

Attachment A – New Public School in Mulgoa Rise, Glenmore Park – Response to additional agency comments

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Penrith City Council	
<p>The Department is urged to have strong regard to the need to ensure (in line with the Premiers Priorities and the Minister's recently issued Planning Principles), the need for high levels of canopy tree planting and green streets, Council raises that regard is to be had to Council's previous comments provided in cover letter dated 1 October 2021 including:</p>	
<p>(i) It is critical that planting within the front setback at this location is proposed where there are no street trees (also refer comments below in relation to street tree removal and recommended actions). The development of the site shall achieve and provide continuous canopy tree planting around the periphery of the development to screen the hard stand / manoeuvring area associated with the waste facilities.</p>	<p>The Landscape Design contained in Attachment D provides a continuous tree canopy has been provided to street frontages where possible. However, there is an opportunity to provide a staggered tree alignment to further increase the tree canopy and screening, via adding 7 additional trees with 100L pot size. No condition of consent in relation to this matter is required.</p>
<p>(ii) The plant and infrastructure should be relocated away of the frontage location and could be reorientated and relocated to the east of the waste / loading area.</p>	<p>The two remaining services apparatus located along the boundary line of Deerubbin Drive are the Fire Booster Valve cabinet and the water meter. These 2 spaces are required to be located on the property boundary. All other plant and infrastructure spaces have been set back from site boundary. Refer to the previously reissued Architectural drawing no. SSDA-0110 (rev 11). A condition in relation to relocation of plant and infrastructure is not warranted.</p>
<p>(iii) It has previously been raised that the application foreshadows additional parking for Stage 2 works. It is inappropriate to push back the delivery of necessary parking. All parking must be provided up front as part of the stage 1 works. This will negate unnecessary reliance on the public road network for parking and reduce potential overflow into Council's adjacent car parking facilities.</p>	<p>As mentioned within the submitted RtS, car parking generated by the next stage of development will be provided for in future development applications when required. The proposed number of parking spaces has been assessed against the requirements of AS2890.1:2004, with reference to Class 1A (employee) facilities. The School Transport Plan (STP) included in the Transport and Traffic Assessment (TTA) promotes active transport to the site, supporting mode shares and sustainable management of the transport needs of staff and students to the development to reduce the need for onsite parking. By providing parking as proposed, a culture of active transport usage will be realised from the commencement of school operation and will be ingrained in the culture of the school community.</p> <p>A condition requiring additional parking is not warranted.</p>
<p>The Environment Team have reviewed the Response to Submissions Report, architectural and landscape plans, the Electromagnetic Energy (EME) assessment and the Noise and Vibration Assessment (NVA).</p> <p>With regard to the EME report, it is agreed that the design measures and recommendations are incorporated into the design of the development. With regard to the NVA, there appears to be a discrepancy with section 5.6 stating</p>	<p>An Updated Noise and Vibration Assessment is contained in Attachment E and Section 5.6 has been amended to be consistent with Section 7.1.5 thus clarifying that, after 10 pm, all external windows and doors should be kept closed in the library spaces in Building A, and in the Communal Hall, Building C.</p>

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<p>that windows and doors of library and hall are to be closed at 8pm, whereas section 7.1.5 states this is to occur from 10pm. This needs to be clarified and amended.</p>	
<p>It is agreed that a construction noise and vibration management plan is required to be developed prior to works commencing.</p>	<p>Noted and no objection to the inclusion of a condition to this effect, subject to review of draft conditions.</p>
<p>Landscape plans and cross sections represent proposed level changes and thus must take into consideration proposed engineering and infrastructure and this is to be demonstrated in detailed sections and details.</p>	<p>Two additional sectional elevations of both entry points to the school have been added and are contained in Attachment D.</p>
<p><u>Streetscapes</u></p>	
<p>Fencing details are lacking - for streetscape amenity fences should be setback from the boundary with landscaping to reduce the visual impact of the fence.</p>	<p>The fence location as proposed is located to void stormwater infrastructure in the area. Understorey planting has been included to reduce visual impact of the 2.1m high palisade fence. The palisade fence will be black in colour and is a recessive element in the proposed visual landscape.</p>
<p>Street trees are proposed to be removed to enable accessible parking bays. These street trees should be replaced at a 2 for 1 ratio. Council supports street trees of a suitable size above and below ground in between kerb ramps at accessible parking bays. Additional street trees should be considered in the verge north of playing courts.</p>	<p>A greater than 2:1 ratio is achieved along Deerubbin Drive and the remaining area of the proposed development. Tree planting along Deerubbin Drive has been adjusted, refer to Attachment D, to be a staggered line of trees and the inclusion of an additional 7 trees. Street tree planting within the verge north of the playing courts will be contemplated with future expansion of the school and subject to separate planning approval. In addition, the future stage of the school will incorporate comprehensive landscaping.</p>
<p>To further support amenity in the streetscape and wayfinding, the site corner has capacity for large feature trees in association with walls and signage.</p>	<p>The Updated Landscape Design Drawings show a feature tree (<i>Araucaria cunninghamii</i>) located next to the signage wall as wayfinding element.</p>
<p>Consistent with Council's Cooling the City Strategy, a continuous and effective street tree canopy is preferred. Street trees should be planted in accordance with Council's Street and Park Tree Management Plan and Appendix. Protection of existing street trees to be retained should be in accordance with Australian Standards and documented.</p>	<p>Noted.</p>
<p><u>Tree Canopy Cover</u></p>	
<p>There is a lack of detail regarding tree species and the corresponding canopy dimensions on the plan. Whilst the canopy cover appears to meet targets, large tree species are not identified on the plan, nor their mature canopy spread represented on the plan.</p>	<p>Drawing L-SSDA-0010 Planting Zone Plan (Attachment D) provides the locations of tree planting across the site. This corresponds with the planting schedule provided on sheet L-SSDA-0011 Planting Schedule – Trees (Attachment D). The canopy dimension shown on the Planting Zone Plan is based on an average mature canopy dimension to account for variance in growth. Large canopy trees are located away from building awnings where possible to minimise the impact on maintenance.</p>

