



planning consultants

## Response to Submissions Report

State Significant Development – SSD 17\_8365

Penshurst Public School Redevelopment

510 Forest Road, Penshurst

(Cnr Forest Road and Arcadia Street)

Prepared for: NSW Department of Education  
October 2018

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# 1 Introduction

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The Department of Education (the department) submitted a State Significant Development (SSD) Application SSD 17\_8365 to Department of Planning and Environment (DPE) for demolition of the existing buildings and construction of new facilities to cater for an increase of up to 1,012 students at 510 Forest Road, Penshurst (the site).

The SSDA was notified from 10 May 2018 to 8 June 2018 in accordance with DPEs policy. Within this time submissions were received from:

- Department of Planning and Environment (DPE)
- Government Architect New South Wales (GA)
- Environmental Protection Authority (EPA)
- Office of Environment and Heritage (OEH)
- Roads and Maritime Services (RMS)
- Transport for New South Wales (TfNSW)
- Sydney Water
- Georges River Council
- Public Submissions.

In addition to the above, a separate submission was received by the Department of Education directly from the National Trust. This submission has been incorporated into the body of this Response to Submissions (RTS) Report for a complete discussion on heritage matters.

The project team has reviewed these submissions and responded to each item raised. The following document summarises the responses and directs the Department to the relevant report where each item has been addressed.

## 2 NSW Department of Planning and Environment

### 2.1 General

| Issue                                                                                                                                                                                                                                            | Response                                                                                                                                                                                                                                                              | Reference                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| The development description is to be amended to include consolidation of the multiple allotments into one single allotment and a draft subdivision plan be submitted.                                                                            | Amend description as follows, "Demolition of all existing structures; construction of a new educational establishment to accommodate approximately 1,012 primary school students and approximately 59 staff; and consolidation of allotments into a single allotment. | Subdivision Plan<br><b>Appendix 1</b> |
| The Applicant is advised that the proposal is a State Significant Development for which the Minister for Planning is the consent authority. The advice prepared by Hunt and Hunt lawyers at Appendix 29 of the EIS has no effect in this regard. | Noted                                                                                                                                                                                                                                                                 | N/A                                   |

### 2.2 Transport and Parking

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Reference                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| <p>The EIS identifies that the school will be used for out of hours activities. In particular, it identifies the use of the multi-purpose hall and associated facilities for school or community events such as presentation nights, drama or music recitals and public gatherings up to 10 pm at night. The traffic report identifies that the maximum capacity for each event will be 350 people. However, the traffic report states that events with greater than 100 attendees may have significant traffic and parking impacts on the surrounding streets. Further details and justification must be provided that identifies:</p> <ul style="list-style-type: none"> <li>a) The parking generation for up to 350 attendees at after school hours events</li> <li>b) The proposed parking management measures for after school hour events, noting that the availability of on-street parking will be minimal during these times</li> </ul> | <p>This application does not propose to use Penshurst Public School for community events. The multi-purpose hall will be used for school purposes only. Most school functions occur during the afternoon directly after School finishes (not the evening) to mitigate the parking impacts on local residents. Evening use of the school hall is only for very occasional school related functions.</p> <p>For this reason, the on-street parking survey does not cover the evening hours as there is no community use of the hall proposed within this application and it will only be on very rare occasions that a school function would occur on site at night.</p> | Traffic Impact Assessment<br><b>Appendix 8</b> |
| The traffic report must be updated to provide an assessment of the adequacy of the proposed five additional kiss and ride spaces to accommodate the demand generated by the proposed student population increase. Recommendations provided by Transport for NSW should be closely reviewed and further consultation with Council undertaken to ensure suitable sign posting and management of on-street parking within the local road network is reviewed to support the proposal.                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Further assessment of the adequacy of the kiss and drop spaces has been undertaken by PTC and is included in the Traffic Impact Assessment provided at <b>Appendix 8</b> . The assessment concludes that the proposed additional kiss and drop spaces will adequately cater for the rise in student numbers and result in an improvement in waiting times and queue probability from the current provisions.                                                                                                                                                                                                                                                           | Traffic Impact Assessment<br><b>Appendix 8</b> |
| Details of the largest service vehicle required to access the car park must be provided. Swept path analysis is to be provided demonstrating how these vehicles manoeuvre within and into/out of the car park in a forward direction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | A peer review of the Waste Management Plan was conducted by waste consultant Waste Audit (see <b>Appendix 12</b> ). The largest service vehicle required to enter the site is a Waste Wise Mini rear loader 2.08 metres in height, 6.4 metres in length and 1.7 metres in width (see <b>Appendix 13</b> ). Swept path analysis has been provided by ptc demonstrating that the vehicle is capable of manoeuvring within and into/out of the car                                                                                                                                                                                                                        | Swept Path Analysis<br><b>Appendix 9</b>       |

## 2 NSW Department of Planning and Environment

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Reference                                   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | parking in a forward direction (see <b>Appendix 9</b> ). The manoeuvre relies on the use of three car parking spaces. Accordingly, the review conducted by Waste Audit proposes that servicing will be undertaken outside of school operating hours so as not to conflict/impact use of the car parking spaces. This is in line with current waste collection arrangements at the site.                                                                                                                    | Waste Statements <b>Appendix 12 and 13</b>  |
| Identify whether a bus will be provided to service the school for students and/or children with special needs and how this will be accommodated (i.e. bus parking) within the surrounding street network.                                                                                                                                                                                                                                                                                                                                                      | A bus service is provided for students from the Hearing-Impaired Unit. The bus stops in the Bus Zone on Arcadia Street. The bus is not accommodated on site, it leaves the site after dropping students and returns to the depot or to other services. There is no requirement for the bus to be accommodated on or around the site.                                                                                                                                                                       | N/A                                         |
| The 'Kiss and ride' plan (Appendix C of the Traffic Report) must be updated to show the proposed car park entry/exit point to ensure there is no conflict between the operation of the kiss and ride spaces and the car park entry/exit driveway. The plan currently shows the existing entry/exit driveways which are proposed to be modified as part of this application.                                                                                                                                                                                    | An updated diagram has been provided in the Traffic Impact Assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                     | Traffic Impact Assessment <b>Appendix 8</b> |
| The Applicant must prepare and submit a Green Travel Plan that addresses the high reliance on private motor vehicle trips by staff. This should include the information outlined within the Traffic Report along with: <ul style="list-style-type: none"> <li>a) Targets for the school to work towards achieving to promote sustainable travel behaviour</li> <li>b) Details of how the effectiveness of the Green Travel Plan will be monitored and reviewed periodically along with recommendations and actions where targets are not being met.</li> </ul> | An improved Green Travel Plan has been prepared and targets have been set for the school to work towards to promote sustainable travel behaviour. A target of a 10% reduction in staff and student reliance on private vehicle travel in 5 years has been established along with a series of robust strategies to support the school to achieve this. The Green Travel Plan also details monitoring and review practices to ensure the school remains on track to achieve the sustainable travel outcomes. | Green Travel Plan <b>Appendix 11</b>        |

### 2.3 Privacy

| Issue                                                                                                | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Reference                        |
|------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|
| Identify how potential privacy impacts upon residents along the northern boundary will be addressed. | <p>Landscape planting will help provide privacy to residents along the northern boundary as follows:</p> <ul style="list-style-type: none"> <li>• 9 x Blueberry Ash trees (7m high x 4m wide); and</li> <li>• 6 x Brush Box trees (8m high x 8m wide).</li> </ul> <p>During construction screening, scaffolding and hoarding will be provided. Details will be provided in the final CMP being prepared by the contractor prior to the commencement of works.</p> | Landscape Plan <b>Appendix 5</b> |

## 2 NSW Department of Planning and Environment

### 2.4 Noise

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Reference                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| The Acoustic Report identifies that the construction noise impacts will approach the highly affected noise level of 75dBA for the majority of the construction period. Recommended work practices are not considered to provide sufficient acoustic relief for the surrounding sensitive receivers over this extended period. Further details must be provided to demonstrate how noise impacts on surrounding properties can be managed throughout the construction process to minimise impacts. | <p>The Acoustic Assessment Report has been updated to include engineering and practical noise controls to mitigate noise during the construction period. These include:</p> <ul style="list-style-type: none"> <li>Distance – locate mechanical plant as far as practically possible from the nearby existing residences;</li> <li>Enclosure – construct acoustical enclosures around items of mobile plant such as generators where extended use for long periods is expected;</li> <li>Screening – erect temporary sound barrier screens along the boundaries of the site near adjacent residential buildings to remain throughout all construction phases as far as reasonably practical;</li> <li>Silencing – all plant and machinery should be selected with consideration to low noise options where practical and available. Care should be taken to ensure not more than one item of plant is operating simultaneously within close proximity of any given residence as far as reasonably practical</li> </ul> | Acoustic Report<br><b>Appendix 3</b> |
| Provide further information regarding the cumulative noise impacts from St Declan's Primary School and the proposed Penshurst Public School upon surrounding sensitive receivers.                                                                                                                                                                                                                                                                                                                 | <p>In considering the cumulative impacts from St Declan's Primary School and the proposed Penshurst Public School upon surrounding sensitive noise receivers, the Acoustic Consultant stated that St Declan's has a student population of approximately 435. Accordingly, the noise emission is likely to be greater from Penshurst Public School, with its population of 1,000 students.</p> <p>The combination of both schools will likely lead to an increase in overall noise level by 1-2dB at the most sensitive noise receptors, which is considered a negligible increase.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                 | Acoustic Report<br><b>Appendix 3</b> |
| Provide noise management measures to address the identified operational noise impacts of up to 7dBA above the amenity noise criteria on the neighbouring St Declan's Primary School.                                                                                                                                                                                                                                                                                                              | <p>The operational noise impacts of up to 7dBA above the amenity noise criteria on the neighbouring St Declan's Primary School are a result of outdoor play at recess and lunch times.</p> <p>The EPA has noted that due to the zoning of the site as a school, noise from outdoor play is considered acceptable for use. The Acoustic Consultant has assessed the noise from outdoor play with consideration that St Declan's classrooms have their windows open. Closing of windows at St Declan's during outdoor play at Penshurst Public School is current practice and will provide a satisfactory indoor acoustic environment of 45dBA.</p>                                                                                                                                                                                                                                                                                                                                                                      | Acoustic Report<br><b>Appendix 3</b> |
| Confirm that the Acoustic Report has considered the use of the school outside of school hours for private events, community functions, etc. for events consisting of up to 350 people until 10 pm at night and detail how impacts upon surrounding sensitive receivers resulting from these events will be managed.                                                                                                                                                                               | <p>The Acoustic Assessment Report has considered the use of the school hall by the school (and not the community) outside of school hours. The assessment has predicted the level of noise from activities within the hall with the doors open to the south at the worst affected residences. See <i>Table 9 – Predicted <math>L_{eq}</math> Hall Noise Levels (Large Doors Open)</i> in <b>Appendix 3</b>. The predictions indicate that the only receptor to potentially have an elevated noise level is St Declan's Primary School (second floor) during a concert/ disco/ function. If St Declan's is also in use during the out of hours event, the noise impact can be mitigated by closing the doors and windows to the hall. However, the likelihood of two functions occurring at the schools simultaneously is very low.</p>                                                                                                                                                                                 | Acoustic Report<br><b>Appendix 3</b> |

## 2 NSW Department of Planning and Environment

### 2.5 Trees / Landscaping

| Issue                                                                                                                                                                                                                                                                              | Response                                                                                                                                                                                                                                                                                                                                                                         | Reference                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| Tree No.6,7 and 8 along the northern boundary adjacent to 13 Arcadia Street, Penshurst are proposed to be removed. These trees help to provide a visual barrier between the school and properties to the north. Identify options to retain these trees as part of the development. | Trees will need to be removed in order to accommodate the increased car parking supply. Replacement trees (mature/large pot size) will be provided on the northern boundary to provide privacy to residents as follows: <ul style="list-style-type: none"> <li>• 6 x Blueberry Ash trees (7m high x 4m wide); and</li> <li>• 6 x Brush Box trees (8m high x 8m wide).</li> </ul> | Landscape Plan<br><b>Appendix 5</b>        |
| Provide details demonstrating what landscaping treatment is proposed within the northern boundary setback to provide a visual screen for adjoining residents.                                                                                                                      | During construction screening, scaffolding and hoarding will be provided. Details will be provided in the final CMP being prepared by the contractor prior to the commencement of works.                                                                                                                                                                                         |                                            |
| Confirm, via the 'landscape site plan' whether the street tree to the south east of T44 is proposed to be retained or removed.                                                                                                                                                     | The proposed parking area is in the same area as the current parking area. However, an expanded vehicular crossover is required for vehicular access and egress from the site, which encroaches into the TPZ of Tree 44.<br><br>Tree 44 falls within the footprint of the expanded vehicular crossover and will require removal to facilitate the proposed crossover.            | Arboricultural Report<br><b>Appendix 4</b> |

## 3 Government Architect Response

### 3.1 General

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Reference                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| <p>Lack of detail in the submitted material notwithstanding, our concerns regarding the architectural expression, form and geometry remain along with broader concerns regarding the general overdevelopment of the site and justification for demolition of the heritage item and other existing buildings from both a heritage and sustainability perspective.</p> <p>Generally, we feel the proposal is unnecessarily complex and costly with little regard for sustainability and efficiency of design approach in response to Department of Education's objectives for the school.</p> <p>Issues are identified below.</p> | <p>Noted – additional discussion and response is provided below.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | N/A                                                |
| <p>The complete removal of existing buildings, including recent BER and heritage structures should be offset by superior design and sustainability outcomes.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The existing buildings are not sufficient in meeting the current education model required for the collective arrangement of the site and would not satisfy the EFSG requirements for a school providing facilities for approximately 1,000 students.</p> <p>The extent of alterations and upgrades required to existing buildings to meet these requirements, together with the restrictions this would place on the availability of site area for redevelopment of new facilities, were the ultimate factors identified in the design development phase of the project which aided in the determination to remove all buildings.</p> <p>Additional/supplementary detail is provided in the Design Options Report prepared by Perumal Pedavoli Architects that indicates the current proposal provides superior design and sustainability outcomes. Notably, the EFSG requires that all SINSW development achieve a benchmark against the Green Star Education V1 Rating System, with a goal of achieving an equivalent of a 4 star rating. Although this project is not pursuing a formal Green Star rating, the proposal will achieve desirable sustainability outcomes which go towards offsetting the removal of all existing buildings on the site by providing high-performance buildings for the future of the site.</p> | <p>Design Options Report<br/><b>Appendix 7</b></p> |
| <p>The discontinuity in form and geometry of the ground and upper levels of the main building has significant impacts.</p> <p>Structural inefficiency.</p> <p>Compromised operational efficiency (irregular spaces and column placement).</p>                                                                                                                                                                                                                                                                                                                                                                                   | <p>A full assessment of the proposal against the design quality principles under the Education SEPP has been provided in the EIS within the Design Analysis Report. The Report outlines all design responses of the proposal to the design quality principles and provides assessment which confirms the proposal is satisfactory in its design response to each of the design quality principles.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | N/A                                                |

### 3 Government Architect Response

| Issue                                                                                                                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                                                            | Reference                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| The curved upper level provides inconsistent width of covered way at the ground level and is at its narrowest near the main entry where the greatest amount of shelter is needed. |                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                            |
| The curved form of the upper levels has a greater overshadowing impact on the playground area than a conventional rectilinear layout.                                             | A variety of play spaces have been provided throughout the site which each experience different levels of solar access throughout the year. The shadow diagrams submitted with the DA identify that all play areas will achieve solar access throughout the course of a day. The level of solar access to play areas is considered appropriate and is not reduced to unsatisfactory levels as a result of the proposed curved form. | N/A                                                        |
| The architectural expression of the main entry is unsuited to the character of a primary school, particularly in terms of scale, materials and colour.                            | A full assessment of the proposal against the design quality principles under the Education SEPP has been provided in the EIS within the Design Analysis Report. The Report outlines all design responses of the proposal to the design quality principles and provides assessment which confirms the proposal is satisfactory in its design response to each of the design quality principles.                                     | N/A                                                        |
| Perimeter fencing creates an unpleasant barrier at the entry to the school.                                                                                                       | Fencing has been provided to the boundary of the site in order to meet the safety and security requirements of the Department of Education.                                                                                                                                                                                                                                                                                         | N/A                                                        |
| Little consideration of community access to library and hall.                                                                                                                     | Site planning does allow for convenient access to library and hall facilities, however this application does not seek consent for community use of these facilities outside of school hours, and will be used for school purposes only.                                                                                                                                                                                             | N/A                                                        |
| No evidence of engagement with Aboriginal culture and heritage.                                                                                                                   | An Aboriginal Archaeological Assessment has been undertaken by Apex Archaeology. This assessment includes consultation with the Metropolitan Local Aboriginal Land Council (MLALC).                                                                                                                                                                                                                                                 | Aboriginal Archaeological Assessment<br><b>Appendix 14</b> |

#### 3.2 Demolition

| Issue                                                                                                                                                                                                                                                                                                                                                                               | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Reference                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| Justification for demolition of a listed heritage building is insufficient and not warranted by the design outcome proposed. The 1925 building appears to be in relatively good condition, has generous proportions and is not poorly sited. This position appears also to be consistent with council's previous heritage advice which is included in appendix 4 of the submission. | <p>A supplementary heritage assessment has been prepared to address the issues raised in the submissions. The report provides a greater depth of information about the opportunities and constraints for adaptive reuse of the 1925 building. The report identifies that in order to accommodate the additional students, retention of the heritage building would require construction of a six-storey building on site over the existing open playground area.</p> <p>The supplementary heritage report also makes a comparison of the architectural qualities of the heritage listed building against other examples of Inter-war Free Classical</p> | <p>Supplementary Heritage Assessment at<br/><b>Appendix 6</b></p> <p>Design Options Report<br/><b>Appendix 7</b></p> |

