

12 October 2021

NSW Department of Planning, Industry and Environment  
Regional Assessments  
4 Parramatta Square, Darcey Street  
Parramatta NSW 2150

Attention: Michelle Niles (Senior Planner - Regional Assessments)

By email: [michelle.niles@planning.nsw.gov.au](mailto:michelle.niles@planning.nsw.gov.au)

Dear Michelle,

**RE: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION FOR SSD-10224, NEW PRIMARY SCHOOL AT EDMONDSON PARK**

**1. Overview**

On 30 August 2021 School Infrastructure NSW (SINSW) submitted to the Department of Planning, Industry and Environment (DPIE) the response to submissions for the new primary school in Edmondson Park. On 24 September 2021, DPIE issued a request for additional information (RFI). The RFI requests a response on:

- Whether the proposed school access on Faulkner Way was modelled in the AECOM modelling;
- A perceived error in the traffic flows and addressing the need for the provision of an interim roundabout at the intersection of Buchan Avenue and Faulkner Way;
- Inclusion of multi-line marking on the Games Court;
- Confirmation the Unexpected Finds Protocol has been prepared or reviewed by consultant that are appropriately certified;
- Submission of a street parking demand survey reviewing usage and availability of street parking in the vicinity of the site to support the proposed reduced on-site parking provision during operation and off-site parking proposed during construction;
- Clarification regarding DA670/2021 regarding site preparation and bulk earthworks for the site; and
- Clarification regarding the location of construction access, waste storage and construction worker parking on Lot 2, and whether this is included as part of the identified site area associated with the proposal.

Whilst submissions were received from various agencies in relation to the previously submitted RtS response, DPIE has confirmed that SINSW is only required to respond to the matters raised in the abovementioned RFI. Notwithstanding this, and to assist DPIE in finalising its assessment of the subject SSDA, Section 4 of this letter provides an updated list of mitigation measures reflecting the submissions from:

- Government Architect NSW (GANSW) – delivery of landscaping and ongoing maintenance;
- Environmental Protection Authority (EPA) – removal of requirement for Section B Site Audit Statement;
- EPA – commitment to engage a site auditor and implement the UFP during works;
- Rural Fire Services (RFS) - Condition for an asset protection zone and vegetation management plan;
- Council – environmental health conditions; and
- Council – development engineering conditions.

This report has been prepared in response to the matters raised in DPIE's RFI, on behalf of SINSW.

The table at **Appendix 1** provides a response to each matter raised, where relevant, and should be read in conjunction with the following annexures:

- **Appendix 2-** Amended Architectural Plans prepared by TKD dated 12 October 2021
- **Appendix 3-** Amended Landscape Plans prepared by Oculus dated 8 October 2021
- **Appendix 4-** Construction Methodology Plan prepared by Richard Crookes Constructions dated 11 October 2021
- **Appendix 5-** Review of Unexpected Finds Protocol Letter prepared by JBS&G dated 7 October 2021
- **Appendix 6-** Traffic Response Letter prepared by PTC dated 12 October 2021
- **Appendix 7 –** Amended Preliminary Construction Traffic Management Plan prepared by PTC dated 12 October 2021
- **Appendix 8-** Amended to Ecological Sustainable Development Report prepared by JHA Services dated 12 October 2021

We note that minor amendments have been made to the proposed development, specifically, removal of the site preparation and bulk earthworks from the SSDA, noting consent will be granted shortly by Liverpool City Council (Council) under DA670/2021 for the same site preparation and bulk earthworks scope. Whilst two (2) consents may apply to the same scope under two (2) separate DAs, it is SINSW's preference to clearly delineate the early works scope under the early works DA and the main building works scope under the SSDA.

In addition to the above, minor amendments are proposed to the landscape design, sun shades on the Faulkner Way facade and Preliminary Construction Traffic Management Plan (PCTMP). These amendments have been made as a result of further design development and to ensure the timely delivery of the school in the context of road infrastructure delivery surrounding the site. These amendments are addressed in Section 2 below. Section 6 undertakes an assessment of the proposed changes having regard to the SEARs as issued by DPIE on 10 December 2020.

## **2. Description of Proposed Amendments**

The following amendments have been incorporated into the proposal:

- Removal of the site preparation and bulk earthworks scope from SSD-10224. This scope of work is likely to be approved by Council in the short term pursuant to DA670/2021;
- Minor amendments to the landscape design/plans;
- Amendment to the sun shades on the Faulkner Way façade; and
- Minor amendment to the PCTMP prepared by PTC to nominate an alternate construction route in the event that the new intersection at Soldiers Parade and Buchan Avenue is not complete/operational in time for the commencement of construction.

Each of these amendments is discussed in further detail below.

