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Social and Infrastructure Assessment  
Locked Bag 5022  
Parramatta NSW 2124

Sent by email: [patrick.andrade@dpie.nsw.gov.au](mailto:patrick.andrade@dpie.nsw.gov.au)

**Re: State Significant Development – SSD-10391 Mod 2 – New Liverpool Primary School  
18 Forbes Street Liverpool NSW 2170**

Dear Patrick Andrade,

Thank you for your correspondence dated 17 November 2022, requesting Liverpool City Council's comments on the State Significant Development (SSD) Modification Application 'SSD-10391-Mod-2', for the construction of a new Liverpool Primary School at 18 Forbes Street, Liverpool.

The SSD was approved by the Minister of Planning on 19 May 2022 for the construction and operation of the new Liverpool Primary School, including construction of a new 2 and 3 storey primary school, with core school facilities, teaching spaces, preschool facilities and support units, landscaping, open space improvements, and associated works. The SSD was subject to a previous modification application, approved on 4 November 2022, for the re-wording of two conditions (A8 and B5), requiring an agreement with NSW Health to be reached prior to permanent construction occurring on Burnside Drive.

It is noted this current Modification Application primarily seeks to improve transport arrangements, including the following:

- New internal road and new crossover from Lachlan Street, to provide access to school drop-off and pick-up arrangements within the site;
- New raised median strip on Lachlan Street;
- Relocation of 25 pick-up and drop-off spaces from Burnside Drive, and 33 parking spaces from the southern car park, to the new internal road;
- Revised landscaping design; and
- Staged construction as follows:
  - Stage 1: Construction of the amended school design, excluding Block Z, with capacity of 580 students and 98 staff; and



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- Stage 2: Construction of Block Z and additional teaching spaces in Block Y, with capacity of 1,280 students and 98 staff.

Council has reviewed the supporting documentation for this application and recommendations are provided within the attachments to this letter. There is particular concern regarding traffic implications from the proposed road layout modification, and in its proposed form Council does not support the modified traffic arrangements. It is recommended that the original approved driveway off Burnside Drive is to be retained to provide access to the school.

Thank you for the opportunity to provide comment on this application and Council also welcomes the opportunity to comment on further applications.

Should you wish to discuss this matter further, please contact Brianna van Zyl, Strategic Planner, on (02) 8711 7940 or [VanZylB@liverpool.nsw.gov.au](mailto:VanZylB@liverpool.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink that reads "Ian Stendara". The signature is written in a cursive, slightly slanted style.

**Ian Stendara**

Acting Coordinator Strategic Planning

## **Comments on the new Liverpool Primary School – 18 Forbes Street, Liverpool**

### **1. Modification Application**

Under Section 4.55(2) of the *Environmental Planning & Assessment Act 1979* (the Act), an applicant may seek approval to modify an application, provided the modification is substantially the same development for which consent was originally granted. Council is also satisfied this modification is substantially the same development as originally approved, and the modification can be assessed under 4.55(2) of the Act.

### **2. Staged Construction**

The modification intends to stage construction of the new school, as follows:

- Stage 1: Construction of the amended school design, excluding Block Z, with a student capacity of 580 (500 K-6 students + 40 preschool students + 40 SSU students) and 98 staff;
- Stage 2: Construction of Block Z and additional teaching spaces in Block Y, with a student capacity of 1,280 (1,200 K-6 Students + 40 preschool students + 40 SSU students) and 98 staff.
- Relocation of the pre-school and its associated play space area, and the special support unit (SSU) and its associated play space area, from Block Z to Block Y, during Stage 1 only, and moved back to Block Z in Stage 2.

Council raises no concerns with the proposed staging of the development, however requests further details regarding the proposed timing.

### **3. Traffic and Transport**

#### **a. Traffic Generation Potential**

According to Table 1 of the Traffic Impact Assessment statement, the proposed primary school has capacity for 1,280 students and 98 FTE staff, which is expected to generate approximately 508 vehicular movements and 255 vehicular movements in AM and PM peak hours, respectively.

