



planning consultants

Environmental Impact Statement

State Significant Development

Gledswood Hills Public School

The Hermitage Way, Gledswood Hills



Prepared for: NSW Department of Education
January 2018

DECLARATION

ENVIRONMENTAL IMPACT STATEMENT

Applicant Name: Applicant Address: Land to be developed: Proposed development:	New South Wales Department of Education Level 4, 35 Bridge Street, Sydney NSW 2000 Lot 3, The Hermitage Way, Gledswood Hills, Erection of a new public school (Gledswood Hills Public School) as detailed in Section 4 of this Environmental Impact Statement.
ENVIRONMENTAL IMPACT STATEMENT	This report is an Environmental Impact Statement which addresses all relevant matters required by Section 78A(8A) of the <i>Environmental Planning and Assessment Act 1979</i> and Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i> .
DECLARATION	The undersigned certify that we have prepared the contents of this Environmental Impact Statement and to the best of our knowledge it: - addresses all relevant matters listed under Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i>; - contains all available information that is relevant to the environmental assessment of the development to which the EIS relates; and - is not, by its presentation or omission of information, false nor misleading.
PREPARED BY Name: Qualifications: Address: Signature: Date:	Stephen Earp B. Planning (Hons) MPIA 11 Dartford Road, Thornleigh NSW 2120  9 January 2018

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Abbreviations

AADT	annual average daily vehicle trips
AEP	Annual Exceedance Probability
AHIP	Aboriginal Heritage Impact Permit
AIA	aquifer interference approval
AS	Australian Standard
ASS	acid sulfate soils
BCA	Building Code of Australia
CAA	controlled activity approval
CC	construction certificate
CIV	capital investment value
CMP	construction management plan
COLA	covered outdoor learning area
Council	Camden Council
CPTED	crime prevention through environmental design
DA	development application
DBYD	Dial Before You Dig
DCP	development control plan
DDA	<i>Disability Discrimination Act 1992 (Cth)</i>
DFP	DFP Planning Pty Limited
DoT	NSW Department of Transport
DP	Deposited Plan
DPE	NSW Department of Planning and Environment
EEC	endangered ecological community
EFSG	Educational Facilities Standards and Guidelines
EIS	Environmental Impact Statement
EMP	environmental management plan
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPA	NSW Environmental Protection Authority
EPBC	<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>
EPI	environmental planning instrument
ESCP	erosion and sedimentation control plan
ESD	ecologically sustainable development
FTE	full time equivalent
GFA	gross floor area
ILP	Indicative Layout Plan
JRPP	Joint Regional Planning Panel
LEP	local environmental plan
LGA	local government area
NDA	net developable area
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPWS	NSW National Parks and Wildlife Service
OEH	NSW Office of Environment and Heritage
PA	planning agreement
PAD	potential archaeological deposit
PRG	project reference group
RAP	remedial action plan
REP	regional environmental plan
RL	reduced level
RMS	NSW Roads and Maritime Services

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Abbreviations

RTA	former Roads and Traffic Authority of NSW
SEPP	state environmental planning policy
SEARs	Secretary's Environmental Assessment Requirements
SIC	special infrastructure contribution
SIS	species impact statement
SRD SEPP	<i>State Environmental Planning Policy (State and Regional Development) 2011</i>
SSD	State Significant Development
TSC Act	<i>Threatened Species Conservation Act 1995</i>
UGNSW	UrbanGrowth NSW
VENM	Virgin Excavated Natural Material
VMP	vegetation management plan
WELS	water efficiency labelling scheme
WM Act	<i>Water Management Act 2000</i>
WSUD	water sensitive urban design

Executive Summary

The NSW Department of Education proposes the construction of Gledswood Hills Public School at Lot 3, The Hermitage Way, Gledswood Hills. The Site is located within the Turner Road Precinct of the South West Priority Growth Area and has a total area of 24,850m². The surrounding area is under redevelopment for a mixture of retail, commercial, community, mixed use and residential land uses.