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<p>appropriate for the available volume above and below ground for canopies and rootzones respectively and the minimum 40% cover target would still be achievable.</p>	<p>The area south of the proposed car park is part of an area that will be the subject of a future planning approval. As part of this SSDA tree planting is not proposed in this area primarily due to the fact that such trees if planted would require removal during construction of the future stage.</p>
<p>Assuming the unidentified open space along the access to Forestwood Drive is intended for parking, additional shade planting is appropriate to cast shade onto pavement areas.</p>	<p>A kerb edge has been included in the car park design.</p>
<p>A kerb edge is required to contain parking to formalized carparks. Overflow and unauthorized parking in landscaped areas compromises soil compaction and tree health.</p>	
<p><u>Play spaces</u></p>	
<p>Shade from structures should be provided on day one providing protection and safety for children, not later. Structural components need to be integrated with other elements in detailed design phase as well as during construction - it would be very difficult to retrofit.</p>	<p>Individual shade structures may be considered by the school Principal once the school is operational. A condition requiring including of such structures is not warranted in this instance.</p>
<p><u>Accessibility</u></p>	
<p>DDA compliant seating, incorporating universal design principles, should be provided in close proximity to accessible drop-off and pickup parking areas.</p>	<p>Typically, students, especially those with special needs, are encouraged to wait for parent pick up at the COLA, OSHC & Support Unit Hub for better after school hour supervision while waiting in weather protected areas.</p>
<p>The above areas provide sufficient shelter and seating together with adequate supervision to accommodate a waiting space in proximity to the accessible pick-up areas.</p>	
<p><u>Maintenance and operational</u></p>	
<p>Details of maintenance access have not been provided and are required. A plant establishment period of 52 weeks is considered minimum industry practice.</p>	<p>Maintenance vehicle access is achieved via the vehicular access from Forestwood Drive which services the staff car park.</p> <p>The plant establishment period / requirements will be provided in the Landscape technical specification at the Detail Design Stage.</p>
<p><u>Public Health Considerations</u></p>	
<p>The Canteen, OSCH Kitchenette and any other food preparation or food handling areas must comply with Standard 3.2.3 of the Australian and New Zealand Food Standards Code, and AS4674-2004 Design, Construction and Fitout of Food Premises. Conditions will be applied to ensure the development complies.</p>	<p>Noted and no objection to the inclusion of a condition to this effect, subject to review of draft conditions.</p>
<p>It should also be noted that the hand wash basin located in the Sick Bay, Building A, should be supplied with soap, warm water from a single spout and disposable paper towels to facilitate adequate hand washing for students who may be ill.</p>	
<p>All amenities should be high quality, light filled, highly ventilated and high amenity. Amenities for children shall have easy to operate taps, hand soap</p>	