### **2.1 Site preparation and bulk earthworks**

SINSW seeks an amendment to SSD-10224 to remove the proposed site preparation and bulk earthworks scope from the subject SSDA. As DPIE would be aware, concurrent consent is being sought from Council for the site preparation and bulk earthworks pursuant to DA670/2021. As discussed in the EIS and RtS, the purpose of lodging a separate local DA was to expedite the construction programme and assist in delivering the new primary school by Day 1 Term 1 2023. SINSW has reviewed the draft conditions for DA670/2021 and development consent is anticipated to be issued imminently by Council.

### **2.2 Landscape Amendments**

SINSW seeks an amendment to the Landscape Plans prepared by Oculus. The changes are detailed below and illustrated in Appendix 2.

**General**

- Paving materials finalised including coloured concrete banding to the amphitheatre
- Mechanical enclosures, fire pump room and hydrant locations finalised and access to services coordinated
- Bike and scooter parking numbers and locations finalised
- 600mm wide brick edges added to paths over 1:20 to improve accessibility
- All levels finalised

**Forecourt**

- Length of walls to forecourt decreased

**Amphitheatre**

- Design of amphitheatre bleachers modified to prevent falls over 400mm
- Retaining walls to the north of the northern bleachers removed
- Planting added to the north of southern bleachers

**COLA and Outdoor Classrooms**

- Concrete replaced with deco granite to canteen and COLA areas
- Outdoor classroom seat materials and layouts finalised

**Central Playspaces**

- Seating removed from the passive recreation space
- Outdoor play and gathering area developed to include line marked games, areas of softfall and timber steppers
- Seating wall added to the south of passive recreation space

**SSU Courtyard**

- The design of the SSU courtyard has been finalised, including the removal of green wall
- Design of Faulkner Way ramp modified for final levels
- Tree species to the north of Block A have been changed to prevent overshadowing to solar panels

**Preschool**

- Preschool play space detailed and accessible space expanded
- Access ramp to the west of stair 4 redesigned
- Paving and ramp between preschool and carpark resolved to minimise paving materials

**Sports Court**

- Inclusive access provided to the sports court
- Sports court line markings added as per Education Facilities Standards and Guidelines requirements

**Edible Gardens**

- Edible gardens detailed with timber sleeper garden beds and trellis archways

**2.3 Façade Changes**

As shown on the Amended Architectural Plans in Appendix 2, SINSW seeks consent to amend the design of the sun-shades on the western elevation of the Faulkner Way building. The changes involve:

- Ground floor shading devices with horizontal blades only;
- Intermediate vertical blades removed from 2,140mm wide windows;
- Vertical blade elements removed from every second 800mm wide window, providing horizontal shading device only; and
- Blade depths consolidated to two proprietary dimensions – 427mm and 727mm.

Refer to the following images.



Figure 1: Extract of western elevation (Faulkner Way) as submitted in the RtS (Source: TKD)

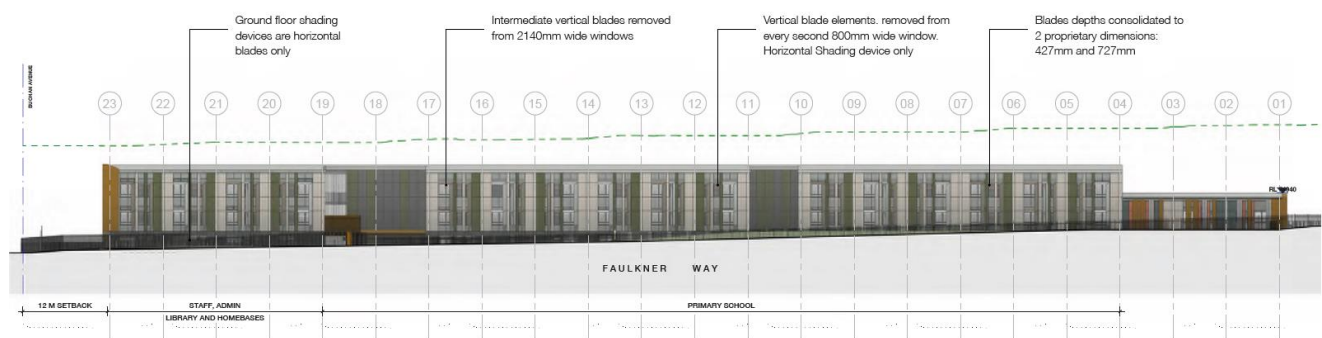


Figure 2: Extract of amendment to western elevation (Faulkner Way) (Source: TKD)

## 2.4 Alternate Construction Access Route

PTC has prepared an Amended PCTMP in Appendix 7. Minor amendments are proposed to the construction route in the event the new intersection at Soldiers Parade and Buchan Avenue is not complete/operational in time for the commencement of works. The original/preferred route means construction vehicles travel on Soldiers Parade and enter Buchan Avenue by turning left/right. However, this was on the basis that the intersection of Buchan Avenue/Soldiers Parade is complete. In the event construction of the intersection is not complete/operational, an alternate route is proposed as depicted in Appendix 7. Construction vehicles will continue along Camden Valley Way, then left into Rynan Avenue and weave southbound through the existing residential area to reach the site. It is to be noted that following completion of the new intersection, construction vehicles will revert to the original route.