This traffic generation potential has been estimated with a very low car mode share assumption (i.e. 20% by car). Based on the latest TfNSW trip generation survey and analysis reports of existing schools, the average vehicle trip generation per student and car mode splits for primary schools are as follows:

- Trip generation: 0.88 and 0.71 vehicles per hour, per student in AM and PM peak hours respectively
- Car mode splits: 56% and 46% trips made by car in AM and PM respectively.

Based on the above trip generation rate, the proposed primary school is expected to generate approximately 1126 and 910 vehicle movements per hour in AM and PM peak hours, respectively.

The traffic impact assessment is to be revised to include the expected traffic generation potential based on TfNSW traffic generation potential as outlined above, and its likely impacts on the surrounding road network. Any reduction of vehicular trips should be supported by effective bus and active transport improvement measures and implemented as part of the school Green Travel Plan.

b. Revised Access Arrangements

It is noted that the revised vehicular access to the school is proposed via a left in/left out only access off Lachlan Street, in close proximity to the existing Hart Street, Burnside Drive and Lachlan Street roundabout.

Council is concerned that the proposed new vehicular access would result in traffic congestion along the section of Lachlan Street fronting the development site and this will block westbound traffic from the roundabout and affect its operation. Pedestrian movements along Lachlan Street could also affect vehicular movements into the pick-up/drop-off and create gridlock at the existing roundabout. Of specific concern:

1. The proposed left in/left out access on Lachlan Street will increase vehicular movements to turn right into Lachlan Lane or Drummond Street in order to access Hume Highway.
2. To reinforce the left in/left out arrangement, a median island is proposed. Pedestrians might attempt to cross this median island. Therefore, the median island needs to have a minimum width of 0.9 m.
3. It is noted that the original development consent includes a school car park, reconstruction of a section of Burnside Drive to provide a driveway to the school with pick up/drop off area along the road. Council recommends that this driveway arrangement to the car park is to be retained as it will minimise traffic impacts along Lachlan Street as well as affect the operation of the existing Hart Street/Lachlan Street/Burnside Drive.
4. The proposed driveway off Lachlan Street requires Council's approval under Section 138 of the *Roads Act 1993*. From the information provided to date, this is not likely to be supported.
5. Lachlan Street/Forbes Street intersection arrangement is yet to be confirmed. Additional assessment is required as part of the proposed Campbell Street closure between Goulburn Street and Forbes Street and the school development.

c. Cumulative Traffic Impacts of other development and project in the precinct

It is noted that the approved hospital redevelopment and multi-storey car park will generate additional traffic along Hart Street and Burnside Drive. As part of the Liverpool Hospital Redevelopment, Campbell Street between Goulburn Street and Forbes Street is proposed to be closed. This will result in significant additional traffic redistributed to Lachlan Street.

The road closure will result in re-routing of the existing bus routes including some school bus services. Hence, the revised Traffic Impact report should consider the cumulative impacts of other developments such as hospital development and the proposed changes to Campbell Street.

d. Traffic Modelling

Traffic modelling is to be used to assess the cumulative traffic impacts of the subject development and other developments or network changes in the precinct, particularly along Lachlan Street including the intersections along Lachlan Street. Electronic copy of the revised SIDRA models is requested to be submitted to Council for review.

e. Kiss and Drop

The proposed 25 kiss and drop spaces will not be sufficient for 1280 students / 550 vehicle movements.

Generally, the AM peak is more staggered, therefore the current kiss and drop may suffice. However, in the PM peak parents tend to arrive early and will park in these spaces long before bell time, and this will create a queue out of the driveway, around the roundabout and down Hart St.

The gate will have to opened very close to bell time to avoid this early queue, but as experienced with other schools that allow on site pick up, this queue could potentially bank up on street whilst waiting to enter the gates.

Another concern with the 25 kiss and drop spaces is there is only one pedestrian access gate in the middle of the zone. This will mean that parents will want to stop in the spaces closest to the gate and may not move down towards the spaces near the cul-de-sac head, this will result in the area not being used to its more efficient and best capacity.