The proposed development comprises the following:

- Construction of a new Gledswood Hills Public School over two (2) stages to cater to up to 600 students initially but with room for future expansion to a capacity of approximately 1,000 students;
- Pedestrian access from The Hermitage Way, MC06 and MC07. Regular vehicular access is from both MC07 (to the visitors car park) and MC06 (to the staff car park);
- A student drop off/ pick up area is located along MC06, with a roundabout in the northern section of the street to allow safe and easy circulation in and out of the area;
- Promotion of the use of sustainable transport, including servicing with public bus transport services and connectivity to the regional cycling and walking pathway network;
- A bus stop is located on The Hermitage Way suitable for three buses at one time and an accessible bus stop suitable for a 22-seater bus with accessible access to the school grounds is located on MC07;
- Landscaping works including the retention of two (2) trees, the removal of 22 trees, and the planting of 145 new trees along with a range of scrubs, clumping plants and ground covers; and
- Connection of new public school buildings and stormwater drainage system into the public stormwater network, which links into the precinct-wide water retarding and treatment basin designed for up to 1 in 100 year ARI storm events. The public stormwater system and precinct-wide basin have been designed to include the catchment of the school site.

The proposal has a capital investment value exceeding \$20 million and therefore must be assessed as State Significant Development, pursuant to *State Environmental Planning Policy (State and Regional Development) 2011*.

This Environmental Impact Statement report has been prepared in accordance with the Secretary's Environmental Assessment Requirements issued by the NSW Department of Planning and Environment, Part 4 of the *Environmental Planning and Assessment Act 1979* and Schedule 2 of the *Environmental Planning and Assessment Regulations 2000*. This report provides the NSW Department of Planning and Environment and relevant NSW State Government Agencies with all relevant information necessary to assess the proposed development and for the Minister to determine the DA in accordance with Section 89E of the *Environmental Planning and Assessment Act 1979*.

The project team has carried out consultation with a wide range of stakeholders, including State government departments, local government, community and experts in the design of schools. The advice received throughout the consultation process has been incorporated into the current proposal where possible and reflects a commitment to achieve a quality and objective-driven outcome.

The proposed development will involve built form up to three (3) storeys in height, resulting in a number of buildings which exceed the maximum building height control under *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* of 9.5m by up to 4.9m. Despite the provisions of Clause 42 of *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*, the application is supported by a Clause 4.6 Variation Statement which is considered to be well founded.

In response to the opportunities and constraints of the site, the requirements of the EFSG and the design requirements of the NSW Department of Education, the proposal has been designed to meet the current and future education demands for residents of Gledswood Hills by providing 6,533.02m² of student and staffing accommodation, and over 16,000m² of play areas.

In addition, the proposed building works will provide high quality learning and teaching spaces with flexible layout arrangements and durable finishes ensuring the proposal operates as a long-life, high utility and low-maintenance educational establishment.

Executive Summary

The proposal will provide a total of 75 car parking spaces for the public school, meeting the requirements of Camden Council's DCP. This parking supply is supported by a range of sustainable transport initiatives including improved access to public bus services and integration with the precinct-wide pedestrian and cycle pathway network. Traffic impacts of the proposal are expected to meet the demand forecast for this site as part of the initial Precinct-wide traffic planning studies.

The proposal achieves acceptable environmental amenity outcomes, including desirable outcomes for acoustic amenity (both internal and external to the site), stormwater drainage, flooding and waste management. Furthermore, the proposal will incorporate environmentally sustainable development initiatives considered to be best practice within the Australian building industry.

The works proposed under this development application will be subject to the recommendations of specialist reports so as to ensure appropriate Aboriginal heritage, archaeological, geotechnical, contamination and salinity outcomes are achieved.

The proposed works have been designed to, and will be carried out in the interests of the public. The Development Application will meet the project objectives to provide primary school accommodation in a high quality built form which has safe and efficient access for children, teachers, visitors and service personnel.

Accordingly, it is recommended that the Minister for Planning and Environment grant approval to the proposed State Significant Development application as set out in this report.

1 Introduction

1.1 Purpose of this Report

DFP Planning Pty Ltd (DFP) has been commissioned by Perumal Pedavoli Architects, acting on instructions from the NSW Department of Education, to prepare an Environmental Impact Statement (EIS) to accompany a development application (DA) to the NSW Department of Planning and Environment (DPE) for the proposed erection of a new primary school, Gledswood Hills Public School at The Hermitage Way, Gledswood Hills (the Site).

