

POST RESPONSE TO SUBMISSIONS REPORT

ALEX AVENUE PUBLIC SCHOOL_SSD_9368



URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Project Code	P4090
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TABLE OF CONTENTS

1.	Introduction	4
1.1.	Overview	4
1.2.	Project Team.....	4
2.	Response to Submissions	6
3.	Conclusion	23
Disclaimer	24	
Appendix A	Group GSA Letter	
Appendix B	Modscape Letter	
Appendix C	Amended Environmental Noise Assessment	
Appendix D	BDAR Waiver Request	
Appendix E	Arboricultural Impact Assessment	
Appendix F	Copy of Deposited Plan 1244925	
Appendix G	Easement A	
Appendix H	Easement B	
Appendix I	OSD Location Plan	
Appendix J	Pelican Road Redesign Sketch	

TABLES:

Table 1 – Project Team	4
Table 2 – Response to Submissions	6

1. INTRODUCTION

1.1. OVERVIEW

This supplementary Response to Submissions (RtS) Report has been prepared to respond to further submissions received in relation to SSD 19_9368 for 'Alex Avenue Public School'.

The following agencies have provided additional comments:

- Department of Planning, Industry & Environment (DPIE)
- Environment Protection Authority (EPA)
- Government Architects NSW (GANSW)
- Blacktown City Council (Council)
- Transport for NSW (TfNSW)
- Roads and Maritime Services (RMS)

The following agencies have provided no further comments:

- Office of Environment and Heritage (OEH)
- Sydney Water (SW)
- Endeavour Energy (EE)

A further submission was also received from Catalina Developments who reinforced their previous comments.

The key matters raised within the submissions relate to:

- Stormwater contributions and OSD;
- Construction methodology and modular design; and
- Other design matters.

In addition to the above matters, an early works DA (DA19-00283) is currently under assessment by Blacktown Council. One of the draft conditions provided by Council in the early works DA requires the matching the levels along the Pelican Road frontage/boundary. As such, the project team has agreed to match the levels, and updated earthwork drawings can be provided to DPIE on request to demonstrate the matching of these levels.

The above matching of levels along the Pelican Road boundary will have no impact to the overall layout of the school buildings and will only require some additional landscape treatment and ramping as shown on the sketch provided at **Appendix J**. The DPIE can impose a condition that all relevant landscape plans will need to be updated prior to construction.

1.2. PROJECT TEAM

This supplementary RtS is supported by:

Table 1 – Project Team

Deliverable	Consultant	Appendix
Letter from Group GSA	Group GSA	Appendix A
Letter from Modscape	Modscape	Appendix B
Amended Environmental Noise Assessment	Acoustic Logic	Appendix C

Deliverable	Consultant	Appendix
BDAR Waiver Request	EcoPlanning	Appendix D
Amended Arboriculture Impact Assessment	Paul Shearer Consulting	Appendix E
Copy of Deposited Plan 1244925	Land Registry Services	Appendix F
Easement A		Appendix G
Easement B		Appendix H
OSD Location Plan	Northrop	Appendix I
Pelican Road Redesign Sketch	Richard Crookes Construction	Appendix J

2. RESPONSE TO SUBMISSIONS

Table 2 – Response to Submissions

Issue	Comment	DoE Response	Reference
NSW Department of Planning and Environment:			
1. BDAR Waiver Request	Section 7.9 of the Biodiversity Conservation Act 2016 (BC Act) states that a SSD application must be accompanied by a biodiversity development assessment report (BDAR) unless the Planning Agency Head and the Environment Agency Head have determined that the proposed development is not likely to have any significant impact on biodiversity values (and consequently that a BDAR is not required). The Environmental Impact Statement (EIS) submitted in support of the proposal did not include a BDAR or a BDAR waiver. Therefore, in order to satisfy the requirements of the BC Act, either a BDAR or BDAR waiver request must be provided. Whilst it is noted that the land has been biodiversity certified, biodiversity certification does not negate the need to satisfy the requirements of Section 7.9 of the BC Act.	In response to the DPIE's correspondence RFI-2037, a BDAR waiver request has been prepared and was submitted to the DPIE via the Major Project's website on 8 August 2019. A copy of the BDAR waiver is provided at Appendix D .	Appendix D
2. Government Architect's concerns	You are requested to submit a response to the comments made by submitters on the RtS and queries raised by the Department and Government Architect NSW (GANSW), particularly with regard to:	Noted. The project team has addressed the queries raised by the Government Architect NSW. Refer to responses to item's 3-11 in this table.	
	the need for further articulation, activation and / or landscaping of the northern (Farmland Drive facing) elevation of the proposed school hall building.	Refer to response to item 3.	