It is recommended that this kiss and drop needs to be managed in the afternoons to ensure vehicles continue to move down and use all the provided spaces. This will also need to be accompanied by an education program to parents and students about how to use this area most efficiently. Alternatively, a second pedestrian access gate should be provided.

f. Staff Parking

The proposed 32 car spaces for 98 staff is insufficient. Whilst it is noted that the Department of Education's preference for employing local staff and encouraging their use of carpooling and public transport, this location does not provide the opportunity for enough on street parking should it be required.

As a minimum requirement, in accordance with Council's DCP, each staff should be provided with a parking space unless a public transport reward program is implemented.

Due to the proximity to the Warwick Farm station, Liverpool hospital and adjoining medium density development, on-street parking is very limited. Appropriate parking needs to be provided within the development.

g. Pedestrian Gate Lachlan Street

The pedestrian gates on Lachlan St are right next to the roundabout. Should this option be considered any further, Council recommends that pedestrian fencing needs to be installed from the new school driveway to the pedestrian refuge on the eastern side of the roundabout (near Burnside Dr).

The relocation of the entry/exit driveway means that when pedestrians enter/exit the school to or from the west they will now have to cross this driveway. This is unsafe, and problematic given there will be a large number of small children around, and it is expected to be busy with vehicles lining up to drop off / pick up.

h. Pedestrian Crossing

A formal pedestrian crossing facility is required across Lachlan St, to the west of the school. A crossing at this point, in addition to the proposed driveway off Lachlan Street will lead to traffic queuing to go around the roundabout and enter the school, and it could also affect the flow of traffic exiting the school. This crossing would need a crossing supervise to manage traffic as much as pedestrian safety.

This is another reason why Council recommends that the original approved driveway off Burnside Drive is to be retained to provide access to the school.

The school site plan is to show the proposed bus zones as well as identify pedestrian desire lines to access the proposed new school gates.

i. Operational Traffic Management Plan:

A school Operational Traffic Management Plan is to be prepared for the new primary school and updated to include operation of the two adjoining schools in consultation with Council and the school principals.

There are three proposed on street spaces for the preschool with 15-minute timed restrictions between 7-8am and 4-6pm, which should also specify this applied to school days only.

Clarification is required in regard to access to the Kiss and Drop spaces outside school peak times. Of particular question, is if the kiss and drop spaces will be able to be utilised by parents dropping their pre-school children off outside normal school hours.

In addition, the school must coordinate major events (e.g. concerts, award ceremonies etc) with the adjacent two schools to ensure traffic impacts are minimised. The current road network would not cope if functions were held from all 3 schools on the same day or night.

A revised Transport Impact Assessment report and development layout is required to be prepared and address all of the issues above. Specifically, the below is of particular concern:

- A catchment map of the proposed intake area is to be included in the revised TIA report.

- The TfNSW specified traffic generation rates and the likely impact on the surrounded road network must be utilised and explained. Any reduction of vehicular trips should be supported by effective bus and active transport improvement measures and implemented as part of the school's Green Travel Plan.
- Council recommends the approved driveway arrangement to the car park off Burnside Drive be retained. The approved design will minimise traffic impacts along Lachlan Street and the operation of the existing Hart Street/Lachlan Street/Burnside Drive roads.
- Revised traffic modelling and network assessment to address the cumulative traffic impacts of the subject development and other developments or network changes in the precinct, particularly along Lachlan Street including the intersections along Lachlan Street.
- Car parking provision should be provided in accordance with Council's DCP. Each staff should be provided with a parking space unless a public transport reward program is implemented.
- Due to the proximity to the Warwick Farm station, Liverpool hospital and adjoining high density development, on-street parking is very limited. Appropriate parking needs to be provided within the development.
- Adequate parking for pick-up and drop off zone.
- Additional pedestrian gate and crossing on Lachlan Street.
- A draft Operation Traffic Management Plan for three schools.

The above traffic information is required prior to determination of the application.

#### **4. Heritage**

While the proposal involves additional works and relocation of buildings or components from one site to a new area on the same land, it is considered that due to the absence of any heritage items within the area, the overall impact will be minimal. It is recommended that the original conditions relating to heritage should be continued in this modification and no further conditions are required.

