

Department of Planning, Housing and Infrastructure  
Social and Infrastructure Assessments  
Locked Bag 5022  
**PARRAMATTA NSW 2124**

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

**Re: Notice of Exhibition - New High School at Edmondson Park (SSD - 62028458)**

Dear Patrick,

Liverpool City Council was invited to provide comments to the notification of a State Significant Development (SSD-62028458) for the development of a high school at 145 Buchan Avenue, Edmondson Park (Lot 2 in DP1287903). The proposed development includes the construction of four new buildings ranging in height from one to five storeys, onsite carparking, associated earthworks and infrastructure over two stages and a capacity of 2,000 students.

The site is zoned R1 (General Residential) under *the State Environmental Planning Policy (Precincts – Western Parkland City)*, and the high school is permissible development in this zone.

Council notes the Environmental Impact Assessment including the technical assessment reports prepared in support of the proposal. Noting the above, Council staff provide several recommendations relating to strategic context, community planning, urban design and public domain, environmental health, waste management, traffic and transport planning, flood plain and water management aspects of the proposal. Detailed comments are provided as an attachment to this letter in **Attachment A** and are to be considered in the assessment of the proposed development.

Should you require any further information or clarification, please contact Masud Hasan, Senior Strategic Planner on 8711 7549.

Yours sincerely,



**Ian Stendara**  
A/Coordinator Strategic Planning

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## Attachment A – Detailed comments

### **Strategic Context**

- Council previously a high school capacity that fits the current and projected school age group population in the area. Forecast Id has estimated that the catchment area of the proposed high school will experience a growth in high school age group population to approximately 3,400 by 2030. The new high school is planned to accommodate 2,000 students, which is under the projected high school age group population.

The number could further increase if additional uplift is approved in the Landcom Town Centre (North precinct). Hence, it is important that the capacity of new high school infrastructure takes into consideration the forecast population of school students and pupils within the Edmondson Park area.

- Landcom proposed Modification 5 to the Edmondson Park South Concept Plan to modify the school zone boundary and to reduce the site area to 4ha. This was proposed based on the concept that a primary school would be established on this site and a future high school (vertical high school) would be established in Fraser's Town Centre (Ed Square) to the south of the rail line. Modification 5 proposed residential development on the portion of the land identified for Schools in the Concept Plan. This is currently under assessment by DPHI.

Any amendments required to the proposed Modification 5 due to the construction of the high school on this site needs to be considered.

- Proposed Modification 5 to the Concept Plan and the associated planning control changes are currently under assessment by DPHI. Whilst Mod 5 is not yet approved, the proposed height variation for the high school needs to be consistent with the height control under the Western Parkland City SEPP.

### **Strategic Recommendations**

1. Further capacity for high schools in Edmondson Park should be considered based on the student population projection of its catchment area. The capacity of such a school should be guided by the population projections of Edmondson Park, and surrounds. Planning for school infrastructure shall consider any additional capacity required, to accommodate demand from potential increase of population in the town centre due to proposed Mod 5 of the Edmonson Park South Concept Plan.
2. DPHI should consider any required amendments to the proposed Mod 5 of the Concept Plan due to the construction of the new high school, as Mod 5 currently proposed residential development on part of the school site.
3. Whilst the Mod 5 to the Concept Plan is not yet approved, the proposed height variation for the school building should be consistent with the building height controls under the Western Parkland City SEPP.

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### **Community Planning**

- The population density of Edmondson Park has increased multiple times than which was originally planned. In the previous referral advice (on draft SEARS), it was recommended to conduct an updated social infrastructure needs assessment based on the increased population density of the entire precinct. The submitted Social Impact Assessment for the proposed new high school didn't include any information on the threshold for the current demand and projected need.
- There is an apparent shortfall in social infrastructure provisions and dedicated community space in Edmondson Park. The wider scope of community benefit from the proposed school facilities is therefore acknowledged. However, the submitted supporting document lacks adequate information on after-hour management and access control for the facilities. Usually, Council arranges a contractor or operator for managing the after-hour facilities in a shared school site or other types of community facilities. For example, a soccer club to organize events and look after the facility on-behalf of Council.

