRP following the design presentation to the Pilot SDRP on 27 June 2018 and SDRP correspondence dated 6 July 2018. The details covered in this document are structured so as to specifically respond to the matters raised by DPE/SDRP, including: • Community Diversity and Indigenous Learning (Pp. 3-5); • The Master Plan (Pp. 6-18); • Building Form and Internal Planning (Pp. 19-25); and • Accessibility and Landscape (Pp. 26-29). NBRS has also prepared a detailed response to matters raised by GANSW in the RTS package.	Response to GANSW Appendix 13
11. The Secretary's Environmental Assessment Requirements (SEARs) required architectural drawings to be dimensioned. The architectural plans are required to be updated accordingly.	The Architectural Plans have been updated with dimensions.	Architectural Plans Appendix 1
Out of Hours Use of School Facilities 12. No information has been provided identifying the current hours of operation of the school. The Department requires the identification and assessment of the proposed use of facilities for community purposes, and their hours of operation to be undertaken.	Nominal Core school hours are 9am – 3:30pm. Section 4.4 of the EIS details the consideration given for the potential impacts arising from out-of-hours use of the school facilities, in particular the continuation of the use of the multi-purpose hall, external basketball courts (available for school or community use between 3:30pm-10pm Monday to Friday, or 7am-10pm on weekends) and associated facilities for school or community events, such as presentation nights, drama or music recitals, or other gatherings of the public (whether one-off or periodic events).	Nil

2 NSW Department of Planning and Environment

Issue	Response	Reference
	Such uses will occur after the core school hours of 8:30am – 4:00pm and possibly up to 10pm. The design has responded to the use of school areas by the public by including fencing, external lighting, separate car park for the gymnasium which is used on weekends for sports events and other access and security considerations.	
Signage 13. Provide clear photomontages of the proposed signage to be used, which also show the proposed signs illuminated.	The Architectural Plans have been updated to include photo montages for all signage proposed, and which show the signs as illuminated.	Architectural Plans Appendix 1

3 NSW Environmental Protection Authority

3.1 General

Issue	Response	Reference
Waste Management The EIS provides a Waste and Recycling Management Plan (Appendix 25 of the EIS) for the proposal. The EIS refers to an additional waste management plan that has been prepared to address the early works component of the development including demolition works and some preliminary construction works, however, this report has not been provided with the EIS. The EPA recommends the requirement for a Waste and Recycling Management Plan be incorporated into the conditions of consent for the proposal, should approval be granted. This plan should include waste management and recycling details for the early works component of the proposal.	The EPA's comments are noted. A Waste and Recycling Management Plan will be included in the Principal Contractor's Construction Environmental Management Plan (CEMP).	Nil
The EPA strongly encourages the proponent to continue to engage and consult directly with Armidale Regional Council regarding resource recovery and waste disposal options. It is the EPA's understanding that the Armidale Waste Management Facility has limited capacity to accept large volumes of industrial waste at the premises and therefore alternate disposal options may need to be considered by the proponent.	The EPA's comments are noted.	Nil
Any excavated soils should be classified as Virgin Excavated Natural Material (VENM) in accordance with the Act or as Excavated Natural Material (ENM) in accordance with the resource recovery order and exemption for ENM prior to being re-used off site or disposed of. The resource recovery order and exemption for ENM is available from our website at: http://www.epa.nsw.gov.au/your-environment/recycling-andreuse/resource-recovery-framework/current-orders-and-exemption. Loads of VENM should be delivered to the Armidale Waste Management Facility with a completed certificate, certifying the load as VENM. These certificates are available at: http://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/virgin-excavated-natural-material.	The EPA's comments are noted. Details regarding excavated soils will be included in the Principal Contractor's CEMP.	Nil
All other waste material from the development should be classified in accordance with the EPA's Waste Classification Guidelines prior to being disposed of at a facility that can lawfully accept the waste material. These guidelines can be found on our website at: https://www.epa.nsw.gov.au/yourenvironment/waste/classifying-waste/waste-classification-guidelines	The EPA's comments are noted. Waste classification will be incorporated in the Principal Contractor's CEMP.	Nil
Contaminated Land Management The EIS identifies the presence of asbestos and polycyclic aromatic hydrocarbons (PAHs) contamination in soil at the development site. Most of the contaminated material will be excavated, tested and re-used or disposed of appropriately as part of the school redevelopment works. The remaining remediation works require development consent and have therefore also been included in this application.	The EPA's comments are noted. The Remediation Action Plan (RAP) will be included in the Principal Contractor's CEMP and implemented. Due to the minor nature of the RAP, SINSW confirm that it has been determined that an EPA accredited site auditor is not appropriate for this project and will not be engaged.	Nil

3 NSW Environmental Protection Authority

Issue	Response	Reference
The EIS indicates that the site can be made suitable for the proposed use with the recommended remediation strategy outlined in the EIS. The remediation required should be conducted and managed in accordance with the methodology and controls in the Remedial Action Plan (RAP; Appendix 9 of the EIS). The EPA recommends that any approval granted requires the proponent to implement the RAP during the demolition and construction works associated with the development. This includes the preparation of a validation report for the development site which should be provided to the EPA upon completion of the development. Consideration may also be given to engaging an EPA accredited site auditor. Further information regarding our site auditor program is available at: https://www.epa.nsw.gov.au/your-environment/contaminatedland/site-auditor-scheme.		
Stormwater Management The EPA recommends the Stormwater Management Plan (Appendices 14 & 15 of the EIS) be incorporated into the conditions of consent for the proposal, should approval be granted. The EPA expects that erosion and sediment controls during the construction phase of the proposal be designed and implemented in accordance with the Managing urban stormwater: soils and construction publications.	The EPA's comments are noted. Stormwater management will be included in the Principal Contractor's CEMP.	Nil
Dust Management The proponent must, as far as practicable, prevent or minimise the generation of air emissions, including dust generation, from the site. The EPA expects dust mitigation measures to be identified and implemented as part of a Construction Environmental Management Plan.	The EPA's comments are noted. Dust mitigation measures will be identified and implemented as part of a CEMP	Nil
Construction Noise and Vibration The Construction Noise & Vibration Management Plan (CNVMP; Appendix 23 of the EIS) suggests that noise from construction works will exceed the calculated Leq15-minute noise management level at the nearest residential receivers. The CNVMP states that provided its recommendations are implemented, the level of noise and vibration from the construction works will be minimised as far as reasonably practical. The EPA recommends that a noise validation assessment be carried out, prior to the construction works commencing, that considers all equipment to be used and all mitigation measures to be implemented at the development site. If predicted construction noise levels still exceed the calculated noise management levels, then the proponent should examine further feasible and reasonable work practices and/ or mitigation measures that can be applied to minimise noise levels.	The EPA's comments are noted. A Noise Validation Assessment will be carried out prior to construction, and the Principal Contractor's CEMP will include measures for the abatement of noise.	Nil
The CNVMP states that works will occur outside of standard construction hours in the Interim Construction Noise Guideline (7am- 6pm on Mon- Fri and 8am- 1pm on Sat). The CNVMP states that construction works will occur between 8:00am and 4:00pm on Saturdays, however, no justification for extended construction hours is provided.	The Construction Noise and Vibration Management Plan (CNVMP) by Day Design has been updated to reflect the undertaking of works on Saturdays in accordance with the Interim Construction Noise Guideline, being 8am – 1pm.	Construction Noise and Vibration