### 3. Justification for Proposed Amendments

SINSW seeks to remove the site preparation and bulk earthworks from the SSDA in response to DPIE's feedback dated 24 September 2021. This amendment seeks to ensure consent for the described early works scope will be granted under a single Part 4 application to ensure a more seamless practical outcome for the post-consent process.

The landscape and architectural design amendments are the result of ongoing design development.

The alternate construction access route is proposed in the event that the Soldiers Parade/Buchan Avenue intersection is not complete in time to commence construction, in doing so, ensuring the timely delivery of the stimulus project.

### 4. Strategic and Statutory Context

The modifications involve the removal of the site preparation and bulk earthworks scope from the SSDA (as approval will be granted by Council in DA670/2021), minor amendments to the architectural and landscape design/plans and construction route detailed in the PCTMP. None of these modifications result in any change in the strategic or statutory context of the site/development from the original assessment in the EIS dated 11 June 2021 and the RtS dated 30 August 2021. Section 6 of this letter undertakes a detailed environmental assessment of the changes.

### 5. Community Engagement

No additional community engagement has been undertaken for the proposed amendments.

With regard to the removal of the bulk earthworks/site preparation scope, this amendment will reduce the overall level of "impact" of the development that is the subject of this application. Furthermore, the amendments to the architectural design, landscape design and construction route are minor and do not alter the use, nature or intent of the proposal. No further engagement is therefore considered to be necessary in this regard.

### 6. Response to SEARs – Environmental Assessment

The proposed modifications outlined in Section 2 above are assessed having regard to the SEARs below, to determine any change in the environmental assessment of the proposed development in the original EIS.

Table 1 Response to SEARs

SEAR	Response having regard to RtS/amended proposal
General requirements – QS report/CIV	The CIV for the SSD will be reduced with the removal of the bulk earthworks and site preparation works. At this late stage in the assessment process, an updated CIV/QS report is not considered to be necessary.
1 – Statutory and Strategic Context	No change to the original assessment in the EIS dated 11 June 2021.
2 – Policies	No change to the original assessment in the EIS dated 11 June 2021.
3 – Built Form and Urban Design	As a result of ongoing design development, the sun-shades on the western elevation of the Faulkner Way building are proposed to be amended to "rationalise" the design of the façade. In the amended design, TKD has sought to maintain a well-articulated façade to the Faulkner Way streetscape. This is depicted in the Amended Architectural Plans prepared by TKD (Appendix 2). The proposed built form modifications are minor and positive, and the detailed assessment undertaken in the EIS dated 11 June 2021 remains unchanged. Mitigate measure A1 is required to be updated to reflect this change.
4 – Tree Removal and Landscaping	In response to Council's submission, Oculus has clearly identified multi-line markings on the Games Court. In addition, other minor landscape changes

SEAR	Response having regard to RtS/amended proposal
	are proposed as a result of ongoing design development. They further enhance the quality of the overall landscape design. The detailed assessment undertaken in Section 7.2 of the EIS dated 11 June 2021 remains unchanged. Mitigation measure A2 is required to be updated, as per Table 2 below, to reflect the amended Landscape Plans dated 8 October 2021.
5 – Environmental Amenity	The proposed change to the western elevation of the Faulkner Way building alters the visual presentation of the building to the streetscape. It is assessed that the amended design results in a reduced visual impact, as it involves rationalising the façade design and reducing the overall bulk of the building when viewed from the streetscape. The building separation from the boundary remains unchanged. The proposal results in minimal environment impacts on surrounding development. Refer to Section 7.3 of this EIS.
6 – Transport and Accessibility	<p>PTC has prepared a detailed response to the matters raised by Council and DPIE in Appendix 6. The environmental assessment from a traffic and parking perspective remains generally unchanged from that undertaken in the EIS dated 11 June 2021 and the RtS dated 30 August 2021. This response provides supplementary advice to:</p> <ul style="list-style-type: none"> <li>• Reaffirm a roundabout is not required at Faulkner Way and Buchan Avenue Intersection; and</li> <li>• There will be sufficient parking provision during construction and operation for the proposal.</li> </ul> <p>The alternate construction route is proposed to ensure the construction of the new primary school can be delivered in accordance with the construction programme, in the event that the intersection of Buchan Avenue and Soldiers Parade is not yet complete by Landcom. Once the intersection is operational, construction vehicles for the new primary school will utilise this route.</p>
7 – Ecologically Sustainable Development	JHA confirm in Appendix 7 that the proposal continues to achieve relevant standards from an ESD perspective in the context of the minor façade change on Faulkner Way.
8 – Heritage	No change to the original assessment in the EIS dated 11 June 2021.
9 – Aboriginal Cultural Heritage	As the site preparation and bulk earthworks scope is proposed to be removed from the subject SSDA, the relevant mitigation measures for the preparation of an UFP for Aboriginal objects may be deleted in Table 2. The consent for DA670/2021 addresses these requirements.
10 – Social Impacts	No change to the original assessment in the EIS dated 11 June 2021.
11 – Noise and Vibration	No change to the original assessment in the EIS dated 11 June 2021 and as amended in the RtS dated 30 August 2021.
12 – Biodiversity	No change to the original assessment in the EIS dated 11 June 2021.
13 - Contributions	No change to the original assessment in the EIS dated 11 June 2021.
14 - Staging	No change to the original assessment in the EIS dated 11 June 2021.
15 – Utilities	No change to the original assessment in the EIS dated 11 June 2021 and as amended in the RtS dated 30 August 2021.
16 – Stormwater Drainage	No change to the original assessment in the EIS dated 11 June 2021.
17 - Flooding	No change to the original assessment in the EIS dated 11 June 2021.
18 – Soil and Water	No change to the original assessment in the EIS dated 11 June 2021.
19 - Waste	RCC has illustrated in Appendix 5 the location of waste storage during construction. The original assessment in the EIS dated 11 June 2021 remains otherwise unchanged.