### **Community Planning Recommendations**

4. An updated social infrastructure needs assessment is recommended for Edmondson Park. If the planned school capacity is not adequate compared to the projected demand, the delivery and staging model should consider how this shortfall will be addressed.
5. The operational plan of management (PoM) for the shared use of the school facilities should be prepared in consultation with Council. This may include the following –
  - a) Share our Space Program and Share Use Program between school authority and the local community.
  - b) SINSW to provide a license to Council to use indoor facilities and sport fields Monday to Friday after school hours and on weekends. In return for the use of sports fields, Council may, for example, install flood lights.
  - c) During Stage 1 development, the Sport fields could have some temporary line marking to divide the fields into various sports types, to allow for a variety of sports to be played. This is to ensure the facilities are more useable until the completion of Stage 2.

### **Urban Design and Public Domain**

- Council supports the design seeking to connect the proposed high school with the existing primary school. However, the proposal has not provided any connected space between the two educational institutions. Two entrances towards the Oval and Gym are proposed, but they are lacking definition of boundaries, fencing or details to show how these entrances come together. Refer to the image below.

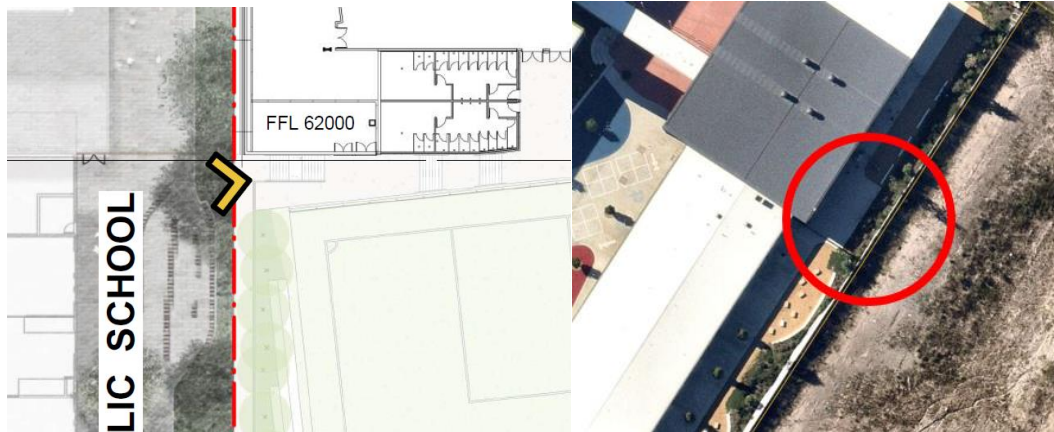


Figure: Entrances between the primary school and the proposed high school.

- The overall architectural expression/language of the proposed built form is quite repetitive and unidimensional. Articulation of the building façade is required.
- The development proposed a tree canopy coverage of around 28%. Further canopy cover is needed to reduce the effect of extreme summer heat and urban heat island effect which are prevalent in the Western Sydney region.
- The school's substation is located at the frontage of Buchan Ave without a buffer. The visual impact of this asset toward the public domain and the street interface of the school needs to be addressed.
- The proposal has integrated public art opportunities throughout the design. Public art outcomes need to be delivered in collaboration with Council's Public Art Officer.

#### Urban Design and Public Domain Recommendations

6. Details addressing the interface works between the primary and high school should be provided. Where possible cohesive open spaces between the two schools should be provided rather than the provision of gates only.
7. It is recommended to consider modulating the overall built form to achieve a more playful and articulated building facade.
8. The development to provide further tree planting where possible to achieve a minimum of 40% canopy cover within the overall site to reduce the effect of extreme summer heat and heat island effects.
9. Provision of further landscaping, o integration of the substation into a room within the built form to minimise the visual impact at the front of the school is recommended. This is to provide a better street interface between the school and the public domain.
10. Council recommends all public art opportunities are undertaken as paid collaborations between profession public artist/s and local artists.
11. Council supports the delivery of public art associated with the “Entry Canopy” and the 5 courtyard facing stairwells to support wayfinding through meaningful and

relevant endemic narratives. These motifs are recommended to be included on the external facing facades of the buildings to reinforce wayfinding and connections to the community. Public art outcomes for the proposed high school are to be delivered in collaboration with Council's Public Art Officer.