### 3 Government Architect Response

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Reference                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>school buildings in the area including Peakhurst Public School, Hurstville Public School and Georges River College.</p> <p>A report has been prepared by the architect detailing the design process and fifteen (15) designs that were considered for the site, including designs that retain the heritage building; partial retention of the building; and demolition of the building.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                |
| <p>In justifying the demolition, the heritage impact statement recommends the <i>incorporation of interpretive measures including incorporation of landscape features and elements such as brick wall, historical photographs and signage in publicly accessible areas that will recall the history of the site for past, current and future users and enhance its historic and social significance</i>. These interpretative measures do not appear to have been incorporated into the scheme nor detail provided to allow for an informed assessment of their appropriateness.</p> <p>In light of this lack of detail and justification, we feel the decision to demolish the heritage item should be revisited with further consideration given to retaining and adapting the heritage building.</p> <p>In consideration of the above, several issues need to be addressed if the current scheme is to be supported.</p> | <p>A supplementary heritage assessment has been prepared which provides further discussion regarding the heritage impacts of the proposal. Namely, any potential heritage impacts will be reduced by the following measures:</p> <ul style="list-style-type: none"> <li>• Preparation of a Photographic Archival Recording;</li> <li>• Provision of interpretive material in the new building and on the School site;</li> <li>• Provision of an interpretive installation incorporating bricks and details from the 1925 building on the School site.</li> </ul> <p>The above measures were proposed in the Statement of Heritage Impact that was submitted with the EIS and provides sufficient detail and justification for the proposed demolition of the heritage building.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Supplementary Heritage Assessment at <b>Appendix 6</b></p>  |
| <ul style="list-style-type: none"> <li>• Further consideration of the architectural expression and selection of materials and colours to achieve a less overwhelming street presence particularly in relation to the entrance.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>The Design Analysis Report submitted with the EIS considered the architectural expression and selection of materials and colours having regard to the design quality principles set out under the Education SEPP. The curvilinear form provides a visual juxtaposition to the rectilinear built form at ground level, which generates visual interest appropriate for a place of learning. The building does not create unacceptable overshadowing of the school site and contains elements of architectural merit that will provide a vibrant and visually interesting contribution to the streetscape.</p> <p>In particular, the entrance of the school from Arcadia Street provides clear way-finding which also assists in providing a break in the building towards the public domain. The scale of the entry is in keeping with the remainder of the development and is not considered an overwhelming element to the street presence or for building users.</p> <p>The design options which have been considered as part of this project (highlighting other options considered for architectural expression and street entrances) are detailed within the Design Options Report provided with this report.</p> | <p>Design Options Report <b>Appendix 7</b></p>                 |
| <ul style="list-style-type: none"> <li>• Demonstration of genuine engagement with local culture and community, in particular local Aboriginal culture and heritage as well as the school's history which is effectively erased with the demolition of all existing buildings</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <p>The updated Aboriginal Archaeological Assessment provides full details of consultation with the Metropolitan LALC. No response was received from the LALC, other than confirmation by email read receipt and verbal confirmation from the LALC representative that they had received the consultation material. The site is not mapped as containing items of Aboriginal heritage significance.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Aboriginal Archaeological Assessment <b>Appendix 14</b></p> |

### 3 Government Architect Response

| Issue                                                                                                                                                                                                                                                                                                                      | Response                                                                                                                                                                                                                                                                                                                                                                                        | Reference                                                                                            |
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| <ul style="list-style-type: none"> <li>Reconsideration of the geometry, orientation and mass at upper levels as it relates to sheltered circulation and overshadowing at ground level.</li> </ul>                                                                                                                          | A full assessment of the proposal against the design quality principles under the Education SEPP has been provided in the EIS within the Design Analysis Report. The Report outlines all design responses of the proposal to the design quality principles and provides assessment which confirms the proposal is satisfactory in its design response to each of the design quality principles. | N/A                                                                                                  |
| <ul style="list-style-type: none"> <li>Provision of bike parking facilities for students and staff as well as end of trip facilities where possible</li> </ul>                                                                                                                                                             | Bicycle parking for students is provided at the frontage of the site to Arcadia Street, as shown on the Site Plan Ref: DA_00_004, while staff bicycle storage and end of trip facilities are shown on the Floor Plan Ref: DA_01_010.                                                                                                                                                            | N/A                                                                                                  |
| <ul style="list-style-type: none"> <li>Further consideration of community access to the library</li> </ul>                                                                                                                                                                                                                 | This application does not propose to use Penshurst Public School for community events. The multi-purpose hall will be used for school purposes only. All facilities used outside of school hours will be for school functions only.                                                                                                                                                             | N/A                                                                                                  |
| <ul style="list-style-type: none"> <li>Detail of interpretative elements to be incorporated into the design including further consideration of adaptive reuse of heritage item.</li> </ul>                                                                                                                                 | The supplementary heritage assessment and design options report provide discussion on the consideration of adaptive reuse of the heritage building.                                                                                                                                                                                                                                             | Supplementary Heritage Report<br><b>Appendix 6</b><br><br>Design Options Report<br><b>Appendix 7</b> |
| <ul style="list-style-type: none"> <li>Rationalised structural approach and consequent location of columns throughout internal spaces</li> </ul>                                                                                                                                                                           | The floor planning detailed on the Floor Plans shows how the structural approach to building design has been accommodated and optimal function of all classroom spaces has been achieved.                                                                                                                                                                                                       | N/A                                                                                                  |
| <ul style="list-style-type: none"> <li>Consideration and design of ground level rooftop areas as elevations, including potential for access</li> </ul>                                                                                                                                                                     | The internal layout of the buildings has responded to the potential for downward views to the roof top area through considered interior planning (such as the location of fixed fittings including cupboards), limiting potential downward view lines of students.                                                                                                                              | N/A                                                                                                  |
| <ul style="list-style-type: none"> <li>Reconsideration of fence alignment at main entry, balancing security requirements with accessibility and legible street presence</li> </ul>                                                                                                                                         | Fencing has been provided the boundary of the site in order to meet the safety and security requirements of the Department of Education.                                                                                                                                                                                                                                                        | N/A                                                                                                  |
| <p>We also recommend that the following additional information is requested;</p> <ul style="list-style-type: none"> <li>Plans of the proposal at minimum 1:200 scale including dimensions (overall, setbacks, openings, rooms), materials and finishes proposed, all RLs, furniture layouts and detailed notes;</li> </ul> | All Floor Plans provided as part of the DA package are at 1:200 scale. Setbacks have been dimensioned on the Site Plan provided as part of the DA package. Materials and finishes were detailed in the Design Analysis Report submitted as part of the DA package. Furniture layouts are not required for DA assessment and are not intended to form part of the DA determination.              | N/A                                                                                                  |
| <ul style="list-style-type: none"> <li>Sections and Elevations of the proposal at minimum 1:200 scale incorporating site context including neighbouring buildings, streets and public spaces, dimensions, materials and finishes proposed, all RLs;</li> </ul>                                                             | All Sections and Elevations provided as part of the DA package are at 1:200 scale. 3D perspectives provide additional detailed site context required for assessment.                                                                                                                                                                                                                            | N/A                                                                                                  |
| <ul style="list-style-type: none"> <li>An integrated landscape plan that includes detail of all new planting, shade structures, materials and finishes proposed;</li> </ul>                                                                                                                                                | A Landscape Plan has been provided as part of the DA package, including new planting details, areas with shade structures and other related materials/finishes.                                                                                                                                                                                                                                 | N/A                                                                                                  |

### 3 Government Architect Response

| Issue                                                                                                                                                                                                                                        | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Reference                                                     |
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| <ul style="list-style-type: none"> <li>Detailed sections at 1:20 that demonstrate typical cladding, window and door details and general construction quality and materials;</li> </ul>                                                       | Detailed sections will be provided as part of the construction package and are not required for the purposes of DA assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | N/A                                                           |
| <ul style="list-style-type: none"> <li>Masterplan for the whole school site including opportunities for future expansion and additional facilities</li> </ul>                                                                                | The proposal represents a masterplan of the redevelopment of the site, carried out in a single stage and taking into consideration all relevant design factors. The proposal is not a 'staged concept DA' under Section 4.22 of the EP&A Act, as it is proposed to carry out the entire redevelopment of the site in a single stage of works. The proposal therefore represents the operational and development capacity for the site at this time and a 'masterplan' is not warranted.                                                                                                                                                                                                                                                                                                                                                                                                            | N/A                                                           |
| <ul style="list-style-type: none"> <li>A physical materials sample board where materials are shown in proportion they are intended to be used in the project;</li> </ul>                                                                     | Details of the proposed materials have been set out in the Design Analysis Report, and the 3D images provide sufficient detail to identify materials and finishes throughout the site. A physical materials sample board is not necessary to complete an assessment of the proposal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | N/A                                                           |
| <ul style="list-style-type: none"> <li>Site and context plans that demonstrate active transport strategies and linkages with existing, proposed and potential footpaths and bicycle paths;</li> </ul>                                        | Active transport strategies external to the school site are not part of this project scope, however the Green Travel Plan identifies targets and strategies to increase the proportion of students and staff walking and cycling to the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Green Travel Plan<br><b>Appendix 11</b>                       |
| <ul style="list-style-type: none"> <li>Demonstrated engagement with Aboriginal cultural heritage context reflected in design approach and documentation of consultation with local Aboriginal community groups;</li> </ul>                   | The Aboriginal Archaeological Assessment (AAA) provides details of consultation with the Metropolitan Local Aboriginal Land Council (MLALC) in accordance with OEH guidance. Documentation of the consultation is provided as an Appendix to the AAA. The AHIMS database did not identify a site within the proposed project area. A visual inspection did not identify any surface objects or the potential for subsurface deposits to be present.                                                                                                                                                                                                                                                                                                                                                                                                                                                | Aboriginal Archaeological Assessment at<br><b>Appendix 14</b> |
| <ul style="list-style-type: none"> <li>Clearer outline of sustainability targets and demonstrated expression of these in design approach (eg. Opportunities to reuse any existing materials on site; capabilities of solar array)</li> </ul> | <p>The sustainability targets of the proposed development have been detailed in the ESD Report provided as part of the DA package and have been compiled based on best practice design principles, BCA/NCC Section J energy efficiency targets, Australian Green Building Council Green Star benchmarking, and the Department of Education's EFSG. The initiatives to minimise consumption of energy generated from non-renewable sources and energy efficiency measures include:</p> <ul style="list-style-type: none"> <li>Electricity metering and sub-metering will be specified in accordance with Green Star standards;</li> <li>A 70KW roof mounted photovoltaic system aims to provide approximately 10% of the building's energy needs; and</li> <li>Lighting will achieve a minimum 15% improvement over the BCA Section J6 light power density allowances (W/m<sup>2</sup>).</li> </ul> | N/A                                                           |
| <ul style="list-style-type: none"> <li>Demonstrated reasoning for demolition of existing building and the impact of this decision on overall sustainability targets</li> </ul>                                                               | The supplementary heritage assessment and design options report provide demonstrated reasoning for the decision to demolish the heritage building, including consideration of multiple options for retention and partial retention of the building before coming to the decision. The overall sustainability targets remain the same for all project outcomes, as the EFSG requires all projects be benchmarked against the Green Star Education B1 Rating System, with a goal of achieving an equivalent of a 4 star rating.                                                                                                                                                                                                                                                                                                                                                                      | Supplementary Heritage Assessment<br><b>Appendix 6</b>        |

### 3 Government Architect Response

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| Issue | Response | Reference                                  |
|-------|----------|--------------------------------------------|
|       |          | Design Options Report at <b>Appendix 7</b> |

## 4 NSW Environmental Protection Authority

### 4.1 Location

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Reference                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| <p>The EPA notes with concern the proposed location of the communal hall and the waste storage/collection area adjacent to the north western boundary and anticipates significant noise impacts on adjoining residences, especially the adjoining residences at 13 Arcadia Street and 11 and 13 Percival Street. Accordingly, the EPA recommends relocation of the waste storage/collection area away from the north western boundary and strict limits on community use of the communal hall and associated parking outside normal school hours.</p> | <p>The hall and waste storage/collection area cannot be located elsewhere on the site for the following reasons:</p> <ul style="list-style-type: none"> <li>• The topography of the site and requirement to link the hall with an external courtyard establish site-linkage restrictions that limit the options for the location of the hall, together with the dimensions of the hall (such as floor to ceiling clearance) which then impact on floor levels and connectivity with the floors above;</li> <li>• The hall then also comprises a canteen with associated facilities and direct access to the waste storage area. In this way, the hall and waste storage/collection area are linked;</li> <li>• The vehicle crossover/access from Arcadia Street dictates the location of vehicle access and the location of the car park, together with vehicle circulation areas and in turn the access to the waste storage/collection area;</li> <li>• Given the above factors, the hall, canteen, waste storage area and car parking area are all required to be located at the northern side of the site and cannot be relocated without significant loss of site area and conflict with other school operations.</li> </ul> <p>The potential impacts of the waste storage/collection area have been considered further in the Acoustic Assessment Report and will form part of future operational management practices for the School. No community use of the school facilities is proposed in this application.</p> | <p>Acoustic Report<br/><b>Appendix 3</b></p> |
| <p>The EPA further anticipates significant noise impacts from the outdoor sports court and the communal hall on other noise sensitive receiver locations, especially on –</p> <p>(a) the adjoining educational establishment (i.e. St Declans Catholic School) during normal school hours, and</p> <p>(b) two places of public worship (in Penshurst Street) during community [use] of school facilities.</p>                                                                                                                                         | <p>Predicted noise emission criteria created by children in outdoor areas and the school hall has been assessed for the nearest residential receptors and St Declan's School in the Acoustic Report at <b>Appendix 3</b>. The findings are that noise from outdoor play will likely exceed the noise criteria by up to 7dB however this will still be within the residential amenity noise criteria.</p> <p>With regard to St Declan's Catholic School, it is likely they will be generating their own noise during recess and lunch breaks when the above is proposed to take place. Accordingly, the Acoustic Report concludes, <i>"given the existing school noise emission, the limited duration of noise from outdoor play, the zoning of the site and expectations of noise from children on a school site we are of the opinion that the noise from outdoor play would be considered acceptable."</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>Acoustic Report<br/><b>Appendix 3</b></p> |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Reference                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
|                                                                                                                                                                                                                                                                                                                                              | <p>With regard to the school hall, the only sensitive receptor that will receive slightly elevated noise levels is St Declan's School during daytime indoor sports activities if the hall doors are left open and in the evenings a concert or function. This can be mitigated by closing the hall doors while St Declan's School is in use, which can be managed by School staff during hall use.</p> <p>This application does not proposed to use the multi-purpose hall for community or private events. The hall will only be used for school purposes. Therefore assessment of the impact of the use of the hall by the community upon the two places of public worship is not required.</p>                                                                                                                                                                                                                                                                                             |                                      |
| The EPA has identified the following site-specific concerns based on the project information available on the Department of Planning and Environment major projects web site:                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                      |
| (a) The need for a detailed assessment of potential site contamination, including information about groundwater and a detailed assessment of the footprint and surrounds of existing buildings following their demolition;                                                                                                                   | No objection – the Department will comply with this request.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N/A                                  |
| (b) The need for a detailed hazardous materials survey prior to any demolition activities;                                                                                                                                                                                                                                                   | A HAZMAT survey was submitted with the original EIS package.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | N/A                                  |
| (c) Construction phase noise and vibration impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) on noise sensitive receivers such as surrounding residences;                                                                                                 | These items have been considered in both the Preliminary Construction Management Plan (PCMP) provided with the original EIS package and by the Acoustic Report provided at <b>Appendix 3</b> to this document. It is expected further conditions of consent will be applied to the proposal to further mitigate these potential impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Acoustic Report<br><b>Appendix 3</b> |
| (d) Construction phase dust control and management and erosion and sediment control and management;                                                                                                                                                                                                                                          | This has been considered as part of the PCMP and Stormwater Management Plan provided with the original EIS package. It is expected further conditions of consent will be applied to the proposal to further mitigate these potential impacts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | N/A                                  |
| (e) Operational noise impacts on noise sensitive receivers (especially surrounding residences on adjoining and adjacent holdings) arising from operational activities such as public address/school bell systems, community use of school facilities, waste collection services and mechanical services (especially air conditioning plant); | <p>The Acoustic Consultant has addressed these issues as follows:</p> <ul style="list-style-type: none"> <li>Public Address/ School Bell – While the location of the six speakers has not been determined, the maximum sound pressure level should be no greater than 80dBA at 3 metres from each speaker in order to meet residential noise criteria. It is expected a condition of consent will be included to this effect.</li> <li>Community Use of School Facilities – No community use of school facilities is proposed as part of this application.</li> <li>Waste Collection Services will be restricted to the daytime hours of between 7.30am and 6pm Monday to Friday, and parking will be coordinated through a management plan to be prepared prior to the commencement of the operation of the school;</li> <li>Mechanical Services – air-conditioning has been considered as part of the Acoustic Assessment, which found that with all 33 condensers operating and</li> </ul> | Acoustic Report<br><b>Appendix 3</b> |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                       | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Reference                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|
|                                                                                                                                                                                                                                                                                             | no additional noise controls, the noise emission will be able to meet the noise criteria. Air conditioners will also only operate during daytime hours.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                        |
| (f) The need to assess feasible and reasonable noise mitigation and management measures (including time restrictions on the use of the facilities proposed to be available for community use) to minimise operational noise impacts on surrounding residences and places of public worship; | Feasible and reasonable noise mitigation and management measures have been identified by the Acoustic Consultant for operational noise impacts, including use outside school hours. These are detailed in the report at <b>Appendix 3</b> but generally include limiting noise making activities to daylight hours on Monday – Friday.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Acoustic Report t<br><b>Appendix 3</b> |
| (g) Practical opportunities to implement water sensitive urban design principles, including stormwater re-use; and                                                                                                                                                                          | The Stormwater Management Plan prepared by Woolacotts Consulting Engineers provided with the original EIS package details plans for a rainwater tank to be installed adjacent to the OSD tank. Water stored in the rainwater tank will be used for non-potable uses on site, such as watering garden areas and for general irrigation purposes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | N/A                                    |
| (h) Practical opportunities to minimise consumption of energy generated from non-renewable sources and to implement effective energy efficiency measures.                                                                                                                                   | A report prepared by JHA Consulting Engineers detailing the Ecologically Sustainable Design (ESD) Initiatives for the project was provided with the original EIS package. The report confirms that the proposed initiatives comply with the Department of Education's EFSG ESD Guidelines. The initiatives to minimise consumption of energy generated from non-renewable sources and energy efficiency measures include: <ul style="list-style-type: none"> <li>Electricity metering and sub-metering will be specified in accordance with Green Star standards;</li> <li>A 70KW roof mounted photovoltaic system aims to provide approximately 10% of the building's energy needs; and</li> <li>Lighting will achieve a minimum 15% improvement over the BCA Section J6 light power density allowances (W/m<sup>2</sup>).</li> </ul> | N/A                                    |