Issue	Comment	DoE Response	Reference
	demonstration of how ecologically sustainable design (ESD) measures have been incorporated into the design of the proposed modular buildings.	Refer to response to item 5.	
	further details of the merits of the modular pre-fabricated system.	Refer to responses to item 8 and 9.	
	demonstration of construction credibility of the modular components including technical construction details of proposed walls, roof, floor, panel type and finishes	Refer to responses to item 8 and 9.	
	appropriate management of stormwater drainage within, and outfall from, the site.	Permanent OSD will now be incorporated on site. Northrop are currently updating their civil plans and report to reflect the new arrangements. OSD will be provided in the form of an inground tank with a storage capacity of approximately 1,200m³, and will be located beneath Building B3. Refer to Option 2 in the sketch diagram provided at Appendix I. As such, the OSD will not impact on the current layout of the school buildings. DPIE can impose a condition of consent requiring OSD to be constructed prior to occupation (occupation will be staged as per the post-approval staging plan). Detailed design of the OSD will be forthcoming.	Appendix I
	Consideration of potential land use conflict with the possible future extension of the school onto the southern portion of Lot 1 DP1244925 (as indicated in the RtS) and the existing access and services easement to Lot 4 DP1244925 located immediately south of the current proposed school site.	The NSW Department of Education intends to retain the remainder of Lot 1 land for future expansion of the School given the predicted population growth in the area. The land could be used to provide future car parking and green space requirements in the event that the Joint Use agreement with Blacktown Council is not achieved. Easement A has been established to provide an unencumbered access path from Farmland Drive along the eastern boundary of	

Issue	Comment	DoE Response	Reference
		the school site connecting with Lot 4. This easement will be removed once Pelican Road is constructed and Easement B is established in the southern portion of Lot 1 to create a new local road that will provide access to Lot 4 at the south eastern boundary of the site. Easement B will ultimately be dedicated as a Council road. An agreement is in place to deliver the new road – Easement B – which will allow local traffic to access the future development of Lot 4. The bus bay location on Pelican Road has been planned to account for the future local road (Easement B) and to ensure there is minimal impact to the future intersection. Further to the above, in the case that Council's joint use car park is delivered prior to the construction of Pelican Road, then Easement A will be maintained to provide access to Lot 4. If this were to eventuate, the School would ensure that during the interim period, appropriate management measures are in place to ensure the safe movement of students, staff and other users of the car park from the joint use car park to the School site. The proposal is therefore not anticipated to generate any land use conflicts. For further details, refer to responses to Catalina's submission (Items 30 - 36).	
Government Architects NSW:			
3. Design Feedback	The relationship between the hall and Farmland Drive is a large blank façade with only a couple of small door openings. This façade should be further articulated to create an engaging, welcoming interface with the street.	A letter from Group GSA has been prepared to address concerns with the blank façade and is submitted at Appendix A. The letter provides a series of artists impressions taken along Farmland Drive to aid in the understanding of the scale and materiality of the site and surroundings. The scale and massing of the hall and school entry are developed with a conscious awareness of the scale of the surrounding two storey-built form,	Appendix A

