Response to Submissions Report

New Primary School at Googong

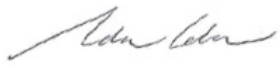
SSD-10326042

On behalf of
NSW Department of Education
September 2021

mecone

Project Director

Adam Coburn



27 September 2021

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This document is for discussion purposes only unless signed and dated by the persons identified. This document has been reviewed by the Project Director.

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1 Introduction

This Response to Submissions (RtS) report has been prepared by Mecone NSW Pty Limited on behalf of the NSW Department of Education (DoE) to support the proposed primary school in Googong, NSW (SSD-10326042).

The Environmental Impact Statement (EIS) for the project was exhibited from 17 June 2021 to 14 July 2021. A total of 11 submissions were received (one objection and 10 comments or supports).

The Department of Planning, Industry and Environment (DPIE) addressed a letter to DoE dated 23 July 2021 outlining key issues and requesting a response to the submissions received during exhibition of the EIS.

This RtS addresses the issues raised in DPIE's letter and in the submissions received during exhibition. This RtS also describes changes to the proposal made since exhibition of the EIS.

This RtS is accompanied by, and should be read in conjunction with, the following supporting plans and reports:

- Appendix 1: Updated architectural drawings by Pedavoli Architects.
- Appendix 2: Updated landscape drawings by TaylorBrammar.
- Appendix 3: Updated civil report and drawings by Northrop.
- Appendix 4: Updated Operational Waste Management Plan by EcCell.
- Appendix 5: Updated Arboricultural Impact Assessment by Wade Ryan Contracting.
- Appendix 6: Response to SDRP comments by Pedavoli Architects.
- Appendix 7: Public domain drawing by Northrop.
- Appendix 8: Traffic cover letter by Ason Group.
- Appendix 9: Updated Infrastructure Management Plan by Norman Disney & Young.
- Appendix 10: Updated Acoustic Assessment by Pulse White Noise Acoustics.
- Appendix 11a: Solar glare analysis by Aviation Projects
- Appendix 11b: CASA correspondence regarding solar glare analysis

The public domain drawing at Appendix 7 is being submitted to provide clarity for the assessment process and to assist in future discussions with Queanbeyan-Palerang Council regarding any required approvals under Section 138 of the Roads Act 1993.

2 Changes to the proposal

A number of changes to the design are proposed in response to submissions received and as a result of design development. These changes are summarized in the table below. Further detail on some of the key changes are provided in the sections 2.1 to 2.5.

Table 1. Proposed changes to the development

Proposed change	Reason for change
1. Primary kiss-and-ride area moved to Wilkins Way	This change was made in direct response to Council's submission. Refer to section 2.1 below for further detail.

Proposed change	Reason for change
2. Special Education Learning Unit (SELU) kiss-and-ride on Gorman Drive converted to two 15-minute parking spots and two disabled parking spots	After consultation with relevant stakeholders, it was decided that SELU kiss-and-ride is not operationally viable. SELU students will be encouraged to use the kiss-and-ride on Wilkins Way, and the spaces along Gorman Drive will only be used when required. Refer to section 2.2 below for further detail.
3. Two pedestrian crossings on Gorman Drive changed to one mid-block crossing	Change made in response to Council comment. Refer to section 2.3 below for further detail.
4. Car park layout altered to set gate further inside site boundary. Waste pad also relocated	Changes made to meet Australian Standards and to improve waste collection. Refer to section 2.4 below for further detail.
5. Digital pylon sign relocated to corner of Gorman Drive and McPhail Way.	Change made in response to Council's concern of electronic signage facing residential properties. Refer to section 2.5 below for further detail.
6. Block A and C changed from compressed fibre cement to metal cladding (Custom Orb)	Change made to suit comments made by the Government Architect NSW. Refer to Pedavoli's letter at Appendix 6 for further detail.
7. Shade structure moved from sports court area to new kiss-and-ride location	Change made to provide shelter for students when waiting to be picked up from the kiss-and-ride.
8. Minor changes to landscape layout, paths, etc.	Changes made as a result of design development.
9. Bicycle parking removed from front entrance and added to bicycle parking area adjacent the sports court	Change requested by school stakeholders. Total bicycle parking maintained at 60 spaces.
10. Kerb adjustments for Gorman Drive bus bay and parking spaces	Changes made in accordance with comments from TfNSW.
11. Home base façade window layout changes	Change made to ensure compliance with natural ventilation and daylight requirements.
12. Reduced extent of Level 1 concrete walkways	Change made as a result of design development; extent of walkways reduced to meet school requirements.
13. Update to internal layout of Block B Special Education Learning Unit (SELU)	Change made in response to requested by school stakeholders.

An updated site plan is shown in the figure below.

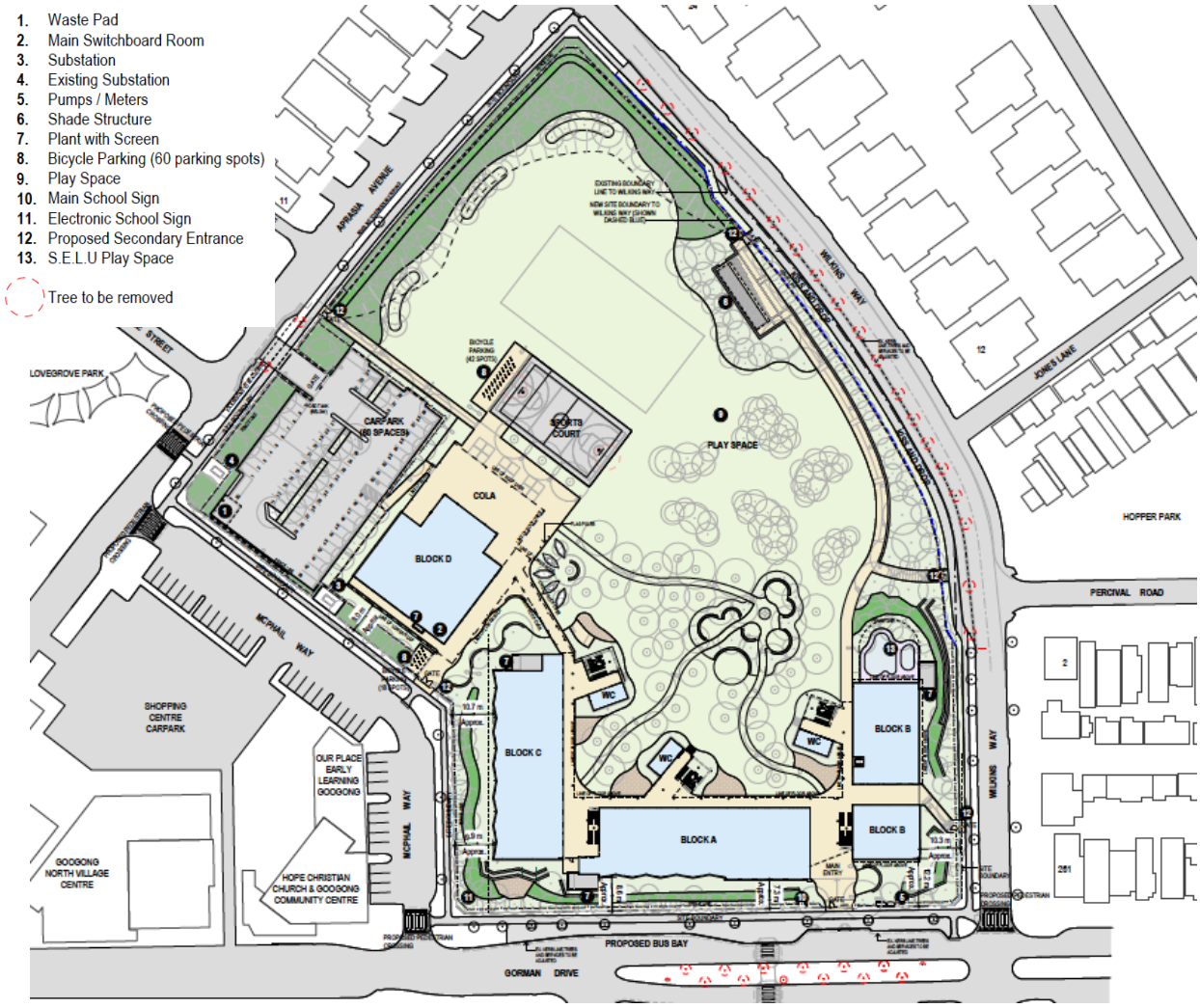

Figure 1: Updated site plan (Source: Pedavoli Architects)

2.1 Revised kiss-and-ride

In its submission, Council advised it did not support the location of the kiss-and-ride along Aprasia Avenue primarily due to issues associated with the narrow width of the road. Council recommended that the kiss-and-ride be relocated to along Wilkins Way (first preference) or within the site (secondary preference). The project team met with Council officers twice following receipt of Council's submission to discuss this matter along with other issues.