### 4.2 Construction phase

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Response | Reference |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------|
| <p>The EPA anticipates that site establishment, demolition, bulk earthworks, construction and construction-related activities will be undertaken in an environmentally responsible manner with particular emphasis on</p> <ul style="list-style-type: none"> <li>the site contamination remediation action plan accompanying the EIS,</li> <li>compliance with recommended standard construction hours,</li> <li>intra-day respite periods from high noise generating construction activities (including jack hammering, rock breaking, pile boring or driving, saw cutting),</li> <li>feasible and reasonable noise and vibration minimisation and mitigation,</li> <li>effective dust control and management,</li> <li>erosion and sediment control, and</li> <li>waste handling and management, particularly concrete waste and rinse water.</li> </ul> | Noted    | N/A       |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                               | Reference                                                                               |
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| <p><b>Site contamination</b></p> <p>The EPA acknowledges that EIS Appendix7 'Preliminary Site Assessment' whilst limited in scope, recommends a detailed site investigation, remediation action plan and hazardous building materials survey, be undertaken.</p> <p>The EPA notes that</p> <ul style="list-style-type: none"> <li>(a) EIS Appendix 8 'Stage 2 Site Investigation and Remediation Action Plan' forms part of the EIS,</li> <li>(b) until existing structures are demolished and removed from the site, a detailed assessment of the nature and extent of the site contamination is impracticable, and</li> <li>(c) soil samples were only collected from 10 boreholes which is considered inadequate for proper assessment of the 10,605 square metre development site for which the Sampling Design Guidelines (NSW EPA, 1995) recommends a minimum of 21 sample locations.</li> </ul> <p>Accordingly, the EPA considers a more detailed site investigation is required to address those areas of the development site not yet investigated. Further, that the remediation action plan be updated to account of the results of that additional investigation.</p> | No objection – investigations to be undertaken following demolition works.                                                                                                                                             | N/A                                                                                     |
| <p><b>Recommendations</b></p> <ol style="list-style-type: none"> <li>1. The proponent be required to conduct additional site investigation and prepare an updated remedial action plan to address the contamination with proper regard to the - <ul style="list-style-type: none"> <li>i. NSW EPA Sampling Design Guidelines,</li> <li>ii. Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017,</li> <li>iii. Guidelines for Consultants Reporting on Contaminated Sites, 2011</li> <li>iv. The National Environment Protection (Assessment of Contamination) Measure.</li> </ul> </li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | No objection                                                                                                                                                                                                           | N/A                                                                                     |
| <ol style="list-style-type: none"> <li>2. The proponent should comply with the processes outlined in State Environmental Planning Policy 55 - Remediation of Land (SEPP55) when assessing the suitability of the land and any remediation required in relation to the proposed sensitive use.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | No objection                                                                                                                                                                                                           | N/A                                                                                     |
| <ol style="list-style-type: none"> <li>3. The proponent be required to: <ul style="list-style-type: none"> <li>a) engage a site auditor accredited under the Contaminated Land Management Act 1997 (CLM Act) to review the adequacy of the investigations, unexpected finds protocol, any remedial works or management plan required and to confirm the suitability of the land for the proposed use;</li> </ul> </li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Senversa has been engaged as a Site Auditor to review the adequacy of site investigations, protocols and management plans. Following advice from the Site Auditor, the Remediation Action Plan (RAP) has been revised. | Site Auditor's Statement<br><b>Appendix 16</b><br><br>Revised RAP<br><b>Appendix 18</b> |
| <ul style="list-style-type: none"> <li>b) implement the recommendations of the updated remedial action plan as reviewed by the accredited site auditor;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | No objection                                                                                                                                                                                                           | N/A                                                                                     |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response                                                                                                                         | Reference |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|-----------|
| c) prepare an Asbestos Works Management Plan (AWMP) that includes stringent requirements for controlling dust emissions in the development site so as not to affect the adjoining land. The plan should be reviewed and considered appropriate by an accredited site auditor;                                                                                                                                                               | No objection – the preparation of an AWMP is the Contractors' responsibility and will be written into the contract arrangements. | N/A       |
| d) provide a site audit statement (SAS) and accompanying site audit report (SAR) prepared following completion of remediation and validation, certifying suitability of the development site for the proposed use prior to undertaking any construction;                                                                                                                                                                                    | No objection                                                                                                                     | N/A       |
| e) ensure that any contamination identified as meeting the trigger in the EPA 'Guidelines for the Duty to Report Contamination' is notified in accordance with requirements of section 60 of the CLM Act;                                                                                                                                                                                                                                   | No objection                                                                                                                     | N/A       |
| f) ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site so as to result in significant contamination.                                                                                                                                                                                                                                                              | No objection                                                                                                                     | N/A       |
| Note: The EPA requires all reports submitted to the EPA to comply with the requirements of the CLM Act to be prepared, or reviewed and approved, by a certified consultant.                                                                                                                                                                                                                                                                 | Noted                                                                                                                            | N/A       |
| 4. The proponent be required (prior to commencing any work on the development site) to prepare and implement a procedure for identifying and dealing with unexpected finds of site contamination (including asbestos containing materials and lead-based paint). That procedure must include details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved. | No objection – Contractor to implement.                                                                                          | N/A       |

### 4.3 Asbestos Waste

| Issue                                                                                                                                                                                                                                                       | Response                                                                                                                                                                                                                    | Reference |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>Recommendations</b>                                                                                                                                                                                                                                      |                                                                                                                                                                                                                             | N/A       |
| 1. The proponent be required to satisfy the requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 'asbestos wastes'. Note: The EPA provides additional guidance material at its web-site | No objection                                                                                                                                                                                                                |           |
| 2. The proponent be required to consult with Safework NSW concerning the handling of any asbestos waste that may be encountered during the course of the project.                                                                                           | Consult with Safework NSW when guidelines for asbestos management contained in Safework Australia Guidelines, NSW Work Health and Safety Act 2011 and NSW Work Health and Safety Regulation 2011 are likely to be exceeded. | N/A       |

## 4 NSW Environmental Protection Authority

### 4.4 Noise and Vibration

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                         | Reference                     |
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| <p><b>General construction hours</b><br/>The EPA emphasises that demolition, site preparation, bulk earthworks, construction and construction-related activities should be undertaken during the recommended standard construction hours. The EPA emphasises that the proponent is a 'public authority' within the meaning of the Protection of the Environment Administration Act 1991. Further, that the EPA has general responsibility under that Act for amongst other things:</p> <ul style="list-style-type: none"> <li>a) ensuring that the best practicable measures are taken for environment protection in accordance with the environment protection legislation and other legislation, and</li> <li>b) coordinating the activities of all public authorities in respect of those measures.</li> </ul> <p><b>Recommendation</b><br/>The proponent be required to ensure that as far as practicable all demolition, site preparation, bulk earthworks, construction and construction-related activities likely to be audible at any noise sensitive receivers such as surrounding residences are only undertaken during the standard construction hours, being –</p> <ul style="list-style-type: none"> <li>a) 7.00 am to 6.00 pm Monday to Friday,</li> <li>b) 8.00 am to 1.00 pm Saturday, and</li> <li>c) no work on Sundays or gazetted public holidays.</li> </ul> | <p>No objection – Construction will be undertaken during standard construction hours as detailed by the EPA.</p> | N/A                           |
| <p><b>Intra-day respite periods</b><br/>The EPA anticipates that those demolition, site preparation, bulk earthworks, construction and construction-related activities generating noise with particularly annoying or intrusive characteristics (such as those identified as particularly annoying in section 4.5 of the Interim Construction Noise Guideline) would be subject to a regime of intra-day respite periods where –</p> <ul style="list-style-type: none"> <li>a) they are only undertaken after 8.00 am,</li> <li>b) they are only undertaken over continuous periods not exceeding 3 hours with at least a 1 hour respite every three hours, and</li> <li>c) 'continuous' means any period during which there is less than an uninterrupted 60 minute respite between temporarily halting and recommencing any of the intrusive and annoying work referred to in Interim Construction Noise Guideline section 4.5.</li> </ul> <p>The EPA emphasises that intra-day respite periods are not proposed to apply to those demolition, site preparation, bulk earthworks, construction and construction-related activities that do not generate noise with particularly annoying or intrusive characteristics.</p>                                                                                                                                                      | <p>Intra-day respite periods are incorporated in the Acoustic Impact Assessment Report.</p>                      | Acoustic Report<br>Appendix 3 |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Response                                                                                                                                                                                                                         | Reference                                   |
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| <p><b>Recommendation</b><br/>The proponent be required to schedule intra-day 'respite periods' for construction activities identified in section 4.5 of the Interim Construction Noise Guideline as being particularly annoying to noise sensitive receivers, including surrounding residents.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                  |                                             |
| <p><b>Idling and queuing construction vehicles</b><br/>The EPA is aware from previous major infrastructure projects that community concerns are likely to arise from noise impacts associated with the early arrival and idling of construction vehicles (including concrete agitator trucks) at the development site and in the residential precincts surrounding that site.</p> <p><b>Recommendation</b><br/>The proponent be required to ensure construction vehicles (including concrete agitator trucks) involved in demolition, site preparation, bulk earthworks, construction and construction-related activities do not arrive at the project site or in surrounding residential precincts outside approved construction hours.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>The Acoustic Impact Assessment Report has recommended that construction vehicles do not arrive at site or in the surrounding residential precincts outside approved construction hours.</p>                                   | <p>Acoustic Report at <b>Appendix 3</b></p> |
| <p><b>Reversing and movement alarms</b><br/>The EPA has identified the noise from 'beeper' type plant movement alarms to be particularly intrusive and is aware of feasible and reasonable alternatives. Transport for NSW, Barangaroo Delivery Authority/Lend Lease and Leighton Contractors (M2 Upgrade project) have undertaken safety risk assessments of alternatives to the traditional 'beeper' alarms. Each determined that adoption of 'quacker' type movement/reversing alarms instead of traditional beepers on all plant and vehicles would not only maintain a safe workplace but also deliver improved outcomes of reduced noise impacts on surrounding residents.<br/>Interim Construction Noise Guideline Appendix C provides additional background material on this issue.</p> <p><b>Recommendation</b><br/>The proponent be required to consider undertaking a safety risk assessment of site preparation, bulk earth works, construction and construction-related activities to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety.</p> | <p>The Acoustic Impact Assessment has recommended that "vehicles be fitted with broadband reversing alarms or alternative, non-tonal proximity warning systems...Reversing alarms to be of "quacker" broadband alarm style."</p> | <p>Acoustic Report at <b>Appendix 3</b></p> |

## 4 NSW Environmental Protection Authority

### 4.5 Dust control and Management

| Issue                                                                                                                                               | Response                                                                                                                  | Reference |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-----------|
| <b>Recommendation</b><br>The proponent be required to:<br>(a) minimise dust emissions on the site, and<br>(b) prevent dust emissions from the site. | No objection – This will be included in the Construction Management Plan to be prepared by the Contractor once appointed. | N/A       |

### 4.6 Sediment Control

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response                                                                                                                  | Reference |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|-----------|
| The proponent should implement all such feasible and reasonable measures as may be necessary to prevent water pollution in the course of developing the site.<br><br>The EPA emphasises the importance of –<br>a) not commencing demolition, site preparation, bulk earthworks, construction and construction-related activities until appropriate and effective sediment controls are in place, and<br>b) daily inspection of sediment controls which is fundamental to ensuring timely maintenance and repair of those controls. | No objection – This will be included in the Construction Management Plan to be prepared by the Contractor once appointed. | N/A       |

### 4.7 Waste Control and Management

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Reference                          |
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| <b>General waste control and management</b><br>The proponent be required to ensure that:<br>(1) all waste generated during the project is assessed, classified and managed in accordance with the "Waste Classification Guidelines Part 1: Classifying Waste" (Department of Environment Climate Change and Water, December 2009);<br>(2) the body of any vehicle or trailer, used to transport waste or excavation spoil from the premises, is covered before leaving the premises to prevent any spill or escape of any dust, waste, or spoil from the vehicle or trailer; and<br>(3) mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site, is removed before the vehicle, trailer or motorised plant leaves the premises. | The Preliminary Construction Management Plan (PCMP) issued with the original EIS package details the waste management aims for the project. Once engaged, the Principal Contractor will engage a waste management specialist to prepare a site-specific Construction Waste Management Plan (CWMP) with the following aims: <ul style="list-style-type: none"> <li>aim for a waste diversion target rate of 80%;</li> <li>provide guidance for waste minimisation from works activities;</li> <li>identify and classify the likely waste streams to be generated by the works;</li> <li>describe the measure to be implemented to safely manage this waste;</li> <li>ensure the CWMP is in a format appropriate to assist with the Waste Auditor Report required as part of the future Green Star submission.</li> </ul> A revised PCMP has been provided with this report. | Revised PCMP<br><b>Appendix 19</b> |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Response                                                                                                                                                | Reference                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| <p><b>Concrete and concrete rinse water waste control and management</b></p> <p>The EPA anticipates that during the course of the project concrete deliveries and pumping are likely to generate significant volumes of concrete waste and rinse water. The proponent should ensure that concrete waste and rinse water is not disposed of on the project site and instead that –</p> <p>(a) waste concrete is either returned in the agitator trucks to the supplier or directed to a dedicated watertight skip protected from the entry of precipitation, and</p> <p>(b) concrete rinse water is directed to a dedicated watertight skip protected from the entry of precipitation or a suitable water treatment plant.</p> <p>Recommendation</p> <p>The proponent be required to ensure that concrete waste and rinse water are</p> <p>(a) not disposed of on the development site, and</p> <p>(b) prevented from entering waters, including any natural or artificial watercourse</p> | <p>The Preliminary Construction Management Plan (PCMP) has been revised to address waste control and management for concrete waste and rinse water.</p> | <p>Revised<br/>PCMP<br/><b>Appendix 19</b></p> |