SEAR	Response having regard to RtS/amended proposal
20 – Contamination	In response to the EPA submission, mitigation measure B29 has been deleted as a Section B Site Audit Statement is no longer required.
21 – Bushfire	No change to the original assessment in the EIS dated 11 June 2021 and as amended in the RtS dated 30 August 2021.
Plans and Documents	Not applicable.
Consultation	SINSW provided a detailed response to the issues raised during the public notification/consultation on 30 August 2021. This letter and accompanying appendices provide a response to DPIE's request for additional information dated 24 September 2021.

Having regard to the above assessment, we consider the proposed amendments to the proposal are minor and will not result in any adverse environmental impact. In fact, the proposed amendments will result in a positive impact in terms of play space and parking during operation and construction. Further, the SEARs have been satisfied in the assessment above, where relevant, having regard to the modified proposal. Given the minor scale and nature of the amendments, we consider that notification of the amended plans is not warranted.

## 7. Updated Table of Commitments/Mitigation Measures

Below is an updated table of commitments/mitigation measures based on the outcomes from Sections 2 and 6 of this RTS above. All proposed changes are in red.

Table 2 Mitigation Measures

ID	Mitigation Measures
<b>Part A - Administration</b>	
A1	The development is to be carried out in accordance with the Architectural Plans prepared by TKD dated 12 October 2021.
A2	The development is to be carried out in accordance with the Landscape Plans prepared by Oculus dated 8 October 2021.
A3	No imposition of a contribution for the project in the Notice of Decision.
A4	Development consent is not granted for bulk earthworks and site preparation works approved under DA670/2021, issued by Liverpool City Council on [insert date].
<b>Part B - Prior to Commencement of Construction</b>	
B1	Prior to commencement of lighting installation, evidence must be submitted to the satisfaction of the Certifying Authority that all outdoor lighting within the site has been designed to comply with AS 1158.3.1:2005 Lighting for roads and public spaces – Pedestrian area (Category P) lighting – Performance and design requirements and AS 4282-2019 Control of the obtrusive effects of outdoor lighting.
B2	Lead contractor is to induct all subcontractor to ensure procedures are followed by vehicles entering and exiting the construction site.
B3	Prior to the commencement of works, a traffic control plan is to be prepared to demonstrate the changed road conditions during construction.
B4	Prior to the commencement of works, an emergency management plan is to be prepared to confirm access for emergency vehicles to the site, if required.
B5	Prior to the commencement of construction, unless otherwise agreed by the Planning Secretary, the Applicant must demonstrate that ESD is being achieved by registering for a minimum 5-star Green Star rating with the Green Building Council Australia and submit evidence of registration to the Certifying Authority.
B6	<del>Prior to the commencement of works, prepare an unexpected finds protocol for the handling unexpected Aboriginal objects or human remains as documented by KNC in Appendix O.</del>