Following discussions with Council, the kiss-and-ride area has been relocated to Wilkins Way, consistent with Council's recommendation, as shown in the figure below. The relocated kiss-and-ride will require slight widening of Wilkins Way. The public domain plan at Appendix 7 of the RtS identifies the extent of the works.

The new kiss-and-ride area has 21 bays.

Additionally, there are two accessible spaces and three 15-minute parking spaces along Gorman Drive to cater for special learning students as required. This results in 26 total bays for drop-off and pick-up (increased from 21 total bays as originally proposed).

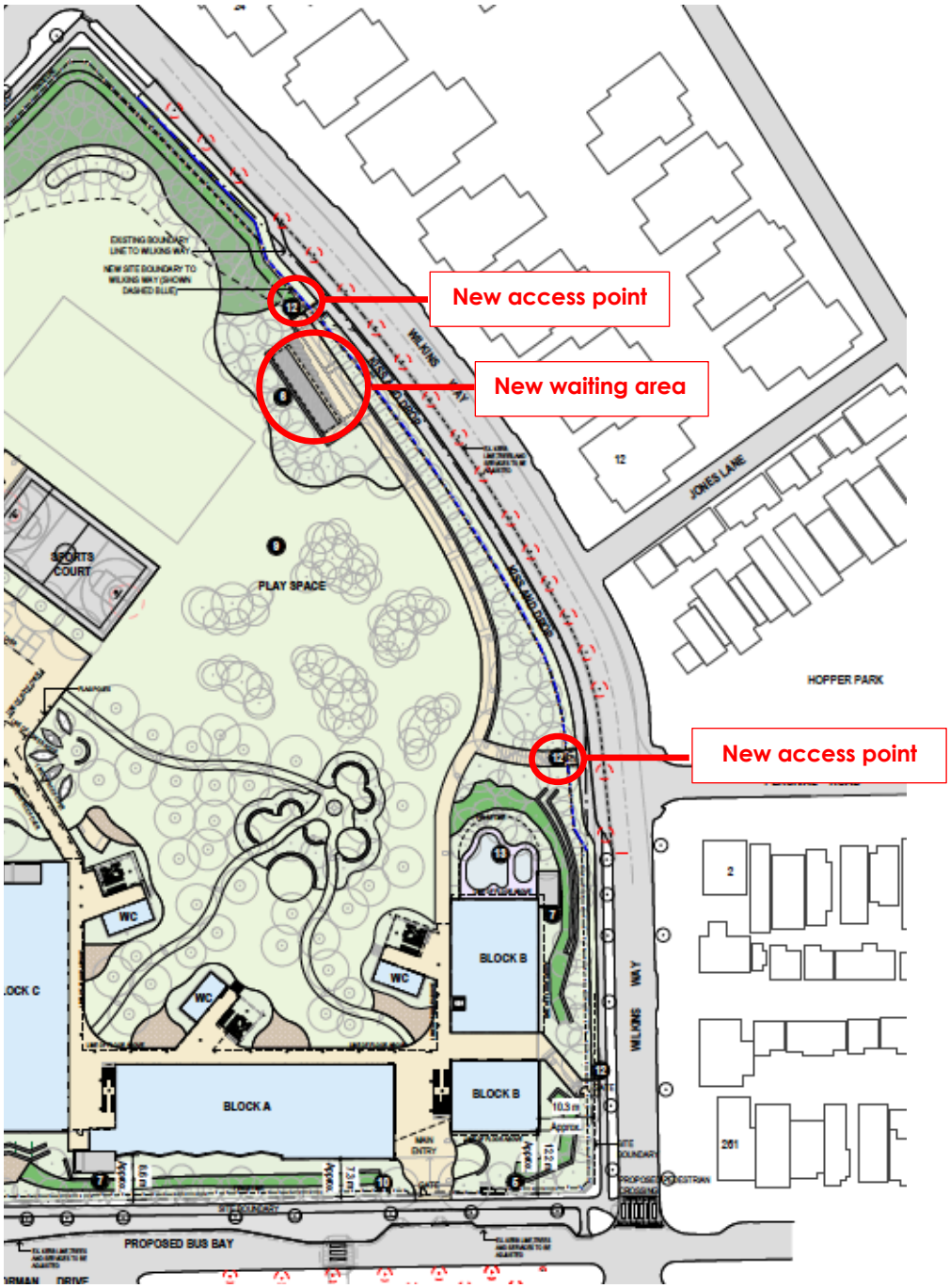

Figure 2: Revised kiss-and-ride location (Source: Pedavoli Architects)

The new kiss-and-ride area is located centrally on the longest boundary of the site, on the highest level, offering clear sight lines for surveillance. The drop-off has been set away from Gorman Drive to reduce traffic congestion around the main school entrance and away from the adjacent commercial precinct. A footpath can be maintained around the perimeter of the site, offering uninterrupted movement of local pedestrians.

New pathway, gates and waiting area

As seen in the figure above, the updated design includes a new pathway, two new access gates and a waiting area with shade shelter along the Wilkins Way frontage.

The new pathway within the site will provide secure access for students entering and exiting the site for drop-off/pick-up, and the waiting area and shade shelter will serve students waiting for pick-up. The waiting area with shelter has been purposefully located at the head of the kiss-and-ride within the site near the Wilkins Way boundary.

The two additional access points have been included at the request of school stakeholders for the purpose of facilitating kiss-and-ride operations.

Management measures

The kiss-and-ride along Wilkins Way will require the establishment of clear rules that are supported by school staff and parents, with regular communication reinforcing the following:

- The kiss-and-ride will be subject to "No Parking" restrictions, whereby vehicles are required to stop for a maximum of two minutes, and the driver is not allowed to be more than 3m away from the vehicle.
- Families shall be assigned a number and timeslot for when their children will be discharged from the school.
- Families that reside within the walking catchment will be encouraged to adopt walking and cycling modes of transport in the afternoon in particular, as pick-up in the afternoon in particular is typically where parking issues are typically experienced at schools.

The rules regulating the kiss-and-ride will form part of the School Travel Plan (STP), which will be subject to consultation with Council as a condition of any future consent.

Impacts to services

The Wilkins Way kiss-and-ride will require modifications to the road and potentially modifications to the existing services beneath the road. An updated Infrastructure Management Plan has been prepared to address this issue (see Appendix 9 – in particular page 13).

There is currently a potable water main and recycled water main running below Wilkins way for the full length of the site boundary. It is anticipated these services will require modifications to suit the new kiss-and-ride and alterations to the roadway. The extent of the modifications to the water mains is not yet known and will depend on a site survey to determine invert levels. All modifications to the services are to be in accordance with Council's direction.

Subdivision

The Wilkins Way kiss-and-ride will require minor widening of the roadway to accommodate the required bays, resulting in a minor change to the site's lot boundary. The future indicative site boundary is shown in blue in the updated architectural site plan.

It is intended that the road widening/boundary realignment be undertaken as exempt development under the provisions of subdivision 38 of *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*.

Works within the Wilkins Way road reserve will also require a section 138 approval under the *Roads Act 1993*.

Acoustic impacts

An updated Acoustic Assessment has been prepared to assess the acoustic impacts associated with the kiss-and-ride location on Wilkins Way (see Appendix 10 – in particular page 40).