### 4.8 Operational Phase

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Reference                                        |
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| <p><b>Noise impacts</b></p> <p>The EPA anticipates the proposed development (especially out of hours use of school facilities by external parties) may have significant operational noise impacts on nearby noise sensitive receiver locations (especially adjoining residences) and potentially on the two nearby places of public worship located in Penshurst Street. The EPA notes with concern the proximity of the surrounding residences and the adjoining Catholic primary school and is aware from long experience of the need for appropriate operational noise mitigation and management measures, particularly in regard to:</p> <ol style="list-style-type: none"> <li>the nature of and times during which school facilities are made available for community use;</li> <li>the design and operation of the school public address/bell system;</li> <li>the design and location of waste storage facilities;</li> <li>time restrictions on waste collection services;</li> <li>design, selection and operation of mechanical ventilation plant and equipment; and</li> <li>time restrictions on grounds maintenance using powered equipment (e.g. leaf blowers, brush cutters and lawn mowers).</li> </ol> | <p>The Acoustic Consultant has addressed these issues as follows:</p> <ul style="list-style-type: none"> <li>Community Use of School Facilities – This has been addressed in Section 5.3 of <b>Appendix 3</b>. Community use will be infrequent, but the potential uses have been assessed acoustically and found to be acceptable for sensitive residential noise receivers;</li> <li>Public Address/ School Bell – While the location of the six speakers has not been determined, the maximum sound pressure level should be no greater than 80dBA at 3 metres from each speaker in order to meet residential noise criteria;</li> <li>Waste Collection Services will be restricted to the daytime hours of between 7.30am and 6pm Monday to Friday, and a management plan will be implemented to ensure there is no clash with car parking;</li> <li>Mechanical Services – air-conditioning has been considered as part of the Acoustic Assessment, which found that with all 33 condensers operating and no additional noise controls. The noise emission will be able to meet the noise criteria. Air conditioners will also only operate during daytime hours.</li> <li>Grounds maintenance, including the use of lawn mowers, leaf blowers and potentially power tools for minor repairs, will be restricted to 7.30am to 6pm Monday to Friday.</li> </ul> | <p>Acoustic<br/>Report<br/><b>Appendix 3</b></p> |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response                                                                                                                                                                                                                                                                                      | Reference                                    |
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| <p><b>Background noise measurement</b></p> <p>The EPA emphasises that properly establishing background noise levels in accordance with guidance material in the New South Wales Industrial Noise Policy (INP) is fundamental to a consistent approach to the quantitative assessment of noise impacts of development.</p> <p>The proponent has monitored noise at sites on the subject property. Noise should have been monitored at the nearest affected receivers, in accordance with the INP. However, for this site the EPA considers that the background noise levels appear reasonably representative of potentially affected noise sensitive receiver locations.</p> <p>The EPA does not agree with the project specific noise levels (PSNLs) nominated by the proponent in Section 4.7 of Appendix 25. For example:</p> <ul style="list-style-type: none"> <li>• In Section 4.7 the more stringent PSNL for the front of the site at night time is 41dBA (background + 5dBA), not 48dBA;</li> <li>• The proponent has not determined that the ambient noise levels are dominated by road traffic noise rather than by noise from the schools.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>The revised Acoustic Assessment Report has been amended to adjust the night time criteria to 41dBA at Section 4.7. Given that the school does not generally operate at night, there will be no net affect. Consideration has been given to the occasional evening event, 1-3 per year.</p> | <p>Acoustic Report<br/><b>Appendix 3</b></p> |
| <p><b>Out of hours community use of school facilities</b></p> <p>The EPA is aware of government policy to encourage out of hours community use of school facilities provided that use does not cause noise emissions that interfere unreasonably with the comfort or repose of persons not on the premises.</p> <p>The EPA considers that, in relation to the school hall and outdoor multi-purpose court:</p> <ol style="list-style-type: none"> <li>noise from school activities during normal school hours may be acoustically significant for the adjoining school; and</li> <li>use of the hall for other events, particularly outside school hours, has the potential to adversely impact on adjoining and nearby residences, and potentially on nearby places of public worship</li> </ol> <p>The EPA considers the proposed community use of school facilities (especially the hall and outdoor sports court) outside normal school hours needs to be carefully managed to ensure noise impacts on nearby residences, school and places of public worship are minimised.</p> <p>Recommendations</p> <ol style="list-style-type: none"> <li>The proponent be required to ensure that the outdoor multi-purpose sports court is not made available for community use –             <ol style="list-style-type: none"> <li>during week day mornings,</li> <li>after 6.00 pm on week nights,</li> <li>other than between the hours of 8.00 am and 6.00 pm on Saturdays, and</li> <li>during Sundays and public holidays.</li> </ol> </li> <li>The proponent be required to –</li> </ol> | <p>There is no community use of school facilities proposed as part of this application. All out of hours functions or activities are school-based functions and sporting activities and have been assessed for the acoustic amenity of nearby sensitive noise receptors.</p>                  | <p>Acoustic Report<br/><b>Appendix 3</b></p> |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                                                                                                                                                                                                  | Reference                                     |
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| <p>a. undertake comprehensive noise compliance monitoring of representative uses of the hall outdoor multi-purpose court and associated facilities (e.g. parking) outside school hours to demonstrate that the level, nature, quality and character of noise emitted by those uses and the time at which and frequency of those uses would not interfere unreasonably with or be likely to interfere unreasonably with the comfort or repose of persons not on the development site, especially the occupants of nearby residences.</p> <p>b. submit a detailed noise compliance monitoring report with noise measurements reported against relevant noise criteria and the outcomes of appropriate community consultation together with detailed recommendations concerning any additional feasible and reasonable noise mitigation and management measures, including further (or more relaxed) restrictions on the times at which and the frequency of each type of use of the hall, outdoor multi-purpose court and associated facilities (e.g. parking) outside school hours.</p> <p>c. ensure that noise compliance monitoring referred to in paragraph (a) above, would include quantitative noise impact assessment to address noise emissions arising from amongst other things –</p> <ul style="list-style-type: none"> <li>• audience/spectator noise,</li> <li>• referee whistle noise,</li> <li>• training sessions as well as sporting events,</li> <li>• any amplified sound during sporting events and any associated training sessions, and</li> <li>• post-event audience/spectator noise, including vehicle door slamming and departure noise.</li> </ul> |                                                                                                                                                                                                                                                                                                                                           |                                               |
| <p><b>Mechanical plant and equipment</b><br/>           Section 5.5 to EIS Appendix 25 states that the location and type of mechanical plant has not yet been selected. Section 5.5 to EIS Appendix 25 further states that "... mechanical plant will typically only operate during day time Monday to Friday." However, the EPA notes that school facilities such as the school hall are likely to be made available for community use and such use would include the operation of mechanical plant (including HVAC plant and equipment) other than during day time weekdays.<br/>           Recommendation<br/>           The proponent be required to:</p> <p>a) provide a comprehensive quantitative assessment of operational noise impacts on surrounding noise sensitive receivers, especially adjoining residences;</p> <p>b) ensure mechanical plant and equipment installed on the development site does not –</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>There is no community use of the hall proposed as part of this application. All out of hours functions or activities will be school based activities. Use of mechanical plant has been assessed by the Acoustic Consultant for occasional use up to 10pm and found to be meet acceptable noise criteria for residential receptors.</p> | <p>Acoustic Report<br/> <b>Appendix 3</b></p> |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Response                                                                                                                                                                                                                    | Reference                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| <ul style="list-style-type: none"> <li>i. generate noise that exceeds 5dBA above the rating background noise level (day, evening and night) measured at the western boundary of the development site, and</li> <li>ii. generate noise that exhibits tonal or other annoying characteristics.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                             |                                              |
| <p><b>Public address and school bell system</b></p> <p>The EPA notes numerous reports of community concern arising from inadequate design and installation as well as inappropriate use of school public address and bell systems and considers that appropriate design, installation and operation of those systems can both –</p> <ul style="list-style-type: none"> <li>• meet the proponent's objectives of proper administration of the school and ensuring the safety of students, staff and visitors, and</li> <li>• avoid interfering unreasonably with the comfort and repose of occupants of nearby residences</li> </ul> <p>Recommendation</p> <p>The proponent be required to design, install and operate the school public address/bell system to implement all such other measures as may be necessary to ensure use of that system does not interfere unreasonably with the comfort and repose of occupants of nearby residences.</p> | <p>The Acoustic Consultant has addressed the installation and operational parameters of the school bell and public address system in their report to ensure the acoustic amenity of the nearest residential receptors.</p>  | <p>Acoustic Report<br/><b>Appendix 3</b></p> |
| <p><b>Waste collection services</b></p> <p>The EPA notes numerous reports of community concern arising from waste collection services undertaken at schools and especially during evening and night times.</p> <p>Recommendation</p> <p>The proponent be required ensure waste collection services are not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>The Acoustic Report has been updated to support limiting waste collection from the site to 7.30am and 6 pm Monday to Friday, and a management plan will be implemented to ensure there is no clash with car parking.</p> | <p>Acoustic Report<br/><b>Appendix 3</b></p> |
| <p><b>Grounds maintenance using powered equipment</b></p> <p>The EPA notes numerous reports of community concern arising from grounds maintenance involving the use of powered equipment (example: leaf blowers, lawn mowers, brush cutters) at schools during early morning and evening periods as well as on weekends and public holidays.</p> <p>Recommendation</p> <p>The proponent be required ensure grounds maintenance involving the use of powered equipment is not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.</p>                                                                                                                                                                                                                                                                                                                                                                                                | <p>The Acoustic Report has been updated to support limited grounds maintenance using powered equipment to within 7.30am and 6 pm Monday to Friday.</p>                                                                      | <p>Acoustic Report<br/><b>Appendix 3</b></p> |
| <p><b>Waste Management</b></p> <p>The proponent should manage waste in accordance with the waste management hierarchy (mentioned earlier).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <p>The Waste Management Plan submitted with the original EIS package identifies general waste and recycling streams for each area of the school's operation.</p>                                                            | <p>N/A</p>                                   |

## 4 NSW Environmental Protection Authority

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Response | Reference |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------|
| Recommendation<br>The proponent be required to identify and implement feasible and reasonable opportunities for the re-use and recycling of waste, including food waste.                                                                                                                                                                                                                                                                                                                                   |          |           |
| <b>Water sensitive urban design and energy conservation and efficiency</b><br>The EPA acknowledges that EIS Appendix 26 comprises an environmentally sustainable development report that proposes –<br>a. A range of water sensitive urban design measures, including –<br>i. rainwater harvesting and re-use, and<br>ii. water efficient fixtures; and<br>b. range of measures to maximise energy efficiency and minimise energy consumption, including installation of rooftop solar photovoltaic arrays | Noted.   | N/A       |

## 5 NSW Office of Environment and Heritage

### 5.1 Heritage Response

Penshurst Public School is not listed on the State Heritage Register (SHR) and is not located in a Conservation Area. However, the 1925 building of the Penshurst Public School has been listed as an item of local heritage significance in the Hurstville LEP 2012, (now administered by Georges River Council). The 1925 building is also listed on the Department of Education s170 Register.

The LEP listing states that:

*Penshurst Public School is of local significance as an Inter-War period education establishment providing educational facilities to the area since its establishment in 1925. The main building maintains its original scale and form as well as fenestration and is a landmark within the streetscape. It is a representative example of public education and reflects the growth of the area following WWI. The site also has a long association with the development of the Penshurst area and the resultant increase in population. It has particular associations with the Second World War, when the cricket pitches were replaced with air raid shelters (on the present grassed area). There was a rise of special needs education and Opportunity deaf (OD) classes commenced in the 1940s after an outbreak of rubella as there were many children born with a hearing impairment.*

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Reference                                                              |
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| <p>It is considered that the documentation submitted with the application does not present a strong argument for the demolition of the 1925 school building listed on the LEP. It is preferable that the 1925 school building be retained as part of the new school. It is recommended that the local Council's heritage advisor be consulted in finalising the preferred option.</p> <p>If an approval is granted for demolition of the 1925 school building the following condition is recommended to be attached to such an approval:</p> <ul style="list-style-type: none"><li>A photographic archival recording of significant built and landscape elements affected by the proposal should be prepared prior to the commencement of works, in accordance with the NSW Heritage Division Publications <i>How to prepare archival records of heritage items and Photographic Recording of Heritage Items using Film or Digital Capture</i>. A copy of these archival recordings shall be provided to the Heritage Council of NSW and to Council.</li></ul> | <p>As recommended, the project team has consulted further with Council's heritage advisor and the feedback provided is addressed in this RTS report at <b>Section 9.6</b>. The proposed development is unable to meet the Department of Education's requirements for redevelopment of the site for approximately 1,000 students while preserving Building A. The preferred option is to demolish all existing buildings and redevelop the site for a purpose-built school.</p> <p>The report concludes that in consideration of all the options and given that there are other, superior examples of Inter-war period school and institutional buildings of comparable scale, fabric and details that are visible features in the Georges River area, the demolition of the 1925 building is proposed as an option that provides optimum use of the site and continues the provision of educational facilities and uses at the Penshurst Public School site</p> <p>Supplementary heritage assessment has been provided. No objection proposed to the recommendation for Photographic archival recording.</p> | <p>Supplementary<br/>Heritage<br/>Assessment<br/><b>Appendix 6</b></p> |

## 5 NSW Office of Environment and Heritage

### 5.2 Environment Response

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                                                                                                                                                                                         | Reference                                            |
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| <p><b>Biodiversity</b></p> <p>Reference is made to the OEH emails of 17 and 23 May 2018 to the Department, seeking advice in relation to the appropriate biodiversity assessment for the SSD project. SEARs for the project were issued on 19 April 2017 and revised SEARs were issued on 29 September 2017. Both the original and the revised SEARs require biodiversity impacts to be assessed in accordance with the Framework for Biodiversity Assessment (FBA). OEH sought advice on this from the Department, as the Biodiversity Conservation (BC) Act 2016 commenced on the 25 August 2017 and Section 7.9(2) of the BC Act requires SSD applications to be accompanied by a biodiversity development assessment report (BOAR). OEH notes the Department's email reply of 25 May 2018, advises that because the Secretary issued the SEARs prior to 25 August 2017, these projects are 'pending planning applications' and therefore the BC Act does not apply.</p> <p>In accordance with the SEARs, the EIS is required to include an FBA and no request has been received by OEH for the FBA not to apply. OEH may consider a request from the Department to not implement the FBA where it has been demonstrated that no native vegetation (or FSA-assessable species credit species habitat) occurs on site. The EIS does not currently contain sufficient information to demonstrate that an FBA is not required (e.g. desktop research, database searches, site inspection, targeted surveys). The EIS only states that the <i>"development proposes the removal 25 trees, none of which are listed as vulnerable, endangered or critically endangered flora or ecological communities under the Threatened Species Conservation (TSC) Act"</i> and <i>"the proposal is taken to be development that is not likely to significantly affect any threatened species, population or ecological community, or its habitat"</i> (Section 7.3.3, page 72).</p> | <p>A formal request for a Biodiversity Development Assessment Report (BDAR) waiver was prepared by SLR Consulting and was submitted to DPE on 22 August 2018.</p>                                                                                                                                | <p>Waiver Request<br/><b>Appendix 17</b></p>         |
| <p><b>Landscaping</b></p> <p>The EIS notes the proposed site landscaping includes the planting of 82 new trees, shrubs and ground covers and that these include deciduous tree planting along Arcacia Street and in the paved court yard (Section 4.5, page 28). OEH recommends the landscaping at the site and street planting uses a diversity of native provenance trees, shrubs and groundcover species from the relevant native vegetation community rather than non-native species.</p> <p>There is educational value and numerous benefits in using a diversity of local native plants at the school site including:</p> <ul style="list-style-type: none"> <li>• preservation of the biodiversity values of the local area</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Revised Landscape Plans have been provided at <b>Appendix 5</b>. Landscaping incorporated into proposal has been selected on the basis of suitability, durability and resilience, the variety of which is considered acceptable in fulfilling the Department's brief for the development.</p> | <p>Revised Landscape Plans<br/><b>Appendix 5</b></p> |

## 5 NSW Office of Environment and Heritage

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Reference                                                          |
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| <ul style="list-style-type: none"> <li>provision of the most suitable food and habitat for local native fauna including nectar for pollinators (moths, butterflies, bees etc) which provide a food source for local native birds</li> <li>a stepping stone for more mobile native fauna to move across the landscape and</li> <li>once established local provenance vegetation would require less maintenance/watering than exotic plants. The use of local native vegetation also has added benefits in reducing the need for fertiliser application which reduces fertiliser laden runoff entering the local waterways and will assist to improve instream health, water quality, reduce algal blooms etc.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                    |
| <p><b>Gleditsia triacanthos "Sunburst"</b></p> <p>The Landscape Site Plan (ground level) proposes to plant Gleditsia triacanthos "Sunburst" along Arcadia Street. Prior to determining the project, it is recommended the Department considers information relating to Gleditsia triacanthos, available for example on the NSW Department of Primary Industries (DPI) website and the Australian Government Department of the Environment website.</p> <p>The DPI website: <a href="http://weeds.dpi.nsw.gov.au/Weeds/Details/71">http://weeds.dpi.nsw.gov.au/Weeds/Details/71</a> indicates Gleditsia triacanthos spreads rapidly from seed; is capable of out-competing and replacing native vegetation; can form dense thickets particularly along waterways as it spreads by the seed being washed downstream and the sharp thorns can injure wildlife.</p> <p>It is recommended:</p> <ul style="list-style-type: none"> <li>Gleditsia triacanthos "Sunburst" is not used unless it can be demonstrated that "Sunburst" is a non-invasive variety and it not capable of producing large thorns or seed pods which if they germinate have the potential to revert to the 'normal' parent physiology and be invasive. The following website indicates that Gleditsia triacanthos var. inermis 'Sunburst' develops large seedpods:</li> <li>the Landscape Site Plan is amended to use local native plant species from the relevant local native vegetation community.</li> </ul> | <p>Gleditsia triacanthos will no longer be used in planting. It is proposed to use alternative deciduous species as per Sydney Tree Species Selection Document 2015. The species proposed are:</p> <ul style="list-style-type: none"> <li>Faxinus oxcarpa "Raywood" – Claret Ash</li> <li>Pistacia chinensis – Chinese Pistachio; and</li> <li>Sapium Sebiferum – Chinese Tallowood</li> </ul>                                                                                                                                                                                                                                                                                         | <p>Revised Landscape Plans<br/><b>Appendix 5</b></p>               |
| <p><b>Aboriginal Cultural Heritage</b></p> <p>OEH notes that a due diligence Aboriginal Archaeological assessment was undertaken for the proposal (section 7.3.2, page 71 of EIS). Due diligence is not a substitute for undertaking an Aboriginal cultural heritage assessment. Due diligence is a legal defence against harm under the National Parks and Wildlife Act 1974 and is inadequate to assess the impacts of the proposed development on the Aboriginal archaeological and cultural heritage values of the subject land. OEH recommends that Aboriginal Cultural heritage is considered in relation to the proposed development</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>In reference to OEH letter, Apex Archaeology updated their report to include consultation with the Metropolitan LALC and a visual inspection of the site to identify any surface objects or the potential for subsurface deposits to be present.</p> <p>In relation to the consultation with the LALC, full details are provided in an appendix to Apex's report and the report concludes, "No comments were received. This is not uncommon for projects considered to be of low scientific significance. Generally, the Aboriginal community will comment on projects they feel are important, and if they do not provide comment, it is due to limited interest in the site."</p> | <p>Aboriginal Archaeological Assessment<br/><b>Appendix 14</b></p> |