ID	Mitigation Measures
B7 B6	Prior to the commencement of construction, prepare a detailed CMP addressing noise, dust, traffic and construction parking mitigation measures.
B8 B7	Strategically locate and select mechanical plant to ensure cumulative noise at the receiver boundaries is not adverse <b>and is in accordance with the recommendations in Noise and Vibration Impact Assessment dated 12 August 2021.</b>
B9 B8	Acoustically assess the public address and school bell systems once the location, number and type of loudspeakers has been nominated and assess in detail noise impacts from the railway line.
B10 B9	Undertake a detailed assessment of the sound insulation performance of the façade.
B11 B10	Prepare a detailed CNVMP to assess noise impacts of construction works and include a protocol to minimise potential noise impacts to sensitive receivers.
B12 B11	Prior to commencement of works, prepare and implement a CEMP including details of 15 on-site construction parking spaces.
B13 B12	Prior to commencement of works, obtain approvals from relevant service providers to deliver utility infrastructure.
B14 B13	Prior to the commencement of construction, the applicant must design an operational stormwater management system for the development. The system must: (a) be designed by a suitably qualified and experienced person(s); (b) be generally in accordance with the conceptual design in the EIS; (c) be in accordance with applicable Australian Standards; (d) ensure that the system capacity has been designed in accordance with Australian Rainfall and Runoff (Engineers Australia, 2016) and Managing Urban Stormwater: Council Handbook (EPA, 1997) guidelines. <b>Copy of stormwater plans to be provided to Council.</b>
B15 B14	Prior to the commencement of any works, prepare and implement a sediment and erosion control plan in accordance with Council's requirements and Managing Urban Stormwater Soil and Construction 2004 (Blue Book).
B16 B15	Ensure routes for movement of waste from work site to the storage area are clear of obstructions. Similarly, between waste storage and collection points.
B17 B16	Ensure collection activities will not be compromised by construction-related activities.
B18 B17	Waste is to be left on-site unless it is part of a valid reuse on site.
B19 B18	Vehicles entering and exiting the site are to have their loads covered.
B20 B19	To avoid tracking material on surrounding roads, vehicles are to be cleaned of dirt, sand or other material.
B21 B20	Following completion of construction works, the work site is to be left clear of waste and debris.
B22	<del>Prior to commencement of works, prepare an unexpected finds protocol to establish a framework for management should any isolated unexpected contamination occurrences be identified and accordingly will be disposed of appropriately.</del> <b>The unexpected finds protocol is to outline that if remediation is required a site auditor be engaged.</b>
B23 B21	Materials and landscaping to comply with the performance objectives of an inner protection area as outlined in Appendix 4 of PBP <b>and, in accordance with the Landscape Masterplan (Ref: LA-W-REP-100-A, revision E, dated 8 October 2021, prepared by Oculus) and the recommendations in Section 4.2 of the Bushfire Assessment Report (Ref: 21047 dated 12 May 2021, prepared by Peterson Bushfire).</b>
B24 B22	Building located wholly or partially within BAL-12.5 being the southern 10 metres of the school buildings fronting Faulkner Way are to be designed and construction to comply with BAL-12.5 in accordance with AS3959-2019 <i>Construction of buildings in bushfire-prone areas</i> .



ID	Mitigation Measures
<del>B25</del> <b>B23</b>	Install fire hydrants complying PBP and AS2419.1-2005 <i>Fire Hydrant Installations - System Design, Installation and Commissioning</i> . Install and maintain gas services in accordance with AS/NS1596-2014 <i>The storage and handling of LP gas</i> .
<del>B26</del> <b>B24</b>	<del>Prior to the commencement of construction, evidence of compliance with this condition from an appropriately qualified person is to be provided and that the requirements are referenced on any certified plans.</del>
<del>B27</del> <b>B25</b>	Prior to commencing works on-site, all construction personnel are to be advised that the site is a former military area and accordingly there is a very remote possibility that UXO may be unexpectedly encountered.
<del>B28</del> <b>B26</b>	Prior to commencing works on-site the primary contractor is to induct all site personnel that there is a UXO Management Protocol in place and to follow the procedure in the unlikely event an EO, UXO and EOW is discovered at the primary school site.
<del>B29</del> <b>B27</b>	Prior to commencing works on-site, prepare an accurate survey locating the development with respect to the rail boundary.
<del>B30</del> <b>B28</b>	Prior to commencing works on-site, engage an electrolysis expert to prepare a report on Electrolysis Risk to the development from stray currents from the railway line to the south.
<del>B31</del>	<del>Prior to commencing works on-site, provide certification from a qualified Geotechnical and Structural Engineer stating the proposed works will have no adverse impact on the rail corridor and associated infrastructure.</del>
<del>B32</del> <b>B29</b>	Prior to commencing works, provide documentary evidence to Endeavour Energy confirming satisfactory arrangements have been made for the connection of electricity and design requirement of the substation.
<del>B33</del> <b>B30</b>	Within six months of the commencement of construction, the Applicant must provide written evidence to the satisfaction of the Planning Secretary demonstrating that approval pursuant to Section 138 of the Roads Act 1992 has been obtained from Liverpool City Council for the detailed design and construction of the following infrastructure works: a. Two pedestrian crossings, one across Faulkner Way and the other across Buchan Avenue; b. Pedestrian fence at the south-east corner of the intersection of Faulkner Way and Buchan Avenue; c. New driveway crossover on the south-west corner of the site adjoining Faulkner Way; d. New driveway crossover on the south boundary adjoining the future South Road; e. Bus stop on the northern side of Buchan Avenue and 30 metre bus zone; and f. Signposting for drop-off and pick-up on Faulkner Way and Buchan Avenue. <b>Note:</b> Pursuant to Clause 4.42(1) of the <i>Environmental Planning and Assessment Act 1979</i> , any authorisation under S138 of the Roads Act 1993 cannot be refused if it is necessary for carrying out SSD that is authorised by a development consent and is substantially consistent with the consent.
<b>B31</b>	<b>The bus stop on the north of Buchan Avenue is to be designed in accordance with the Disability Discrimination Act 2002 (DDA), Disability Standards for Accessible Public Transport (DSAPT) and the Guidelines for assessing compliance of bus stops with the Disability Standards for Accessible Public Transport 2002.</b>
<b>B32</b>	<b>A dilapidation report of all infrastructure fronting the development in Buchan Avenue and Faulkner Way 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 50m either side of the development.</b>
<b>Part C - During Construction</b>	
<b>C1</b>	Construction hours are to be limited to: Monday to Friday: 7.00am to 6.00pm Saturday: 8.00am to 1.00pm Sunday and Public Holidays: No excavation or construction works
<b>C2</b>	Public roads and rail corridor access gate are not to be obstructed by vehicles, materials, refuse skips and the like, during construction.