3 NSW Environmental Protection Authority

Issue	Response	Reference
The Interim Construction Noise Guideline states that construction outside the standard hours should only be allowed where the proponent provides clear, strong, justification for reasons other than convenience, such as to sustain the operational integrity of road, rail and utility networks. As the proponent has not provided strong justification for construction work outside standard hours, the EPA recommends that any approval granted should limit construction to standard hours. The Environmental Noise Assessment (ENA; Appendix 22 of the EIS) does not provide information about how the location of the noise sensitive receptors (186 & 187 Mossman Street) and noise logger (175 Mossman Street) were selected. However, the project specific noise criteria appears appropriate.	It is noted that the PCMP has also been updated to reflect these working hours.	Management Plan Appendix 9 Preliminary Construction Management Plan Appendix 14
The EPA's Noise Policy for Industry (NPfI) only relates to industrial noise associated with the development. Therefore, noise from the outdoor play areas and games courts are not considered as part of the EPA's assessment. Regardless of this, the EPA recommends the proponent adopt the noise control recommendations within the ENA for the games courts to minimise noise impacts to the surrounding community.	The EPA's comments are noted. "Option 1" of the noise control recommendations within the Environmental Noise Assessment (Appendix 22 of the EIS) for the games court have been incorporated into the proposal (i.e. the inclusion of a 1.5m high wall surrounding the games courts).	Architectural Plans Appendix 1
The general learning areas (GLAs) have been included in the EPA's assessment as noise from these areas includes machinery noise from within the Technology and Applied Studies workshops. The ENA identifies that predicted cumulative Leq 15-minute noise levels for the GLAs and mechanical plant (e.g. air conditioning, exhaust fans and dust collectors/ extractors) will exceed the project specific noise criteria. The ENA also states that the type and location of mechanical plant for the development has not yet been selected. The EPA recommends that any approval require an acoustic assessment to be completed once the type and location of mechanical plant has been finalised and prior to the construction of the development. The mechanical plant should be selected, built and operated so that all mechanical plant, operating simultaneously, does not exceed the project specific noise criteria at any residence for the most restrictive period that the plant will be operating (e.g. air conditioners operating during the night time period)	The EPA's comments are noted. An acoustic assessment will be completed for the main building as part of the final design.	Nil
Should any noise complaints be received by the EPA regarding the development, the EPA may require noise monitoring to be undertaken and/ or additional noise mitigation measures to be implemented. Where noise impacts cannot be mitigated, the EPA recommends the proponent negotiates a private agreement with the noise affected resident(s).	The EPA's comments are noted.	Nil

4 NSW Office of Environment and Heritage

4.1 Heritage Division – Previous Advice

Issue	Response	Reference
During April and May 2018, the Heritage Division provided comment on the Concept Design at the request of the Department of Education. On 5 April 2018, the Heritage Division provided the following advice: • The proposed semi-circular building does not respond to the geometry of the town and the site. • There is an opportunity to recreate an arrival space to the original front entry with consideration to the historical drive and envisioned road layout. There are also opportunities to connect the south side of the heritage building with the landscape and re-establish views of the front of the building. • The new building obscures and dominates the heritage building and removes all public views of the front of the building from Hargraves, Butler and Kentucky Street. • The identified significant view from Hargraves Street to the heritage building would be lost. • The design should be informed by a masterplan for the whole of the site. • The retention of significant views to the north of the heritage building are positive. • New buildings could be placed to the north of the building and relate to the established axis, without obstructing significant views. • Heritage advice from the local Council should be sought as the item is of local heritage significance.	This advice from OEH has been noted and has been addressed in the EIS and supporting documentation.	Nil
Following this advice, the Department of Education provided additional documentation and on 1 May 2018, the Heritage Division gave the following comments: • The placement of the new building is essentially the same as the Concept Plan upon which earlier OEH comments were provided. We note the slight reduction in the semi-circular building at the eastern end which provides greater public views of the building, as well as a better understanding of the alignment of the historic drive which is proposed to be interpreted with feature paving • Armidale High School and its original 1921 school building has significance for being a "Local example of typical public-school building of the period. Connected with the important theme of education. Institutional landscaping from about 1950's and possibly earlier, of local significance." • It is noted that the proposal retains the original 1921 school building and removes all later additions allowing the historic building to be viewed in the round. The proposal also retains Memorial Drive and the Avenue of Elms which is a significant landscape element.	The final dot point raised concern in regard to significant views being retained, enhanced and/or re-established. Appendix 16 of the EIS included a View Analysis which addressed these comments. The View Analysis provided as part of the original DA submission (refer Appendix 16 of the EIS) has been updated to provide additional information, including: • Comparison between existing and proposed views at significant viewpoints around the site; • Demonstration as to how these views would be maintained with the construction of the proposed buildings; and • Consideration of the impact the proposed buildings would have on significant views, including potential improvement to views or prominence of visual settings within the site.	View Analysis Appendix 2

4 NSW Office of Environment and Heritage

Issue	Response	Reference
- As Armidale High School is of local significance, approval from the Heritage Council is not required. It is recommended that heritage advice on the draft proposal be sought from Armidale Regional Council and the Department of Education's in-house heritage specialist. - The Heritage Impact Statement should address how significant views will be retained, enhanced and/or re-established, and how the visual setting for the 1921 school building and its relationship with the landscape will be enhanced.	Further, it is noted that the design change to accommodate air conditioning (resulting in an increase in building height by 300mm) has been incorporated into the expanded View Analysis.	

4.2 Heritage Division – Advice of Current Proposal

Issue	Response	Reference
1. The proposal will have no adverse impact upon the railway items of State Heritage significance located in the vicinity	The OEH's comment is noted.	Nil
2. It is noted that the placement of the new buildings and associated landscaping in the current proposal remains essentially the same as the Concept Design. On the basis, the Heritage Division's comments dated 1 May 2018 are still appropriate.	The OEH's comment is noted. OEH comments dated 1 May 2018 have been addressed in the EIS and supporting documentation.	Nil
3. Comments on impacts the project will have to local heritage items are deferred to the local council as the managers of items of local heritage significance.	The OEH's comment is noted. SINSW agrees that Council is the heritage approval authority on the matter. Council has confirmed it is supportive of the design response regarding heritage considerations.	Nil
4. In relation to historical archaeology, the Heritage Division previously recommended to the Department of Planning and Environment (DP&E) that a Historical Archaeological Assessment be included in its SEARs, however DP&E did not include this requirement. Therefore, a historical archaeological assessment was omitted from the Environmental Impact Statement.	The OEH's comment/statement is noted.	Archaeological Watching Brief Appendix 6
5. The Statement of Heritage Impact (SoHI) by NBRS dated 16 October 2018 states that "the site has the potential to contain archaeological deposits due to its ongoing use as a school since 1923 and the incremental nature of the site's development. The new buildings are substantially in the footprint of buildings and structures which have been demolished. Significant ground disturbance has occurred as a result of demolition and site remediation". The SoHI then includes in its recommendation that an archaeological watching brief should form part of the contract for construction.	The Heritage Impact Statement (HIS) prepared by NBRS and submitted with the EIS indicates that an Archaeological Watching Brief will be implemented during the early works being carried out as 'development without consent' pursuant to an authorised Review of Environmental Factors (REF). The early works assessed under the REF appropriately mitigate the risks of archaeological finds, and this approach is endorsed by the Heritage Council in their comments regarding the EIS. A copy of the Archaeological Watching Brief is included with this RTS Report.	
The Heritage Division does not object to this recommendation.		