The updated assessment has found that kiss-and-ride operations along Wilkins Way will likely result in minor short-term exceedances of the noise criteria. The exceedances will occur on weekdays for approximately 45 minutes during each peak period. The exceedances are consistent with the original assessment of noise impacts associated with the Aprasia Avenue kiss-and-ride operations.

The noise levels above the criteria are worst-case as they are predicted to the front façade of the adjacent dwellings. A review of the existing residential dwellings located

along Wilkins Way shows that private open spaces in all cases are provided in the rear of the property, and modelling indicates full compliance with the 55dBA would be achieved in these rear areas. Additionally, in the event windows are open, internal noise levels of the dwellings would also be with typically accepted levels for windows open scenarios.

Based on the limited daily frequency and time of day during which the exceedances may occur, Pulse White Noise concludes that the Wilkins Way kiss-and-ride will not cause unacceptable acoustic impacts for surrounding residences.

2.2 Revised parking along Gorman Drive

After consultation with relevant stakeholders, it was decided that SELU kiss-and-ride is not necessary or operationally viable, and therefore a separate SELU kiss-and-ride area (originally provided along Gorman Drive) has been removed and replaced with two disabled spaces and two 15-minute parking spaces, as illustrated in the figure below.

SELU students will be encouraged to use the kiss-and-ride on Wilkins Way, and the parking spaces along Gorman Drive will only be used when required.

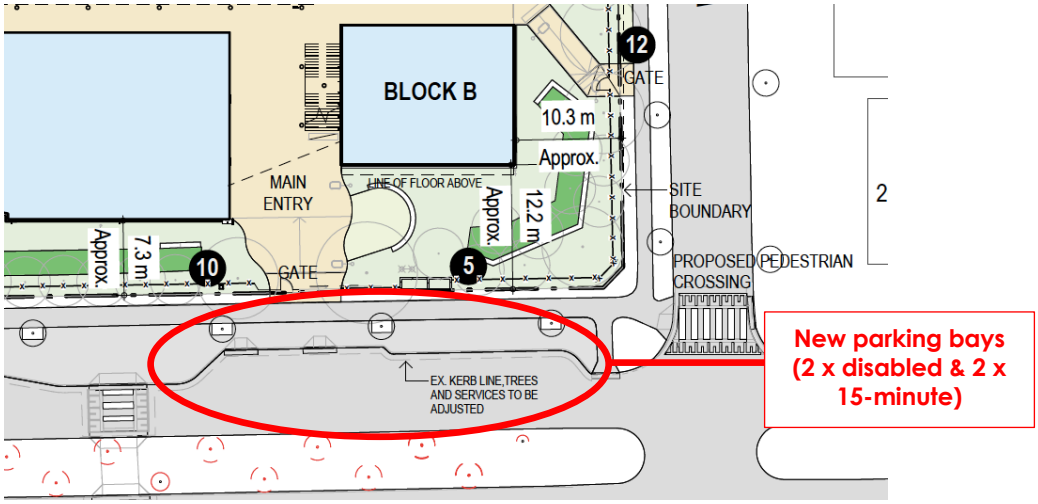

Figure 3: Parking along Gorman Drive (Source: Pedavoli Architects)

2.3 Revised Gorman Drive pedestrian crossing

In its submission Council advised it did not support the number of pedestrian crossings and recommended that the number of crossings be minimised.

In response, the two crossings at either end of the Gormand Drive frontage have been replaced with a single mid-block crossing, as illustrate in the figure below. The location of this crossing was supported by Council officers at a meeting on 9 September 2021.

The mid-block crossing will require removal of Trees 91 to 99 inclusive as identified in the updated Arboricultural Impact Assessment Report at Appendix 5 of this RtS. The trees are all young London Plane trees, each with a canopy spread of approximately 2-3m. The project team considers the tree removal to be acceptable given it will accommodate a pedestrian crossing in a location supported by Council officers.

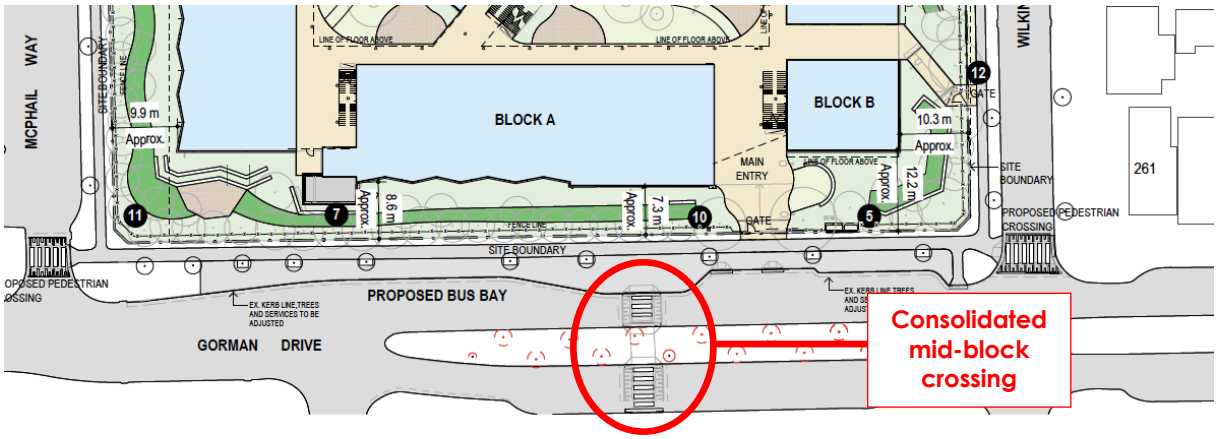

Figure 4: Parking along Gorman Drive (Source: Pedavoli Architects)

2.4 Revised car park layout

The car park layout has been modified slightly as follows:

- The gate has been set back to ensure the carpark is compliant with Australian Standards, allowing for a two-car queuing space.
- The waste pad has been relocated to the northwestern corner of the car park to allow for collection by an 11m front-lifting waste truck.
- The corners of the carpark car park have been "squared off" to allow for appropriate servicing maneuverability.

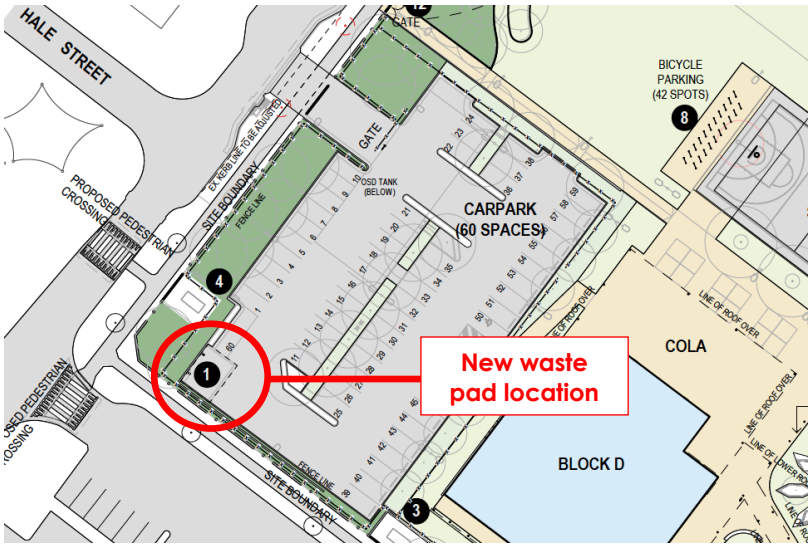

Figure 5: Modified car park layout (Source: Pedavoli Architects)

The total number of parking spaces has been maintained at 60.

An updated Operational Waste Management Plan has been prepared to reflect the revised waste collection area (see Appendix 4).

2.5 Re-located digital pylon sign

A digital pylon sign was originally proposed at the main vehicular entry along Aprasia Avenue, facing the residential properties across the street. In its submission, Council recommended that any proposed illuminated signage should not face residential properties.