## 5 NSW Office of Environment and Heritage

| Issue                                                                                                                                                                                                                                                                                         | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Reference |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
|                                                                                                                                                                                                                                                                                               | With regard to the cultural heritage of the site, an AHIMS database search was conducted as well as a visual inspection of the site, which concluded: <i>"No surface archaeological sites or areas of sub-surface potential were identified during the visual inspection."</i>                                                                                                                                                                                                                  |           |
| <b>Rooftop play area</b><br>The Site Plan level 3 indicates a rooftop play area is proposed. OEH recommends where possible the roof top also includes a green roof into the design. The benefits of Green Roofs are outlined in the OEH (2015) Urban Green Cover in NSW Technical Guidelines. | The design brief from the Department of Education included a desire to achieve a play space of close to 10m <sup>2</sup> per student, as detailed in the Design Analysis Report included with the original EIS package. The design of the roof top play space was developed with the aim of achieving this outcome to improve student amenity and in this regard comprises some landscaping but cannot dedicate large areas of roof for a green roof without reducing the supply of play space. | N/A       |

## 6 Roads and Maritime Service

### 6.1 General

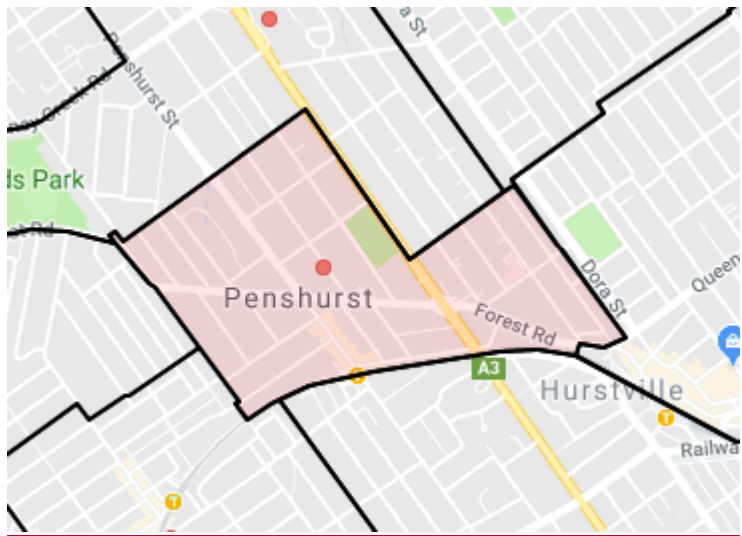
| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Reference                                   |
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| <p>Roads and Maritime has reviewed the submitted application and provides the following comments</p> <ul style="list-style-type: none"> <li>It appears that the additional traffic generated in the peak hour of 229 vehicle trips is only one-way and exiting trips have not been modelled.</li> <li>No information has been provided which document how the assumptions for entering traffic distribution were estimated. It is noted that no vehicles are estimated to turn right from Forest Road into Penshurst Street.</li> <li>No information has been provided for exiting vehicle distribution assumptions.</li> <li>2017 volumes have been used for the post development assessment instead of future base traffic volumes which consider growth on Forest Road.</li> <li>No additional pedestrians have been included in the post development intersection modelling.</li> <li>The distribution assumes that 25% of arriving vehicles will turn right into Cambridge Street. The impact of additional right turning vehicles has not been assessed by the Applicant.</li> <li>The intersection of Forest Road and Penshurst Street has extended pedestrian protection due to the close proximity to the school. Without the Sidra models being provided, we are unable to determine whether the modelling has adequately reflected the existing conditions.</li> </ul> | <p>These comments have been addressed in the Traffic Impact Assessment (TIA) provided at <b>Appendix 8</b>. A summary of the content that addresses these comments is included below:</p> <ul style="list-style-type: none"> <li>Revised modelling included in this report accounts for two-way trips</li> <li>Revised traffic distribution has been undertaken documenting the assumptions traffic distribution both inbound and outbound. This is based on residential areas within the school catchment and the anticipated route to the school based on the road layout and permitted turning movements. Updated traffic distribution assumes vehicles will turn right from Forest Road (south) into Penshurst St (east) for a proportion of the inbound trips (30%) .</li> <li>Information has been provided for exiting vehicle distribution (see above)</li> <li>Considerable research has been undertaken regarding growth of background traffic based on RMS data. However, growth of traffic has not been included in modelling due to minimal observed growth (0.04% per year), which makes further modelling unnecessary.</li> <li>Increased pedestrian activity has been considered. SIDRA modelling for pedestrian movements at the Forest Road/ Penshurst St intersection indicates that the existing Level D service will be retained.</li> <li>The impact of additional vehicles turning right into Cambridge Street has been considered and found to be negligible due to limited existing and future right-turning amenity at this intersection and the presence of more reliable alternative routes such as at the Forest Rd/ Penshurst St intersection and along King Georges Road;</li> <li>Pedestrian protection has been incorporated into the SIDRA models through the adoption of red turn arrow protection. This reflects existing conditions.</li> </ul> | Traffic Impact Assessment <b>Appendix 8</b> |
| <p>To fully assess the Application, Roads and Maritime requests that additional information is submitted addressing the comments provided and the Sidra model files provided. Following receipt of the additional information, we will review and respond accordingly.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>Updated SIDRA modelling has been included in the TIA</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Traffic Impact Assessment <b>Appendix 8</b> |

## 7 Transport for NSW

### 7.1 Detailed Comments on SSD Application 8365

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Reference                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| <p><b>Adequacy of Kiss- and- Ride</b><br/>The Applicant should provide evidence that the proposed kiss-and-ride spaces could accommodate the expected demand.</p> <p>The proposal should consider the implementation of timed parking within the school zone to accommodate short term parking demand beyond the restrictions of kiss-and-ride. This should be done in consultation with the local council.</p>                                                                              | <p>The TIA includes a Poisson queuing analysis that demonstrates that the proposed kiss-and-ride spaces can accommodate the expected demand and will result in a better outcome, with shorter waiting periods than currently exist. PTC suggest,</p> <p><i>“Where queuing analysis is limited due to large variations in dwell time (such as in the afternoon peak), additional traffic management measures are also proposed (see Section 8.6) such as staff carpool spaces and increased parking restriction enforcement to reduce staff parking near the school and ensure the availability of short-term parking spaces for parent drop-off/pick-up. Hence, the proposed parking control modifications accommodate the expected demand and provide short term parking beyond the restrictions of kiss-and-ride”</i></p> | Traffic Impact Assessment<br><b>Appendix 8</b> |
| <p><b>Configuration of kiss-and-ride zones</b><br/>The provision of kiss-and ride spaces should consider the direction of incoming vehicle travel (in a forward direction) and minimise the need to undertake U-turn movements.</p>                                                                                                                                                                                                                                                          | <p>Consideration and discussion of the configuration of kiss-and-ride spaces to minimise the need to undertake U-turn movements is included in the TIA. PTC state:</p> <p><i>“As part of the on-street parking control modifications, changes are proposed on both sides of Arcadia Street with 5 additional P5 spaces on the eastern side of Arcadia Street and 8 on the western side, this considering the direction of vehicle movement and providing additional provisions on both sides, minimising the need for U turn movements.”.</i></p>                                                                                                                                                                                                                                                                           | Traffic Impact Assessment<br><b>Appendix 8</b> |
| <p><b>Traffic Impact Analysis Recommendation</b><br/>The Applicant should provide further evidence that:</p> <ul style="list-style-type: none"> <li>Inbound and outbound vehicle movements have been considered within the morning and afternoon peak periods; and</li> <li>The assessment has considered the configuration of the road network in inbound and outbound trip distribution assumptions.</li> </ul> <p>Any subsequent intersection analysis should be revised accordingly.</p> | <p>Revised traffic modelling has assessed the additional vehicle trips to consider both inbound and outbound movements. The revised TIA includes detailed discussion and analysis about the direction of vehicle movements in the morning and afternoon peaks considering the configuration of the road network.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Traffic Impact Assessment<br><b>Appendix 8</b> |
| <p><b>Carriageway width of Arcadia Street Recommendation</b><br/>The traffic assessment should be revised to include swept path analysis of car movements along Arcadia Street demonstrating the proposed parking restrictions can be implemented within the existing road geometry, while still maintaining safe two-way vehicular movements.</p>                                                                                                                                           | <p>In response to this comment, PTC has stated:</p> <p><i>The existing narrow carriageway of Arcadia Street is noted , and as such, the proposed parking restrictions have been designed to modify the</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Traffic Impact Assessment<br><b>Appendix 8</b> |

## 7 Transport for NSW

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Reference                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <p><i>parking restrictions on the existing parking spaces rather than introducing any new linemarking or other delineation.</i></p> <p><i>Therefore, swept path analysis has not been undertaken as no changes are proposed that would alter the maximum number of vehicles that can be accommodated in the parking on Arcadia Street. Moreover, the narrow width of the road aids in promotion a lower speed environment and reduced pedestrian crossing distances.</i></p>                                                                                                                                                                                                                             |                                                                                                        |
| <p><b>Future Bus Services</b><br/>Recommendation<br/>Prior to commencement of new school operations, the proponent should provide additional data and the proposed student catchment area to determine the likely demands on the transport network (all modes). With particular regard to bus usage. Data should also be provided on existing and expected patronage by route. This data could be obtained by travel surveys of staff and students (existing and new enrolments). The student catchment area and travel data provided to TfNSW will assist with future service planning.</p> | <p>Travel mode surveys of PPS students indicate that current demand for bus services is low at less than 1% of students. The Green Travel Plan includes strategies and methods of increasing uptake of bus and other sustainable modes of transport by 10% over five years. The TIA proposes conducting travel surveys upon commencement of the new school to determine and monitor bus utilisation. The Penshurst Public School catchment zone is shown below. Given the zone boundary proximity to the school, it is proposed that the majority of students will not need to take public transport to school.</p>  | <p>Traffic Impact Assessment<br/><b>Appendix 8</b></p> <p>Green Travel Plan<br/><b>Appendix 11</b></p> |
| <p><b>Bicycle Parking</b><br/>Recommendations</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>Updated site plans include 10 staff bicycle spaces and 12 student bicycle spaces.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>Revised<br/>Architectural</p>                                                                       |

## 7 Transport for NSW

| Issue                                                                                                                                                                                                                                                                                       | Response | Reference                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|----------------------------|
| <ul style="list-style-type: none"> <li>The EIS and/or site plan should state the quantity of student bicycle parking available.</li> <li>Bicycle parking should also be available to teachers to accommodate cycling to the workplace as an alternative for private vehicle use.</li> </ul> |          | Plans<br><b>Appendix 2</b> |

### 7.2 Recommended Conditions of Approval

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                                 | Reference                                                                                             |
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| <b>Green Travel Plan</b><br>Recommended Condition:<br>As part of the ongoing operation of the school, a detailed Green Travel Plan (GTP), which includes target mode shares for both staff and students to reduce the reliance on private vehicles, shall be prepared. The GTP must be implemented accordingly and updated annually.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | A Green Travel Plan has been provided with the aim of shifting staff and student reliance on private vehicles toward sustainable modes of travel by 10% over five years. | Green Travel Plan<br><b>Appendix 11</b>                                                               |
| <b>Traffic and Parking Management Plan</b><br>Recommended Condition:<br>The Applicant shall prepare a Traffic and Parking Management Plan, which details the measures to safely manage the daily transport task to/from the school. Traffic management measures that need to be addressed include: <ul style="list-style-type: none"> <li>kerbside vehicle pick-up/drop-off management and orderly vehicle queuing;</li> <li>maintaining bus accessibility and student waiting areas;</li> <li>safe parent and student behaviour during pick-up/drop-off; and</li> <li>safe pedestrian movements to the school entrances, minimising vehicle-pedestrian conflicts.</li> </ul> The plan shall also detail the responsibilities of various personnel executing the plan and include measures to monitor, review the performance and make improvements to the plan. This plan should be implemented as part of the ongoing operation of the redeveloped school. | A Kiss-and-Ride Management Plan has been provided and further traffic and parking management issues are discussed in the TIA..                                           | Kiss and Ride Management Plan<br><b>Appendix 10</b><br>Traffic Impact Assessment<br><b>Appendix 8</b> |
| <b>Signage and Linemarking Plan</b><br>Recommended Condition: <ul style="list-style-type: none"> <li>The Applicant shall prepare a detailed signage and linemarking plan of the proposed changes to kerbside parking restrictions to accommodate the various vehicle movements to/from the development within the local road network.</li> <li>The preparation of the plan should be made in consultation with and approved by Georges River Council.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | A Signage Plan has been provided.                                                                                                                                        | Signage Plan<br><b>Appendix 10</b>                                                                    |

## 7 Transport for NSW

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Response      | Reference |
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| <ul style="list-style-type: none"><li>The approved kerbside parking restrictions must be implemented to the satisfaction of Council, prior to commencement of the new school.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                       |               |           |
| <b>Road Safety Evaluation</b><br>Recommended Condition: <ul style="list-style-type: none"><li>The Applicant shall, both at the detailed designed stage and prior to commencement of the new school, conduct a Road Safety Evaluation (RSE, refer to <i>NSW Centre for Road Safety Guidelines for Road Safety Audit Practices</i> and <i>Austroads Guide to Road Safety Part 6: Road Safety Audit</i>) on all relevant sections of road utilised for bus and private vehicle pickup and drop-off.</li><li>Appropriate road safety measures and/or traffic management measures shall be implemented based on the outcomes of the RSE.</li></ul> | No objection. | N/A       |

## 8 Sydney Water

### 8.1 Waste & Waste water

Our preliminary investigation shows that there is adequate capacity for water and wastewater system for the proposed development. This advice is not a formal approval of our servicing requirements. Detailed planning and servicing requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 compliance certificate, usually following assessment of the development application.

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response | Reference |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------|
| <b>Attachment 1<br/>Sydney Water Servicing</b><br>A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water prior to development commencement. It is recommended that the Council includes this term as a Condition of the DA approval.<br><br>The proponent is advised to make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways or landscape designs. Applications must be made through an authorised Water Servicing Coordinator. For help either visit <a href="http://www.sydneywater.com.au">www.sydneywater.com.au</a> > Plumbing, building and developing > Developing > Land development or telephone 13 20 92 | Noted    | N/A       |

### 8.2 Building plan Approval

The approved plans must be submitted to the Sydney Water Tap in™ online service to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.

The Sydney Water Tap in™ online self-service replaces our Quick Check Agents as of 30 November 2015

If this property is to be developed for Industrial or Commercial operations, it may need to meet the following requirements

| Issue                                                                                                                                                                                                       | Response | Reference |
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| <b>Trade Wastewater Requirements</b><br><br>If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to | Noted    | N/A       |

## 8 Sydney Water

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response             | Reference |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-----------|
| <p>Sydney Water's sewerage system. You must wait for approval of this permit before any business activities can commence.</p> <p>The permit application should be emailed to Sydney Water's Business Customer Services at <a href="mailto:businesscustomers@sydneywater.com.au">businesscustomers@sydneywater.com.au</a></p> <p>It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission.</p> <p>A Boundary Trap is required for all developments that discharge trade wastewater where arrestors and special units are installed for trade wastewater pre-treatment. If the property development is for Industrial operations, the wastewater may discharge into a sewerage area that is subject to wastewater reuse. Find out from Business Customer Services if this is applicable to your development.</p>                                                                                                                                                                                                                                                                                                                                                                                  |                      |           |
| <p><b>Backflow Prevention Requirements</b></p> <p>Backflow is when there is unintentional flow of water in the wrong direction from a potentially polluted source into the drinking water supply.</p> <p>All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum.</p> <p>Separate hydrant and sprinkler fire services on non-residential properties, require the installation of a testable double check detector assembly. The device is to be located at the boundary of the property.</p> <p>Before you install a backflow prevention device:</p> <ol style="list-style-type: none"> <li>1. Get your hydraulic consultant or plumber to check the available water pressure versus the property's required pressure and flow requirements.</li> <li>2. Conduct a site assessment to confirm the hazard rating of the property and its services. Contact PIAS at NSW Fair Trading on 1300 889 099</li> </ol> | Noted                | N/A       |
| <p><b>Water Efficiency Recommendations</b></p> <p>Some water efficiency measures that can be easily implemented are:</p> <ul style="list-style-type: none"> <li>• Install water efficiency fixtures</li> <li>• Consider installing rainwater tanks</li> <li>• Install water-monitoring devices</li> <li>• Develop a water efficiency plan</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Noted – no objection | N/A       |

## 9 Georges River Council

### 9.1 Planning Controls

It is acknowledged that site is zoned SP2 – Infrastructure – where educational establishments are permissible with consent. The allotment does not contain a height limit or nominated floor space ratio.

| Issue                                                                                                                                                                                                                                                                                                                                                      | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Reference                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| <p>The development form is proposed as 3 storeys with a usable roof top. It is acknowledged the SEPP Educational Establishments and Child care Facilities will prevail over Council's LEP. Notwithstanding this, it is requested that consideration be given to amenity impacts from the roof top play area with respect to acoustics and overlooking.</p> | <p>The Acoustic Report has modelled the noise emissions from children outside at play, including on the rooftop play area. The Acoustic Report concludes, <i>"noise from outdoor play will likely exceed the acceptable noise criteria by up to 7 dB. However, the noise levels will still be within the residential amenity noise criteria...Given the existing school noise emission, the limited duration of noise from outdoor play, the zoning of the site and expectations of noise from children on a school site we are of the opinion that the noise from outdoor play would be considered acceptable"</i>.</p> <p>In regard to overlooking, a solid balustrade of 1.8m is provided to the western and northern edges of Level 3. This balustrade will prevent students on Level 3 from overlooking the adjacent St Declan's School and residential properties at the north of the site.</p> <p>A parapet is provided to the curved Arcadia Street facade, projecting 500mm above Level 3 floor level. A steel balustrade constructed of flat stanchions and tubular balusters is located behind the parapet. These measures limit students' access to the edge of Level 3 and mitigate against students on Level 3 overlooking immediate neighbouring properties.</p> <p>New tree plantings are proposed for the whole of the northern boundary, to provide a visual screen between the school and residential properties at the north of the site. The Landscape Plan shows the location and species selection.</p> | <p>Acoustic Report<br/><b>Appendix 3</b></p> <p>Landscape Plans<br/><b>Appendix 4</b></p> <p>Architectural Plans<br/><b>Appendix 16</b></p> |
| <p>In addition it is requested that consideration be given to the use of the school outside the nominated school hours and the impact this may have on the evening and weekend amenity of the local residents with the movement of vehicles into and out of the site and the light spill and acoustic implications that may result.</p>                    | <p>Consideration has been given to the acoustic impacts of using the school outside of nominated school hours. The school is not proposed to be used by community groups as part of this application. It will only be school based activities conducted outside normal school hours. Discussion has been provided that most activities take place before school or in the afternoons, not the evenings. This is to mitigate parking impacts on local residents. There may be very occasional evening events (1-3 per year). These have been assessed as meeting acceptable acoustic amenity criteria for residential receptors. On the basis of the above, it is unlikely the proposal will give rise to unacceptable light spill implications.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>Acoustic Report<br/><b>Appendix 3</b></p>                                                                                                |
| <p>It is acknowledged the application has had regard to the requirements of the relevant SEPP's and the protection of the amenity of the school students in the learning environment from vehicle noise and traffic vibration which will be included in greater detail as part of the construction documentation.</p>                                      | <p>Noted</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | <p>N/A</p>                                                                                                                                  |