#### **5. Environmental Health**

##### **a. Noise Impact Assessment**

According to the consultant, the proposed modifications will comply with the noise emission criteria detailed in the approved acoustic report. Construction noise associated with Stage 2 is to be managed in accordance with the NSW EPA Interim Construction Noise Guideline. The recommendations included in Section 4 of the report must be incorporated into the development to mitigate potential acoustic impacts.

It should be noted that Council requires all acoustic assessments to be prepared or reviewed and certified by a suitably qualified acoustic consultant who is a member of the Australian Acoustical Society or employed by an Association of Australasian Acoustical Consultants (AAAC) member firm. It is unclear whether the submitted acoustic assessment complies with these requirements.

## **6. Community Planning**

The modification seeks to remove two of the two tennis courts, and a basketball court at Liverpool Boys and Girl High School. Hence permanently reduce the amount of open space currently available to students at these school. The loss of the sports ground will disrupt school sporting routines, alternative arrangements for replacing these sports facilities should be addressed.

## **7. Flooding**

The minimum finished floor level of the proposed new school buildings shall be no lower than PMF level (RL10.8AHD). No other flooding related matters were raised.

## **8. Landscaping and Public Domain**

### **a. Digital Signage**

Council has concern the new digital signage will prevent direct access to the school from Lachlan Street. The applicant should submit perspective highlighting the positioning of proposed signage, including perspectives of frontages of the school from the public domain.

### **b. Bicycle Parking**

There is concern the location of the bicycle parking is inaccessible to cyclists. The relocation of the road will place the bicycle parking along the new internal road which only supports vehicles. Further consideration should be given to how cyclists are able to access bicycle parking from the public domain.

Consideration should be given to providing a protected cycle path or consider moving the bicycle parking closer to the Lachlan Street entrance.

### **c. Median Strip (Lachlan Street)**

It is strongly recommended a raised pedestrian threshold crossing is added at the entrance of the new internal road along Lachlan Street. A number of drop offs are expected to occur at Lachlan Street given the constraining nature of the internal road layout.

### **d. Internal Road**

The new internal road needs to provide for better access to people who walk and cycle. Considering this road will have periods of high pedestrian activity there needs to be inclusion of traffic calming devices along the road to ensure the safety of people, especially children. The footpaths proposed along the internal road should align with the measurements proposed in the NSW Walking Space guide.

### **e. Waste (access)**

There is concern the current design doesn't allow appropriate area for waste trucks to access the waste service area. Turning circles for larger vehicles are required, and the internal road must be able to accommodate for these larger vehicles.



f. Tree Planting

The proposed internal road and relocation of the staff car park along the internal road requires street tree planning. This will provide shade and shelter for children and parents waiting for school drop-off/pick-up. Installation of street trees should be considered within the internal road layout.

**9. Engineering**

The following engineering conditions are recommended be included:

1. All roadworks, drainage works and dedications, required to affect the consented development shall be undertaken at no cost to Liverpool City Council.

**Prior to the issue of a Construction Certificate**

2. Prior to the issue of a Construction Certificate a S138 Roads Act application/s, including payment of fees shall be lodged with Liverpool City Council, as the Roads Authority for any works required in a public road. These works may include but are not limited to the following:
  - a. Vehicular crossings (including kerb reinstatement of redundant vehicular crossings)
  - b. Road opening for utilities and stormwater (including stormwater connection to Council infrastructure)
  - c. Road occupancy or road closures

All works shall be carried out in accordance with the Roads Act approval, the development consent including the stamped approved plans, and Liverpool City Council's specifications.

3. Periphery Type paving shall be installed along the entire frontage of Lachlan Street, as part of this development. Footpath paving and Landscaping works shall be strictly in accordance with the adopted Liverpool City Centre Public Domain Master Plan 2020 and Liverpool CBD Streetscape and Paving Guidelines 2005 as amended in implementation note 12/15 – Liverpool CBD Paving. Detailed landscape and public domain plans need to be submitted to Councils City Design and Public Domain Team for approval and subsequent endorsement from Manager Development Assessment prior to the issue of Construction Certificate.
4. Detailed plans are required to be submitted to and approved by Council showing the proposed tree locations, species and planting sizes, paving location and layout, including references to the relevant details and specifications as contained in the abovementioned documents.