The proposed development is for an educational establishment with a Capital Investment Value (CIV) of more than \$20 million and accordingly, is deemed to be State Significant Development (SSD) pursuant to Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (the SRD SEPP).

On 3 May 2017, the Secretary of the DPE issued Secretary's Environmental Assessment Requirements (the SEARs) (see **Section 1.4** and **Appendix 1**).

This report has been prepared in accordance with the SEARs, Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (the Regulation) to provide the DPE and relevant NSW State Government Agencies with all relevant information necessary to assess the proposed development and for the Minister to determine the DA in accordance with Section 89E of the EP&A Act.

1.2 Project Objectives and Summary

The Site is located within the Turner Road Precinct of the South West Priority Growth Area, which presently comprises undeveloped/greenfield land in the process of urban transformation.

The NSW Department of Education proposes to construct a new school to meet the educational needs of the growing population in the new residential suburb of Gledswood Hills within the Turner Road Precinct, which is forecast to have a total population of 10,000 – 11,000 people within 4,00 new dwellings. The proposed development is intended to be completed by 2020 to enable student enrolments commencing in 2021.

The Project Objectives are as follows:

- To provide a new primary school;
- To provide a high quality built form and open spaces that are adaptable and flexible to cater for future educational needs; and
- To provide safe and efficient access for children, teachers, parents, visitors and service personnel.

The Project is detailed in Section 4 of this EIS report and can be summarised as follows:

- Construction of a new Gledswood Hills Public School over two (2) stages to cater to up to 600 students initially but with room for future expansion to a capacity of approximately 1,000 students;
- Pedestrian access from The Hermitage Way, MC06 and MC07. Regular vehicular access is from both MC07 (to the visitors car park) and MC06 (to the staff car park);
- A student drop off/ pick up area is located along MC06, with a roundabout in the northern section of the street to allow safe and easy circulation in and out of the area;
- Promotion of the use of sustainable transport, including servicing with public bus transport services and connectivity to the regional cycling and walking pathway network;

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- A bus stop is located on The Hermitage Way suitable for three buses at one time and an accessible bus stop suitable for a 22-seater bus with accessible access to the school grounds is located on MC07;
- Landscaping works including the retention of two (2) trees, the removal of 22 trees, and the planting of 145 new trees along with a range of scrubs, clumping plants and ground covers; and
- Connection of new public school buildings and stormwater drainage system into the public stormwater network, which links into the precinct-wide water retarding and treatment basin designed for up to 1 in 100 year ARI storm events. The public stormwater system and precinct-wide basin have been designed to include the catchment of the school site.

1.3 Analysis of Feasible Alternatives

1.3.1 Option 1 – The Proposal

Option 1 is as detailed within this EIS Report and accompanying documents and is considered to be the best option as it utilises land that has already been acquired by the NSW Department of Education that has been earmarked for this purpose, and will provide a high quality educational facility to meet the growing demands of the new residential population in Gledswood Hills without significant adverse environmental impacts.

1.3.2 Option 2 – Alternate Design

Option 2 would entail an alternate design and layout. The Design Analysis Report prepared by Perumal Pedavoli Architects (**Appendix 10**) sets out the context and site analysis of the site, including opportunities and challenges which have led to a number of site strategies informing the current design.

Alternative designs considered as part of the design development stages, leading out of the design analysis phase have been considered but ultimately were considered to not efficiently utilise the topography and access connections of the site, resulting in an inferior urban design and learning outcome to Option 1.

1.3.3 Option 3 – Alternate Site

Option 3 would entail acquiring an alternate parcel of land within Gledswood Hills for a new primary school. Because the purchase of this site has already been carried out and the delivery of facilities is a high priority for the Department of Education, an alternative site would require additional land acquisition resulting in considerable delays to the delivery of education facilities for Gledswood Hills residents resulting from the acquisition of an alternative site (if one is available) and increased costs through the sale/purchase process.