4 NSW Office of Environment and Heritage

Issue	Response	Reference
6. It is noted that an Aboriginal Archaeological Assessment has been undertaken however separate comments on Aboriginal archaeological and cultural values of the project may be provided by the Regional Operations Division, Northern Region of the Office of Environment and Heritage.	The OEH's comment is noted and we understand no response is required at this time.	Nil
7. The Heritage Division also advises that no further referral is required to the Heritage Council unless State significant historic or archaeology is subsequently identified.	The OEH's comment is noted. It is not anticipated that any further referral will be required, unless identified during the carrying out of works.	Nil

4.3 Conservation and Regional Delivery – North East Branch

Issue	Response	Reference
We have reviewed the Environmental Impact Statement (EIS) and supporting documents and advise that we have no substantial issues with the assessments undertaken. Nevertheless, for future reference, we recommend the accredited assessor who prepared the Biodiversity Development Assessment Report (BDAR) should comply with the definitions of “development site” and “subject land” as provided in the Biodiversity Assessment Method (BAM), which are synonymous when preparing the BDAR for this project. Furthermore, the accredited assessor should refrain from using terms such as “development site footprint” and “operational footprint”, which are not used or defined in the BAM.	The OEH's comment is noted. The Biodiversity Development Assessment Report (BDAR) has been updated to address the comments regarding the BAM.	Biodiversity Development Assessment Report Appendix 10
The OEH also reviewed the Aboriginal Archaeological Assessment prepared by Apex Archaeology in October 2018, particularly with respect to Aboriginal stakeholder consultation. Based on our review, we have no outstanding issues to raise on Aboriginal cultural heritage matters and we recommend the following conditions of consent if the development is approved: 1. If surface disturbance identifies Aboriginal objects, then all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeological specialist and representatives of the Armidale LALC must be contacted to determine the significance of the object(s) and to develop an appropriate management strategy. The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided for such registration.	The OEH's comment is noted and no objection is raised to the inclusion of the proposed conditions of consent being included if the development is approved. These matters will be included in the Principal Contractor's CEMP.	Nil

4 NSW Office of Environment and Heritage

Issue	Response	Reference
2. If human remains are located, all works must halt in the immediate area to prevent any further impacts to the remains. The NSW Police are to be contacted immediately. No action is to be undertaken until the NSW Police provide written notification to the proponent. If the human remains are identified as ancestral Aboriginal, then the proponent must contact OEHS Environment Line on 131 555 and representatives of the local Aboriginal community. No works are to continue until OEHS provides written notification to the applicant.		

5 Roads and Maritime Service

Issue	Response	Reference
The assessed impact is not considered acceptable within the policy context of Roads and Maritime, for the following reasons: - To encourage slower vehicle speeds around schools, consideration should be given to the installation of traffic calming devices. - The advanced warning signage and delineation of the Kentucky Street pedestrian refuge needs to be improved to provide better visibility. - RMS supports council's suggestion for an off road bus bay.	The following responses are provided in regard to the matters raised by RMS: <u>Traffic calming devices</u> As per other RMS requests, a Road Safety Audit (RSA) has been undertaken by the traffic consultant (TTM) which has not identified the need for any additional calming devices. SINSW has provided responses to the matters raised in the RSA. <u>Kentucky St refuge upgrade works:</u> Notwithstanding the low volumes in the survey data in the updated TIA, the limited sight distance on the western approach of Kentucky Street has been noted. As discussed and endorsed by Council, SINSW has agreed to complete the following upgrades works as part of the proposed development: - Colouring existing refuge blisters to increase visibility; and - Installing (non-electronic) advance warning signage to increase awareness of the crossing. <u>Bus bay</u> The proposal bus bay zone includes sufficient bus bays which provides for up to a total of 30 buses per hour, which is a conservative response. The bus bay length is derived from Educational School Facilities Standard Guidelines (EFSG) appropriate for a school of this size. A total bus bay zone length of 60 metre is provided for 5 buses concurrently. In line with Council's request, an additional sixth "overflow" bus bay has been incorporated into the proposed design to mitigate this issue allowing for schedule variance / early arrivals / late departures. SINSW confirm that the bus bay is in the optimal location for the site and proposed development, and will remain on Butler Street for the following reasons: - The existing road infrastructure is already in place and compliments the concept design by way of concrete kerb blisters separating the bus bay from the general street traffic; - It allows SINSW to increase the number of off-site parking in this area to 56 spaces which is desirable to Council. - It avoids complications with / impact on Councils Main infrastructure services.	Road Safety Audit Appendix 11 SINSW Response to RSA Appendix 12
Roads and Maritime has identified the need for additional work. This work should be completed before opening the redeveloped Armidale Secondary College which accommodates up to 1,580 students.	SINSW advises that the broad improvement of walking and cycling infrastructure outside of the proposed development site are the responsibility of Armidale Council. SINSW suggests that RMS follow up this request directly with Council outside of the SSDA process.	Nil

5 Roads and Maritime Service

Issue	Response	Reference
Further work is required to align with NSW Government guidelines for Active Transport planning which identifies a 2km radius for walking & 5km radius for cycling from the target destination. The proposed Green Travel plan will encourage modal shift, but the walking and cycling network needs to be in place to support this initiative.		
Drop off facilities need further assessment to ensure road safety requirements are maintained around the school.	The Traffic Impact Assessment has nominated appropriate locations for drop off facilities that have been assessed and are considered appropriate following consultation with Council. Also, the Road Safety Audit has carried out further assessment and does not highlight any recommended upgrades to existing drop-off facilities.	Road Safety Audit Appendix 11
A Road Safety Audit (RSA) is required and should consider: - advance warning signage for the pedestrian crossing near Butler Street - intersection of Lambs Avenue/Mann Street and Butler Street - existing pedestrian crossing, - stopping restrictions on both sides of Lambs Avenue/Mann Street - placement of vegetation	A Road Safety Audit has been prepared by the traffic consultant (TTM) which provides an assessment of the existing road environment and identifies matters of potential risk on a scale of A (high-risk) to D (comment only, no risk). The RSA considers the matters specifically identified by RMS. The Road Safety Audit identified fourteen (14) items of potential risk with most ratings being "low" or "medium". One (1) item (Item 3) was identified with a risk ranking of "high", being a street tree at the intersection of Butler Street and Kentucky Street that obscures visibility to oncoming vehicles on Kentucky Street. TTM recommends "<i>that the lower branches of the tree be removed. Further investigation should be carried out to assess if the tree is required to be removed</i>". In accordance with Austroads Guidelines, the RSA is an independent assessment identifying potential risk, regardless of asset authority ownership. SINSW has provided a response to each of the 14 potential risks items raised, including advice of where matters are not applicable to SINSW and do not pertain to the scope of works under the SDDA.	Road Safety Audit Appendix 11 SINSW Response to RSA Appendix 12