## 9 Georges River Council

### 9.2 Environmental

| Issue                                                                                                                                                                                             | Response                                                                         | Reference                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| The documents accompanying the application indicate there is contamination on site and a Remediation Action Plan (RAP) has been required together with a hazardous building materials assessment. |                                                                                  |                                                                                    |
| The RAP has detailed that the site can be adequately remediated to be suitable for its intended use                                                                                               | A Site Auditor has been engaged and upon their advice, the RAP has been amended. | Site Auditor Advice<br><b>Appendix 16</b><br><br>Revised RAP<br><b>Appendix 18</b> |
| The demolition and control of asbestos is to be undertaken by an appropriately licenced contractor and the residents notified accordingly.                                                        | Noted                                                                            | N/A                                                                                |

### 9.3 Stormwater Management and Drainage

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Reference                               |
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| <p>Council Officers advise there are stormwater pipes within the school site that connect to Council's drainage network within both Arcadia Street and Forest Road within the south eastern corner of the site.</p> <p>The report accompanying the EIS does not mention the piped connection from the school into Forest Road near the intersection of Arcadia Street which is indicated as being 900mm in diameter. As a result this pipe will need to be identified, and if physically located further assessment will need to be undertaken to ascertain the catchment into which it drains, and if it has implications for the hydraulic design of the site.</p> <p>Council officers request that DRAINS modelling of the local catchment area and street drainage network be undertaken to determine if the proposed new connection to the pit in Arcadia Street from the OSD system is a better alternative with respect to allowing for the hydraulic effectiveness of Council's street drainage and downstream impacts in comparison with connecting to the Council drainage system in Forest Road. The feasibility to connect into the drainage existing in both Forest Road and Arcadia Street avoiding underground services should be included as part of this analysis.</p> | <p>Woolacotts has provided advice and drainage maps that indicate the proposed stormwater drainage system does not adversely impact on the existing drainage system. Accordingly, they are of the opinion that DRAINS modelling is not required and so this has not been provided as part of the RTS package. Multiple attempts were made to contact Council in regard to this matter but no response was received throughout the preparation of the RTS report.</p> | Stormwater Letter<br><b>Appendix 20</b> |

## 9 Georges River Council

| Issue                                                                                                                                                                                                                                                                                       | Response | Reference |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------|
| Investigation of all the existing stormwater pipes within the school will need to be undertaken to determine if they provide service for discharge of any neighbouring properties of Council's network.                                                                                     |          |           |
| If any pipes are found in either the design or investigation stage that service other properties, they will need to be either maintained or an alternative system provided that facilitates stormwater discharge, with and any legal documents updated or created to address the easements. |          |           |

### 9.4 Landscaping and Tree Removal

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Reference                            |
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| The application is seeking to remove 45 trees from the site, 9 are considered and referenced as a being trees of High Significant Value and in the opinion of Council Officers require retention. As a result it is requested that consideration be given to the retention of these trees whereby the development is located a distance from the trees that satisfies the criteria referenced in AS4970 - 2009 "Protection of trees on development sites. | The expansion of the car park is required in order to increase on-site parking provision. Accordingly, the expansion warrants removal of trees as required by the AS4970 requirements, replanting will then be provided per the landscape plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Landscape Plan<br><b>Appendix 5</b>  |
| It is acknowledged there is an inconsistency between the tree species referenced in the arborist report and that reflected in the landscape plan, namely trees 27 and 29, the arborist report has also indicated that tree 29 requires further inspection/investigation which Council Officers consider is necessary.                                                                                                                                     | Agree to conduct inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | N/A                                  |
| Council Officers also have concerns as to the finished RL's of the development post site works to ensure that trees 9, 23, 14, 25 and 26 are able to be retained. In addition, the street tree planting is to occur outside of the proposed development.                                                                                                                                                                                                  | <p>The updated Arborist Report outlines the following:</p> <ul style="list-style-type: none"> <li>Tree 9 – "it is planned to demolish and replace the existing fence and car parking area, while the new driveway provides a greater setback than the existing. The tree can be retained and protected in accordance with Arboricultural Method Statement".</li> <li>Tree 14 – is "assessed with short useful life expectancies and allocated a low retention value, their removal should not be a constraint to the proposal".</li> <li>Tree 23, 25 and 26 – "works within the TPZ and SRZ's include demolition of the existing garden area. It is noted no building works are planned, however it is strongly recommended the existing soil levels be retained when demolishing the low timber edging". These trees are identified in Table 2 for retention.</li> </ul> <p>Tree 14 is the only tree which will require removal and is of low retention value. The Arborist Report provides recommendations for the protection of trees which are being retained. A condition of consent could be imposed if required to ensure the outcomes of the Arborist Report are adhered to.</p> | Arborist Report<br><b>Appendix 4</b> |

## 9 Georges River Council

### 9.5 Traffic and Car parking

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Reference                                                                                                                                 |
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| <p>Council Officers have reviewed the information provided relating to traffic and carparking for the development and are of the opinion the carparking proposed is inadequate (15 spaces provided which includes 1 accessible space and 30 are required by Council's DCP).</p>                                                                                                                                                                                                                                      | <p>Following review of site and options for car parking, 5 additional parking spaces have been incorporated into the design (a total of 20), which represents a shortfall of 10 spaces measured against the Council's DCP. The Traffic Impact Assessment Report provides that an occupancy survey identified 48-60 vacant on-street parking spaces that can adequately capture the increased demand. In addition, management measures are proposed to encourage staff to park in the streets further away and reduce staff reliance on private vehicles.</p> <p>Forecast impact and mitigation measures include:</p> <ul style="list-style-type: none"> <li>• Provision of 13 additional P5 parking spaces, replacing existing unrestricted spaces;</li> <li>• Staff carpool spaces are proposed to reduce vehicle numbers;</li> <li>• Promotion of the Green Travel Plan, which aims to reduce reliance on private vehicle use for staff and students by 10% over five years;</li> <li>• Proposal to increase Council Ranger presence to enforce compliance;</li> <li>• Potential for a Resident Parking Scheme is also considered to reduce staff parking in the most sensitive streets near the school.</li> </ul> | <p>TIA<br/><b>Appendix 8</b></p> <p>Green Travel Plan<br/><b>Appendix 11</b></p>                                                          |
| <p>The increase in traffic generation resulting from this development in the opinion of Council Officers cannot be accommodated in this precinct without the incorporation of a designated student drop off and pick up zone to ensure student and parent safety, and the extent of the school safety zones. The accommodation of all staff parking should be accommodated within the grounds of the school. There is inadequate capacity within the street network to accommodate the additional staff parking.</p> | <p>The Traffic Impact Assessment, Kiss and Ride Plan and Signage Plan provide a range of strategies to address this. The Kiss and Ride zone will be extended to provide additional spaces. This has been assessed within the TIA and will result in improved outcomes, shorter queue and wait times that existing conditions. In addition, 13 P5 spaces are proposed to enable parents to walk their children into school and not block the Kiss and Drop areas to improve traffic flow in the area.</p> <p>Onsite parking has been increased to provide 20 spaces. A Green Travel Plan will also be adopted with the aim of reducing reliance on private vehicles by 10% over five years.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>TIA<br/><b>Appendix 8</b></p> <p>Signage/Kiss and Ride Plan<br/><b>Appendix 10</b></p> <p>Green Travel Plan<br/><b>Appendix 11</b></p> |
| <p>Strong concerns are raised by Council officers in relation to inadequate car parking provision and the increase in traffic generation, in an area already affected by traffic congestion, particularly in the morning peak traffic period. Consideration is required to addressing the information above as part of the final design and construction documentation.</p>                                                                                                                                          | <p>Traffic and parking implications and mitigation measures resulting from the school's upgrade are discussed in the TIA and summarised below:</p> <ul style="list-style-type: none"> <li>• Shortfall in staff parking is proposed to be managed by encouraging staff to park further away, conversion of 13 unrestricted spaces to P5 spaces to increase effective capacity of existing and proposed parking provisions;</li> <li>• Proposed car pool spaces and the Green Travel Plan to encourage sustainable travel with a target of 10% reduction in reliance on private vehicles over 5 years;</li> <li>• Potential for a Resident Parking Scheme;</li> <li>• Provision of a CTMP to maintain resident amenity during construction; and</li> <li>• Potential for staggering start and finishing times with nearby St Declan's Catholic Primary School.</li> </ul>                                                                                                                                                                                                                                                                                                                                               | <p>TIA<br/><b>Appendix 8</b></p> <p>Green Travel Plan<br/><b>Appendix 11</b></p>                                                          |

## 9 Georges River Council

### 9.6 Heritage

There is an existing heritage building that exists on the site which is listed in Schedule 5 of the Hurstville Local Environmental Plan 2012 as a local item "Penshurst Public School is of Local significance as:

*'an Inter-War period education establishment providing educational facilities to the area since its establishment in 1925. The main building maintains its original scale and form as well as fenestration and is a landmark within the streetscape. It is a representative example of public education and reflects the growth of the area following WWJ. The site also has a long association with the development of the Penshurst area and the resultant increase in population. It has particular associations with the Second World War, when the cricket pitches were replaced with air raid shelters (on the present grasses area). Here was a rise of special needs education and Opportunity Deaf (OD) classes commenced in the 1940's after an outbreak of Rubella as there were many children born with a hearing impairment*

| Issue                                                                                                                                                                                                                                                                                                                               | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Reference                                                                                                     |
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| The Statement of Heritage Impact accompanying the proposal recommends the original 1925 building be retained. However, this is proposed to be demolished as part of the application. The application does not adequately address why the building is being removed, as a result it is requested that the 1925 building be retained. | <p>A supplementary heritage assessment has been prepared to address the issues raised in the submissions, including Council's feedback. The report provides a greater depth of information about the opportunities and constraints for adaptive reuse of the 1925 building. The report identifies that in order to accommodate the additional students, retention of the heritage building would require construction of a six-storey building on site over the existing open playground area.</p> <p>The supplementary heritage report also makes a comparison of the architectural qualities of the heritage listed building against other examples of Inter-war Free Classical school buildings in the area including Peakhurst Public School, Hurstville Public School and Georges River College. The report concludes that in consideration of all the options and given that there are other, superior examples of Inter-war period school and institutional buildings of comparable scale, fabric and details that are visible features in the Georges River area, the demolition of the 1925 building is proposed as an option that provides optimum use of the site and continues the provision of educational facilities and uses at the Penshurst Public School site.</p> <p>A report has been prepared by the architect detailing the design options development process and fifteen (15) designs that were considered for the site, including designs that retain the heritage building; partial retention of the building; and demolition of the building.</p> | <p>Supplementary Heritage Report<br/><b>Appendix 6</b></p> <p>Design Options Report<br/><b>Appendix 7</b></p> |

On 7 August 2018, the project team had a meeting with Council and further discussed the heritage-related matters of the project. Specifically, the project team asked if Council needed additional time to review the files and provide comments, which Council agreed to. On 17 September 2018, Council provided additional comments from their Heritage Advisor. The matters raised in that letter are summarised and addressed below:

## 9 Georges River Council

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Reference                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| <p>Further to my advice of 19 September 2017 and 21 June 2017 and review of documentation provided including Environmental Impact Statement (EIS), Statement of Heritage Impact (SoHI), Design Analysis Report and Plans, to follow is advice from a heritage point of view:</p> <p>Based on the Statement of Significance for Penshurst Public School which is noted in section 4.4 of the SoHI, preservation of the identified heritage values of the place, including the 1925 building and 1927/8 addition (referred to as Building A in Figure 3.10 of the SoHI) is required.</p>                                                                                                                                                                                                                                          | <p>The proposed development is unable to meet the Department of Education's requirements for redevelopment of the site for approximately 1,000 students while preserving Building A. The design options report sets out the various scenarios that were explored and considered through the early stages of the project, and provides additional context behind the range of matters that need to be considered in the redevelopment proposal.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>Design Options Report<br/><b>Appendix 7</b></p>                                                            |
| <p>The Design Analysis Report notes various options which were considered for the redevelopment of the subject site, including demolition of the heritage item. It would appear Department of Education (DoE) requirements for the redevelopment of the subject site are such that preservation of the heritage item cannot be achieved without a more flexible approach.</p> <p>In overall terms the 1925 building and 1927/28 addition would be considered to be in fair to good condition and should be capable of being sympathetically upgraded to meet DoE requirements. Building authority requirements and controls relating to fire and life safety, health and amenity issues etc are constraints which should be able to be satisfied without substantial adverse impacts on fabric and heritage values overall.</p> | <p>The project team considered a wide number of flexible approaches to redevelopment of the site, as detailed in the design options report. The redevelopment of the site had to factor in a range of requirements including:</p> <ul style="list-style-type: none"> <li>• <u>Principle brief requirements</u>, such as accommodation area, EFGS relationships, play space, hall size and COLA sizes;</li> <li>• <u>Operational requirements</u>, such as the staging of works, temporary relocation of the school, number of storeys for a primary school, BCA compliance and acoustic compliance;</li> <li>• <u>Educational principles</u>, such as innovative pedagogy, response to community and identity, pleasing aesthetics, contemporary/sustainable learning environment and re-configurability;</li> <li>• <u>Design principles</u> as set out under the Education SEPP; and</li> <li>• <u>Council feedback</u>, including whether a height of four (4) or more storeys could be accommodated on the site (not supported by Council).</li> </ul> <p>The design options report highlights how these various requirements influenced the decision to proceed with redevelopment of the site with the current scheme.</p> | <p>Design Options Report<br/><b>Appendix 7</b></p>                                                            |
| <p>It was noted in review of public submissions to the proposed development that there is community desire and expectation that the heritage values of the 1925 building and 1927/8 addition should be protected, and that all efforts be made to ensure that remains the case.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Of the 16 public submissions received by DPE, only two (2) expressed concern regarding the removal of the heritage item, and only one (1) of these were expressed as an objection. In light of the extent of community consultation carried out throughout this project, this represents at most a minor public view. All public submissions are addressed in detail below.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>N/A</p>                                                                                                    |
| <p>As per previous advice it is preferable that the 1925 school building and 1927 addition be retained as part of the new school. This approach was recommended by Rajeeve Maini, Manager Conservation, Heritage Division, Office of Environment &amp; Heritage on 8 June 2018.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Feedback from OEH has been addressed in <b>Section 5.1</b>. Pursuant to OEH's recommendation, further consultation with Council's heritage advisor has been carried out and relevant concerns have been addressed in the supporting supplementary heritage report and the design options report.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Supplementary Heritage Report<br/><b>Appendix 6</b></p> <p>Design Options Report<br/><b>Appendix 7</b></p> |

## 9 Georges River Council

| Issue                                                                                                                                                                                                              | Response                                                                                                                        | Reference                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Finally, at no point in the SoHI is there acknowledgment that the proposed demolition of the heritage item constitutes a detrimental impact on the heritage significance of same. This omission must be corrected. | A supplementary heritage report has been prepared which provides additional discussion on the heritage impacts of the proposal. | Supplementary Heritage Report<br><b>Appendix 6</b> |

### 9.7 Construction and Traffic Management

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response                                                                                                                                                                                                                                                                                                                                                                                                           | Reference                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Given the sensitivity of the site and its location to Forest Road, the adjacent school site, residential and commercial development it is imperative the site is maintained in good order and kept clean, neat and tidy. As a result it is considered that a robust construction management and traffic management plan be developed and implemented for the site to ensure there is minimal and controlled impacts on the precinct and residents. | A Preliminary Construction Management Plan (PCMP) is provided with this report that includes preliminary construction traffic management. A working CMP and Construction Traffic Management Plan (CTMP) will be prepared upon engagement of the construction contractor, prior to issue of the Construction Certificate to ensure there is minimal and controlled impacts on the precinct and residents.           | PCMP<br><b>Appendix 19</b> |
| The location and the extent of construction zones are also to be considered and communicated to the local residents.                                                                                                                                                                                                                                                                                                                               | A Preliminary Construction Management Plan (PCMP) is provided with this report that includes preliminary construction traffic management. A working CMP and Construction Traffic Management Plan (CTMP) will be prepared upon engagement of the construction contractor, prior to issue of the Construction Certificate. The location and extent of construction zones will be considered as part of this process. | PCMP<br><b>Appendix 19</b> |
| In addition it is requested that the department notify the precinct of the contractor for the development to assist in the liaison for site management issues.                                                                                                                                                                                                                                                                                     | Noted                                                                                                                                                                                                                                                                                                                                                                                                              | N/A                        |

