CITY OF PARRAMATTA

Department of Planning, Housing
and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2124

Your Ref	SSD-48497708
Our Ref	NCA/18/2022
Contact	Paul Sartor
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4 December 2024

ATTN: Bethany Lane;

COUNCIL SUBMISSION
NOTICE OF EXHIBITION OF ENVIORNMENTAL IMPACT STATEMENT FOR THE CONCEPT AND STAGE 1 APPLICATION FOR THE REDEVELOPMENT OF THE KING'S SCHOOL (87-129 PENNANT HILLS ROAD, NORTH PARRAMATTA)

I refer to the above application and the request to provide advice on the proponent's Environmental Impact Statement. Council has reviewed the supplied report and wish to make the following comments:

Traffic
Council has reviewed the supplied Transport and Accessibility Impact Assessment and request further information regarding the traffic modelling to better understand the impact of the proposed access road off Masons Drive. Council remains concerned that this accessway may result in adverse traffic impacts as detailed below.

Mason Road Access and Traffic Modelling

1. The modelling only considers intersections between Masons Drive and Bettington Road. However, there is a chance that the capacity of these intersections may also be impacted by the intersection of Pennant Hills Road and James Ruse Drive. Accordingly, the TIA should justify its exclusion based on on-site observations or expand the model to include this intersection.

2. The traffic modelling for the Pennant Hills Road and Bettington Road intersections shows that it is currently performing at a Level of Service ('LoS') C and only shows queue lengths of 74m for the northern leg of Bettington Road in the AM peak and 7m for the right turn lane on the eastern leg of Pennant Hills Road. This is inconsistent with Council site observations for the AM peak where the right turn bay in the eastern leg of Pennant Hills Road overspills onto the through lanes. Furthermore, for traffic travelling southbound in Bettington, it may take several cycles before getting through the intersection. Accordingly, the model should be calibrated based on site observations.

3. The applicant should confirm what peak demand flow period was set in SIDRA. It would be appropriate to set this at 15-30min given that a school peak is generally short and very concentrated. Further to this, it is unclear if the existing scenario model was calibrated by observing on-site traffic conditions. Notably, there is a lack of discussion of on-site observations within the TIA.

4. There are already effectively two southbound lanes for approximately 90m in Masons Drive as a result of school peak time No Stopping restrictions. As such, the proposed upgrades to line marking will not translate to improved intersection performance and the conclusions that scenario 3 and scenario 4 (with upgrades and development traffic) will perform at a similar level as per the current situation is not accepted.

5. It has been reported to Council that due to the vehicle queues in Pennant Hills Road to turn right into Masons Road, vehicles are turning into Glencoe Avenue and performing an illegal U-turn at Blackwood Street. Should additional traffic be diverted to Masons Road as a result of the proposed development, it is likely that this issue would become worse. This street is already very heavily congested during school peak times as it services Tara Anglican School, Burnside Public School, and Redeemer Baptist School and diverting additional traffic from the Kings School to Masons Drive is not yet justified based on the information provided within the TIA.

Parking

6. Further clarification regarding the design of the proposed expansion of the prep-school car park is to be provided. The plans are unclear regarding grades. The western side circulating road shows ramps that have grades of 1:10 as per the landscape plans. However, there is no grades shown for the eastern side circulating road or the parking aisle to show how they will transition. Based on the contour plan in the civil plans there is a gradual slope throughout the car park which appears to become steeper for the northern parking aisle. This may mean that some of the parking spaces, including the disabled spaces, do not comply with AS 2890. Accordingly, the applicant's TIA should check the compliance of the proposed car park to ensure it complies with relevant standards before the issue of any construction certificate.

Pedestrians

7. There is a missing footpath (approx. 10m) on the east side of Russell Road from the school gate to Pennant Hills Road. Aerial and StreetView imagery show that turf has been damaged due to pedestrian activity to and from the school. Accordingly, this missing section of footpath should be constructed as part of the development to support pedestrians, and a condition should be included for this subject to the footpath being constructed to Council's Standards and the applicant obtaining relevant permits from Council in order to commence the works.

CTMP

8. The Final CTMP is to nominate construction worker parking areas within the site and ensure that sufficient arrangements are made for the expected number of workers that will be driving to the site.

9. Construction vehicles are not to access the site via Masons Drive during school zone hours to limit traffic and pedestrian impacts. For all other access points, the CTMP

must assess whether there is any risk of conflict between school children and truck movements. Should a conflict exist, appropriate measures are to be taken including prohibiting truck movements during peak pedestrian movements to and from the schools.

10. The CTMP must clearly show all measures that will be taken to separate school children from areas where construction will be taking place including plans showing where hoardings will be installed.