The development of an alternative site in the hope that it would provide a superior outcome to the current design is not warranted as a valid option.

1.4 Response to SEARs

Table 1 provides a summary of where a response to the SEARs can be found within this EIS report or accompanying documentation.

Table 1 Location of Response to SEARs within this EIS		
Requirement	Response within this Report	Relevant Supporting Documentation
General Requirements The Environmental Impact Statement (EIS) must be prepared in accordance with, and meet the minimum requirements of clauses 6 and 7 of Schedule 2 the Environmental Planning and Assessment Regulation 2000 (the Regulation).	-	-

1 Introduction

Table 1 Location of Response to SEARs within this EIS

Requirement	Response within this Report	Relevant Supporting Documentation
Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development.		
Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include: - adequate baseline data; - consideration of potential cumulative impacts due to other development in the vicinity (completed, underway or proposed); and - measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment.	Section 8	Multiple Appendices
The EIS must be accompanied by a report from a qualified quantity surveyor providing: - a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the Environmental Planning and Assessment Regulation 2000) of the proposal, including details of all assumptions and components from which the CIV calculation is derived; - an estimate of the jobs that will be created by the future development during the construction and operational phases of the development; and - certification that the information provided is accurate at the date of preparation.	Section 6.4.1	Appendix 3
Key Issues The EIS must address the following specific matters: 1. Statutory and Strategic Context – including: Address the statutory provisions contained in all relevant environmental planning instruments, including: - State Environmental Planning Policy (State & Regional Development) 2011; - State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 - State Environmental Planning Policy (Infrastructure) 2007; - State Environmental Planning Policy No.55 – Remediation of Land; - State Environmental Planning Policy No. 64 – Advertising and Signage; - Deemed State Environmental Planning Policy No. 20 – Hawkesbury-Nepean River; and - State Environmental Planning Policy (Sydney Region Growth Centres) 2006 <i>Permissibility</i> Detail the nature and extent of any prohibitions that apply to the development. <i>Development Standards</i> Identify compliance with the development standards applying to the site and provide justification for any contravention of the development standards.	Section 6.4	Multiple Appendices
2. Policies Address the relevant planning provisions, goals and strategic planning objectives in the following: - NSW State Priorities; - A Plan for Growing Sydney; - NSW Long Term Transport Master Plan 2012; - Sydney's Cycling Future 2013; - Sydney's Walking Future 2013; - Sydney's Bus Future 2013; - Crime Prevention Through Environmental Design (CPTED) Principles; - Healthy Urban Development Checklist, NSW Health; and	Section 6.5	N/A

1 Introduction

Table 1 Location of Response to SEARs within this EIS

Requirement	Response within this Report	Relevant Supporting Documentation
- Greater Sydney Commission's Draft South West District Plan; - Turner Road Development Control Plan; and - Camden Development Control Plan 2011.		
3. Built Form and Urban Design - Address the height, density, bulk and scale, setbacks of the proposal in relation to the surrounding development, topography, streetscape and any public open spaces. - Address design quality, with specific consideration of the overall site layout, streetscape, open spaces, façade, rooftop, massing, setbacks, building articulation, materials, colours and Crime Prevention Through Environmental Design Principles. - Detail how services, including but not limited to waste management, loading zones, and mechanical plant are integrated into the design of the development.	Section 6.6.1	Appendix 9, Appendix 10 and Appendix 11
4. Environmental Amenity - Detail amenity impacts including solar access, acoustic impacts, visual privacy, view loss, overshadowing and wind impacts. A high level of environmental amenity for any surrounding residential land uses must be demonstrated. - Detail any proposed use of the school grounds out of school hours (including weekends) and any resultant amenity impacts on the immediate locality and proposed mitigation measures.	Section 6.6.2	Multiple Appendices
5. Transport and Accessibility (Construction and Operation) Include a transport and accessibility impact assessment, which details, but not limited to the following: - accurate details of the current daily and peak hour vehicle, public transport, pedestrian and cycle movement and existing traffic and transport facilities provided on the road network located adjacent to the proposed development; - an assessment of the operation of existing and future transport networks including the bus network and their ability to accommodate the forecast number of trips to and from the development; - details of estimated total daily and peak hour trips generated by the proposal, including vehicle, public transport, pedestrian and cycle trips based on surveys of similar schools within the local area; - the adequacy of public transport, pedestrian and bicycle networks and infrastructure to meet the likely future demand of the proposed development; - the impact of the proposed development on existing and future public transport infrastructure within the vicinity of the site in consultation with Roads and Maritime Services and Transport for NSW and identify measures to integrate the development with the transport network; - details of any upgrading or road improvement works required to accommodate the proposed development; - details of travel demand management measures to minimise the impact on general traffic and bus operations and to encourage sustainable travel choices and details programs for implementation - the impact of trips generated by the development on nearby intersections, with consideration of the cumulative impacts from other approved developments in the vicinity, and the need/associated funding for upgrading or road improvement works if required (note: traffic modelling is to be undertaken with scope to be agreed by TfNSW and RMS in advance); - the proposed active transport access arrangements and connections to public transport services; - details of proposed school bus routes along bus capable roads (i.e. travel lanes of 3.5m minimum) and infrastructure (bus stops, bus layovers etc.); - the proposed access arrangements, including car and bus pickup/drop-off facilities, and measures to mitigate any associated traffic impacts and impacts on public transport, pedestrian and bicycle	Section 6.6.3	Appendix 17