### 9.8 Significant Public Concerns

| Issue                                                                                                                                                                                                                                  | Response                                                                                                                                                                                                                         | Reference             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| There are elements of this proposal that are considered to require further consideration with respect to public interest and the protection of the amenity for the local residents and business owners:                                | Further consideration has been provided to each of the issues of public interest. The following list directs the reader to the relevant assessment material for each item:                                                       | Various<br>Appendices |
| <ul style="list-style-type: none"> <li>Traffic and carparking deficiencies and the proposed use of the street network to accommodate the shortfall in carparking within what is a saturated and constrained street network;</li> </ul> | Traffic and parking deficiencies and proposed use of the street network are addressed in the TIA at <b>Appendix 8</b> , the Signage/Kiss and Ride Plan at <b>Appendix 10</b> , and the Green Travel Plan at <b>Appendix 11</b> . |                       |
| <ul style="list-style-type: none"> <li>The demolition and removal of a local heritage item ;</li> </ul>                                                                                                                                | Demolition of a local heritage item is addressed in the Supplementary Heritage Report at <b>Appendix 6</b> and the Design Options Report at <b>Appendix 7</b>                                                                    |                       |

## 9 Georges River Council

| Issue                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                                                                                                                                                                                                                                                            | Reference |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| <ul style="list-style-type: none"><li>• The identification and protection of public infrastructure;</li></ul>                                                                                                                                                                                                                          | Protection of public infrastructure is addressed in the Stormwater Letter at <b>Appendix 20</b>                                                                                                                                                                                                                                                                     |           |
| <ul style="list-style-type: none"><li>• The availability of access to residents and businesses during the construction and demolition;</li></ul>                                                                                                                                                                                       | A Preliminary Construction Management Plan is provided at <b>Appendix 19</b> . A working Construction Traffic Management Plan will be prepared when the Contractor is engaged, it will address availability of access to residents and businesses during the construction period and the protection of the amenity of the locality for the duration of the project. |           |
| <ul style="list-style-type: none"><li>• The protection of the amenity of the locality during the demolition and construction phases of the development;</li></ul>                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                     |           |
| <ul style="list-style-type: none"><li>• Consideration be given to the staggering of the start and finishing times in this precinct given the immediate adjoining neighbour is a school to ensure congestion in the precinct is minimised; and</li></ul>                                                                                | Consideration by the Department of Education for entering discussions with St Declan’s Catholic Primary School to stagger start and finishing times is addressed in the TIA at <b>Appendix 8</b>                                                                                                                                                                    |           |
| <ul style="list-style-type: none"><li>• Consideration as to the location and servicing of waste removal from the site to ensure the impact is minimised on the local residents.</li></ul>                                                                                                                                              | Consideration of the location and servicing of waste removal from the site to minimise the impact on local residents is addressed in the Acoustic Assessment at <b>Appendix 3</b> and the Peer Review of WMP at <b>Appendix 12</b> .                                                                                                                                |           |
| It is requested that the Department and their appointed contractors engage with the local residents through the process in order to manage the community expectations relating to the redevelopment of the site and to ensure that there are open lines of communication and points of contact to address any concerns that may arise. | Noted                                                                                                                                                                                                                                                                                                                                                               | N/A       |

## 10 National Trust

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                              | Reference                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| <p>The SEARs application cover letter prepared by DFP Planning Consultants noted that <i>"Preliminary heritage advice received for the Proposal indicates that although this building is a local Heritage Item (see Section 4.6.4) the building is of minor aesthetic significance, comprises a typical rather than distinctive example of the inter-war period and its physical integrity has been diminished by various modifications."</i></p> <p>The National Trust disputes this claim, has inspected the building, and found it to be in excellent condition. The building retains many original features, and is currently in use by the school community. The building forms a key part of the streetscape and local community identity. The Trust notes that the original building accommodated 505 students when it was first opened in May 1925, yet was successfully expanded in 1928 following an increase in enrolments to 730 students, at which time an additional block of over half an acre was also purchased to expand the site. In 1998 a new hall and administration block were built on the site.<sup>2</sup></p> <p>The Trust would argue that the demolition of a heritage listed building that has served the Penshurst community for almost 100 years does not respond to or enhance the heritage nature of the school site, is not a sustainable outcome, and does not represent site wide strategic planning. The adaptive re-use and modification of the building is entirely possible and will achieve the current learning outcomes, and is indeed desirable. The National Trust recently recognised the outstanding efforts of the Education Department in regard to the award-winning redevelopment of the former King's School site in Parramatta. This redevelopment successfully balanced the needs of contemporary education and heritage conservation in a new school for 1,000 students. The Trust maintains that Penshurst Public School can achieve the same result without the demolition of a heritage listed building.</p> <p>The proposed design does not in the Trust's opinion consider the future needs of the site or represent site wide strategic planning. The current main building, both in its layout and its siting, has proven to be an adaptable and versatile building that makes best use of the limited site area, and continues to meet the needs of the current school population. Whilst the Trust recognizes the increased pressures on the school site and the projected increase in student numbers, the Trust argues that the proposed design drastically reduces the precious available outdoor play space and offers virtually no possible future adaptation - all at the expense of the present well-sited, heritage-listed building.</p> | <p>A Supplementary Heritage Assessment for the project is provided at <b>Appendix 6</b>, and a Design Options Report, which details 15 design options that were considered for the site, is at <b>Appendix 7</b>.</p> | <p>Supplementary Heritage Report<br/><b>Appendix 6</b></p> <p>Design Options Report<br/><b>Appendix 7</b></p> |

## 10 National Trust

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Response | Reference |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------|
| <p>The Trust notes that the Statement of Heritage Impact states <i>"The demolition is proposed in order to meet the optimum requirements for learning and open play area and spaces that will greatly improve on the existing facilities and allow greater levels of flexibility and connectivity in addition to ensuring a compliant, safe and manageable environment for a much larger student population"</i><sup>3</sup> The original project brief required the provision of educational facilities for approximately 1,000 students, providing 10sqm of play space per student.</p> <p>The proposed design does not meet this requirement, with the Design Analysis Report showing only 905sqm of total play area (including the 273sqm assembly hall as "indoor play area")<sup>5</sup>. This design thus only achieves <u>at best</u> 9sqm of play space per student. Arguments supporting demolition of the existing heritage building based on the need for increased play space are disputed by the Trust. The current building and layout could be retained in a better designed school upgrade that follows the existing, logical, pattern of development on the site which allows for a large, sunny, open place area in the centre of the site.</p> <p>The National Trust has serious reservations about the heritage procedures and reports that accompany this proposal. The Statement of Heritage Impact (SOHi) has been prepared by Perumal Murphy Alessi Heritage Consultants, while the architectural design has been prepared by Perumal Pedavoli Architects- both firms operating from the same office. An impartial Statement of Heritage Impact must be prepared by an independent consultant, not by the same office that is proposing the new design.</p> <p>The Heritage Office Guidelines for Statements of Heritage Impact state that "where the effect of proposed work is likely to be detrimental to the heritage significance of the item or area, a SOHi needs to argue why such action is the only viable solution and explain why alternatives are not."<sup>7</sup> The SOHi states that three options were proposed for the site, two of which involved retention of the 1925 building, and argued that "all options can provide the required 9,400m<sup>2</sup> of floor space"<sup>8</sup> yet argued that preliminary Council advice regarding building heights made retention impossible. The Trust disputes the claim that "the building was designed in 1924 and catered for the educational philosophy and methods of the day which has since evolved and requires a greater level of flexibility in addition to compliance to current building standards and codes and equitable access and facilities." <sup>9</sup> The Trust maintains that with sensitive adaptation many of our State's historic public school buildings can and do allow for flexible, twenty-first century learning environments. Indeed, the Trust notes that the current ceiling heights of the classrooms in the existing building are far greater than those proposed in the new structure, and that the current building has successfully adapted to present requirements.</p> |          |           |

## 10 National Trust

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Response | Reference |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|-----------|
| <p>The SOHi is full of contradictions. The report argues that "the 1925 building has been the focus of the site and appears to be in sound and relatively good condition ... (It) retains generous sized rooms, high ceilings and reasonable amenity which provides opportunities for re-use,"<sup>10</sup> yet concludes that adaptation is not possible. Elsewhere the report states the building "has undergone previous change which has impacted on its original character and integrity." <sup>11</sup> This is despite the report outlining that the building retains early battened ceilings, moulded dado, timber windows, doors and joinery, early layout, splayed fireplace with timber mantle, glass panelled doors, top lights, simple timber joinery, etc,</p> <p>The report, despite its extensive research and analysis, was written as a fait accompli, designed only to support the proposed design by the same company. The proposal to "Interpret the historic use of the site and character of the 1925 building"<sup>12</sup> by salvaging bricks from the demolished structure to use for "interpretive and landscaping elements around the site" is heritage tokenism at its worst.</p> <p>The Trust also notes the advice of the Georges River Heritage Advisor, James Stephany, that "there is no support for the demolition of the subject heritage item (including the early two-storey addition) from a heritage point of view" and that in order to support potential demolition "credible justification from a community benefit point of view by the Education Department as to why the heritage item (and early addition) cannot form part of the redevelopment of the site."<sup>13</sup> The Trust would argue that the existing SOHi does not provide the required credible justification.</p> <p>The National Trust supports the redevelopment of our public schools to help deliver the best educational outcomes for the students of NSW while promoting the delivery of world class adaptive re-use within our historic school buildings. Extensions to the heritage-listed building could provide accommodation for the 1,000 school students. This would eliminate the transport of school students 4 kilometres to another school during the construction period and save the disruption caused to two schools by the current proposal.</p> <p>The National Trust strongly objects to the proposed redevelopment of the Penshurst Public School site as proposed. It views the demolition of a heritage-listed building as setting the worst kind of precedent for the remainder of our precious educational building stock.</p> |          |           |

# 11 Public Submissions

## 11.1 Overview

The following Table provides an overview of public submissions and the key issues they raise. Further details are in the following sections.

| No. | Address                           | Resident                  | Position  | Key issue(s)                                                                                   |
|-----|-----------------------------------|---------------------------|-----------|------------------------------------------------------------------------------------------------|
| 1   | 4/16-18 Arcadia Street, Penshurst | Alice Meng & Matthew Long | Concerned | Acoustic, Traffic, Parking, Lack of Consultation, Lack of Social Impact Report                 |
| 2   | Penshurst                         | Chris Ashton              | Support   | Lack of Parking, Built Form                                                                    |
| 3   | Penshurst                         | David Wright              | Object    | Lack of Parking                                                                                |
| 4   | Cambridge Street, Penshurst       | John Paton                | Concerned | Cumulative Traffic Impacts from Penshurst Park redevelopment, Construction Traffic Plan        |
| 5   | 28B Arcadia Street, Penshurst     | Leonardo Andreone         | Object    | Lack of Parking, Traffic, Proposes relocation of Shuttle Bus Stop                              |
| 6   | Penshurst                         | Leonie Haritos            | Support   | Traffic around school crossing, lack of staff parking, increased pedestrian crossings required |
| 7   | Penshurst                         | Michael Burt              | Object    | Traffic and safety concerns for school pedestrian crossing                                     |
| 8   | Penshurst                         | Olivia Kourkoumelis       | Object    | Traffic, acoustic concerns from rooftop play-space                                             |
| 9   | Penshurst                         | Warren Scott              | Comment   | Traffic management and pedestrian safety                                                       |
| 10  | Penshurst                         | Name withheld             | Object    | Heritage, trees and traffic                                                                    |
| 11  | Penshurst                         | Name withheld             | Concerned | Traffic                                                                                        |
| 12  | Penshurst                         | Name withheld             | Object    | Parking, Traffic                                                                               |
| 13  | Penshurst                         | Name withheld             | Object    | Traffic                                                                                        |
| 14  | Penshurst                         | Name withheld             | Object    | Parking, Traffic, Overshadowing                                                                |
| 15  | Penshurst                         | Name withheld             | Object    | Traffic, parking, pedestrian safety, play-space, loss of heritage building                     |

# 11 Public Submissions

| No. | Address                 | Resident        | Position | Key issue(s)                                                                                                                                                                                   |
|-----|-------------------------|-----------------|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 16  | Penshurst               | Name withheld   | Comments | Inadequacy of parking and traffic management, pedestrian safety. Suggest shuttle runs from Young St alongside Gifford Park as it is wider than Arcadia St. More shade needed on roof playspace |
| 17  | Percival St, Penshurst  | Name withheld   | Object   | Visual and acoustic privacy, traffic, parking, traffic management                                                                                                                              |
| 18  | Cambridge St, Penshurst | Kathryn Skelsey | Object   | Traffic, parking, shuttlebus arrangements (suggest Young St by Gifford Park), traffic report inadequate, playground design, loss of heritage, visual privacy                                   |

## 11.2 Car Parking

Most of the submissions raised the proposed level of on-site car parking (15 spaces) as inadequate and were concerned about the knock-on effects for on-street parking. The following table identifies the specific car parking issues raised.

| Issue                                                                                                                                                                                                                                                                                                                                     | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Reference                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| Construction – concern about construction hours of 7am to 7pm. Want a 5pm finish to reduce congestion on Forest Road during the peak.                                                                                                                                                                                                     | A Preliminary Construction Management Plan has been provided with this report. Construction hours are proposed to be Mon-Fri 7am-6pm and Sat 8am-1pm as prescribed by the EPA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | PCMP<br><b>Appendix 19</b>              |
| Query on number of construction workers and vehicles – request more information in connection with parking problems.                                                                                                                                                                                                                      | A Preliminary Construction Management Plan has been provided with this report. A robust Construction Traffic Management Plan (CTMP) will be prepared upon engagement of the construction contractor, prior to issue of the Construction Certificate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | PCMP<br><b>Appendix 19</b>              |
| 15 on-site parking spaces not sufficient and not in line with DCP rates. Particularly given traffic report indicates that 83% of staff drive to school, which means 75 cars (an increase of 32 cars from existing rates), of which 60 will be parking on the local streets. Report provides no mitigation of impacts for local residents. | <p>The proposal provides 20 onsite car parking spaces. The Traffic Impact Assessment has proposed a range of measures to mitigate parking impacts for residents including:</p> <ul style="list-style-type: none"> <li>• Provision of 13 additional P5 parking spaces during School Zone times on Arcadia Street (5 spaces on the eastern side and 8 spaces on the western side), replacing existing unrestricted spaces to provide a balance between the needs of the school and the amenity for residents;</li> <li>• Staff carpool spaces are proposed to reduce vehicle numbers;</li> <li>• Promotion of the Green Travel Plan, which aims to reduce reliance on private vehicle use for staff and students by 10% over five years;</li> <li>• Proposal to increase Council Ranger presence to enforce compliance with traffic and parking restrictions;</li> <li>• Consideration of a Resident Parking Scheme to reduce staff parking in the most sensitive streets near the school and maintain parking amenity for residents, subject to discussions with Council</li> </ul> | TIA<br><b>Appendix 8,</b>               |
| Concern about on-street parking for teachers, given currently 28 park on street and the street parking on Arcadia St between Forest Rd and Percival St was already almost full. But proposal expects local street network to accommodate an additional 49 cars parking within them.                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Signage Plan<br><b>Appendix 10</b>      |
| DCP rate is 30-45 onsite parking spaces, proposal provides 15. This is inadequate.                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Green Travel Plan<br><b>Appendix 11</b> |
| Local residents will not be able to park outside their homes between 8am and 4pm as all on-street parking will be occupied by local schools.                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                         |
| Propose resident parking zones with restricted 2 hour parking spaces for visitors between 8am and 6pm, with exception for residents.                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                         |

## 11 Public Submissions

| Issue                                                                                                                                                                                                                                                                                                                                                                                                         | Response                                                                                                                                                                                                                                                                                                                                                                                         | Reference                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Suggest that parking survey is misleading and an inaccurate reflection of normal parking conditions, which are busier than identified. Particularly given parking conditions include a section of Arcadia St as well as Clarence and Cambridge Streets which are further away from the school and therefore diminish the impact5 upon Percival Street and the section of Arcadia Street closer to the school. |                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                         |
| Unacceptable cumulative on-street parking impacts from both neighbouring primary schools (Penshurst and St Declan's), both of which provide inadequate parking on-site.                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                         |
| Unreasonable to expect teachers to catch the bus to school or walk 700 metres to train station with the amount of homework, craft supplies, marking etc they need to take home/ bring to work. More onsite parking is required.                                                                                                                                                                               | The Green Travel Plan and Traffic Impact Assessment proposes a range of sustainable measures to reduce staff reliance on private vehicles including carpooling.                                                                                                                                                                                                                                  | Green Travel Plan<br><b>Appendix 11</b><br><br>TIA<br><b>Appendix 8</b> |
| School should consider purchase two adjoining properties to existing car park to provide adequate parking facilities and mitigate on-street parking impacts for neighbours.                                                                                                                                                                                                                                   | Noted. The acquisition of additional land does not form part of the project brief from the Department of Education.                                                                                                                                                                                                                                                                              | N/A                                                                     |
| Concern about construction workers parking on street                                                                                                                                                                                                                                                                                                                                                          | A Preliminary Construction Management Plan is provided with this report. The CMP states that <i>"management measures to be implemented during construction could include...construction personnel parking controls"</i> . A working Construction Traffic Management Plan (CTMP) will be prepared upon engagement of the construction contractor, prior to issue of the Construction Certificate. | PCMP<br><b>Appendix 19</b>                                              |
| Proposal to construct underground on-site car parking or multi-storey car park to to satisfy demand and include basketball court or playspace on the roof.                                                                                                                                                                                                                                                    | Noted. Basement car parking is not feasible in design terms given the requirement for turning circles, ramp gradients and other matters set out under the Australian Standards.                                                                                                                                                                                                                  | N/A                                                                     |
| Parents already block driveways when dropping off with only 400 students, will be worse with 1000 students.                                                                                                                                                                                                                                                                                                   | Traffic Impact Assessment proposes a range of measures to improve kiss and drop area and provision of 13 P5 spaces during School Zone times.                                                                                                                                                                                                                                                     | TIA<br><b>Appendix 8</b>                                                |
| Cumulative impact of apartment buildings in and around Arcadia Street makes on-street parking difficult.                                                                                                                                                                                                                                                                                                      | Traffic Impact Assessment considers on-street parking pressures and availability                                                                                                                                                                                                                                                                                                                 | TIA<br><b>Appendix 8</b>                                                |
| Local businesses on Arcadia Street will have no place for their customers to park                                                                                                                                                                                                                                                                                                                             | Traffic Impact Assessment considers on-street parking pressures and availability                                                                                                                                                                                                                                                                                                                 | TIA<br><b>Appendix 8</b>                                                |
| Concern about parents illegally parking to drop off due to lack of parking spaces.                                                                                                                                                                                                                                                                                                                            | Traffic Impact Assessment proposes a range of measures to improve kiss and drop area and provision of 13 P5 spaces during School Zone times.                                                                                                                                                                                                                                                     | TIA<br><b>Appendix 8</b>                                                |
| Provide parking bay pads on the nature strip                                                                                                                                                                                                                                                                                                                                                                  | Noted                                                                                                                                                                                                                                                                                                                                                                                            | N/A                                                                     |