Issue	Comment	DoE Response	Reference
		as well as a consideration for the environmental context of the site. The articulation of the entry COLA allows for a strong visual identity for the school, whilst maximising visibility to the public domain. The public domain in the front of the school is articulated in the landscape design and is arranged to accommodate the functional requirements surrounding the main entry. The facade of the hall facing Farmland Drive is small in scale and is not considered a 'large blank facade'. The facade is broken up with materiality. The Farmland Drive curtilage to the Hall houses the site substation and pump room for authority access. The location of these services is limited due to the current extent of Farmland Drive and minimal street frontage.	
4.	The landscaping should be delivered concurrently with the building works.	We suggest this as a condition worded as deemed appropriate by DPIE.	
5.	Detail is lacking on the architectural drawings of how ESD strategies will be incorporated including 'building as a learning tool' proposals.	ESD measures as a learning tool include the following: 1. Rainwater collection to propagation and reuse. 2. The inclusion of a grid connected PV solar system on the roofs. 3. Potable water use reduction through the use of efficient fixtures and fittings. 4. Increased building fabric performance through efficient building fabric and glazing selection to reduce thermal comfort. 5. Expressed functionality of the building through purposeful graphics e.g. length, height and shape of elements expressed in engaging and interactive ways.	Appendix A

Issue	Comment	DoE Response	Reference
		6. Vegetable gardens and 'learn to grow' areas in the landscape will allow children to learn the importance of healthy eating and grow, harvest and cook concepts. 7. Using wayfinding to tell a story whilst teaching young students to navigate a complex environment. 8. The home base clusters are planned as pavilions around the central courtyard, allowing cross ventilation and daylighting from all sides of the learning space. Students will learn how to control their environment by understanding and manipulating the passive systems in the building fabric. 9. External shading and cooling devices. 10. Plant species selected for the site will be native or have a low irrigation demand. For more details, refer to page 9 of Group GSA's letter provided at Appendix A.	
6.	The scheme does not demonstrate a response to Aboriginal culture and heritage either in the landscape or architectural approach.	As identified in Appendix A , there will be future consultation with the Aboriginal Education Consultative group (AECG) to ensure that any specific relevance or connection that the site has to the Darug People is integrated into the landscape and learning environment.	Appendix A
7.	The COLA structures and walkway eaves as illustrated lack construction credibility. Construction details, particularly through the edge condition should be provided.	As outlined further in Appendix A , the COLA structures are reinforced concrete frames, consisting of steel screw piles founded in siltstone with reinforced concrete pile caps, reinforced concrete columns and beams with reinforced concrete first floor slabs. Lateral stability of the COLA concrete frame structure is provided by frame action. The COLA roofs are steel framed structures, consisting of steel rafters, steel purlins and steel columns. All steel sections are 'open' sections except	Appendix A

Issue	Comment	DoE Response	Reference
		for the steel columns, which are “closed” SHS members. Lateral stability of the COLA steel framed roof structures is provided by steel portal frame action. The edge condition of the COLA roofs are made up of fully welded angles at required centres, fixed back to the structural steel. The cladding and soffit lining are supported via a top hat subframe and plywood substrate. Detailed plans of the COLA structures are provided in page 11 of Group GSA’s letter.	
8. Modular system	Illustrate how design quality and individuality of architectural expression will be achieved within the constraints of the proposed modular system.	Appendix B provides an overview of the benefits associated with modular design from a sustainability and quality design aspect and also provides technical details of the modular system to demonstrate that the design quality is achievable.	Appendix B
9. Construction methodology	Provide technical details of the modular system (ie, wall/roof/floor typical construction, panel types, finishes) to demonstrate that the design quality illustrated and proposed for this project is achievable within the modular system.	A letter from Modscape has been prepared and is submitted at Appendix B to address concerns raised with the proposed construction methodology. In their letter, Modscape highlight the following benefits regarding the proposed off-site construction methodology including the fact that off-site construction will ensure that the time spent on site is minimised significantly. This reduces the impact on: • Environmental factors including pollution, carbon footprint and site disturbance; • Site wastage of materials as the building is built with all materials affixed to the building or delivered with the building; • Site OHS and cleanliness in and around the site and local streets; • Noise and general disturbance to residents and the local community; • Traffic management controls to residents, local communities and transportation services as there are less deliveries and pickups of general construction materials and supplies.	Appendix B