6 Transport for NSW

6.1 TAB A – Detailed comments on SSD 9095

Issue	Response	Reference
Rail Crossings <u>Comment</u> There is a pedestrian railway crossing is north of the Armidale High School boundary near the Butler Street – Lambs Avenue intersection. There is also a pedestrian and vehicle railway crossing near the Railway St – Markham Street intersection. It is acknowledged that the increased traffic flow generated as a result of the proposal is not likely to have any significant impact on the level crossings based upon the current frequency of the rail services, being one arriving train (8:30 am) and one departing train (7:00 pm) a day. Should the frequency of the rail services increase, the risk level at the crossing will be reassessed and the need for risk mitigation measures will be considered. <u>Recommendation:</u> The Proponent should note the above.	The TfNSW comment is noted.	Nil
Bus Infrastructure <u>Comment</u> The EIS recognises there will be an increase in the number of buses required for the redeveloped school and as such the redevelopment will be provided with five (5) on-street bus bays. <u>Recommendation</u> Detailed design of the proposed bus bays, demonstrating compliance with bus capable infrastructure standards and disability access standards/ guidelines should be provided.	The EIS is based on Concept Design only. The Detailed Design will be completed pending SSDA approval, at which point it is expected that SINSW will demonstrate compliance with bus capable infrastructure standards and disability access standards/guidelines.	Nil
Bus Services <u>Comment</u> At present, there are two public bus routes (483/484) that pass the current Duval High School Site. As a result of the proposed development, adjustments to these routes, such as removing the stop at Duval High School and diverting the 483 service to the new school entrance during school hours, will be required. <u>Recommendation</u> The Proponent should consult with the local bus operator to ensure the bus routes and stops can be adjusted as required. Temporary relocation impacts <u>Comment</u> The proposed development will require the temporary relocation of Armidale High School students and staff to the Duval High School campus during the construction phase. It is noted the works associated with this temporary relocation are subject to a separate planning pathway and that extensive consultation has occurred with Armidale Regional Council and Roads and Maritime Services regarding the relocation. Further consultation with both the	The proposal includes sufficient bus bays which provides for up to a total of 30 buses per hour, which is a conservative response. The total bus bay zone length is derived from Educational School Facilities Standard Guidelines (EFSG) appropriate for a school of this size. A total bus zone length of 60 metre is provided for 5 buses concurrently. In line with Council's request, an additional sixth "overflow" bus bay has been incorporated into the proposed design to mitigate this issue allowing for schedule variance / early arrivals / late departures. SINSW confirm that the bus bay is in the optimal location for the site and proposed development, and will remain on Butler Street for the following reasons: • The existing road infrastructure is already in place and compliments the concept design by way of concrete kerb blisters separating the bus bay from the general street traffic; • It allows SINSW to increase the number of off-site parking in this area to 56 spaces which is desirable to Council.	Nil

6 Transport for NSW

Issue	Response	Reference
local bus operator and TfNSW is required to address the transport impacts, particularly in regards to bus services, of the temporary relocation. <u>Recommendation</u> The Proponent should consult with both the local bus operator and TfNSW regarding the impacts of the temporary relocation of Armidale High School.	It avoids complications with / impact on Councils main infrastructure services. SINSW is presently unable to confirm the number of buses to arrive at any one time. Rescheduling of the bus timetables is the responsibility of the relevant authority, TfNSW, in consultation with the bus operator, the school, and Council prior to the school commencing operations. This data will not be known until late 2020 when a submission is made by the bus company (Edwards Coaches) to TfNSW for approval. Also, the bus operators have had the opportunity to view the current design at the community consultation Drop-In sessions held to date (as defined in the Stakeholder Consultation Plan in the EIS). The bus operator will be provided with a copy of the final design in due course with sufficient time to adjust their infrastructure as they feel is appropriate.	
Bicycle Parking <u>Comment</u> The EIS notes the site currently has approximately 20 bicycle parking spaces and will require up to 20 spaces following the redevelopment. <u>Recommendation</u> Bicycle parking and end-of-trip facilities for staff and students should be provided in accordance with Australian Standards AS2890.3 (Bicycle Parking Facilities) and guideline documents. Access to bicycle parking should be physically separated from vehicles and pedestrians and end of trip facilities should be located in secure, convenient, accessible areas close to the main entries incorporating adequate lighting and passive surveillance in accordance with Austroads guidelines.	The proposal has been amended to increase the on-site bicycle parking from 20 to 100 bicycle spaces over two (2) locations, together with the provision of suitable space for extension should demand necessitate in the future. This approach has been discussed with Council who are supportive of the strategy. End of trip facilities are provided and are suitable to meet BCA/NCC requirements, including facilities for: - Students in the Gymnasium change room, including: 4 x male showers and 5 x WC's; 4 x female showers and 13 WC's; - Teachers in the administration area and staff study facilities, including: - Admin: 4 x unisex WC's and 1 x accessible WC + shower; and - Staff Study: 4 x unisex WC's and 1 x accessible WC + shower.	Architectural Plans Appendix 1 Traffic Impact Assessment Appendix 5
Future Bus Services <u>Comment</u> The TfNSW Growth Services Program routinely monitors regular bus routes and improvements can be made, subject to demand and funding. <u>Recommendation</u> Prior to commencement of school operations, the proponent should provide additional data and the proposed student catchment area to determine the likely demands on the transport network (all modes). With particular regard to bus usage, data should also be provided on existing and expected patronage by route. This data could be obtained by travel surveys of staff and students (existing and new enrolments). The student catchment area and travel data provided to TfNSW will assist with future service planning.	The TfNSW comment is noted. SINSW confirm that relevant data will be provided by SINSW to necessary stakeholders prior to operation of the school.	Nil