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<p>dispensers and hand drying amenities which promote and encourage hand washing.</p> <p>Design heights and user-friendly fittings are to be considered.</p>	
<p><u>Water Quality Management Considerations</u></p> <p>The bioretention systems downstream are already online, as such it will be important that adequate erosion and sedimentation plans are in place to protect the downstream basins for the full extent of the works.</p> <p>It is recommended that during construction, erosion and sediment control measures are to be provided in accordance with the requirements of "Managing Urban Stormwater Soils and Construction, 4th Edition (Blue Book)".</p> <p>It is also recommended that adequate conditions be provided to the consent (should it be issued) to ensure the sediment and erosion measures are implemented and maintained during the development of the site and that they are sufficient to manage and control sediment discharge from the site.</p>	<p>Noted and no objection to the inclusion of conditions requiring compliance with the "Managing Urban Stormwater Soils and Construction, 4th Edition (Blue Book)", subject to review of draft conditions.</p>
EES – Environment Energy and Science Group	
<p><u>Use of local native provenance species</u></p> <p>In its submission on the EIS, EES recommended the SSD uses a diversity of local provenance native species from the relevant native vegetation community (or communities) that once occurred on the site/locality, rather than use exotic species or non-local native species. EES recommended this particularly as the site is located near the Mulgoa Nature Reserve and Surveyors Creek Nature Reserve, both of which are mapped as containing biodiversity values. The EIS notes Mulgoa Nature Reserve contains good quality Cumberland Plain Woodland, which is listed as a critically endangered ecological community under the Biodiversity Conservation Act 2016 (BC Act), while Surveyor's Creek Reserve contains River Flat Eucalypt Forest, which is an endangered ecological community.</p> <p>EES also recommended in its submission on the EIS:</p> <ul style="list-style-type: none"> • The RtS and Landscape Design Report should identify the native vegetation community that once occurred on the site, or in the locality. • The Landscape Design Report should provide a list of local native species from the relevant vegetation community to be planted and demonstrate that the plant species to be used are of local provenance. • the Planting Palette and Planting Schedule in the Landscape Design Drawings are amended to use local native provenance species and 	<p>Noted.</p> <p>An updated planting schedule that identifies species from local plant communities is contained in the Updated Landscape Design Drawings – Attachment D.</p> <p>Planting palette images will be updated to reflect selected species. Exotic species have been removed from the design.</p>

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<p>identifies which species are local native provenance species and any non-local native or exotic species.</p>	
<p>In response, the RtS states “where possible species from the local plant communities have been included in the design (subject to availability & EFSG requirements). To supplement these species local natives or robust native species have been selected to suit the site conditions”. The RtS does not specifically identify which native vegetation community once occurred on the site, or in the locality and it is unclear why the local native species need to be supplemented by other ‘robust native species’.</p> <p>EES notes in the RtS that Council recommended alternative tree species be identified that are more consistent with Shale Plains woodland. It is noted the Planting Schedule in Appendix C identifies plant species that are from Cumberland Plain Shale Woodlands and the Shale-Gravel Transition Forest Community but the Planting Schedule also includes numerous species that are not identified from these communities.</p>	<p>An updated planting schedule will be included to provide information regarding local plant species / communities. Native species from local planting communities will be prioritised based on availability and suitability for the school environment. No objection to the inclusion of a condition to this effect, subject to review of draft conditions.</p>
<p>EES repeats its recommendation that a condition of consent is included for any planting / landscaping associated with the SSD to use a diversity of local provenance native trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community that once occurred in this locality (see below). EES recommends an appropriately qualified bush regenerator is engaged by the proponent to provide advice on appropriate local native species that can be used on the site and to revise the Planting Schedule.</p>	<p>Noted. Landscape documentation will be peer reviewed by a Bush Regenerator Consultant who will provide a compliance statement of the final documentation.</p>
<p>Installation of Habitat Features</p> <p>EES recommended the school installs habitat features such as logs, a range of artificial nest boxes which are suitable for native fauna likely to utilise the site such as mobile birds and bats and bee hotels. The RtS notes reclaimed logs, boulders and the use of native trees have been included to provide habitable spaces, and that other habitat features will be considered where appropriate.</p> <p>EES recommends the installation of habitat features on the site is included as a condition of consent.</p>	<p>Habitat elements will be included and integrated into the landscape design. As no significant existing trees occur on site mobile bird and bat accommodation is not achievable (until trees mature). As such priority will be placed upon bug hotels, logs and boulders. SI NSW will accept the inclusion of a condition requiring priority on bug hotels, logs and boulders, subject to a review of the draft condition.</p>
<p>Urban Heat Island Effect</p> <p>EES recommended the development incorporate green roofs and/or a cool roof and green walls into the design. The EIS and the Landscape Design Report indicated the design will include a light-coloured roof and the RtS confirms that the proposed design includes light coloured roofs to minimise</p>	<p>SI NSW objects to the inclusion of green walls in the design however supports the usage of light-coloured roofs. SI NSW will accept the inclusion of a condition requiring light coloured roofs, subject to a review of the draft condition.</p>