Issue	Comment	DoE Response	Reference
		The letter also outlines the sustainability benefits and provides technical details and plans demonstrating how the modular detailing including joints and floor system will be designed.	
Environmental Protection Authority (EPA):			
10. Site contamination	The RtS appears to accept the EPA's advice and recommendations. However, Appendix M comprising a single page unexpected finds protocol appears to only deal with asbestos in soil. The unexpected finds protocol should include a detailed procedure: • for identifying and dealing unexpected finds on not only asbestos but also other contamination, • that requires the proponent to engage a certified contaminated land consultant rather than a hygienist to respond to finds, • clearly detailing the responsibilities of all parties, and • outlining the qualifications of those responsible for implementing the protocol. Accordingly, the EPA reaffirms its advice and recommendations concerning soil and groundwater contamination.	We suggest this as a condition worded as deemed appropriate by DPIE.	
11. Background noise and project noise trigger levels	Appendix C Amended Environmental Noise Assessment indicates significantly lower background noise levels than those presented in the EIS. Table 5 to Appendix C includes errors in the presented intrusiveness and amenity noise trigger levels.	The table has been updated by Acoustic Logic. Refer to page 12 of amended Environmental Noise Assessment provided at Appendix C . Acoustic Logic have advised, the reason for the update is that the calculated background noise levels for the day, evening and night periods for each day were transposed in the draft of the report and have subsequently been corrected. Therefore, the rating background noise levels in the report are valid and the trigger levels should be based on the background	Appendix C

Issue	Comment	DoE Response	Reference
		noise levels in the report, which will be more accurate than the EPA estimates.	
12. Construction Noise (standard hours)	EPA reaffirms its advice and recommendations concerning standard construction hours.	SINSW is no longer seeking extended construction hours on Saturdays. Therefore, we suggest that standard construction hours are imposed as a condition worded as deemed appropriate by DPIE.	
13. Operational Noise (community use)	The EPA reaffirms its advice and recommendations concerning community use of school facilities.	Noted. No further response required.	
Blacktown City Council:			
14. Arboricultural Impact Assessment	There is a section of the Arboricultural Impact Assessment that has not been supplied, it is "Attachment 4" it relates to the tree protection measures for the trees to be retained, we need to confirm the measures are suitable and meet AS-4970-2009 "Protection of Trees on Development Sites", could you see if this is available.	A copy of the full Arboricultural Impact Assessment which includes Attachment 4 was submitted to the DPIE via email on 2 July 2019 and is provided at Appendix E .	Appendix E
15. On site detention	Council will require written advice from the DoE stating the agreed upon amount payable by the Department through section 7.11 contributions before consent conditions on drainage and water quality matters can be provided.	Permanent onsite OSD is now to be provided within the school site. Therefore, SINSW are not required to pay any contributions to Council. Northrop are currently preparing updating civil plans and civil report which reflect the new arrangements.	
16. Stormwater Management	The following amendments are required: Section 3.2.3 - the bio retention system is to be sized to treat flows up to the 6-month ARI, assumed to be 75% of the 1-year ARI flows. Section 3.2.3 - the report states the bio retention basin will be situated on the south eastern boundary which	Permanent onsite detention will be provided in lieu of paying contributions to council. The water quality approach may change as a result of this. Water quality measures and the report will be updated to reflect the amended scheme in accordance with BCC policies.	

Issue	Comment	DoE Response	Reference
	contradicts the engineering plans which the bio basin in the south west corner of the site. Blacktown Council has not confirmed that onsite detention is not required for the site. The applicant has the option of providing permanent onsite detention or paying a fee.		
17. Water Quality System	The bio retention system is to be designed in accordance with Council's WSUD standard drawings – Plan No. A(BS)175M.	The water quality approach may change as a result of the provision of permanent onsite OSD. Water quality measures and the civil report will be updated to reflect the amended scheme in accordance with BCC policies.	
18. Water Conservation	The development must supply a minimum of 80% of its non-potable demand using non-potable sources. Provide a MUSIC model for assessment.	The design is going to change as a result of the inclusion of an OSD within the stormwater system. As such, an updated MUSIC model will be provided once the design is complete. Rainwater re-use will be provided in accordance with BCC policies and statutory requirements. A condition of consent can be imposed requiring MUSIC modelling.	
19. Site Discharge	The applicant has chosen to provide a bio retention swale in the south west corner of the site and discharge concentrated flows from the site by overland flow in south west corner of the site. This is not supported by Council. The development either permanent or temporary on-site detention system.	Permanent onsite detention is to be provided in accordance with BCC policy. A condition of consent can be imposed requiring permanent OSD.	
20. Landscaping	The landscape plan should include street tree plantings at spacing's of approximately 8 metres, taking into account vehicle sightlines and streetlight spill and the species should be Pyrus Calleryana 'Capital'. There should also be planting, and maintenance details and I am unsure if we can apply street tree bonds, but they	We suggest this as a condition worded as deemed appropriate by DPIE.	