7 Armidale Regional Council

7.1 Traffic Assessment Review

Issue	Response	Reference
Section 2.1 The designation of speed zones for Butler Street is incorrect. The speed is specified as 40km/hr and should be 50km/hr. This has little affect on the analysis of the traffic study, however correct speed definition will ensure the need for 40km/hr speed zones is realised. <u>Action:</u> Correct the speed zone in the study.	The Traffic Impact Assessment (TIA) has been updated to correct the Butler Street speed zone.	Traffic Impact Assessment Appendix 5
Section 2.3 The study survey notes limited pedestrian use of the Kentucky street pedestrian refuge crossing. This appears to give an indication that limited students approach the school on foot from the south. Council believe this is an underestimation of those movements and think it likely that a number of students cross Kentucky Street at the Butler intersection. The study later notes that the refuge crossing will remain and Council agree with this assessment. The refuge was installed because of the limited sight distance available at Butler Street, the volume of traffic on Kentucky Street and the tendency of student pedestrians to walk through the Aboretum Reserve and cross Kentucky Street at less safe locations. <u>Action:</u> Note risk issues at this locality.	The Kentucky/Butler Street intersection count data showed 1 pedestrian crossing during the morning period (07:00-09:45) and 1 pedestrian crossing in the afternoon period (14:00-16:45). Notwithstanding the low volumes in the survey data in the TIA, the limited sight distance on the western approach of Kentucky Street has been noted. In a related matter, the Road Safety Audit also identifies a potential high risk item, being obstruction of vision due to a tree on the verge of the Butler St / Kentucky St intersection. As discussed with and endorsed by Council, SINSW has agreed to complete the following upgrades works as part of the proposed development: • Colouring existing refuge blisters to increase visibility; and • Installing advance warning signage to increase awareness of the crossing. Further work to reduce the level of risk at this intersection may be required by Council.	Road Safety Audit Appendix 11 SINSW Response to RSA Appendix 12
Section 2.4 The assessment of the railway pedestrian crossing at Butler Street has identified concerns with this facility following requests by council with respect to the likely increase use of the crossing. The study has stated that it should be the responsibility of the rail authority to undertake assessment and upgrade of the crossing if required and that this relates to existing use. This is not an acceptable outcome. The developer has a responsibility to ensure that a safe path of travel is available for students for this new development. While any upgrade may indeed be the responsibility of Railcorp possibly in conjunction with the developer, the developer also has a responsible to ensure any review is undertaken and push for any upgrades in a timely manner. Use of the pathway will only increase and this is a new development. <u>Action:</u> Condition of consent must require review of the rail crossing and confirmation of time frames for any required upgrades.	The TIA which accompanied the EIS (Appendix 17) recommended a hazard assessment review of the crossing facility by the relevant authority noting the surveyed pedestrian crossing data in the TIA. SINSW note that the Butler Street railway crossing is part of the Country Rail Network (CRN) which is a TfNSW asset that is operated/maintained under a lease agreement by John Holland Rail. Thus, SINSW will not be undertaking any works on the rail crossing as it is not a Department of Education asset and SINSW has no jurisdiction to impose any works on the asset owner. Furthermore, we refer to the letter by TfNSW titled <i>Armidale High School Redevelopment, Butler Street Armidale (SSD 9095) Notice of Exhibition</i> and dated 13/12/2018, which confirms that this issue is not the responsibility of SINSW and that from TfNSW's assessment the project is unlikely to have a significant impact on the nearby railway crossing infrastructure: <i>"There are two railway crossings near the proposed development which are the pedestrian crossing near the Butler Street – Lambs Avenue intersection and the pedestrian and vehicle crossing near the Railway St – Markham Street intersection. It is acknowledged that the development is unlikely to have a significant impact on the crossings due to the</i>	Nil

7 Armidale Regional Council

Issue	Response	Reference
	<i>low frequency of the rail services. Should there be an increase in the frequency of the services, the risk level at the crossing will be reassessed and the need for risk mitigation measures will be considered."</i> Accordingly, SINSW considers this matter closed.	
Section 2.6, 3.3, 3.4 & 3.6 Council considers that the traffic assessment of car parking for the development to be flawed and has not been appropriately assessed. TTM Consulting claim to have conducted the traffic assessment based on Road and Maritime (RMS) guideline and methodology. Nevertheless, a critical review of the report indicates that the adopted methodology considered only a day sampling regime. Although some supplementary studies that assessed traffic generations on adjoining streets were undertaken in varying days of the week, sampling period was limited to just a day, followed by inferential predictive modelling. These concerted studies allowed the authors to conclude that total of 164 parking spaces onsite (excluding on-street parking) would be adequate for staff and students of the proposed redevelopment high school. Table 2.2 designates that there are 149 street car parking spaces available in Butler, Mossman and Hargrave Streets. Council have assessed the capacity of these streets and have determined there are 140 parking spaces available. Occupation rates are therefore incorrect. There are also 21 no parking spaces in Butler Street for drop off. The report makes little or no reference to the impact on residents in adjoining residential streets of parking at the front of properties being occupied by "users" of an adjoining development. Council are not in favour of traffic flows in Hargrave and Mossman Street being increased. These are minor residential streets. Traffic movement should be encouraged on the major roads of Kentucky, Butler and Lambs Avenue. We note the formula adopted in section 3.6 of the Traffic Assessment for determining the number of spaces for year 11 and 12 car parking. It is noted that the numbers used in this section of the Traffic Assessment for year 11 and 12 students of 472 for the new school differ to those used in section 6.5.3 of the Environmental Assessment which quotes 526 year 11 and 12 students. Furthermore, Council believe that the assessment is more reflective of a metropolitan location than a rural/regional town. Distances of travel, lack of public transport options and reduced cost to travel by car, will all contribute to a higher	Council's comments are noted and the following responses are provided: - The on-street car parking space number in Table 2.2 of the TIA have been updated using the conservative number of 140; - Parking for drop-off was referred to in Section 2.5 of the TIA as "No Parking School Time" – kiss and ride. The TIA has been updated to note the 21 spaces for kiss and ride; - Section 4.5 of the TIA has been updated to comment on the impact on residents in adjoining streets; - The preference for movement of traffic flows on major streets is agreed. However, this is something which is difficult to enforce. Council may wish to put in additional traffic control signage to assist in enforcing this traffic flow; - Survey data showed 10 x Year 11 and 12 students drove to Armidale High School and 14 x Year 11 and 12 students drove to Duval High School. This is with current student populations of 571 students at Armidale and 626 students at Duval High School. Therefore over approximately 1,200 students, 24 drive to school. With the future Armidale Secondary College accommodating up to 1,580 students, student parking is anticipated to increase to approximately 30 students. The formula adopted calculates a student parking requirement of 47 car parking spaces which if compared with existing data is still overestimating the parking requirement of students. These parking rates can be accommodated during school hours by the 56 parking spaces adjacent the Den gymnasium (Den). It is also noted that higher school parking requirements are typically associated with exam periods. - With regard to off-street parking, SINSW has increased off-street parking near the Den from 35 to 56 spaces (an increase of 21 spaces), including an accessible parking space. These details are provided in the updated Architectural Plans. The Den will not be utilised by external/community groups during school hours and so this is the most appropriate system for student parking.	Traffic Impact Assessment Appendix 5 Architectural Plans Appendix 1 Landscape Plans Appendix 3 Arborist Report Appendix 4