ID	Mitigation Measures
C3	Construction vehicles are limited to a maximum of 25 metre prime mover. Should an oversized vehicle be required, a permit is to be sought from TfNSW prior.
C4	<del>The procedures documented in Appendix O for handling unexpected Aboriginal objects or human remains are to be followed in the event an object/remain is revealed during construction activity.</del>
C5 C4	Maintain a complaint register during construction.
C6 C5	Incorporate security arrangements as such security cameras to minimise risk of school grounds being damaged.
C7 C6	To minimise the impact of the urban heat island effect, provide tree canopy cover at 40% of the site area and shading devices to reduce surface temperatures.
C8 C7	Provide external glazing facing Buchan Avenue and Faulkner Way to provide a minimum sound reduction index of Rw35. A 10.38mm laminated fixed single glazing system achieves the nominated sound reduction index.
C9 C8	If vibration intensive plant is anticipated to be in close proximity of the minimum safe working distances for construction plant, the contractor must engage a qualified engineer to carry out a vibration survey to assess potential risks.
C10 C9	Construction hours are to be limited to: Monday to Friday: 7.00am to 6.00pm Saturday: 8.00am to 1.00pm Sunday and Public Holidays: No excavation or construction works.
C11 C10	If required, engage a suitably qualified expert to undertake a geotechnical assessment of the upper subsurface profile which has topsoil properties to assess its suitability for reuse/blending.
C12 C11	If permanent batter slope in excess of 4 metres is required, undertake global stability analysis to confirm the geometric design.
C13 C12	Undertake CBR testing of proposed pavement areas.
C14 C13	Undertake proof roll inspections.
C15 C14	Inspect and test engineered fill to Level 1 control by a GITA.
C16 C15	Review of Level 1 report by a geotechnical engineer.
C17 C16	Undertake footing and pile inspections.
C18 C17	Undertake density testing of all unbound granular pavement material to at least Level 2 control by a GTA.
C19 C18	During construction works on-site, ensure intra-day respite periods are undertaken from high noise generating construction activities such as an excavator and pile rigger.
C19	Dust screens are to be erected and maintained in good repair around the perimeter of the site during construction works.
C20	All construction delivery vehicles departing from the site shall have their loads fully covered before entering the public roadway.
<b>Part D - Prior to Occupation</b>	
D1	Prior to the commencement of operation, the School Transport Plan must be submitted to the satisfaction of the Planning Secretary to promote use of active and sustainable transport mode.
D2	Develop and implement a local employment/recruitment strategy to increase the number of persons employed from the local and wider study area.