Biodiversity

This entire proposal requires the removal of 451 trees or 2.35 hectares of native vegetation with replacement planting of 1:1 canopy cover or a total of 512 trees. Council notes that many of the trees to be removed are within mapped biodiversity zone under 6.3 of the PLEP 2023 and are required to meet the Bushfire Asset Protection Zones for the buildings.

The Biodiversity Development Assessment Report (BDAR) has not adequately addressed how impacts were avoided or minimised (a requirement under section 7 of the Biodiversity Assessment Method (2020)), including for vegetation with high biodiversity values and habitat for threatened species.

Councils' preference is that building locations are revised to minimise impacts to vegetation with high biodiversity values and habitat for threatened species. This is especially relevant for the Day Boy House and the Boarding House which require the largest tree removal with a biodiversity protection. The relocation of these buildings could also protect the native flora and fauna within the Critically Endangered Ecological Communities natural asset. The BDAR should be updated to demonstrate how impacts were meaningfully avoided/minimised.

Further it is unclear why some trees are shown to be removed outside the APZ (for example B154, B242, B225, B265, B260, B182). Extra detail is requested on why some trees are shown to be removed within the APZ and others retained. Based on clearing trees to separate the crowns by 2 – 5m to reduce the canopy cover as per the bushfire clearing requirements, it would appear many trees can easily be retained, especially since it is noted in the tree schedules that some are significant trees without any defects and which have enough separation from the ones shown to be retained (for example D075, D048, D061, B033, B122, B189, B073, B184, B140).

The Arborist Report has not provided any tree protection plans as part of the tree protection and management strategy. Specific tree protection measures need to be documented, and the locations shown on the plans.

Council also requests that a Vegetation Management Plan should be provided as part of the EIS assessment or form part of a condition and inspected by DCCEEW.

Landscaping

The proposed landscape plans are supported in principle. They appear to be well thought out and have considered the existing landscape, levels, trees to design well between the new and existing buildings to make a seamless landscape and meet the needs of the children and staff for each project area.

Additional non-destructive construction details will be required for each structure proposed within the TPZ of the existing trees to ensure each tree will be sufficiently retained and

protected and the root system and canopies will be minimally impacted. Each structure is to be designed to allow enough room for the trees to move/sway and grow to ensure they thrive.

Some of the proposed trees are unsuitable and/or should be changed to native species reflective of the local CEEC STIF. It is recommended the following trees are changed:- Angophora hispida and Callitris muelleri.

Flooding

The following details are requested to be conditioned as part of the concept approval and required for the Stage 1 proposal:

- Any detailed approval should take account of the sensitivity of the environment, particularly of the extensive bushland down slope, and design an integrated water management system and water sensitive design principles to reduce the adverse impacts of stormwater, capture rainwater and use on-site, and the prevention of nutrient build up and altered soil moisture conditions that promote weed infestation.
- A stormwater management plan must be prepared in accordance with Australian Standards AS 3500, the Council's DCP 2023, and the Development Engineering Design Guidelines, supported by appropriate modelling, such as DRAINS.
- OSD may be required to flatten out discharge peaks, but it is more useful and environmentally beneficial to reduce net overall discharges from the site by 10% compared with the site in its natural state (as recommended in Council's DCP 2023).
- Water sensitive design and water pollution control must first be achieved in the landscape in preference to proprietary solutions (GPTs are an exception to this). This is likely to include water storages, ponds or bioretention areas and landscape water absorption into the soil. This whole site should be modelled using MUSIC or equivalent software as well as responses to each stage.
- Staging of construction and associated construction impacts on flooding behaviours must be addressed.
- Reference should be made to the relevant controls within Council's DCP 2023 and the City of Parramatta Water Sensitive Design and Blue Green City Guidelines, which can be provided on request.
- The whole site should be modelled for overland flow and its safe, low impact conveyance to a suitable downstream location. This should be done with 2D modelling software such as TUFLOW or HECRAS. This should be done assuming 100% blockage of pipes, pits and other inlets.
- Site-specific survey levels must be incorporated into the model to replace LiDAR data. The flood study must consider the impacts of climate change, including the new ARR guidelines introduced on 27 August 2024, and incorporate these into the design rather than limiting them to sensitivity analyses.
- It must be demonstrated that the proposed development does not cause significant afflux during a 1% AEP flood event and does not create any new areas of high hazard. Various design options should be explored, with flood modelling assessments conducted to confirm compliance. In particular, it must be shown that the development does not lead to significant afflux.

A flood assessment report has been provided and appears reasonable. However, afflux maps have not been included in the report. It is therefore recommended that the report is updated to

incorporate afflux maps for the 1% AEP flood event. In addition, the following details are requested to be conditioned as part of any detailed stage 1 approval:

Construction Environmental Management Plan
A Construction Environmental Management Plan (CEMP) shall be submitted to, and approved by, Council prior to work.