7 Armidale Regional Council

Issue	Response	Reference
level of car use in a regional area. We do not dispute the survey data of the study but the results do not correspond with our experience over the years. The risk of impacting local residents is high and should be avoided by increasing the number of off street car parking for students as there is ample area on the subject site to provide the required parking likely to be generated by the development. Whilst it is noted that Clause 11 of SEPP (State and Regional Development) 2011 excludes the application of DCPs for SSD, there needs to be some nexus for an assessment to be made for this development to identify required car parking generated by the development. In the absence of any other suitable formula, following a review of the RTAs guide to traffic generating development which does not provide any assessment criteria for parking for schools, it is considered that requirements under Chapter 2.9 of Council's DCP be utilised in this instance. Chapter 2.9 of the DCP provides the following requirements for a school: 1 per FTE employee + 1 for every ten Year 11 and 12 Students. That being the case and as per the staff and student numbers provided in the Environmental Assessment of 110 staff and 526 year 11 and 12 students, a total of 163 off street car parking spaces would be required. Whilst it is noted that the school is proposing to provide a total of 164 off street car parking spaces made up of 121 spaces allocated for staff parking only, 8 car spaces for visitors and students with special needs, that only leaves the remaining 35 spaces adjacent to the Den as overflow parking for students and staff rather than the 53 required under the DCP for the number of year 11 & 12 students. As such, it is considered that the mix of car parking rather than the number proposed on the site should be looked at so as to provide adequate student parking. Additionally, also under section 6.5.3 of the Environmental Assessment it states that although the Department of Education does not provide student parking on school sites, a total of 35 parking spaces are being provided adjacent to the Den. If the Department is not responsible for providing these off- street car parking spaces as is required by all other non Crown development then who is the actual responsible authority for providing this? The EIS and supporting Assessments suggests that there is adequate capacity for parking on the local roads but this can not be guaranteed in perpetuity as situations change, restrictive parking arrangements could and may be implemented or other	- Also it is not possible to increase the parking adjacent to the staff parking area for the following reasons: - West: Parking would encroach on agricultural education space needs and is too far from school facilities; - East: Parking would require further removal of established trees which are in good condition, it would further encroach into view corridors from the public domain, and would increase the risk of pedestrian/vehicle collisions at the main school entrance. - Provision of excess student parking on site is not recommended as it encourages a culture of driving and is in direct contradiction to the Green Travel Plan initiatives which promote higher use of public and active transport (walking and cycling). The additional car parking accommodated adjacent the gymnasium (Den) has resulted in three (3) additional trees requiring removal (Tree 106, Tree 108 and Tree 109), and this is shown on the updated Architectural and Landscape Plans and in the updated Arborist Report.	

7 Armidale Regional Council

Issue	Response	Reference
significant development in the vicinity of the site could significantly impact on the availability of on street parking. Council is only to aware of the impacts placed on local streets and their residents by Crown developments within the City that have either not provided any additional off street parking following extension and redevelopment of the Armidale Hospital or provide parking at a substantially reduced rate for a social housing development. Council is now left with trying to manage the ongoing legacy left by these two Crown developments, virtually located across the road from one another, with congestion of local streets and disgruntled residents not able to secure parking near their properties. The review of the proposed site plan also raises concerns with respect to parking and the mix with pedestrian movement. Council are of the opinion that the year 11 and 12 car parking should be located on the grass area above the Admin Parking or to the east of the teacher car park. The benefits of this location are • There is ample room to create sufficient car parking • Removes the mix of vehicle movement and pedestrian movement in and around the Den. • Removes the conflict of student drivers entering / leaving the car park near The Den with the arrival and departure of school buses and pedestrian movement to / from the school. • Car parking would still be close enough to the PAF to be utilised by that facility should it eventuate. The site plan also drastically reduces the number of no parking or Kiss and ride spaces. Currently there is no parking above the Hargrave Street entrance, we suggest this should be retained. Refer to section 3.4 in relation to bus parking. This will however only roughly match what is available for the current school. We are not convinced this has been adequately addressed or considered with the combination of the two schools.		
Section 3.4 The study denotes that bus movement will increase. This is despite previous assurances that the number of buses would remain the same. The report states the design is to accommodate a bus bay for 5 buses yet states approximately 6 buses will use the bay in peak times. We are concerned the bay will be of insufficient length and will lead to significant traffic issues at the key arrival and departure periods. The study denotes varying the schedule to limit the confluence of busses at the same time. However the bus routes that service multiple schools will have limited flexibility.	To clarify, the TIA states that there is the ability for approximately 6 buses to use "each bus bay" during the peak hour. i.e. potential for up to a total of 30 buses per hour which is conservative. The TIA has been updated for the avoidance of doubt. The bus bay length is derived from Educational School Facilities Standard Guidelines (EFSG) appropriate for a school of this size. A total bus zone length of 60 metre is provided for 5 buses concurrently. In line with Council's request, an additional sixth "overflow" bus bay has been incorporated into the proposed design to mitigate this issue allowing for schedule variance / early arrivals / late departures. This overflow space is identified on the Architectural Plans and Landscape Plans.	Nil

7 Armidale Regional Council

Issue	Response	Reference
Council are very disappointed that its request to have off road bus parking at Armidale High has been rejected. We are of the view that failing to include such, poses an increased level of risk with the more than doubling of students at Armidale High. <u>Action:</u> Confirmation of the number of buses to arrive at any one time and capability to vary the bus route schedule, prior to finalisation of the length of the bus bay to be provided. Allow one spare bus bay over and above that required to cater for schedule variation / early arrivals / late departures.	Note that there are no physical works required for the overflow bus bay, it is just a nominated zone against the existing kerb and guttering. SINSW confirm that the bus bay is in the optimal location for the site and proposed development, and will remain on Butler Street for the following reasons: - The existing road infrastructure is already in place and compliments the concept design by way of concrete kerb blisters separating the bus bay from the general street traffic; - It allows SINSW to increase the number of off-site parking in this area to 56 spaces which is desirable to Council - It avoids complications with / impact on Councils main infrastructure services. SINSW is presently unable to confirm the number of buses to arrive at any one time. Rescheduling of the bus timetables is the responsibility of the relevant authority, TfNSW, in consultation with the bus operator, the school, and Council prior to the school commencing operations. This data will not be known until late 2020 when a submission is made by the bus company (Edwards Coaches) to TfNSW for approval.	
Section 4.3 We again find the study a little lacking in its consideration of the local traffic environment. It is noted that - Section 4.3.5 AADT of site surrounding roads Stated AADT traffic volume in Kentucky St is 3680 vpd. Actual figures from a classifier survey during Feb/Mar of 2014 indicated a volume of 4758 with 9.5% of vehicles Class 3 and above. - Section 4.3.6 Road safety of site surrounding intersections Stated that there is no apparent road safety concerns identified. Council receive complaints about the Miller/Kentucky intersection and have submitted a Blackspot funding applications for intersection improvements for 2011/2018. There have been 6 crashes at this intersection in the last 5 years; 2 serious injury crashes, 1 uncategorised injury crash and 3 non casualty crashes. This does not take into account any near misses or minor crashes that would come under the self reporting regime that commence in October 2014. The intersection is on school bus routes for both NEGS and Martins Gully. There maybe some changes to this once the school commences operation.	The TIA has been updated to note Council's specified AADT volume from the previous study. TTM has redone the SIDRA analysis using Council's traffic volume figures and this has no significant impact on Level of Service ratings in the TIA. Road safety concerns at the Miller/Kentucky intersection are not significant to the proposed development as Armidale school related activities occur on Butler Street and at the Butler Street / Kentucky Street intersection. There is no site access off Miller St. Potential changes to bus routes to NEGS and Martins Gully is speculative and at the discretion of the bus providers and outside the scope of this project. The TIA has been updated to note the risk area at Butler/Kentucky intersection due to limited sight distance on western approach from Kentucky Street.	Traffic Impact Assessment Appendix 5