## 11 Public Submissions

| Issue                                                                                                                                                                                                                                                                                                                                                            | Response                                                                                                                                                                                                                                                                                                                                                                                                                                 | Reference                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| Concern that quantitative parking survey was undertaken on Wednesday 11 April 2017, which was during school holidays. SEARS required adequate baseline data but the single day parking surveys are not adequate.                                                                                                                                                 | TTM conducted a second site inspection to review on-street parking on 31 July 2017, and PTC conducted a site inspection to observe on-street parking availability on 16 August 2018. The observations on both of the additional visits support the findings from the quantitative data collected. PTC has provided a range of measures to improve the traffic and parking conditions around the school in the Traffic Impact Assessment. | TIA<br><b>Appendix 8</b> |
| TTM made no quantification of site observations on 31 July 2018. They suggest that parking on Arcadia St between Forest Rd and Percival St was nearly fully occupied. But there were "vacant spaces in surrounding streets", which they did not quantify. They based their opinion that on-street parking is adequate on this information, but it is inadequate. | The Traffic Impact Assessment provides further discussion and observations regarding on-street parking availability based on a site visit on 16 August 2018. The report also includes a series of proposed measures to mitigate the impact of traffic and parking on residents.                                                                                                                                                          | TIA<br><b>Appendix 8</b> |
| Inadequate consideration of cumulative parking impacts of Penshurst Park and school development.                                                                                                                                                                                                                                                                 | The Traffic Impact Assessment provides discussion about the existing and future traffic and parking situation around the site.                                                                                                                                                                                                                                                                                                           | TIA<br><b>Appendix 8</b> |

### 11.3 Traffic

Most of the submissions raised the issue of increased traffic and its impacts on the surrounding street network as a concern. The following table identifies the specific traffic issues raised.

| Issue                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Response                                                                                                                                                                                                                                                                                                                                                                            | Reference                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Construction – concern about construction hours of 7am to 7pm. Want a 5pm finish to reduce congestion on Forest Road during the peak.                                                                                                                                                                                                                                                                                                                        | The Preliminary Construction Management Plan proposes standard construction hours of 7am-6pm Monday-Friday and 8am-1pm Saturday                                                                                                                                                                                                                                                     | PCMP<br><b>Appendix 19</b> |
| Concern about construction traffic travelling to site in a westerly direction down Forest Road and turning right into Cambridge St, then left into Percival St, then left into Arcadia St as they are unable to turn right into Arcadia St. Will cause unacceptable traffic impacts on these quiet streets. Request construction traffic travel off King Georges Road into Percival St, then into Arcadia St to mitigate traffic impacts on local residents. | The Preliminary Construction Management Plan proposes construction traffic will travel north up Penshurst Street, right into Percival Street and right into Arcadia Street. Construction traffic will exit the site travelling south down Arcadia Street and left onto Forest Road. When the Contractor is engaged, a robust Construction Traffic Management Plan will be prepared. | PCMP<br><b>Appendix 19</b> |
| Pick up and drop off time already causes traffic to reduce to single file and come to a standstill on Arcadia Street.                                                                                                                                                                                                                                                                                                                                        | The Traffic Impact Assessment provided with this report proposes an expansion of the Kiss and Ride zone among other measures to improve traffic flow at pick up and drop off times. Forecast modelling indicates that the proposed changes will improve traffic conditions and reduce queueing from existing levels.                                                                | TIA<br><b>Appendix 8</b>   |
| Resident cannot exit their driveway during peak drop off and pick up times due to traffic standstill as cars wait to turn onto Penshurst Street. The increase in student numbers will make this situation worse.                                                                                                                                                                                                                                             | The Traffic Impact Assessment provided with this report proposes a range of measures to improve traffic flow at pick up and drop off times, including increased Council Ranger presence to enforce compliance.                                                                                                                                                                      | TIA<br><b>Appendix 8</b>   |

## 11 Public Submissions

| Issue                                                                                                                                                                                                                                                                                 | Response                                                                                                                                                                                              | Reference                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| Traffic management problems are already being faced with only 500 students. The road between Forest Way and Arcadia Street does not allow large vehicles to pass each other when cars are parked or standing to offload passengers                                                    | The Traffic Impact Assessment has provided a range of measures to mitigate the traffic impacts of the school development.                                                                             | TIA<br><b>Appendix 8</b> |
| Traffic impacts of the increased student numbers will be felt throughout the surrounding road network. Surrounding road network will need to be reworked to accommodate impacts.                                                                                                      | The Traffic Impact Assessment has modelled existing and future traffic impacts on the surrounding road network and proposes measures to mitigate the impact of the school's traffic                   | TIA<br><b>Appendix 8</b> |
| Consider converting Arcadia Street to one-way between Forest Road and Percival Streets                                                                                                                                                                                                | Noted                                                                                                                                                                                                 | N/A                      |
| Intersection of Arcadia Street and Percival Street is controlled by a Give Way sign in Percival Street. Due to parked cars in both streets it is difficult to see approaching cars in both streets. This intersection needs to be better managed.                                     | The Traffic Impact Assessment and Signage Plan provide a range of measures to mitigate the traffic impacts and improve flow                                                                           | TIA<br><b>Appendix 8</b> |
| Local businesses on Arcadia Street will face difficulty with customers trying to enter and exit their property.                                                                                                                                                                       | The Traffic Impact Assessment and Signage Plan provide a range of measures to mitigate the traffic and parking impacts.                                                                               | TIA<br><b>Appendix 8</b> |
| Inadequate consideration about cumulative traffic impacts of Penshurst Park redevelopment. Penshurst Park not mentioned in cumulative impacts section of TTM report, this does not comply with SEARs requirement.                                                                     | Modelling of current and future traffic conditions has been undertaken in the Traffic Impact Assessment by PTC.                                                                                       | TIA<br><b>Appendix 8</b> |
| Concern about traffic building up on corner of Percival and Penshurst St due to kiss and drop                                                                                                                                                                                         | Additional Kiss and Ride spaces will be provided in addition to 13 P5 spaces to allow parents to walk their children into school. The Traffic Impact Assessment contain full details of the proposals | TIA<br><b>Appendix 8</b> |
| TTM report had a lack of investigation into traffic impacts in Cambridge St despite being a similar distance from the school to Penshurst St. Cambridge St has 200 units and is adjacent to Penshurst Park "sporting hub" redevelopment. Cumulative impacts have not been considered. | The Traffic Impact Assessment has modelled existing and future traffic impacts on the surrounding road network and proposes measures to mitigate the impact of the school's traffic                   | TIA<br><b>Appendix 8</b> |

### 11.4 Pedestrian Safety

Several submissions raised concerns about pedestrian safety. The following table identifies the specific issues.

| Issue                                                                                                                                                               | Response                                                                                                              | Reference                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|--------------------------|
| Suggest a skybridge/ footbridge to improve pedestrian safety at the Penshurst Road, Forest Road. This would mean that children can safely access after school care. | Noted.                                                                                                                | N/A                      |
| Concern where the road narrows at the children's crossing, the street is not wide enough to accommodate extra traffic.                                              | The Traffic Impact Assessment provides a range of measures to mitigate traffic impacts and consider pedestrian safety | TIA<br><b>Appendix 8</b> |

## 11 Public Submissions

| Issue                                                                                                                                                                                                                                                    | Response                                                                                                                                                                                                      | Reference                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| Need another pedestrian crossing on corner of Arcadia St and Percival St                                                                                                                                                                                 | Noted. This is a Council matter                                                                                                                                                                               | N/A                      |
| Traffic management needs to be monitored to ensure child safety. With the large volume of traffic, the narrow street and inadequate on-site parking pedestrian safety is a major concern. The objector has seen a child hit by a car outside the school. | The Traffic Impact Assessment provided with this report has considered pedestrian safety and incorporates a range of measures including improved signalised intersection at Forest Road and Penshurst Street. | TIA<br><b>Appendix 8</b> |
| Commenter has almost been hit by parents pulling out of parking spaces after drop off, has concerns for pedestrian safety with increased numbers.                                                                                                        | The Traffic Impact Assessment provided with this report has considered pedestrian safety and incorporates a range of measures.                                                                                | TIA<br><b>Appendix 8</b> |

### 11.5 Shuttle bus

Many submissions raised concerns about the location for collection of the shuttlebus and suggested moving it to Young Street adjacent to Gifford Park. The following table identifies the specific issues.

| Issue                                                                                                                                                                                                                                                                                                       | Response                                                                                                                      | Reference |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|-----------|
| Concern that Arcadia Street is not wide enough to accommodate waiting students and their parents. Is a safety concern                                                                                                                                                                                       | Arcadia Street will not be used for the bus transfer of students to the pop-up school.                                        | N/A       |
| Suggest moving shuttle bus stop to Young Street, adjacent to Gifford Park. The road is wide and there is adequate space for a bus to stop, grassed open area for students and parents to park and wait. Bins for rubbish and toilets for amenities. It is a much more suitable location for a shuttle stop. | Suggestion noted. The location of the bus transfer stop at the Penshurst location is the subject of a separate investigation. | N/A       |
| Shuttlebus will not have room to park and move in Arcadia Street, must find better site to allow students to move around.                                                                                                                                                                                   | Arcadia Street will not be used for the bus transfer of students to the pop-up school.                                        | N/A       |

### 11.6 Built form

The following table identifies specific built form issues.

| Issue                                                              | Response                                                                                                                                                                                                                | Reference |
|--------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| Concerns about building overshadowing St Declans School classrooms | The shadow diagrams that were provided with the original EIS package demonstrate that while there is a small amount of overshadowing of St Declans at 9am in mid-winter, but there is none for the majority of the day. | N/A       |
| Design grotesque                                                   | A Design Analysis Report was provided with the original EIS package. The design is found to have architectural merit and meets the nine design quality principals specified in                                          | N/A       |

## 11 Public Submissions

| Issue                                                                       | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Reference                                |
|-----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
|                                                                             | Schedule 4 of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                          |
| Concern about resident's visual privacy due to multi-storey built form      | <p>In regard to overlooking, a solid balustrade of 1.8m is provided to the western and northern edges of Level 3. This balustrade will prevent students on Level 3 from overlooking the adjacent St Declan's School and residential properties at the north of the site.</p> <p>A parapet is provided to the curved Arcadia Street facade, projecting 500mm above Level 3 floor level. A steel balustrade constructed of flat stanchions and tubular balusters is located behind the parapet. These measures limit students' access to the edge of Level 3 and mitigate against students on Level 3 overlooking immediate neighbouring properties.</p> <p>New tree plantings are proposed for the whole of the northern boundary, to provide a visual screen between the school and residential properties at the north of the site. The Landscape Plan shows the location and species selection.</p> | Architectural Plans<br><b>Appendix 2</b> |
| Concern about concentration of built form at north west end of site         | The Design Analysis Report submitted with the original EIS package demonstrates that the building meets the nine design quality principals specified in Schedule 4 of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | N/A                                      |
| Concern about lack of sun shades in play-spaces, particularly the roof top. | The Landscape Plans submitted with the original EIS package include a rooftop covered outdoor learning area (COLA) and a shade structure for evergreen climbers                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | N/A                                      |

### 11.7 Acoustic

The following table identifies the acoustic issues that were raised.

| Issue                                                                                                                | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Reference                            |
|----------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| Hours of construction should be limited to Monday to Friday only with impulsive tonal noise restricted to 9am to 4pm | <p>The project is consistent with the EPA acceptable construction working hours. The Acoustic Assessment Report has been updated to include engineering and practical noise controls to mitigate noise during the construction period. These include:</p> <ul style="list-style-type: none"> <li>Distance – locate mechanical plant as far as practically possible from the nearby existing residences;</li> <li>Enclosure – construct acoustical enclosures around items of mobile plant such as generators where extended use for long periods is expected;</li> <li>Screening – erect temporary sound barrier screens along the boundaries of the site near adjacent residential buildings to remain throughout all construction phases as far as reasonably practical;</li> <li>Silencing – all plant and machinery should be selected with consideration to low noise options where practical and available. Care should be taken to ensure</li> </ul> | Acoustic Report<br><b>Appendix 3</b> |

## 11 Public Submissions

| Issue                                                                                                | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Reference                            |
|------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
|                                                                                                      | not more than one item of plant is operating simultaneously within close proximity of any given residence as far as reasonably practical                                                                                                                                                                                                                                                                                                                                                                                                                           |                                      |
| Adjacent residential properties concerned about visual and acoustic privacy from rooftop play areas. | Acoustic report addresses noise emissions from outdoor play areas including roof top play space and concludes, "noise from outdoor play will likely exceed the acceptable noise criteria by up to 7 dB. However, the noise levels will still be within the residential amenity noise criteria...Given the existing school noise emission, the limited duration of noise from outdoor play, the zoning of the site and expectations of noise from children on a school site we are of the opinion that the noise from outdoor play would be considered acceptable". | Acoustic Report<br><b>Appendix 3</b> |

### 11.8 Consultation

The following table identifies the issues in relation to consultation that were raised by residents.

| Issue                                                                                                                                                                                                                                          | Response                                                                                                                                                                                                                                                                                                                                                                                                                                  | Reference |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| Did not hear about proposal until March 2018, at which point the project was so far advanced that it was too late for community input and engagement. Suggest a letter box drop is the only reasonable way to reach residents with information | A Consultation Report was provided with the original EIS package detailing the consultation that was undertaken with stakeholders and the community. Consultation was conducted in accordance with the SEARs requirements, including advertisements in local newspapers directing people to the project webpage, six information booths at the school and one at Riverwood Plaza, an online survey, and updates in the school newsletter. | N/A       |
| Suggest a banner is installed on Arcadia Street and Forest Road along the school boundary to inform residents of proposed redevelopment.                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |
| Residents in Cambridge St were not invited to consultation despite being sandwiched between the school and Penshurst Park developments.                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |
| Efforts to consult with local residents outside the school community were very limited and ineffective.                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                           |           |

### 11.9 Heritage/ history

The following table identifies the issues raised in connection with the heritage building and history of the school generally.

| Issue                                                           | Response                                                                                                                                                                         | Reference                     |
|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| Objector against knocking down school and losing local history. | Noted. A supplementary heritage assessment has been provided along with a design options report detailing fifteen design options that were considered during the design process. | Supplementary Heritage Report |
| Concerned about loss of heritage building                       |                                                                                                                                                                                  |                               |

## 11 Public Submissions

| Issue                                  | Response | Reference                                                              |
|----------------------------------------|----------|------------------------------------------------------------------------|
| Heritage building should be preserved. |          | <b>Appendix 6</b><br>and Design<br>Options Report<br><b>Appendix 7</b> |

### 11.10 Other issues

The following table includes all other issues that were raised by the public submissions.

| Issue                                                                        | Response                                                                                                                                                                                                                                 | Reference                           |
|------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| Objection to cutting down many of the trees in the school yard               | The Landscape Plan provides details of tree planting to mitigate the impacts of tree removal required to facilitate the works.                                                                                                           | Landscape Plan<br><b>Appendix 5</b> |
| Concerns about bin storage areas causing smells and rodents                  | The Waste Management Plan proposes collection five days a week, so that waste will be removed swiftly.                                                                                                                                   | N/A                                 |
| Traffic report does not adequately assess existing public transport capacity | The revised Traffic Impact Assessment considers public transport capacity                                                                                                                                                                | TIA<br><b>Appendix 8</b>            |
| No Social Impact Assessment was provided, only a consultation report.        | A social impact assessment was undertaken with the original EIS document at Section 6.6.6, which concluded that the proposal will result in significant positive social impacts through the improvement of social/school infrastructure. | N/A                                 |

## 12 Conclusion

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Following submission and exhibition of SSD Application SSD 17\_8365, DPE has issued the RTS package for all authority and public submissions received in regard to this application. This RTS Report summarises these responses and directs DPE to the relevant report where each item has been addressed.

All matters raised in the RTS package provided by DPE, together with the matters raised in the separate submission received by the Department of Education directly from the National Trust, have been addressed and resolved.

DPE has now been provided with sufficient documentation to enable the assessment of SSD 17\_8365 to continue. It is requested that DPE complete the assessment of the DA and proceed to determination in the earliest possible time based on the assessment material provided in the original EIS and the supporting assessment material provided in this RTS Report.