Issue	Comment	DoE Response	Reference
	should be responsible for maintenance and replacement of any street trees for a period of 12 months.		
Transport for NSW:			
21. Walking School Bus	In response to the TfNSW comments on bus access and serviceability to the site, the Applicant is intending to implement a "Walking School Bus" scheme from the nearest existing bus stop as a reason to not introduce any temporary bus zones along Farmland Drive; accommodating a school bus service. This has also been on the basis that "the time between the School opening and the construction of Pelican Road will be relatively short period". However, it is noted that there would be some uncertainty regarding the delivery of Pelican Road. As such, TfNSW provided advice to the Applicant and the DPIE to assist in managing uncertain outcomes whilst ensuring suitable public transport services could be provided to the site. Nonetheless, DPIE should ensure that the Walking School Bus is implemented prior to commencement of school operations as this measure would ensure students and their carers can access the school via public transport if desired.	We suggest this as a condition worded as deemed appropriate by DPIE.	
22. Pedestrian Crossing	The Applicant has committed to consult with Council to determine any need for a pedestrian crossing over Farmland Drive to service the transport movements associated with the school. DPIE should ensure that this is to be undertaken accordingly.	We suggest this as a condition worded as deemed appropriate by DPIE.	
Roads and Maritime Services:			

Issue	Comment	DoE Response	Reference
23. School Zones and Signage	A significant number of vehicles and pedestrians will access the site at the start and end of the school day. School Zones must be installed along all roads with a direct access point (either pedestrian or vehicular) from the school. Roads and Maritime is responsible for speed management along all public roads within the state of New South Wales. That is, Roads and Maritime is the only authorised organisation that can approve speed zoning changes and authorise installation of speed zoning traffic control devices on the road network within New South Wales. Therefore, the Developer must obtain written authorisation from Roads and Maritime to install the School Zone signs, flashing lights and associated pavement markings and/or remove I relocate any existing Speed Limit signs.	We suggest this as a condition worded as deemed appropriate by DPIE.	
24.	School Zone signs, flashing lights and pavement marking patches must be installed in accordance with Roads and Maritime's approval / authorisation, guidelines and specifications.	We suggest this as a condition worded as deemed appropriate by DPIE.	
25.	All School Zone signs, flashing lights and pavement markings must be installed prior to student occupation of the site.	We suggest this as a condition worded as deemed appropriate by DPIE.	
26.	All School Zone signs, flashings lights and pavement markings are to be installed at no expense to the Roads and Maritime.	We suggest this as a condition worded as deemed appropriate by DPIE.	