In response, the pylon sign has been moved to the corner of Gorman Drive and McPhail Way so that it faces the commercial development across McPhail Way, as illustrated in the figure below. The design of the signage remains unchanged.

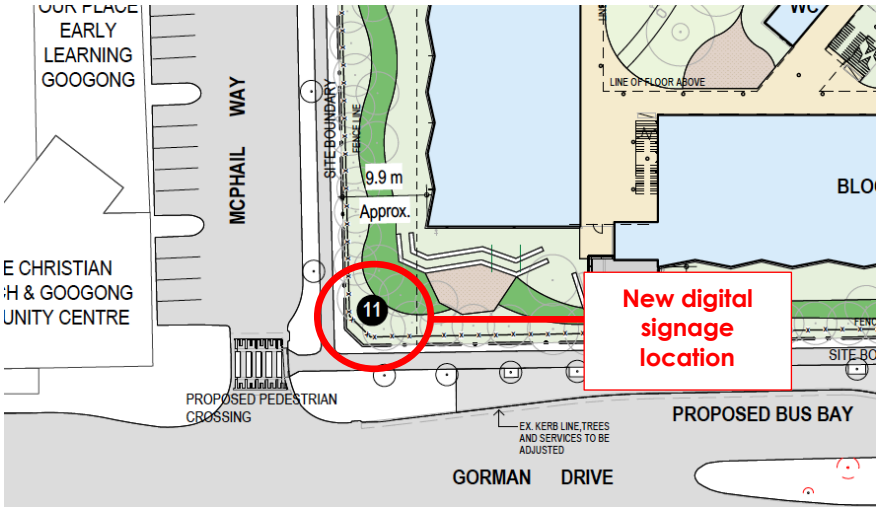

Figure 6: Revised digital signage location (Source: Pedavoli Architects)

The relocated signage does not alter the conclusions of the assessment against State Environmental Planning Policy No 64 – Advertising and Signage (SEPP 64) in the EIS. The signage will remain consistent with the aim and objectives of SEPP 64, and the assessment against the Schedule 1 criteria in the EIS remains valid.

The plinth sign at the Gorman Drive pedestrian entry remains unchanged.

3 Overview of submissions

A total of 11 submissions were received including:

- Six submissions from public authorities (five supports and one objection).
- Five submissions from the public (three supports and three comments).

The one objection was by Queanbeyan-Palerang Regional Council.

Responses to the submissions are provided in sections 5-6 below.

4 Response to DPIE key issues

Following its initial assessment of the proposal, DPIE identified a number of key issues in a letter to the applicant dated 23 July 2021. The table below provides responses to these key issues.

Table 2. Response to DPIE key issues

Issue	Response
1. Traffic, Transport and Access	
Address the comments made by Council in relation to the: • Transport Impact Assessment including the categorisation of the road hierarchy and determination of proposed mode share targets.	Council's comments are addressed at Table 3 below and in Ason Group's cover letter at Appendix 8.

Issue	Response
• Number and location of access points to the site. • Location and design of proposed pick-up and drop-off arrangements.	
Provide further information in relation to how students would be coordinated at drop-off and pick-up times, including assembly point location (and available shelter) and route to the drop-off and pick-up facility.	Refer to Ason's letter at Appendix 8 for details on how students would be coordinated at drop-off and pick-up times. As identified in section 2, a new waiting area with shade shelter has been provided near the Wilkins Way pedestrian entry for students awaiting pick-up.
Demonstrate that appropriate drop-off and pick-up facilities are proposed to cater for the demand and would not have detrimental impacts on the amenity and function of surrounding streets.	Ason Group has undertaken modelling to gauge the adequacy of the proposed 21 kiss-and-ride bays of no vehicles. The analysis found that the 21 bays can adequately accommodate the forecasted demand for kiss-and-ride under all modelling scenarios and that kiss-and-ride operations are unlikely to result in detrimental impacts on the local road network. Refer to Ason's letter at Appendix 8 for further detail.
Demonstrate that the proposed waste storage facilities would be appropriately separated from the on-site carparking and would not interfere with pick-up and drop-off of school children.	The waste storage area has been relocated to the northwestern corner of the carpark. The updated storage area is appropriately separate from carparking and will not interfere with pick-up and drop-off An updated Operational Waste Management Plan (WMP) by EcCell is attached at Appendix 4. Swept diagrams for an 11m rigid waste truck are provided in the update report.
Clarify the number and location of proposed pedestrian entrances to the school and pedestrian crossings adjacent to the school.	A total of six pedestrian entrances (gates) are proposed including: • 3 on Wilkins Way. • 1 on Gorman Drive. • 1 on McPhail Way. • 1 on Aprasia Avenue. This has increased from four gates originally proposed. The two additional gates (located on Wilkins Way) have been included at the request of school stakeholders for the purposes of facilitating kiss-and-ride operations along Wilkins Way. A total of five pedestrian crossings are proposed including: • 2 on McPhail Way. • 1 on Gorman Drive. • 1 on Wilkins Way. • 1 on Aprasia Avenue.

Issue	Response
	This has decreased from six pedestrian crossings originally proposed. The two Gorman Drive crossings in the original design have been consolidated into one mid-block crossing in response to Council's concerns. All crossings are clearly shown in the public domain plan in the updated civil package at Appendix 3 of this RtS. It is noted that GANSW has recommended that the site utilise multiple access points to facilitate connection with the local context and to encourage future community use. The site analysis identified Hopper Park to the east, Lovegrove Park to the north and the community centre to the west as importance contextual links where ingress and egress to the site should be encouraged.
2. Design and Built Form	
Address the Government Architect NSW State Design Review Panel (SDRP) advice for the project, including advice relating to: • Native landscaping and any opportunities to use endemic or native deciduous species that will attract native fauna to the school site. • Addressing the opportunities for shared use of school facilities with the local community, given its proximity to the local centre of Googong. • Providing stronger visual connections between the school, Lovegood Park and the adjacent Googong Community Centre.	A response to the SDRP advice from the first presentation was provided at section 6.2.1 of the EIS and in the Design Analysis Report at Appendix 2 of the EIS. Following lodgment of the EIS, SDRP advice was received following the second presentation. This second round of advice is addressed in the letter by Pedavoli Architects at Appendix 6 of this RtS and in the updated landscape report by TaylorBrammar at Appendix 2 of this RtS. In response to the three key items identified by DPIE: • Native species have been utilised throughout the landscape design. Refer to the landscape report at Appendix 2 of this RtS. • The school has been designed to allow for shared uses to be facilitated if required. The hall is located adjacent to the Googong North Village Centre, with the sports courts, carpark and fields also directly adjacent allowing for ease of access to the community geared facilities without the need to pass through the rest of the school. Multiple access points into the school allow for control of public access in and out of the school should a shared use agreement be established in the future. (Note: No shared use agreements are proposed at this stage.) • Re visual connections: This issue was discussed at the second SDRP meeting, but the SDRP formal comments did not request that the issue be addressed. Accordingly, the project team considers that the issue does not warrant further detailed response.

Issue	Response
Detail the proposed sun shading structures available to students in outdoor play spaces, that would be needed prior to the proposed tree plantings reaching maturity.	The school has been designed with a variety of covered outdoor play and learning environments which include walkways, covered outdoor learning area, shade structure at the games court and transitional spaces between buildings. This provides a variety of covered areas providing shade in addition to the trees. The trees specified around the outdoor play areas will be semi mature when planted (200L size, typically 3-4m height with a canopy spread of 2-3m). This will provide some day one shade as they will be planted quite closely. As noted in section 2, the shade shelter has been relocated as part of this RtS to provide shade for students when waiting to be picked up from the kiss-and-ride.
3. Other issues	
Confirm any construction works that would occur outside of standard construction hours.	The applicant clarifies that no normal construction work is proposed outside of standard construction hours. Delivery of oversized plant or structures may occur outside of standard hours, which is consistent with section 2.3 of the NSW Interim Construction Noise Guideline, which states: *The five categories of works that might be undertaken outside of the recommended standard hours are:* • *The delivery of oversized plant or structures that police or other authorities determine require special arrangements to transport along public roads* […]
Confirm the proposed number of school identification signs.	Two school identifications signs are proposed: • One digital pylon sign located at the corner of Gorman Drive and McPhail Way. • One plinth sign located at the main pedestrian entry along Gorman Drive. As discussed in section 2.3 of this RtS, the digital pylon sign was originally proposed at the main vehicular entry along Aprasia Avenue. In response to Council's submission, the digital sign has been moved to the corner of Gorman Drive and McPhail Way. For details of the proposed signage, including location and dimensions, refer to drawing 005 by Pedavoli Architects at Appendix 1 of this RtS.