ID	Mitigation Measures
D3	Arrange for a licensed waste contractor to be responsible for the removal of waste for the new primary school. The contract shall include provisions for collection of potentially hazardous waste including e-waste.
D4	Prepare a Bushfire Emergency Management and Evacuation Plan prior to occupation consistent with A Guide for Developing a Bush Fire Emergency Management and Evacuation Plan and NSW RFS Schools Program and/or AS3745:2010 Planning for emergencies in facilities. A copy is to be provided to the Local Emergency Management Committee.
D5	Obtain approval for the provision of school zones.
D6	Prepare a Vegetation Management Plan to ensure the site is managed as an Inner Protection Zone in accordance with the Bushfire Report prepared by Petersons Bushfire dated 12 May 2021.
D7	Written certification is to be provided by a suitably qualified acoustic consultant to the relevant certifying authority confirming the development meets the recommendations and achieves compliance with relevant acoustic standards.
D8	Notify Council of the canteen/food premises and ensure the registration form is completed with any relevant fee.
D9	The PCA ensure that stormwater pre-treatment system has been completed in accordance with the approved system and be registered on title.
<b>Part E - Post Occupation</b>	
E1	The School Travel Plan must be updated annually and implemented.
E2	Implement the School Travel Plan prepared by PTC dated May 2021.
E3	Maintain a complaint register post occupation.
E4	Develop a partnership with Council to manage community use of nominated facilities, if required.
E5	Incorporate a 'buddy' program to provide pre-school students the opportunity to interact and engage with primary school students.
E6	Operate the school bell system such that the system does not interfere unreasonably with the comfort and repose of the nearby residences.
E7	To minimise noise impacts on residential receivers, minimise frequency of amplified music events during the evening (as feasible).
E8	Inform the community of noisy events and no events to be held between 10pm and 7am.
E9	Provide a contact number of the relevant persons employed to communicate with the community during noisy events.
E10	Waste collection vehicles are not to obstruct access to adjacent premises, roadways, the footpath or primary pedestrian entrances to the school on Buchan Avenue or Faulkner Way.
E11	Ensure waste collection is carried out with due care for public safety, including other road users, cyclists and pedestrians.
E12	Waste collection is to occur outside of school hours, reducing risk associated with truck and bin movements. This includes prior to 8am or after 4pm on school days. Recommended times by EcCell are between 6.00am and 7.30am.
E13	Provision of signage in all waste disposal, storage and collection points to illustrate how to use the waste management system.
E14	As required, the DoE/Principal to update the Bushfire Emergency Management and Evacuation Plan.
E15	Manage community use of school facilities in accordance with the DoE's policy.
E16	Ensure landscaping is appropriately maintained and pruned to ensure planting and trees become well-established and do not become overgrown in long-term.
E17	Manage APZ in accordance with the Vegetation Management Plan required by mitigation measure D4.

## **8. Response to other matters raised**

In attachment C (development engineering requirements) in Council's referral response, it is requested that street lighting be provided for all new and existing streets within the proposed development to Council's standard. In response, we note that Landcom is responsible for the delivery of street lighting on Buchan Avenue, Faulkner Way and the future south road. Hence street lighting has not been included in the scope of, or mitigation measures for, the proposed development.

## **9. Conclusion**

Based on the discussion contained within this RtS/amendment report and the accompanying documentation, we consider that all of the matters raised by DPIE in the RFI have been satisfactorily addressed with minimal alteration to the environmental impacts of the proposed works as originally proposed.

Given the environmental planning merits and significant public benefits proposed by this application (as amended), we recommend that the proposal be approved.

Should you wish to discuss, please do not hesitate to contact the undersigned or Olivia Page on (02) 9068 7500 or [oliviap@gyde.com.au](mailto:oliviap@gyde.com.au).

Yours sincerely,



Mel Krzus  
**Director**

**Appendix 1**  
Response to DPIE RFI Matrix

Agency	Summary of Matters Raised	Proponent's Response
<b>Department of Planning, Industry and Environment</b>	Response to traffic and transport comments and request updates to Games Court raised in Council advice.	-
	<ul style="list-style-type: none"> <li>It should be noted that the VISSIM model of the area prepared by AECOM as part of the Transport Management and Accessibility Plan for Edmondson Park South – Concept Plan (MOD 5) has not been endorsed by Council. The proponent needs to confirm whether the proposed access to the school off Faulkner Way was previously modelled in the AECOM traffic models.</li> <li>The SIDRA results in Attachment 1 of the traffic advice prepared by PTC show errors on the forecast traffic flows along Faulkner Way with only 14 vehicles in AM peak hour and 3 vehicles in PM peak hour. The vehicular trips in and out of the schools normally occur within the same hour during AM and PM peaks. Hence, it is recommended that an interim roundabout is to be installed at the intersection of Buchan Avenue/Faulkner Way when the student number reaches the required threshold. The threshold is to be identified and confirmed by Council. An interim roundabout is requested as a signalised intersection might be required as an ultimate treatment when the high school site is developed and operational.</li> </ul>	<p>To PTC's knowledge Faulkner Way/Buchan Avenue intersection was not previously modelled by AECOM. However, the master planning for Edmondson Park anticipated a school at the site. In a modification to the concept plan (MOD5), two schools (primary and high school), with combined number of students of 3,000 was included. Accordingly, the land use and student population were considered. We note this SSD seeks consent for the primary school only. While the intersection itself appears not to be modelled, the intersection was modelled by PTC in the RtS.</p> <p>PTC confirms in Appendix 6 that there are no errors in the traffic advice provided, rather, it is based on the assumption that following drop-off and pick-up on Faulkner Way, parents will continue on and turn left or right at the southern end of Faulkner Way instead of undertaking U-turns. U-turns are less convenient and not advised. PTC also assumes no students will arrive from the south, this is reasonable given the drop-off and pick-up is situated on the east of Faulkner Way. PTC has taken a theoretical view that 20% of vehicles will undertake a U-turn to exit Buchan Avenue/Faulkner Way intersection, though in reality is expected to be less. Appendix 6 illustrates the traffic distribution accordingly. PTC details the intersection scenario as existing with no zebra crossings and with zebra crossings (as proposed in the SSDA). The intersection analysis shows that pedestrian movements at the zebra crossing are a major factor contributing toward the reduced performance during school peak hours. PTC conclude that vehicular traffic at a roundabout would be affected by pedestrians the same way as traffic is affected at a priority controlled intersection. Therefore, a roundabout is not likely to improve the overall performance. The removal of the zebra crossings would improve performance, however, is not acceptable from a safety point of view. The zebra crossings will also be supervised to manage traffic and pedestrian flows during school peak. Refer to Appendix 6 for a detailed response to this matter.</p>