7 Armidale Regional Council

Issue	Response	Reference
Butler/ Kentucky should also be noted as a risk area with limited sight distance to the west on Kentucky Street.		
Green Travel Plan Section 6 The proposal for a Green Travel Plan is a thoughtful approach and one that we would encourage. The dynamics for a regional country town school are likely to differ from a metro school given the travel times to and from school are far shorter. Encouragement of cycling to school may have greater results. We therefore suggest that the provision of only 20 bike parking spaces for a school of 1580 students is low. We would recommend either installation of more or provision on the design plans for the bike parking to be amplified if the demand warrants. <u>Action:</u> We would recommend either installation of more or provision on the design plans for the bike parking to be amplified if the demand warrants.	The student and staff survey data in the TIA showed 4 students + 1 staff from Armidale and 3 students + 2 staff from Duval riding bikes to school. Notwithstanding low survey data, SINSW will increase the onsite bicycle parking from 20 to 100 bicycle spaces together with provision of suitable space for extension should demand necessitate in the future. SINSW has discussed this approach with Council who are supportive of the strategy. The number of bicycle parking spaces has been included in the TIA.	Architectural Plans Appendix 1 Traffic Impact Assessment Appendix 5
Lambs Ave / Butler Street There appears to have been little consideration at this point to the vehicle / pedestrian conflict at Butler St/ Lambs Ave. We assume the pedestrian crossing will remain though it is not shown on plan. This area is as you would imagine quite a confusing area at morning and afternoon peaks. Some consideration needs to be given to this locality as to its suitability given the increase number of movements.	The original survey in the TIA submitted in the EIS did not identify any issues with this intersection, however, the RSA recently completed and attached to this RTS package identified the potential risk of collision between pedestrians and vehicles and provided recommended amendments to the existing pedestrian crossing. SINSW has provided a response to each of the potential risks raised in the RSA. In terms of recommendations made in the RSA, the report primarily recommends installing a 'Give Way/Stop' sign and line marking on Butler / Lamb and Mann Streets. An additional 'Left Turn Watch for Pedestrians' which is now superseded by 'Give Way to Pedestrians' sign is recommended on the approach of Lambs Avenue from Butler Street.	Road Safety Audit Appendix 11 SINSW Response to RSA Appendix 12

7.2 Stormwater Drainage Draft Design

Issue	Response	Reference
The proposed stormwater drainage system for the school discharges to the natural water course on the north side of the site and to the Butler Street kerb. The Armidale Regional Council Engineering code, requires "Council's stormwater management policy states that all stormwater outlets to natural gullies and water courses in the urban area, shall have a Gross Pollutant Trap (GPT), installed at or near the outlet of the stormwater pipe system. All new urban subdivision shall comply with the policy."	The proposal will introduce a single Gross Pollutant Trap (GPT) into the system installed at or near the outlet of the stormwater pipe system as suggested by Council in lieu of separate GPTs on site. SINSW will review the proposed connections to the street, however it is the preference to connect into the existing pits or introduce new pits in lieu of multiple 100mm lines.	Stormwater Concept Plans Appendix 8

7 Armidale Regional Council

Issue	Response	Reference
Please refer to Engineering code Specification D5 Stormwater Drainage Design CI D5.37 for details of requirements. The design appears to have addressed the treatment of stormwater by using devices at pits throughout the system with a nominated cleaning schedule. These pits will remain the responsibility of the school to maintain. If the development proceeds on this basis it would meet the requirements of our code. However we doubt the long term performance of these devices, consistency of maintenance and cost have all guided our decision to install end of line GPT's. We will accept either option for an internal pipe system. The plans refer to connection of a Dia. 225 pipe to the roadway in Butler Street (sheet 6). This will require breaking the pipe down in to multiple smaller pipes to cross the footpath to the kerb. Our preference would be for direct connection to the existing stormwater pipe in Butler Street, preferably to an existing pit. If connection to an existing pit cannot be achieved, a new junction pit constructed over the existing pipe line will be required. Sheet 7 of the design indicated connection of new drainage to an existing system. No details are provided as to the discharge point of this system. Please clarify the outlet location and detail of same.		

7.3 Civil Design Drawing Draft

Issue	Response	Reference
Access or driveway cross overs of the footpath indicate an AC surface access. We require such access to be constructed in concrete across the footpath reserve and compliant with Council's current standard drawings. Heavy duty slabs should be installed at generally a 2.5% crossfall across the footpath for pedestrian mobility. We will await further details of any changes to infrastructure in Butler Street before making comment	Council's comment is noted. Civil drawings have been updated to address this comment.	Civil Plans Appendix 7

7 Armidale Regional Council

7.4 Consideration of Existing Infrastructure

Issue	Response	Reference
In fleshing out the detailed design of the modifications to Butler Street and/or Lambs Ave, Council would ask that the following be considered: - Strengthened pavement for the bus zone, concrete pavement may be best option. - Full width footpath upgrade / renewal full length of school frontage Butler Street. - Removal of redundant line marking / resealing to cover. - Removal of the east kerb widenings and west kerb blisters where no longer required - Street lighting assessment / upgrade for the street, particularly the proposed new pedestrian crossing.	The EIS submission relates to upgrades within SINSW's site boundary. SINSW will make-good Council infrastructure impacted by our proposed design, such as removal of a road blister etc. General upgrades to Council's infrastructure such as external footpaths, road markings and street lighting is the responsibility of Council. SINSW has nominated on-site external lighting as shown on Drawing 17352-NBRS-DA012, Rev 1, Appendix 10 of the EIS.	Nil

7.5 Utilities

Issue	Response	Reference
The projected capacity of students of the new Armidale Secondary College of 1580 is significantly greater than the existing combined total of students at both Armidale High and Duval High schools which has been calculated at 1197 students. Such a significant increase in student numbers will place additional demand on Council's water and sewer infrastructure. As such, as per section 306 of the Water Management Act 2000 it is requested that Developer Servicing Plan (DSP) charges be applied to the development in accordance with Council's Policy for the additional number of students of 383, being the difference between the combined number of existing students at both schools of 1197 and the projected capacity of 1580. Under Council's Policy the current Equivalent Tenement (ET) for a Secondary school is calculated at 0.030ET for water and 0.050ET for sewer, per additional student/person.	Council's comments are noted.	Nil

7 Armidale Regional Council

7.6 Additional Applications Required to be Submitted

Issue	Response	Reference
The additional applications will need to be lodged and approval obtained if consent is granted for the development: - Trade Waste application - Plumbing and Drainage (PDP)	Council's comments and requirements are noted.	Nil

8 Government Architect NSW

Issue	Response	Reference
1. Provide additional detail including an indicative 3D visualisation of the nature trail stations. As currently illustrated the stations appear too small and undifferentiated.	NBRS has prepared a detailed response to the issues raised by GANSW. This includes an indicative 3D visualisation of the nature trail stations.	Response to GANSW Appendix 13
2. Provide additional details of the design for outdoor learning areas, including 3D visualisations at human eye-level (not bird's eye view).	NBRS has prepared a detailed response to the issues raised by GANSW. Additional 3D visualisations and commentary relating to outdoor learning areas is provided.	
3. Provide 3D visualisation at eye-level of courtyard space between proposed buildings and existing block B. Indicate materials and landscape treatments. Clearly articulate the relationship between the south side of block B and the proposed courtyard and new buildings.	NBRS has prepared a detailed response to the issues raised by GANSW. 3D visualisations at eye-level of the courtyard space between the proposed buildings and existing Block B together with commentary on the relationship between the south side of Block B and the proposed courtyard and new buildings is provided.	
4. Provide modelling to demonstrate that daylight distribution to a typical ground level south-facing classroom will be adequate.	NBRS has prepared a detailed response to the issues raised by GANSW. This includes modelling to demonstrate that daylight distribution to a typical ground level south-facing classroom is adequate.	
5. Provide modelling to demonstrate the efficacy of the natural ventilation system proposed. Demonstrate how natural ventilation will be used in conjunction with the mechanical cooling system to reduce energy loads.	NBRS has prepared a detailed response to the issues raised by GANSW. This demonstrates the efficacy of the natural ventilation system proposed, and demonstrates how natural ventilation will be used in conjunction with the mechanical cooling system to reduce energy loads.	