5 Response to public authorities

This section provides responses to the six submissions by public authorities. Five of the submissions provided comments, while one (Queanbeyan-Palerang Council) objected.

5.1 Queanbeyan-Palerang Regional Council

The table below provides a response to Council's letter dated 14 July 2021.

Note: Council's comments have been summarised/abbreviated in some cases.

Table 3. Response to Council

Issue/comment	Response
1. Engineering Comments	
1.1 Consultation/General Council has been involved in consultation on the proposed Primary School Site since late 2020. During these discussions the issue of the of the roads around the site not complying with Council's current design specifications was raised as was the frequent safety issues within these areas. The analysis of the existing road network does not adequately consider the existing road geometry or the intersections around the adjacent shopping centre. Throughout consultation Council has provided data from existing schools within Queanbeyan supporting Council feedback which does not appear to have been considered in the current proposal. The submitted traffic design solutions proposed are based on newly constructed schools or suburban Sydney schools without justification linking them to the subject site. Council considers that the use of urban city data as opposed to regional local data is inappropriate in this instance. As such it is concluded that the data provided in the submission may need to be re-visited prior to a determination of this application. Council remains concerned that during construction and following opening, it will be the likely party that will be responsible to undertake implementation of pedestrian crossings proposed. Council's Road Safety Officer will be required to implement proposed measures included in the EIS and the current design does not appear achievable regarding ongoing management. Council has recommended a number of deferred commencement conditions and remains hopeful of engaging with the Department to achieve the best solution to achieve productive and safe outcomes for the community.	Since the receipt of Council's submission, two consultation meetings with Council officers have taken place. The meetings have resulted in the following key actions/changes to the design: • Relocation of kiss-and-ride to Wilkins Way, adopting the road cross-section of Council's Engineering Design and Construction Specifications for a "Collector Street" (see section 2.1 above). • Consultation with QCity and TfNSW is underway to determine the preferred interim bus circulation route that will inform if any further intersection modification is required at the intersection of Gorman Drive/Wilkins Way and Aprasia Avenue/Wilkins Way. • Consolidation of pedestrian crossing locations (see section 2.3 above). Given these changes, the applicant anticipates that Council will revisit its recommended deferred commencement conditions. Refer to Ason Group's letter at Appendix 8 for further detail.

Issue/comment	Response
1.2 Traffic Impact Assessment As previously mentioned, Council raises concern on the data utilised in the Traffic Impact Assessment given it is not targeted to the regional locality.	Further SIDRA analysis has been conducted using more conservative trip generation rates. The results indicate that the majority of the intersections will continue to operate at LoS A, with one intersection to operate at LoS B in 2033 taking into account background growth. LoS B is considered a good level of service with spare capacity. For further detail, refer to the letter by Ason Group at Appendix 8 of this RtS.
1.2.1 Existing Network Some of the Collector roads identified in the Traffic Impact Assessment, including Aprasia Avenue, have not in fact been constructed as Collector roads. Aprasia Avenue is not considered a suitable road for pick up and drop off facilities due to problems associated with the narrow width. No intersection swept path analyses have been provided to support the application for any of the intersections directly surrounding the school site. The assessment does not appear to consider the road widths of Wilkins Way and McPhails Way along with the Caragh/Aprasia and Gorman/Caragh intersections.	The kiss-and-ride has been relocated to Wilkins Way, and the proposed road cross section aligns with Council's Engineering Design and Construction Specifications for a "Collector Street". Accordingly, it is considered that Council's fundamental concern has been addressed. Swept paths for the surrounding intersections are included in the letter by Ason Group at Appendix 8 of this RtS.
1.2.2 Travel Modes […] The 80% vehicle usage mode is likely a middle case and not the worse case as suggested. The modes adopted in the Traffic Assessment are not realistic and as such concern is raised that the assessment of the locality has not been undertaken to consider realistic population growth.	The travel modes identified in the Preliminary STP at Appendix 5b of the EIS are aspirational targets. The targets are set based on forecasted population growth from within the Googong area. The Preliminary STP forms the initial assessment, which is expected to be revised as a requirement of SSD condition. Upon appointment of the school principal, a more targeted approach in conjunction with regular monitoring and data collection will be required as part of a suite of measures to achieve the set target. Notwithstanding, the traffic analysis included within the Traffic Assessment at Appendix 5a of the EIS was conservative, adopting the specified trip rates to all students (excluding the percentage of students attending the out of hours school care (OSHC) facility as they arrive and depart outside of the nominated peak periods), not the 80% target. Further analysis using more conservative trip generation rates has been conducted as part of this RtS, and the results show that intersections will continue to operate at a good level of service with spare capacity. (see letter by Ason Group at Appendix 8 of this RtS).
1.2.3 Analysis Assumptions & Methods During consultation it was agreed that Jerrabomberra School was a similar	As indicated within the Transport Assessment at Appendix 5a of the EIS, it has been assumed that the OSHC facility will be at 80% capacity.

Issue/comment	Response
geographical centre with similar community; however, it does not appear that this data was utilised to calculate trip generation. The use of a reduction factor on the presented data for out of school hours care does not seem appropriate. The future traffic analysis appears to be primarily based on current survey data collected without consideration of the impacts on traffic when the Wellsvale and Gorman Drives loop is opened, providing access to further residential development to the south and west. Googong Township is expected to grow from approximately 3500 dwellings currently to 6200 in its final state. Yet, a 2% annual growth factor has seemingly been adopted.	Noting the start and finish hours of the OSHC program, this results in 192 students arriving outside of the school peak hours. As such, no trips associated with these 192 students have been included in the traffic analysis for the peak school periods. A compounded growth rate of 2% was adopted in the original Traffic Assessment for the surveyed intersections to obtain the 2023 and 2033 base figures as per consultation meeting discussions. The future growth areas associated with land releases are largely to the southwest of the school site, whereby significant portions of the traffic travelling to/from Googong are not expected to travel past the school site to access Old Cooma Road. As part of this RtS, a sensitivity test adopting a 5% compounded growth over 10 years has been prepared to demonstrate the traffic impacts (noting that a 5% compounded growth rate exceeds predicted population growth). The results show that the surrounding intersections will operate at a good level of service. Refer to Ason Group's letter at Appendix 8 for further detail.
1.3 Access/Pedestrian Crossings The number of access points and pedestrian crossings and the location of crossings adjacent to intersections are not supported. Council recommends that the number of access points be minimised. It is envisaged that TfNSW will be unable to staff the number of crossings proposed.	The proposed pedestrian crossings have been reduced from six to five, with the two Gorman Drive crossings consolidated into one mid-block crossing. The mid-block location was chosen following the second meeting with Council officers. The total number of pedestrian access points into the school (i.e., gates) have been increased from four to six. The two additional gates, which are located along Wilkins Way, have been deemed necessary by school stakeholders to facilitate kiss-and-ride operations. Management measures for the access points will be outlined in the future STP, which requires consultation with Council prior to finalisng. For further detail, refer to Ason Group's letter at Appendix 8.
1.4 Drop off/Pick Up Area Council acknowledges the current proposal requires widening of the parking bays on Aprasia Avenue. One of the dangerous traffic movements and unwanted behaviours in school zones is U-Turning. The Kiss and Drop facilities as proposed are easily navigated by residents to the east. However, residents living to west/north of Caragh Avenue and south/west of Gorman Drive do not have a clear access path to Aprasia Avenue facilities,	In relation to U-Turns, it will be necessary during the initial phase of school operations to implement traffic management to educate parents to establish appropriate behaviours. This arrangement has been introduced at a number of school openings in 2021 and has assisted these schools in understanding the importance of establishing appropriate driver behaviour as early as practicable with support from suitably qualified traffic controllers.