The CEMP must be prepared in accordance with ISO14001:2015 and the Department of Infrastructure, Planning and Natural Resources (2004) 'Guidelines for the Preparation of Environmental Management Plans' and submitted to the relevant authorities at least 4 weeks prior to the commencement of construction.

In order to remain compliant with the POEO Act (1997) and this Consent, environmental due diligence must be demonstrated to have been exercised throughout the construction process. To this end, an external, audited environmental management and monitoring system must be proposed as part of the CEMP, to ensure the integrity of environmental management and pollution control measures.

This plan should cover soil and water management and site maintenance and any associated groundwater, flooding and overland stormwater flow management. It must address any possible pollution risks, and how they will be managed. It must incorporate updated erosion and sediment control plans/ stormwater plan showing how rainwater and groundwater captured within the site will be treated to satisfactory water quality standards, monitored and discharged.

Soil erosion and sediment control measures are to be installed in accordance with the publication 'Urban Stormwater: Soils and Construction "The Blue Book" 2004 (4th edition) prior to the commencement of any demolition, excavation or construction works upon the site. These measures are to be maintained throughout the entire works.

The CEMP and Environmental Management System must be implemented throughout the work and must address, but is not limited to, the Applicant's proposed management strategies for the following issues:

- *a) Flood proofing*
- *b) Stormwater management and pollution control*
- *c) Construction material pollution protection*
- *d) Erosion and sediment control measures, including:*
  - *i) Vehicle Wheel wash, cattle grid, wheel shaker or other appropriate device to remove sediment from vehicle wheels.*
  - *ii) A sediment trapping fence, made of a geotechnical textile specifically designed for such a purpose and installed and maintained to manufacturer's specifications, placed below the disturbed area of the construction site along contours.*
  - *iii) Vegetation is to be maintained on the development site as much as possible, and shall not be cleared from neighboring sites.*
  - *iv) Vehicle access shall be restricted to one designated point, and vehicle driveways are to be adequately covered at all times with blue metal or the like.*

All stormwater incident on the construction site must be collected and appropriately disposed of in a manner that does not increase the flood risk for the catchment area or degrade the quality of water being disposed of to Council stormwater infrastructure and the environment.

During construction, any stockpiled materials and/or construction waste stored onsite is to be isolated from stormwater flow to Council stormwater systems and natural waterways, in order that it not become a pollutant. This is to be achieved with provision of continuous perimeter bunding around waste storage areas, constructed to be of sufficient height and durability to withstand site-specific stormwater conditions and construction activity for the life-cycle of the construction project.

Erosion and sediment control measures are to be installed in accordance with the publication 'Urban Stormwater: Soils and Construction "The Blue Book" 2004 (4th edition) prior to the commencement of any demolition, excavation or construction works upon the site. These devices are to include, but not be limited to:

a) *All devices are to be maintained throughout the entire demolition, excavation and construction phases of the development and for a minimum three (3) month period after the completion of the project, where necessary.*
b) *Construction site stormwater may be disçharged to Councils stormwater system during construction only, as part of the approved Construction Environmental Management Plan with the prior approval of Council's Manager, Technical Specialists, and in accordance with the following water quality requirements. Site water discharged must not exceed suspended solid concentrations of 50 parts per million, and must be analysed for pH and any other contaminants of concern identified during the preliminary or detailed site investigation, prior to discharge to the stormwater system. The discharged water quality must comply with Council's DCP 2023 and with relevant Environmental Protection Authority and Australian & New Zealand Guidelines for Fresh & Marine Water Quality.*

Reason: *To prevent pollution of waterways and protect the environment.*

Stormwater during construction
For water accumulated within a site to be approved for drainage into Council Stormwater systems, the following discharge water quality standards must be met at all times throughout the construction phase of the development:
i) pH 6.5-8.5;
ii) Total Suspended Solids (TSS) < 50 mg/l;
iii) Oil and Grease 'not visible'.
iv) If site identified as containing contaminated or acid-sulphate soils, all trace contaminants must be removed from the groundwater prior to disposal.
This may be achieved with a 'WETSEP' system or equivalent, to hold and treat water prior to discharge.
Full plant and equipment details, an operational and monitoring plan and evidence of ability to achieve the required performance must be presented in the final Construction Environmental Management Plan submitted to Council prior to works commencing.
Other options for the disposal of pump-out water include disposal to sewer with prior approval from Sydney Water, or off-site disposal by a liquid waste transporter for treatment/disposal to an appropriate waste treatment/processing facility.
Reason: *To prevent pollution of waterways and protect the environment.*

Conclusion
It is noted that this is the recommendation of Council officers.

Council appreciates the opportunity to comment on the above application and look forward to continued collaboration.

Should you wish to discuss the above matters, please contact Paul Sartor on the details listed above.

Yours sincerely

Alex McDougall
TEAM LEADER
CITY SIGNIFICANT DEVELOPMENT