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<p>heat absorption. EES recommends a condition of consent is included for the development to use a light-coloured roof.</p>	
<p><u>Recommended Conditions</u></p> <p>EES recommends the following conditions of consent are included:</p> <ul style="list-style-type: none"> • Any planting/ landscaping associated with the SSD shall use a diversity of local provenance native trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community that once occurred in this locality. • Tree planting shall use advanced and established native trees with a minimum plant container pot size of 100 litres, or greater for native tree species which are commercially available. Other native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed. 	<p>Noted and no objection to the inclusion of a condition to this effect, subject to review of draft conditions.</p>
<p>A Landscape Plan is to be prepared and implemented by an appropriately qualified bush regenerator and include details on:</p> <ol style="list-style-type: none"> a. the type, species, size, quantity and location of trees b. the species, quantity and location of shrubs and groundcover plantings c. the native vegetation community (or communities) that once occurred in this area and the plan demonstrates that the plant species consist of local provenance d. a list of local provenance species to be used e. the quantity and location of plantings f. the pot size of the trees to be planted g. the area/space required to allow the planted trees to grow to maturity h. plant maintenance regime. The planted vegetation must be regularly maintained and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species. <ul style="list-style-type: none"> • Habitat features shall be installed at the site to improve biodiversity such as logs, bee hotels and a range of artificial nest boxes suitable for native fauna likely to use the site. • The development shall incorporate cool roofs into the design. 	<p>Refer to the Landscape Architecture Design Report (Addendum No 2) contained in Attachment C and the Updated Landscape Design Drawings contained in Attachment D. Information contained within the attachments included the specified detail as requested. It should be noted that the Landscape documentation will be peer reviewed by a Bush Regenerator Consultant who will provide a compliance statement of the final documentation.</p>

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TfNSW Transport for NSW	
<p><u>School Travel Plan (STP)</u></p> <p>Subject to The Department's approval and the following requirement being included in the development consent:</p> <p>A School Travel Plan (STP) detailing travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel and the provision of facilities to increase the non-car mode share for travel to and from the site is to be submitted to TfNSW for review and approval prior to the issue of a Construction Certificate. The STP should as a minimum include a Travel Access Guide (TAG) which includes maps and times of all modes of transport, bikes, bus, train, walking and car-pooling options; details of end of trip facilities; details of mode share; and a parking management strategy.</p>	<p>Noted and no objection to the inclusion of a condition to this effect except it is suggested that the STP be provided for review and approval prior to the issue of a Crown Completion Certificate.</p>
<p><u>School Zones</u></p> <p>Subject to The Department's approval and the following requirement being included in the development consent:</p> <p>Road Safety precautions and parking zones should be incorporated into the neighbouring local road network:</p> <ul style="list-style-type: none"> • 40km/hr School Zones are to be installed in Darug Avenue, Forestwood and Deerubbin drives in accordance with the following conditions. • Council should ensure that any parking, drop-off / pick-up zones and bus zones incorporated are in accordance with TfNSW standards. 	<p>Noted and no objection to the inclusion of a condition to this effect, subject to review of draft conditions.</p>
<p>The Developer must obtain written authorisation from TfNSW to install the School Zone signs and associated pavement markings and/or remove/relocate any existing Speed Limit signs.</p> <p>To obtain authorisation, the Developer must submit the following for review and approval by TfNSW, at least eight (8) weeks prior to student occupation of the site:</p> <ol style="list-style-type: none"> a) A copy of Council's development Conditions of Consent b) The proposed school commencement/opening date c) Two (2) sets of detailed design plans showing the following: <ol style="list-style-type: none"> i. School property boundaries ii. All adjacent road carriageways to the school property iii. All proposed school access points to the public road network and any conditions imposed/proposed on their use 	<p>Noted and no objection to the inclusion of a condition to this effect, subject to review of draft conditions.</p>

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<p>iv. All existing and proposed pedestrian crossing facilities on the adjacent road network</p> <p>v. All existing and proposed traffic control devices and pavement markings on the adjacent road network (including School Zone signs and pavement markings).</p> <p>vi. All existing and proposed street furniture and street trees.</p> <p>School Zone signs and pavement marking patches must be installed in accordance with TfNSW approval/authorisation, guidelines and specifications. All School Zone signs and pavement markings must be installed prior to student occupation of the site.</p> <p>The Developer must maintain records of all dates in relation to installing, altering, removing traffic control devices related to speed.</p> <p>Following installation of all School Zone signs and pavement markings the Developer must arrange an inspection with TfNSW for formal handover of the assets to TfNSW. The installation date information must also be provided to TfNSW at the same time. Note: Until the assets are formally handed-over and accepted by TfNSW, TfNSW takes no responsibility for the School Zones/assets.</p>	<p>Noted and no objection to the inclusion of a condition to this effect, subject to review of draft conditions.</p>