Issue	Comment	DoE Response	Reference
27.	The Developer must contact Roads and Maritime Network and Safety Officer to arrange for authorisation of the school zone and implementation of the signage.	We suggest this as a condition worded as deemed appropriate by DPIE.	
28.	All works/regulatory signposting associated with the proposed development are to be at no cost to Roads and Maritime.	We suggest this as a condition worded as deemed appropriate by DPIE.	
29. Onsite car parking	Roads and Maritime has noted that the proposal does not include any onsite car parking. Car parking for the school is proposed via the Council car park to be built directly adjacent to the site. The Council car park is intended to be shared between school staff and the community. Roads and Maritime request that the car parking be operational before the school is open to the public.	This is a comment only.	
Catalina Public Submission:			
30.	The bulk of the issues raised in the submission relate to the following matters: - The application continues to ignore the existence of the 3ha of land directly to the south of the school (i.e. all of lot 4 and balance of lot 1). - SSD 9368 ignores the registered easement for access and services which burdens Lot 2 and benefits Lot 4. If approved, the proposal would landlock the surplus land (Lot 4) and legal action would result. This is not properly addressed: Although a number of the land uses previously proposed in the easement (easement a) have been relocated, it is still not clear how the shared use carpark will properly interface with the school, i.e. how will students walk safely from their point of drop off to school, when it	The School has been designed in accordance with the attached Deposit Plan 1224 found at Appendix F. The site comprises the following lots: Lot 1 = 1.076Ha Lot 2 = 1.540Ha Total = 2.616Ha. Easement A has been established to provide an unencumbered access path from Farmland Drive along the eastern boundary of the school site connecting with Lot 4. This easement will be removed once Pelican Road is completed and Easement B is established to the southern boundary of Lot 1 to create a local	Appendix F

Issue	Comment	DoE Response	Reference
	crosses a right of carriageway for vehicles (noting this is the only legal point of access to lot 4). Further, the easement through the middle of lot 1 (easement b) has not been considered at all. On the contrary, the application has now been amended so that all stormwater collected on the apps site is now proposed to be deposited directly into the middle of the easement (easement b), which we note is the site of a future public road. Plans for the lower portion of lot 1, and any plans for an 'expansion of the School' into this area must be considered holistically now to ensure there is no sterilisation of land in the future.	road that will provide access to Lot 4. This easement will be become a Council road. The students will be able to access the school from the shared use carpark from Farmland Drive footpath. A copy of Easement A and Easement B are provided at Appendix G and Appendix H respectively.	
31.	As the primary entry to the school, the drop off zone, substation, bin storage areas, retaining walls and basketball courts cannot function properly in the easement, and the current layout is not therefore viable. This is still not addressed: Bin storage area are still planned in the easement. Interface of school and the playing fields does not work - there is currently a 4-6 m height variance proposed at the south eastern corner of the new School. This will preclude co-use arrangements proposed between the school and the playing fields and result in poor light, circulation and large retaining walls at the boundary of the school. Drainage is also a problem here - see comment below.	The easement will remain unencumbered whilst Easement A is in place. The waste bins will be managed so the bins remain within the school site and can still be accessed from the joint use carpark which will be managed by the School. The southern edge of the school follows the lay of the land and is sympathetic to the future development of Lot 4.	
32.	As SSD 9368 does not deal with the southern portion of Lot 1, numerous traffic and transport, flora and fauna, bushfire, drainage, etc. issues result (e.g. integration of the site in the location with the future Pelican Road,	The balance of Lot 1 will be utilised for school purposes in the future. The establishment of Easement B will provide local road access to Lot 4. The stormwater runoff is a temporary solution	

Issue	Comment	DoE Response	Reference
	potential sterilisation of the parcel by being cut off from the bulk of the school, future access across this lot into Lot 4 via Easement B, etc.). Excluding this area leaved massive gaps in the application and potentially devastating outcomes for the balance of the land and will preclude effective development of the area in the future. This is still not addressed: How will the balance of lot 1 be dealt with in the future? The plans, if approved, will sterilise both parcels of land to the south. Further, the application has been amended so that all the stormwater from the school will be deposited directly into a future road (easement b). Access in and around this area needs to be discussed and considered to avoid alienation of the lower portion of lot 1 and lot 4, and sterilisation of both parcels.	until Pelican Road is completed and the introduction of an OSD will reduce the impact of overland flow.	
33.	As SSD 9368 does not deal with the southern portion of Lot 1, it must be assumed that either: 1) this area of land was in purchased for a "Public Purpose" (being the AAPS) and the application is deficient in its dealing with this area; or 2) the land was not purchased for the "Public Purpose" (being the AAPS) and an explanation is required as to why tax payer money was spent purchasing land that is not required for the AAPS, being the public purpose they purported. This is not addressed: The application for the AAPS must address all of the land purchased for the AAPS?	The balance of Lot 1 is for schools' purposes and will support the future growth of Alex Ave. Public School.	
34.	SSD 9368 ignores the future rezoning of the residue SP2 land (Lot 4) to residential. The context of the school in	An agreement is in place to deliver a new road – Easement B – that will allow local traffic to access the future development of	