To ensure that the street tree planting size, quantity and quality is maintained throughout the Liverpool CBD, please contact Council's City Design & Public Design Section on 1300 36 2170 for further information.

5. Prior to the issue of a Construction Certificate for building or subdivision works the Certifying Authority shall ensure that a S138 Roads Act application, including the payment of application and inspection fees, has been lodged with Liverpool City Council (being the Roads Authority under the Roads Act), for provision of stormwater connection in Burnside Drive and footpath works in Lachlan Street.
6. Engineering plans are to be prepared in accordance with the development consent, Liverpool City Council's Design Guidelines and Construction Specification for Civil Works, Austroads Guidelines and best engineering practice.
7. A stormwater drainage system shall be provided generally in accordance with the concept plan/s lodged for development approval, prepared by:

<b>Company</b>	<b>Job No./Drawing No.</b>	<b>Title</b>	<b>Revision/Issue</b>	<b>Date</b>
Meinhardt /Bonacci	NLPPS-CV-DRG-DD-030	Stage 1 Siteworks and Stormwater Plan Sheet 1	P2	17.10.22
Meinhardt /Bonacci	NLPPS-CV-DRG-DD-031	Stage 1 Siteworks and Stormwater Plan Sheet 2	P2	17.10.22
Meinhardt /Bonacci	NLPPS-CV-DRG-DD-050	Stage 1 Siteworks and Stormwater Details – Sheet 1	P1	10.10.22
Meinhardt /Bonacci	NLPPS-CV-DRG-DD-051	Stage 1 Siteworks and Stormwater Details – Sheet 2	P1	10.10.22
Meinhardt /Bonacci	NLPPS-CV-DRG-DD-052	Stage 1 Siteworks and Stormwater Details – Sheet 3	P1	10.10.22
Meinhardt /Bonacci	NLPPS-CV-DRG-DD-030	Stage 1 Siteworks and Stormwater Plan Sheet 1	P2	17.10.22
Meinhardt /Bonacci	NLPS-CV-DRG-DD-030	Stage 2 Siteworks and Stormwater Drainage Plan Sheet 1	P1	10.10.22
Meinhardt /Bonacci	NLPS-CV-DRG-DD-031	Stage 2 Siteworks and Stormwater Drainage Plan Sheet 2	P1	10.10.22

Meinhardt /Bonacci	NLPS-CV-DRG- DD-050	Stage 2 Siteworks and Stormwater Details – Sheet 1	P1	10.10.22
Meinhardt /Bonacci	NLPS-CV-DRG- DD-051	Stage 2 Siteworks and Stormwater Details – Sheet 1	P1	10.10.22

- a. The proposed development and stormwater drainage system shall be designed to ensure that stormwater runoff from upstream properties is conveyed through the site without adverse impact on the development or adjoining properties.
  - b. Engineering plans and supporting calculations for the stormwater drainage system are to be prepared by a suitably qualified engineer and shall accompany the application for a Construction Certificate. The plan shall indicate the method of disposal of all stormwater and must include rainwater tanks, existing ground levels, finish surface levels and sizes of all pipes.
  - c. Prior to the issue of a Construction Certificate the Certifying Authority shall ensure that the stormwater drainage system has been designed in accordance with Liverpool City Council's Design Guidelines and Construction Specification for Civil Works.
8. Prior to the issue of a Construction Certificate the Certifying Authority shall ensure that details of a stormwater pre-treatment system have been provided on the stormwater plans and that the design meets pollutant retention criteria in accordance Council's Development Control Plan.