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	<ul style="list-style-type: none"> <li>The proposed marked pedestrian crossings and their locations need to be referred to Council's Pedestrian, Active Transport and Traffic Committee for comment.</li> </ul>	PTC confirms the plan was submitted with the SSDA and it is noted the proposal will be put forward to Council's Local Traffic Committee for approval.
	<ul style="list-style-type: none"> <li>It is highly recommended that the Games Courts are provided with multi line markings to provide for a diversity of and multi-purpose uses.</li> </ul>	Oculus has amended the Landscape Plan clearly identifying multi-line markings on the Games Court to facilitate a diversity of multi-purpose uses. Refer to Appendix 3 and amended mitigation measures A2.
	Confirm that the submitted UFP has been prepared, or reviewed and approved, by consultants that are appropriately certified as raised in the EPA advice.	JBS&G has confirmed in Appendix 5 that the UFP has been prepared and approved by a consultant (JBS&G) that is appropriately certified.
	Submission of a Street Parking Demand Survey reviewing usage and availability of street parking in vicinity of the site, to support the proposed reduced on-site parking provision during operation and off-site parking proposed during construction.	In considering the current COVID-19 impact on traffic and parking behaviour and that Buchan Avenue east of Faulkner Way has not yet opened for use, physical surveys are not seen by PTC as a reliable method of assessing parking occupancy. Appendix 6 undertakes analysis of available on-street and off-street parking during construction and operation. There are 15 on-site spaces during construction, 56 on-street parking spaces and 38 possible on-street parking spaces. This results in 109 spaces nearby (on and off-site) being greater than the 65 construction staff (in average) per day on-site. PTC has undertaken a desktop analysis of on-street parking occupancy using Near Maps. It demonstrates there are approximately 340 on-street parking spaces available within a 200- 300 metre from the site. The analysis shows that at least 267 spaces (79%) were vacant. Although reliance on on-street parking during operation is not anticipated, there is available on-street parking, if required.
	Confirmation that site preparation works will continue to form part of the application scope, and if so, confirmation that the application with Council (for the same works) has been withdrawn.	<p>As discussed in detail in Section 2 of this letter, SINSW request an amendment to SSD-10224 to remove the site preparation and bulk earthworks. Consent will likely be granted from Council imminently (DA670/2021) for the site preparation and site bulk earthworks at the site. An amended demolition plan for the SSDA is provided in Appendix 1 to reflect the amended scope. The following mitigation measure is proposed in Table 2 to address this matter:</p> <p><b>Exclusions</b></p> <p>A2. <i>Development consent is not granted for bulk earthworks and site preparation works approved under DA670/2021, issued by Liverpool City Council on [insert date].</i></p> <p>We note this is permitted pursuant to Clause 4.17(1)(g) of the <i>Environmental Planning and Assessment Act 1979</i> as follows:</p> <p><b>4.17 Imposition of conditions</b></p>



Agency	Summary of Matters Raised	Proponent's Response
		<p><i>(cf previous s 80A)</i>  <i>(1) Conditions—generally A condition of development consent may be imposed if—</i>  <i>(g) it modifies details of the development the subject of the development application, or</i></p>
	<p>Clarification regarding the location of construction access, waste storage and construction worker parking on Lot 2, and whether this is included as part of the identified site area associated with the proposal. Updated documents to be provided if site area is expanded.</p>	<p>RCC has prepared a Construction Methodology Plan which can be found at Appendix 4. It is anticipated to form part of the stamped plans for approval. It illustrates:</p> <ul style="list-style-type: none"> <li>• Construction access from Buchan Avenue (two gates) and Faulkner Way (one gate);</li> <li>• Waste storage areas on Lot 1 and 2;</li> <li>• Indicative location of on-site construction parking for 15-spaces on Lot 2; and</li> <li>• Site accommodation/amenities during construction on Lot 2</li> </ul> <p>Refer to the Preliminary Construction Traffic Management Plan prepared by PTC for detail on construction vehicle turning circles and swept paths.</p> <p>Lot 2 does not form part of the site area for the primary school. The primary school is proposed on Lot 1 only as depicted on the plans. Lot 2 is proposed to be used temporarily for the construction period only. It is noted that Lot 2 is also owned by the NSW Department of Education.</p>