### **Environmental Health**

- The site is considered to be suitable for the proposed development from a land contamination viewpoint. Contamination was not identified during the detailed site investigation. However, recommendations made under the Detail Site Investigation report prepared by JK Environments (JKE) need to be included into the consent conditions. The unexpected find protocols and imported materials protocol need to be implemented to ensure potential contaminated materials are checked and appropriately managed.
- Council's records indicate that the proposed development is located on land in or adjacent to a rail corridor that may be adversely impacted by noise or vibration. Strategic location and orientation of buildings and fences usually provide shielding from surrounding roads to ensure appropriate external noise levels are achieved. Operational noise from the development is also capable of meeting the relevant noise criteria set out in the Noise and Vibration Impact Assessment, provided noise mitigation measures outlined in the report are implemented as part of the final design. This includes construction requirements and a noise management plan.
- Detailed floor and section plans for the food premises (e.g. school canteen) needs to be submitted to Council for review. Detailed plans and specifications of the mechanical ventilation system servicing the food preparation and dining areas of the premises will also be required.

### **Environmental Health Recommendations**

12. A robust unexpected finds protocol (UFP) is to be prepared by a suitably qualified environmental consultant and that this protocol be implemented during the construction phase of the project. This should outline appropriate procedures to be followed should contaminated or potentially contaminated material be discovered during future works.
13. An imported materials protocol is to be prepared by the suitably qualified environmental consultant so that any soils, gravels and landscaping materials that are imported during the proposed development works are checked and confirmed to be free of unacceptable levels of contamination that could pose a risk in the context of the proposed development.
14. The proponent must liaise with Landcom to obtain information regarding the source and contamination status of any material that will be imported to fill the north-eastern section of the site. This information is to be reviewed by the suitably qualified consultant to confirm that the imported materials do not compromise the suitability of the site.

15. Prior to the commencement of the works, vibration surveys be carried out of each key vibration-generating-activity / equipment to determine whether the existence of significant vibration levels justifies a more detailed investigation.
16. The application shall be supported by a detailed Noise Management Plan prepared under the supervision of a suitably qualified acoustic consultant. The Noise Management Plan must identify and implement strategies to minimise noise from the proposed development and incorporate: 'approaches for promoting noise awareness by patrons and staff; training procedures; a complaint lodgement procedure to ensure that members of the public and local residents are able to report noise issues; an ongoing review process and a plan for responding to noise complaints. The Noise Management Plan shall clearly specify the responsibilities of site personnel in managing noise and include a detailed list of steps taken to manage potential noise impacts.' The Noise Management Plan by a suitably qualified consultant shall be incorporated into the Plan of Management for school which shall be readily accessible to all staff once operational.
17. Detailed floor and section plans of a suitable scale (e.g. 1:50) for the food premises (e.g. school canteen) are to be submitted to Council for review. The plans are to demonstrate compliance with the following:
  - AS4674-2004 – Design, construction and fit-out of food premises
  - Food Standards Code (Australia)
  - Building Code of Australia
18. Detailed plans and specifications of the mechanical ventilation system servicing the food preparation and dining areas of the premises shall be prepared by an appropriately qualified person. The plans shall certify compliance with AS/NZS 1668- 'The Use Of Ventilation and Air-Conditioning In Buildings' and include the following:
  - a) The location of the mechanical ventilation system outlet including detailed specifications of the stack height and discharge velocity required to service the food preparation and dining area;
  - b) Proposed methods to mitigate odour and noise impacts arising from the operation of the mechanical ventilation system; and
  - c) The sound output level (Sound Pressure Level at 1 metre) of the mechanical ventilation system.

### **Waste Management**

- Council only provides domestic waste services. The proposed high school may have to organise waste management services by a private operator. The construction and operational waste of the proposed development will have to be properly managed.
- The garbage/waste storage area is not clearly identified on the school site plan and within the proposed buildings. The Operational Waste Management Plan document

supporting the application does not adequately address the requirements for operational waste.