The Construction Certificate must be supported by:

- Specification & installation details of the stormwater pre-treatment system
  - The approval of an operation and maintenance manual/ schedule for the stormwater pre-treatment system
  - A copy of the approved operation and maintenance manual/ schedule shall be submitted to Liverpool City Council with notification of the Construction Certificate issue.
9. Prior to the issue of a Construction Certificate the Certifying Authority shall ensure that vehicular access, circulation, manoeuvring, pedestrian and parking areas associated with the subject development are in accordance with AS 2890.1, AS2890.2, AS2890.6 and Liverpool City Council's Development Control Plan.
10. Prior to the Commencement of Works a dilapidation report of all infrastructure fronting the development in Lachlan Street and Burnside Drive is to be submitted to Liverpool City Council. The report is to include, but not limited to, the road pavement, kerb and gutter, footpath, services and street trees and is to extend 20m either side of the development.

### **Prior to commence of work**

11. Prior to commencement of works sediment and erosion control measures shall be installed in accordance with the approved Construction Certificate and to ensure compliance with the Protection of the Environment Operations Act 1997 and Landcom's publication "Managing Urban Stormwater – Soils and Construction (2004)" – also known as "The Blue Book".

The erosion and sediment control measures shall remain in place and be maintained until all disturbed areas have been rehabilitated and stabilised.

12. Prior to commencement of works a Traffic Control Plan including details for pedestrian management, shall be prepared in accordance with AS1742.3 "Traffic Control Devices for Works on Roads" and the Roads and Traffic Authority's publication "Traffic Control at Worksites" and certified by an appropriately accredited Roads and Traffic Authority Traffic Controller.

Traffic control measures shall be implemented during the construction phase of the development in accordance with the certified plan. A copy of the plan shall be available on site at all times.

Note: A copy of the Traffic Control Plan shall accompany the Notice of Commencement to Liverpool City Council.

### **Requirements during construction**

13. Erosion and sediment control measures shall remain in place and be maintained until all disturbed areas have been rehabilitated and stabilised.
14. Prior to the connection of private drainage to Council's drainage system, an inspection is to be carried out by Liverpool City Council's Development Engineering Unit. A fee will be charged in accordance with Council's adopted Fees and Charges, and is to be paid prior to the inspection.

### **Prior to the issue of an Occupation Certificate**

15. Prior to the issue of an Occupation Certificate, the Principal Certifying Authority shall ensure that all works associated with a S138 Roads Act approval or S68 Local Government Act approval have been inspected and signed off by Liverpool City Council.
16. Prior to the issue of an Occupation Certificate, works-as-executed drawings and compliance documentation shall be submitted to the Principal Certifying Authority in accordance with Liverpool City Council's Design Guidelines and Construction Specification for Civil Works.
17. An original set of works-as-executed drawings and electronic copies on a USB of compliance documentation shall also be submitted to Liverpool City Council with notification of the issue of the Occupation Certificate where Council is not the Principal Certifying Authority.

18. Prior to the issue of an Occupation Certificate the Principal Certifying Authority shall ensure that the:

- a. On-site detention system/s
- b. Stormwater pre-treatment system/s

Details of the approved and constructed system/s shall be provided as part of the Works-As-Executed drawings.

19. Prior to the issue of an Occupation Certificate a restriction as to user and positive covenant relating to the:

- a. On-site detention system/s
- b. Stormwater pre-treatment system/s

Shall be registered on the title of the property. The restriction as to user and positive covenant shall be in Liverpool City Council's standard wording as detailed in Liverpool City Council's Design and Construction Guidelines and Construction Specification for Civil Works.

20. Prior to the issue of an Occupation Certificate, any damage to Council infrastructure not identified in the dilapidation report, as a result of the development shall be rectified at no cost to Liverpool City Council.

Any rectification works within Lachlan Street and Burnside Drive will require a Roads Act application. The application is to be submitted and approved by Liverpool City Council prior to such works commencing.

Any rectification works required by Council regarding the condition of Council infrastructure shall be undertaken, at full cost to the developer.

### **Advisory**

21. Before any excavation work starts, contractors and others should phone "Dial Before You Dig" service to access plans/information for underground pipes and cables. [www.1100.com.au](http://www.1100.com.au)

22. The cost of any necessary adjustments to utility mains and services shall be borne by the applicant.

23. Care shall be taken by the applicant and the applicant's agents to prevent any damage to adjoining properties. The applicant or applicant's agents may be liable to pay compensation to any adjoining owner if, due to construction works, damage is caused to such an adjoining property.