1 Introduction

Table 1 Location of Response to SEARs within this EIS

Requirement	Response within this Report	Relevant Supporting Documentation
networks, including pedestrian crossings and refuges and speed control devices and zones; - measures to maintain road and personal safety in line with CPTED principles; - the proposed car and bicycle parking provision, including end of trip facilities, which must be taken into consideration of the availability of public transport and the requirements of Council's relevant parking codes and Australian Standards; - proposed bicycle parking facilities in secure, convenient, accessible areas close to main entries incorporating lighting and passive surveillance; - details of the proposed number of car parking spaces and - compliance with appropriate parking codes and justify the level of car parking provided on-site; - details of emergency vehicle access arrangements; - an assessment of road and pedestrian safety adjacent to the proposed development and the details of required road safety measures; - service vehicle access, delivery and loading arrangements and estimated service vehicle movements (including vehicle type and the likely arrival and departure times); - in relation to construction traffic: - assessment of cumulative impacts associated with other construction activities (if any); - an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity - details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process; - details of anticipated peak hour and daily construction vehicle movements to and from the site; - details of access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle; - details of temporary cycling and pedestrian access during construction - details of proposed construction vehicle access arrangements at all stages of construction; and - traffic and transport impacts during construction, including cumulative impacts associated with other construction activities, and how these impacts will be mitigated for any associated traffic, pedestrian, cyclists, parking and public transport, including the preparation of a draft Construction Traffic Management Plan to demonstrate the proposed management of the impact. → Relevant Policies and Guidelines: - Guide to Traffic Generating Developments (Roads and Maritime Services) - EIS Guidelines – Road and Related Facilities (DoPI) - Cycling Aspects of Austroads Guides - NSW Planning Guidelines for Walking and Cycling - Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development - Standards Australia AS2890.3 (Bicycle Parking Facilities)		
6. Ecologically Sustainable Development (ESD) - Detail how ESD principles (as defined in clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000) will be incorporated in the design and ongoing operation phases of the development. - Demonstrate that the development has been assessed against a suitably accredited rating scheme to meet industry best practice. - Include a description of the measures that would be implemented to minimise consumption of resources, water (including water sensitive urban design) and energy.	Section 6.6.4	Appendix 24
7. Social Impacts	Section 6.6.5	Appendix 10