### **Waste Management Recommendations**

19. All waste services to this facility, must be delivered by licensed waste contractors, and all materials leaving the site must be conveyed to a facility that is legally permitted to accept materials of that type.
20. The waste services engaged must cover all the various types of waste materials that the school will generate. This could potentially include a medical sharps service, if staff or students with health issues requiring injections to treat medical conditions are present, or a chemical disposal service for waste chemicals from Chemistry labs.
21. Waste materials must be separated according to type/material by staff or agents of the school, to ensure that materials that can legitimately be recycled, are recycled and that anything hazardous is kept contained, and not accidentally mixed with something with which it may have a chemical reaction. Bins of separated materials are to be kept physically separated to preserve their integrity.
22. All waste collection, tipping, aggregation and sorting activities are to take place within the subject site, not in any public place. Public places include any public road, footpath, nature strip, park or similar that is under public ownership. Any materials spilled during waste tipping/pumping activities must be cleaned up promptly and thoroughly, by staff or agents of the school.
23. All spill protocols (including disposal of spilled materials) in regard to chemicals nominated by NSW EPA or SafeWork NSW must be followed, and appropriate spill treatment kits be provided and kept maintained.
24. All drains and water inlet points within 15 metres of a location where waste materials are to be tipped, separated, stored or collected must be fitted with fine grade drain covers or fine grade trench gratings, to prevent the ingress of gross pollutants into the stormwater system.
25. All waste vehicles servicing the school must be capable of entirely containing their load of materials, without leakage, for the entirety of the journey to the receiving location.
26. Waste services and all disposal points for the school's occupants, including pupils, teachers and auxiliary staff, must permit and encourage the occupants to separate their waste according to type, and undertake recycling. All putrescible waste from lunchrooms, kitchens etc. must be kept entirely contained within appropriate lidded bins, and be emptied with a frequency that ensures that the contents of the bins do not generate odours, or allow the breeding of insects etc. If waste on hand exceeds the capacity of the bins present, an extra waste removal booking must be made promptly by agents of the school's management.
27. The designated garbage/waste storage area shall comply with the following requirements:

- a) The room shall be fully enclosed and provided with a concrete floor, and with concrete or cement rendered walls coved to the floor;
- b) The room shall have a floor waste which is to consist of a removable basket within a fixed basket arrestor and is to comply with Sydney Water requirements;
- c) The door to the room must be tight-fitting, self-closing and fitted with mechanical ventilation.
- d) The construction standards for waste storage areas are to be consistent with the requirements under Liverpool Development Control Plan 2008.

### **Traffic and Transport Management**

- The proponent submitted the proposed traffic and transport facilities to Council's Local Traffic Committee (LTC) meeting on 31 January 2024 for approval. The committee recommended the following –
  - a) *The Committee supports in-principle the following traffic facilities including roundabout at the East Road and Buchan Avenue intersection, median island in Buchan Avenue fronting the school and parking bays along East Road and the parking restrictions along the southern side of South Road.*
  - b) *SINSW to revise the design drawings addressing the above concerns, including removal of one of the pedestrians crossing across Buchan Avenue, consider the provision of a bus zone along South Road, increase the width of paved footpath along the school frontage to accommodate cyclists and to resubmit the revised design drawing to a future LTC meeting for further consideration. The design is to incorporate corrective action recommendations from an independent road safety audit on the drawing.*
  - c) *SINSW to submit output of network traffic modelling such as AIMSUM Modelling and assessment report of the forecasted traffic conditions to be presented to the future meeting.*
- It is noted that the intersection of Buchan Avenue & Faulkner Way will be operating at an unacceptable Level of Service (LoS E/F). Future intersection upgrading will be required.
- Table 11.18 of the Transport and Accessibility Impact Assessment report indicates that the unsignalised intersection of Buchan Avenue and MacDonald Road will be operating at an unacceptable Level of Services (LoS F) for both stage 1 & stage 2 developments for the school. It is noted that this intersection is to be provided by Landcom.
- The project sets up high public transport mode share targets in Table 4.1 of the Transport and Accessibility Impact Assessment report. It will rely on additional school bus services in order to accommodate additional student trips (i.e. 400 trips in stage 1 and 1000 trips in stage 2). The proponent needs to confirm with TfNSW whether



additional services will be available to cater for both primary and high school students.