Issue/comment	Response
especially if congestion with pedestrian crossings is experienced. Several local roads may experience unintended school zone traffic (Daniel Street, Griffiths Link and Aitken Street) but Aprasia Avenue may also experience illegal Uturning. […] The proposal has provision for 21 drop off/pick up spaces, which appears significant though when details of the proposal are interrogated Council staff believe this number to be insufficient. […] *Alternatives to the Aprasia Avenue Drop off Zone* - Council's position has been for the drop off/pick up zone to be located in a single area ideally constructed as an indented bay on Wilkins Way separated from other traffic generating development	The inclusion of a single continuous dividing line along Wilkins Way further reinforces that U-Turns are not permitted when vehicles exit the kiss-and-ride in accordance with Rule 132(2) of the Road Rules 2014 (NSW). The 21 bays for kiss-and-ride along Wilkins Way as proposed under this RtS are considered sufficient, with effective operation requiring establishment of clear rules supported by school staff and parents. Refer to Ason Group's letter at Appendix 8 of this RtS for further detail.
1.5 Bus Bays There is an improvement on the previous plan observed however, Council strongly urges the entire Gorman Drive frontage be used for buses as opposed to a portion as proposed. The Anglican School with a significantly lower student population than proposed currently sees 3-4 buses arriving at the same time, to which Council has extended the existing bus bay to accommodate the buses from queuing on Gorman Drive. This is a common practice at many of our schools and should be expected and catered for by utilising the entire Gorman Drive frontage. It is noted initial designs had the special education needs parking indented on Wilkins Way which would allow Gorman Drive to be used for buses.	It is proposed that the school utilises the same school bus routes as the nearby Anglican School, thereby allowing for scheduling so that they do not arrive at the same time and cause significant queuing. The proposed bus spatials are therefore considered adequate. Consultation with QCity and TfNSW in relation to the future school bus route are underway, and information associated with the proposed bus stop has been provided.
1.6 Car Park Driveway […] the driveway for the proposed waste vehicle swept path is not wide enough to cater for its entry and exit. The vehicle crossing should be widened or location adjusted to prevent damage to Council infrastructure.	The detailed civil design for the vehicle crossing will be designed to QPRC standards (DS5-01) to allow for access without impacting on kerb and gutter.
1.7 Construction Traffic Access to the site via Caragh Avenue and Aprasia Avenue is not considered suitable for heavy vehicles. The site has an existing vehicle crossing on Gorman Drive and heavy vehicles should utilise this entrance. It is also noted that there is no mandate to ensure on-site parking is provided during construction. As on street parking around the site is well utilised, parking must be provided on site to avoid adverse impacts to neighbouring developments.	Once construction progresses to the structural phase, access via Gorman Drive would be impractical given the majority of the proposed school buildings front Gorman Drive, McPhail Way access would interfere with shopping centre traffic, and Wilkins Way is a residential local road. The site access point is located in a location that forms the future staff car park, whereby site access as well as on-site contractor parking

Issue/comment	Response
	can be created in the northwestern corner of the site.
2. Planning Comments	
2.1 Height Privacy is a major concern for residents. The design may result in the following minor privacy impacts: • Block A and B – Gorman Drive – Minor impacts to units along Gorman Drive. • Block B – Wilkins Way – Minor impacts to units along 261 Gorman Drive and 4 and 2 Wilkins Way. Privacy treatments (e.g., obscure glazing or highlight windows) are recommended for windows at the above locations.	The buildings are set back from the road reserve by approximately 7.4m from Gorman Drive and 9.8m from Wilkins Way. The Gorman Drive and Wilkins Way road reserves are approximately 25m and 18m, respectively. the separation distances between the school buildings and neighbouring residences are therefore significant. Given the low scale of the proposed built form (two storeys) and the large separation between the school and neighbouring residences, privacy impacts would be negligible and no special privacy treatments are required. It is further noted that the setbacks are well landscaped, creating additional visual and physical buffering.
2.2 Acoustic Concerns Acoustic treatments for the Gorman Drive and Aprasia Avenue facades are supported in order to prevent learning areas from being disturbed by potential future heavy traffic along these roads.	Section 5.1 of the Acoustic Assessment outlines the minimum performance requirements for glazing, wall and roof treatments. Provided these requirements are complied with, it is expected that internal school areas will achieve appropriate acoustic amenity. An updated Acoustic Assessment accompanies this RtS (see Appendix 10) to assess the impacts of the relocated kiss-and-drive. The updated report includes no changes to the minimum performance requirements.
2.3 Elevation McPhail Way elevation – northern end presents as a blank facade and could be improved with windows, articulation or change of materials.	The hall building located off McPhail has brickwork and corrugated iron for the façade articulation. A feature metal decorative screen has been located in front (street-facing), which will have a unique graphic design for the school utilising motifs derived from Connecting with Country consultation. This screen provides a decorative facade towards the village centre. The building has been designed to utilise passive design principles, natural light, ventilation, and the covered COLA area which connects with the green open play space. The building arrangement has also been designed to consider privacy and acoustic requirements.
2.4 Heritage A condition is recommended requiring that, if any items or artefacts are discovered during construction, all works stop immediately and Heritage NSW contacted.	The applicant accepts a condition which requires that all works *in the area of the find* (not all works) should cease if an unanticipated item is discovered (as recommended in the unanticipated discovery protocols at Appendix 2 of the Aboriginal and European Archaeological Assessment at Appendix 6 of the EIS).

Issue/comment	Response
2.5 General Comments Sustainability concepts should be incorporated into the design, e.g., orientation, shading of buildings, energy efficiency principles (remove gas heating/cooking), kitchen gardens and composting.	The sustainability concepts for the project are identified in the Design Analysis Report and in the ESD SSDA Report at Appendix 2 and Appendix 7, respectively, of the EIS. These concepts include passive design solutions, sustainable initiatives and energy efficient systems. The project will be Green Star 4-star rated.
Space/activity management – the space between Blocks A, B and C (3 WCs) are located in the most desirable play space area on cold wintery days and should be relocated or better integrated into main blocks.	The design intent is to provide "amenity pods" adjacent to vertical circulation areas to facilitate student gathering, water bubblers and views to the wider landscape. The position of these amenity pods reduces the building mass and facilities view lines, natural light and wind to travel across the site. They are also located to provide access from both learning spaces and the play space.
The core principles of crime prevention through environmental design (CPTED) should be incorporated, and a CPTED evaluation is required.	The project will comply with SINSW CPTED guidelines as outlined in the Design Analysis Report at Appendix 1 of the EIS.
Council recommends native plant selection from the local region for landscaping.	The main plantings across the site are designed to reintoduce the Yellow Box Red Gum Grassy woodland, which would have been the predominant vegetation in this area originally. Other plantings are also native and have a particular meaning to the Ngunnawal people. The ACT Governmment's "Municipal Infrastructure Standards Part 25 Plant Species for Urban Landscape Projects" (February 2021) was utilised in plant selection. Some exotic deciduous trees are used in limited numbers around outdoor play and teaching spaces. These are used as they will provide winter sun and day-one size impact (specified as 200L size).
Details of the waste pad are too small, and the waste area should be relocated to an area that is fenced to allow truck movements for pick-up. Consideration should be given to recycling and composting.	The waste pad has been increased in size and relocated to the northwestern corner of the carpark. An updated Operational WMP is attached at Appendix 4. Swept paths in the updated WMP demonstrate that the pad is accessible by an 11m rigid truck without impinging upon carparking spaces. As noted in section 5.1.1 of the updated WMP, it is proposed that the school's food organic waste be sent offsite through collection by the waste contractor. The final processing of the material will be determined by the contractor; however, it is likely the material will be used for generating energy (biogas), compost and/or liquid fertilisers. A school composting program could potentially be explored in the future.