9 Department of Industry – Lands & Water (Crown Lands)

Issue	Response	Reference
The Department of Industry - Lands & Water, Armidale (the department) note that Lot 7005 DP 1052246, being Crown reserve 1334 for public park, is located along the northern boundary of the proposed Armidale High School redevelopment site on Mann Street. The plans for the proposal show that this reserve is largely fenced out of the school site and no construction is to occur in this area. Therefore, no impacts on Crown land are anticipated and the department has no objections to the proposal. However, we request that the applicants be made aware of the reserve should any unanticipated impacts be identified during construction and/or operation of the school.	Crown Lands' comment is noted. We note the location of this parcel of land and that it is located outside of the boundary of the site. The Site Plan for the proposed works indicates that works will occur only within the boundary of SINSW land. Crown Land will be contacted should any impact be forecast upon this land.	Nil

10 Essential Energy

Issue	Response	Reference
Modifications to the electrical distribution network will be required to accommodate the Armidale High School Redevelopment. The works to be undertaken are contestable and costs for network augmentation are to be met by the proponent. A Design Information Package (Project Id: 116031) has been issued by Essential Energy to Marline Newcastle Pty Ltd outlining the electrical distribution network requirements. Strictly based on the documents submitted, Essential Energy has no comments to make as to potential safety risks arising from the proposed development.	Essential Energy's comment is noted.	Nil
Essential Energy makes the following general comments: 1. If the proposed development changes, there may be potential safety risks and it is recommended that Essential Energy is consulted for further comment.	Essential Energy's comment is noted. SINSW will continue to consult with Essential Energy regarding potential safety risks as the need arises.	Nil
2. As part of the development, if required by Essential Energy, easement/s are to be created for any electrical infrastructure.	Essential Energy's comment is noted.	Nil
3. Any existing encumbrances in favour of Essential Energy (or its predecessors) noted on the title of the above properties should be complied with.	Essential Energy's comment is noted. Existing encumbrances are noted and will be complied with (pending finalisation of any new easements between SINSW and Essential Energy).	Nil
4. Modifications to the existing electrical distribution network will be required to accommodate this re-development. Satisfactory arrangements for the provision of power to the re-development must be made with Essential Energy. It is noted that a Design Information Pack for project # 116031 has already been issued by Essential Energy to Marline Newcastle Pty Ltd outlining the requirements. It is the Applicant's responsibility to meet all costs, fees and contributions payable for the network modification / augmentation for this re-development.	Essential Energy's comment is noted.	Nil
5. In addition, Essential Energy's records indicate there is electricity infrastructure located within the properties and within close proximity to the properties Any activities within these locations must be undertaken in accordance with the latest industry guideline currently known as ISSC 20 Guideline for the Management of Activities within Electricity Easements and Close to Infrastructure. Approval may be required from Essential Energy should activities within the property encroach on the electricity infrastructure.	Essential Energy's comment is noted. Should it be required SINSW will liaise with Essential Energy for approval.	Nil

10 Essential Energy

Issue	Response	Reference
6. Prior to carrying out any works, a "Dial Before You Dig" enquiry should be undertaken in accordance with the requirements of Part 5E (Protection of Underground Electricity Power Lines) of the Electricity Supply Act 1995 (NSW).	Essential Energy's comment is noted. This search will be undertaken by the Contractor.	Nil
7. Given there is electricity infrastructure in the area, it is the responsibility of the person/s completing any works around powerlines to understand their safety responsibilities. SafeWork NSW (www.safework.nsw.gov.au) has publications that provide guidance when working close to electricity infrastructure. These include the Code of Practice - Work near Overhead Power Lines and Code of Practice - Work near Underground Assets.	Essential Energy's comment is noted. Safety will be managed by the Principal Contractor for the works in accordance with legislative requirements. References are noted.	Nil

11 Public Submissions

Issue	Response	Reference
We support the DA to re develop the AHS and look forward to the final outcome, but as an owner of an impacted neighbouring residence, I am concerned at any potential adverse impacts both short and long term due to: - increased traffic flow and noise from heavy vehicles during construction phase and after completion with an increased student population requiring access to the site,	The public comments received are noted. SINSW will discuss the raised concerns relating to construction noise and traffic at upcoming drop-in session(s) with community and by way of letterbox drop letter.	Nil
- potential decreased access to on street parking adjacent to our property during the construction period from heavy vehicle traffic and on site worker parking,	Parking activities during the construction period will be managed (where possible) on-site. Any parking not consistent with public road laws can be raised with the Principal Contractor for immediate feedback.	Nil
-potential for construction noise and vibrations affecting the quiet social residential amenity of the area or causing physical effect on my property from drilling or blasting or affecting personal health and wellbeing of property residents, and	Construction noise and vibration will be managed to achieve acceptable levels of amenity for surrounding residential areas.	Construction Noise and Vibration Management Plan Appendix 9
-any potential disturbance to or deterioration of the air quality with particular consideration to dust or asbestos blown from the site during the redevelopment construction.	Air quality will be managed in accordance with the terms of the consent conditions to ensure residential amenity and health is upheld. Demolition works are being carried out under a separate planning pathway (as development without consent, authorised under a Review of Environmental Factors) and this work is subject to air quality monitoring and management.	Nil
We would appreciate being kept informed of the hours of construction, anticipating that whilst they will be outside the normal hours of operation of the current school site, they will take into consideration the residential nature of the area. We would appreciate advice in advance of any major adverse impact anticipated during the construction period. We would also appreciate having an ongoing and readily accessible contact person to discuss any impacting concerns that may arise as neighbouring property owner over the duration of the construction period.	We also note that the Principal Contractor will provide updates in line with their Communication Plan, including a letterbox drop. SINSW may also use the existing electronic noticeboard and new electronic noticeboard (if approved) to provide the community with additional information / updates about the project and construction such as traffic impacts during the construction phase. SINSW confirms that a contact person for the project will be itemised on site signage.	Nil

12 Conclusion

Following submission and exhibition of SSD Application SSD 18_9095, DPE has issued the RTS package for all authority and public submissions received in regard to this application. This RTS Report summarises these responses and directs DPE to the relevant report where each item has been addressed.

All matters raised in the RTS package provided by DPE have been addressed and resolved.

DPE has now been provided with sufficient documentation to enable the assessment of SSD 18_9095 to continue. It is requested that DPE complete the assessment of the DA and proceed to determination in the earliest possible time based on the assessment material provided in the original EIS and the supporting assessment material provided in this RTS Report.