Issue	Comment	DoE Response	Reference
	relation to the future use of this land should be considered in the application. This is not addressed in the application: The transport and traffic issues in the area are not adequately considered. That is, ingress and ingress into the site in the short term as a result of Easement A. Nor is the future construction and connection of the site to Pelican Road and/or the future traffic and transport issues in relation to the balance of the land purchased for the school (southern portion of Lot 1) and/or easement over this portion of land (Easement B), being the future road into Lot 4. Traffic across lot 1, via easement b, is not addressed at all in the application. Access is further precluded by new plans to drain the stormwater directly into this location. The bus bays in their proposed location on Pelican Road do not work with the future use of easement b as a dedicated public road. If not addressed now as part of the greater traffic study, it will have lasting and irreparable impacts on future of the area and ability for lots 1 and 4 to function properly.	Lot 4. The bus bay location on Pelican Road has been planned to account for the future local road (Easement B) and to ensure there is minimal impact to the future intersection.	
35.	The land the subject of the application is incorrectly noted throughout the EIS and consultant's reports, both in its identification of the full 2.6 ha site, but in many cases of the 2 ha portion of the site. All title references are wrong. As the consultant's reports do not address all of the land bought for the school, they are also deficient. This has not been addressed.	Refer to response to item 30.	

Issue	Comment	DoE Response	Reference
	Note: As at the date of preparation of the application, although Lot 1 and 2 in DP1244925 may not been legally registered, the acquisitions of the parcels was complete, and all parties were fully aware of the extent of the land purchased for the "Public Purpose" being the AAPS. Lot 1 & 2 in DP 1244925 are legally registered, after being purchase by DET specifically for the AAPS in 2018. The application must reflect the accurate ownership of land, and address all of the land.		
36.	The design proposes dumping all the stormwater from the school directly onto Lot 4. This is wholly unacceptable. Appropriate on-site measures must be designed and built to avoid creating serious issues for neighbouring land owners (particularly Lot 4), and to avoid an increase in downstream flows before the detention basins are constructed in the catchment area. The proposal, as amended, plans to drain stormwater (being all water collected across the AAPS site) to the lower portion of lot 1 (although the lower portion of lot 1 is not included in the application). How stormwater will proceed from the outlet point to the stream is not dealt with at all. Further, the application now proposes having a stormwater outlet in the middle of easement b (which is a future road). Also, stormwater is no longer being collected at the low point of the school site (which is the south eastern corner) and the low point of the site will drain into lot 4, increasing the downstream impacts of the AAPS on lot 4. The stormwater design is not functional	The school site will adopt an OSD which will significantly reduce the stormwater impact to the balance of Lot 1.	

Issue	Comment	DoE Response	Reference
	and must be redesigned if to comply with basic standards.		

3. CONCLUSION

This post-RtS Report has considered each of the additional submissions received and provided additional documentation, where appropriate. To address some of the comments raised within the submissions, there have been minor amendments to the proposal.

Considering this, and the content contained throughout this report and each of the attached supporting documents, the proposal is in the public interest and approval should be granted, subject to appropriate conditions.

DISCLAIMER

This report is dated 15 August 2019 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Department of Education (**Instructing Party**) for the purpose of Post Response to Submissions (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A GROUP GSA LETTER

APPENDIX B MODSCAPE LETTER

APPENDIX C AMENDED ENVIRONMENTAL NOISE ASSESSMENT

APPENDIX D BDAR WAIVER REQUEST

APPENDIX E

ARBORICULTURAL IMPACT ASSESSMENT

APPENDIX F

COPY OF DEPOSITED PLAN 1244925

APPENDIX G EASEMENT A

APPENDIX H EASEMENT B

APPENDIX I OSD LOCATION PLAN

APPENDIX J

PELICAN ROAD REDESIGN SKETCH