Issue/comment	Response
Council advises consultation with Googong Township on the design of the school in regard to colours and materials.	The project architect, Pedavoli Architects, has reviewed the design guidelines prepared by Googong Township and confirmed the proposed design is compatible with the guidelines. The project design has taken into consideration the local context and streetscapes. The built form is low in scale (one and two-storey) and in keeping with the surrounding residential and commercial developments in the village town centre. The material palette comprises of desaturated colours, warm textures and brickwork, which is consistent with the surrounding streetscapes
No signage plans were provided in the documentation. Council recommends a condition to prevent any obtrusive lighting mechanisms and glare. Council further recommends that illuminated signs do not face into residential properties.	The two proposed signs were set out in the summary table on page 38 and in section 3.10 of the EIS and on drawing 005 by Pedavoli Architects at Appendix 1 of the EIS. The proposed digital pylon sign is being relocated as part of this RtS to address Council's submission, as discussed at section 2.5 of this RtS.
There is a lack of facilitation for disabled access, noting it appears there is only one lift to the second storey of the building and stairs to the play areas. It is recommended this be revised.	The lift has been centrally located near the main entrance with step-free access throughout the site on both levels. The Accessibility Report at Appendix 18 of the EIS provides a preliminary review of the design against relevant accessibility standards and raises no issue with the number of lifts.
3. Building Comments	
Council notes that a full BCA compliance report has been provided but raises no objections to the proposal regarding BCA matters.	Noted. It is anticipated that compliance with the will be required as a condition of any future consent.
4. Health Advice	
Consideration should be given to screening of entry doors to toilet blocks for student privacy.	Gates are located at the entry points to the amenity blocks for teacher surveillance. Within the amenity block there are individual toilet partitions. Single "airline"-style toilets have a solid door. This design is supported by the SINSW stakeholders.
Canteen fit out to comply with AS4674-2004 Design Construction and Fit Out of Food Premises.	The design is capable of complying with AS4674-2004. Compliance will be demonstrated at the detailed design stage.

5.2 Biodiversity and Conservation Division

The table below provides a response to the comments by the Biodiversity and Conservation Division.

Table 4. Response to Biodiversity and Conservation Division

Issue/comment	Response
Biodiversity and Conservation Division notes that a BDAR waiver was issued for this proposal and has no further comment.	Noted.

5.3 Transport for NSW

The table below provides responses to the comments by Transport for NSW (TfNSW) in its submission letter dated 2 July 2021.

Table 5. Response to TfNSW

Issue/comment	Response
1. School Zone	
a) A school zone that complies with current TfNSW requirements is required to be implemented within the adjoining road network (e.g. Aprasia Avenue, McPhail Way, Gorman Drive and Wilkins Way). The developer/landowner shall provide details on the school zone and the associated speed zone reductions (e.g. location of required signage, pavement marking, etc) to TfNSW for approval at least 12 weeks prior to occupation of the site. The developer/landowner should liaise with the TfNSW Community Partnering South East Tablelands Precinct Team regarding the above (Vanessa Wilson, Senior Manager Community and Place Partner – 4253 2618).	Noted. It is expected this will form a condition of consent.
b) Installation of all required/approved school zone signage, speed management signage and pavement markings is to be undertaken at the developers/landowners expense and are to be in place prior to occupation/use of the development as a school. Note: - Section 138 approval under the Roads Act 1993 will be required before commencing works in the adjoining roads.	Noted. It is expected this will form a condition of consent.
c) Following installation of school zone signage, speed management signage and associated pavement markings, as required by condition 2 above, the developer/landowner must arrange an inspection with TfNSW for formal approval/handover of assets. The handover of assets must occur prior to the commencement of occupation of the development.	Noted. It is expected this will form a condition of consent.
d) The approved school zone shall be maintained in accordance with approvals issued by TfNSW for the life of the development.	Noted. It is expected this will form a condition of consent.
2. Ongoing Waste Storage	

Issue/comment	Response
a) The ongoing waste storage area/pad as nominated in the Operational Waste Management Plan prepared by EcCell Environmental Management Version 1 dated 7/06/21 shall be located so it does not impact upon the number of car spaces available within the developments onsite car parking area (i.e. currently shown as being car spaces 12 and 13 within the 60 space car park being provided to service the development). TfNSW notes that the architectural plan with reference Project GOOGSSDA-001 Revision D dated 09/06/2020 shows a different car parking layout where there is no conflict between the ongoing waste storage area/pad and the developments on site car parking spaces.	The waste pad has been increased in size and relocated to the northwestern corner of the carpark. An updated Operational WMP is attached at Appendix 4. Swept paths in the updated WMP demonstrate that the pad is accessible by an 11m rigid truck without impinging upon carparking spaces.
3. Bus Bay	
a) The indented bus bay (i.e. Gorman Drive) shall comply with Austroads Guide to Road Design (2021) Part 3: Geometric Design (refer to Figure 4.63).	Noted. It is expected this will form a condition of consent.
b) Before finalising the indented bus bay design contact shall be made with the TfNSW Rural and Regional Contracts team (Tanya Jennison, Commercial Manager Southern Region – 4253 2683) to discuss the number of buses required to service the site and the suitability of the indented bus bay (e.g. its length to cater for the required/determined number of buses).	Noted.
4. Pedestrian Crossings	
a) Any new pedestrian crossing to be provided should be raised to slow vehicle speed in line with the safe systems approach (i.e. wombat crossing). The design should comply with Austroads Guide to Road Design and Guide to Traffic Management including applicable supplements.	Noted. It is expected this will form a condition of consent.
b) The details on the proposed pedestrian crossings shall be submitted to the Queanbeyan-Palerang Regional Council Local Traffic Committee for review and comment before the submission of a detailed design to Council as part of obtaining Section 138 approval under the Roads Act 1993.	Noted.
5. School Travel Plan	
a) Prior to occupation/use of the development as a school, the NSW Department of Education shall:	Noted. It is expected this will form a condition of consent.

Issue/comment	Response
i) Finalise the Travel Plan in consultation with Council and TfNSW (at development.sco@transport.nsw.gov.au); and ii) Submit a copy of the final Travel Plan to TfNSW and Council.	
b) Every 6 months the operation of the travel plan shall be reviewed with the travel plan being updated annually. As part of updating the travel plan consultation should be had with Council, TfNSW and the school community/parents.	Noted. It is expected this will form a condition of consent.
6. Bus service Implementation	
a) Before the commencement of construction the NSW Department of Education shall contact the TfNSW Rural and Regional Contracts team (Tanya Jennison, Commercial Manager Southern Region – 4253 2683) and provide the required information to enable the school to be registered on the School Student Transport Scheme (SSTS) portal which will allow students to enrol for a bus pass.	Noted. It is expected this will form a condition of consent.
b) A minimum of 8 months before the occupation/use of the development as a school, the NSW Department of Education shall contact the TfNSW Rural and Regional Contracts team (Tanya Jennison, Commercial Manager Southern Region – 4253 2683) to enable discussions with bus operators. This is required to ascertain whether TfNSW can vary existing school bus routes under a Bus Service Alteration Request (BSAR) with existing buses or determine if a new service is required.	Noted.

5.4 Heritage NSW – Aboriginal Cultural Heritage

The table below provides responses to the comments by Heritage NSW – Aboriginal Cultural Heritage in its submission letter dated 12 July 2021.

Table 6. Response to Heritage NSW – Aboriginal cultural heritage

Issue/comment	Response
Heritage NSW is satisfied the application has considered and addressed Aboriginal cultural heritage matters for the land.	Noted.
As such, we support the recommendations outlined within the ACHAR which require the following of unanticipated discovery protocols. We recommend these protocols form part of the Construction Environmental Management Plan as set out under section 10 Mitigation measures of the Environment Impact Statement (EIS), prepared by Mecone and dated June	Noted. It is expected that an unanticipated discovery protocol will be required as a condition of consent. Ongoing consultation with the Aboriginal community will occur as the design develops.

Issue/comment	Response
2021. We would support ongoing consultation with the Aboriginal community as part of construction activities and recommend that the Aboriginal Participation in Construction Policy (APIC) is considered for this development.	