- Parking provision for the development is not adequate to meet the staff parking demand, and on-street parking for pick-up and set down is limited. The proposed on-street parking spaces of 72 spaces don't comply with Council DCP requirements which require a provision of 211 spaces. The parking provision for staff at Stage 1 will be fully accommodated. However, there is a significant reduction of car parking provision by 50% for staff during Stage 2 of the development.
- The proposed high bus patronage will generate high pedestrian movements along Buchan Avenue. A school supervisor is needed to manage pedestrian and traffic movements along Buchan Avenue.
- It is noted that only 1 minute turnover time is assumed to calculate kiss & ride queuing area which will require efficient and coordinated pick up and drop off management by the school and travel coordinator.
- The proposed school bus routes to/from the subject school site and associated bus timetables are not included in the School Transport Plan prepared for the proposed high school. The plan needs to include the information.

### **Traffic and Transport Management Recommendations**

28. The proponent is to incorporate Council's Local Traffic Committee's recommendations on the site plan and associated traffic facilities and submit the revised engineering plans and additional information to Council and the DPHI for approval prior to the determination.
29. Provision should be made for future upgrading of the intersection of Buchan Avenue & Faulkner Way such as Traffic Control Signal (TCS) to manage the level of service at this intersection.
30. The proponent is to liaise with Landcom and ensure that adequate intersection treatments are to be provided at the intersection of Buchan Avenue and MacDonald Road as part of the MacDonald Road construction. The DPHI is to confirm with Landcom on delivery timing of the intersection upgrade to facilitate the planned development including the school within the precinct. Interim intersection treatment would be required until a Traffic Control Signal is approved by TfNSW.
31. The proponent is to confirm with TfNSW whether both baseline and target mode shares (Table 4.1 of the Transport and Accessibility Impact Assessment) are appropriate and suitable for being used for the traffic impact assessment. The proponent is to confirm with TfNSW whether additional bus services will be available to cater for both primary and high school students.
32. The school car parking demand and provision is to be reviewed after 12 months of the first and second stages of the development. If required, strategies to address parking deficiencies or operation are to be developed and implemented in consultation with Council.

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33. An application for a school supervisor for both the primary and high schools is to be lodged with TfNSW to manage pedestrian and traffic movements along Buchan Avenue. It is recommended that school buses to use the bus bays along the southern side of the Buchan Avenue in the morning peak to reduce pedestrian crossing demands.
  34. Detailed measures for the kiss & ride management and reducing queue area are to be included in the updated School Transport Plan. Potential kiss & ride area is to be identified along South Road and Buchan Avenue.
  35. The proposed school bus routes to/from the school site and associated bus timetables are to be identified and included in the School Transport Plan.
  36. The School Transport Plan is to identify incentive measures in order to encourage staff to use public transport such as public transport allowance or free/low fare opal card. Alternatively, consultation is required with TfNSW for a car park lease arrangement in Edmondson Park commuter carparks. The parking improvement measures are to be included in the updated School Transport Plan.
  37. An updated School Transport Plan with the complete travel access guide is to be submitted to Council for approval. The updated transport plan is to include (but not limited to):
    - a) An extended road safety education program catered for the high school students (current one is for the Edmondson Park primary school). The travel coordinator is to liaise with Council's road safety officer to develop a road safety education program for walking and cycling to the school. Contact details of travel coordinator is to be provided to Council once the coordinator is appointed;
    - b) Detailed bus routes and associated timetable;
    - c) Active transport routes to/from the school;
    - d) Overflow parking management and potential kiss & ride parking area and staff parking sites such as leased parking site from TfNSW in Edmondson Park commuter carparks;
    - e) Incentive measures to encourage staff to use public transport such as public transport allowance or free/low fare opal card.

### **Flood Plain and Water Management**

- Sitework and Stormwater Plan, Rev C indicated that the site stormwater is proposed to connect to the existing pit at the northeast corner of the site. The plan proposed Ocean Protect pit inserts and Jellyfish for treating stormwater from the site. This is considered satisfactory. Draft Flood Emergency Management Plan and flood impact assessment is considered satisfactory.

**Flood Plain and Water Management Recommendation**

38. It is recommended that the invert level of the existing pit and size of pipe leading out from the pit are to be investigated onsite and to be confirmed that stormwater from the site can be drained by gravity and the capacity of the downstream stormwater system has a capacity to accommodate the flow from this development.