5.5 Environment Protection Authority

The table below provides responses to the comments by the Environment Protection Authority (EPA) in its submission letter dated 02 June 2021.

Table 7. Response to EPA

Issue/comment	Response
Noise and vibration	
Construction The EPA recommends that the proponent develops and implements a Noise Mitigation and Management Plan prior to commencing works to minimise noise impacts on sensitive receivers. The EPA requires the proponent to implement all reasonable and feasible measures to minimise noise impacts for nearby sensitive receivers during construction.	Noted. It is expected this will form a condition of consent.
Operation The EPA requires the proponent to implement all reasonable and feasible noise mitigation and management measures to minimise noise impacts at sensitive receivers during operations.	Noted. It is expected this will form a condition of consent.
Hours of Operation The EPA requires further information to justify the approval of construction outside of standard hours identified in the Interim Construction Noise Guidelines. The EPA considers it appropriate to capture the standard hours of construction on the consent.	The applicant clarifies that no normal construction works are proposed outside of standard hours. Delivery of oversized plant/equipment may occur outside of standard hours, consistent with section 2.3 of the NSW Interim Construction Noise Guideline.
Water quality	
Water Quality Objectives The EIS does not consider the NSW Water Quality Objectives (WQOs) in receiving waters. The WQOs and Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZG 2018) provide the general framework to assess the potential impacts of a discharge on the environmental values of the receiving waters. The EPA requires consideration of the receiving environment and relevant WQOs in relation to the project.	The project civil engineer (Northrop) has confirmed the proposed stormwater design has considered the WQOs and Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZG 2018). Northrop has prepared detailed water quality measures using MUSIC modeling. These measures are stormwater pit insets, rainwater tank and Stormfilters in the on-site detention tank. The treatment train achieves the following reduction in pollutants:

Issue/comment	Response
	• Total suspended solids – 85.6%. • Total phosphorus – 67.8%. • Total nitrogen – 45.5%. • Gross pollutants – 97.3% For further detail, refer to the updated civil package at Appendix 3 pf the RtS.
Construction 1. The EPA requires further information on the capacity, sizing, design rain event, catchment and management of the sediment basins 2. The EPA reminds the proponent that it is an offence under section 120 of the POEO Act to pollute waters. 3. The EPA recommends that a detailed Sediment and Erosion Control Management Plan is developed for the proposed construction prior to the commencement of works.	Soil and water management measures have been designed with two temporary sediment basins in accordance with 'The Blue Book'. The measures and sediment basin calculations are shown on drawing GOOG-CV-SD-DWG-102.01 of the civil engineering report at Appendix 13 of the EIS. A detailed sediment and erosion control management plan will be prepared prior to commencement of works.
Operation The EPA reminds the proponent that it is an offence under section 120 of the POEO Act to pollute waters	Noted.
Air quality	
The EPA recommends all reasonable and feasible dust mitigation measures must be implemented during construction and operation to prevent dust emissions.	Noted.
Waste management	
The EPA reminds the proponent that all waste should be classified in accordance with the NSW EPA's Waste Classification Guidelines and disposed of at a facility that can lawfully accept it.	Noted.

5.6 Canberra Airport

The application was referred to Canberra Airport for consideration, and the airport subsequently applied to the Civil Aviation Safety Authority (CASA) and Airservices Australia for an OLS and PANS-OPS assessment to understand if the proposal would have an adverse impact on the airport.

A solar glare analysis was undertaken by Aviation Projects to analyse the potential for solar glare to impact on aircraft operations at Canberrra Airport (see Appendix 11a). The analysis was submitted to CASA, and CASA confirmed in correspondence to Canberra Airport dated 11 August 2021 (Appendix 11b) that CASA has assessed the risk associated with solar panels and has concluded that the panels are unlikely to constitute an unacceptable risk to aircraft operations.

As noted in email correspondence from Canberra Airport to DPIE dated 31 August 2021, CASA and Airservices Australia have assessed the proposed development, and the Department of Infrastructure, Transport, Regional Developments and Communication has supported the development subject to a number of conditions regarding total height, construction cranes and notification/reporting requirements. Based on this, Canberra Airport also supports the development. The applicant accepts the recommended conditions.

6 Response to public submissions

Six submissions (three supports and three comments) were received from individual members of the public. The table below provides responses to these submissions.

Table 8. Response to public submissions

Issue/comment	Response
Name Withheld (Supports): Looks great, although the need for a local pre-school should still be considered in the plans.	The proposal is for a primary school only and as such does not consider the need for pre-school.
L. O'Toole (Comments): The project needs to take in consideration parking, children crossings and speed camera This project was obviously never taken into account when Googong was first developed. With the large amount of children moving in a suburban area, where it has already been noted that there is a speeding issue from both contractors and residents, the school will require a speed camera to reduce speeding. It will need appropriate crossings and parking to allow the safe pick and drop off of children. The Anglican School Googong has the usual speed signs indicating it as a 40km zone. This has not reduced people speeding. So only a camera can truly do this or police presence. Since the government doesn't like to invest in law enforcement a camera is the best option. Proper crossings, clearly marked for children to cross a busy road. Even the use of the traditional crossing guard should be used. Also needed will be proper parking for the safe drop off and pick up of children that does not impact on residents. Remember a injured or killed child can cause huge liability issues for the government if it is warned of issues and takes no action. Something that is being seen at the current Anglican School.	Student safety will be ensured through formal pedestrian crossings, school zones and management measures. The project team considers a speed camera to be unnecessary in this case given there are no known significant speeding issues or crash history in the location. As noted in section 4.4 of the Transport Assessment at Appendix 5a of the EIS, the only recorded crashes which have occurred in the area in the recent time (last five years) have taken place away from the school site. No crashes have been recorded within proximity to the subject site. Road safety will be further promoted through the Road Safety Education Program and Safety Around Schools Program as described in section 2.9 and 2.10, respectively, of the Transport Assessment.
A. Stafford (Supports): The community is in need of a public school.	Agreed.
U. Katwal (Supports): I have 3 kids in home who will be ready to go to school in next couple of years. Hope the project will be complete soon.	The school is expected to open in 2023.

Issue/comment	Response
S. Broussos (Comments): Please located this school away from major road ways in order to lessen the impact of school zones on motorists, and thus providing fewer unnecessary traffic jams.	The school is appropriately located along local roads adjacent to a neighbourhood centre. The Transport Assessment at Appendix 5a of the EIS estimates that all nearby intersections will operation with a Level of Service of A (highest rating) once the school is completed and occupied.
A. Brightman (Comments): Whilst in principle I support the new school (which is sorely needed and wanted by the community) I do have some concerns regarding the planned landscaping of the site. I am pleased to see so many large trees planned, but as a parent whose child will potentially attend the school MANY YEARS BEFORE those planned trees will have grown enough to provide shade, I feel that the short to medium term planning for shade structures (sails, pergolas etc) to enable sun safe plan by students appears to have been totally overlooked. Are the children attending for the first decade just supposed to play in full sun environments or stay inside?	The school has been designed with a variety of covered outdoor play and learning environments which include walkways, covered outdoor learning area, shade structure at the games court and transitional spaces between buildings. This provides a variety of covered areas providing shade in addition to the trees. Currently the trees specified around the outdoor play areas will be semi mature when planted (200L size, typically 3-4m height with a canopy spread of 2-3m). This will provide some day one shade as they will be planted quite closely.

7 Conclusion

This RtS has considered the submissions received in response to the public exhibition of SSD-10326042. Submissions were received from public authorities and six members of the public. Further information and design amendments have been made to address the issues raised.

We consider the proposed development as amended to warrant approval for the following reasons:

- Further information has been provided to address all comments received during exhibition of the proposal.
- The amended proposal will result in a high quality development that achieves the original aims of the proposal while resulting in no unacceptable environmental impacts.

Based on the supporting material provided in this RtS in addition to the material provided in the original EIS, DPIE has now been provided with sufficient information and documentation to progress the assessment of SSD-10326042.

It is requested that DPIE complete the assessment of the SSD and proceed to determination.


mecone