1 Introduction

Table 1 Location of Response to SEARs within this EIS

Requirement	Response within this Report	Relevant Supporting Documentation
Include an assessment of the social consequences of the schools' relative location, with particular consideration given to the close proximity of the adjacent future "Entertainment Precinct".		
8. Aboriginal Heritage Address Aboriginal Cultural Heritage (ACH) in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011) and Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW). ¹	Section 7.3.2	Appendix 32 and 33
9. Noise and Vibration - Identify and provide a quantitative assessment of the main noise and vibration generating sources during construction and operation, including consideration of any public address system, school bell and use of the school hall for concerts etc.(both during and outside school hours) and outline measures to minimise and mitigate the potential noise impacts on surrounding occupiers of land. → Relevant Policies and Guidelines: - NSW Industrial Noise Policy (EPA) - Interim Construction Noise Guideline (DECC) - Assessing Vibration: A Technical Guideline 2006 - Development Near Rail Corridors and Busy Roads – Interim Guideline (Department of Planning 2008)	Section 6.6.6	Appendix 23
10. Sediment, Erosion and Dust controls (Construction and Excavation) Detail measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles. → Relevant Policies and Guidelines: - Managing Urban Stormwater – Soils & Construction Volume 1 2004 (Landcom) - Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA) - Guidelines for development adjoining land and water managed by DECCW (OEH, 2013)	Section 6.6.7.1	Appendix 16
11. Contamination Assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable for the proposed use in accordance with SEPP 55. → Relevant Policies and Guidelines: Managing Land Contamination: Planning Guidelines - SEPP 55 Remediation of Land (DUAP)	Sections 6.4.5 and 6.7.1	Appendix 8
12. Utilities - Prepare an Infrastructure Management Plan in consultation with relevant agencies, detailing information on the existing capacity and any augmentation requirements of the development for the provision of utilities including staging of infrastructure. - Prepare an Integrated Water Management Plan detailing any proposed alternative water supplies, proposed end uses of potable and non-potable water, and water sensitive urban design.	Section 6.7.2	Appendix 19 and Appendix 25
13. Contributions Address Council's Section 94A Contribution Plan and/or details of any Voluntary Planning Agreement, which may be required to be amended as a consequence of the proposed development	Section 6.6.10	N/A
14. Drainage Detail drainage associated with the proposal, including stormwater and drainage infrastructure. → Relevant Policies and Guidelines: Guidelines for development adjoining land and water managed by DECCW (OEH, 2013)	Section 6.6.7	Appendix 15 and Appendix 16

¹ Taking into account the advice provided by OEH on 18 July 2017, in relation to the requirements of Aboriginal cultural heritage assessment.

1 Introduction

Table 1 Location of Response to SEARs within this EIS

Requirement	Response within this Report	Relevant Supporting Documentation
15. Flooding Assess any flood risk on site (detailing the most recent flood studies for the project area) and consideration of any relevant provisions of the NSW Floodplain Development Manual (2005), including the potential effects of climate change, sea level rise and an increase in rainfall intensity.	Section 6.5.2	Appendix 15
16. Waste Identify, quantify and classify the likely waste streams to be generated during construction and operation and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site.	Section 6.6.8	Appendix 29
17. Bushfire Address bushfire hazard and, if relevant, prepare a report that addresses the requirements for Special Fire Protection Purpose Development as detailed in Planning for Bush Fire Protection 2006 guidelines.	Section 6.6.9	Appendix 14
Plans and Documents The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Provide these as part of the EIS rather than as separate documents. In addition, the EIS must include the following: - Architectural drawings (dimensioned and including RLs); - Site Survey Plan, showing existing levels, location and height of existing and adjacent structures / buildings and boundaries; - Site Analysis Plan; - Stormwater Concept Plan; - Sediment and Erosion Control Plan; - Shadow Diagrams; - View Analysis / Photomontages; - Landscape Plan (identifying any trees to be removed and trees to be retained or transplanted); - Preliminary Construction Management Plan, inclusive of a Preliminary Construction Traffic Management Plan detailing vehicle routes, number of trucks, hours of operation, access arrangements and traffic control measures; - Geotechnical and Structural Report; - Accessibility Report; - Arborist Report; - Salinity Investigation Report (if required); - Acid Sulphate Soils Management Plan (if required); and - Schedule of materials and finishes.	Section 4 Section 3.2 Section 4.3 Section 4.8 Section 4.8.2 Section 6.4.2 Section 6.4.1 Section 4.9 Section 6.4.2 Section 4.5.3 and Section 7.4.1 Section 6.5.4 Section 4.2 Section 6.5.1 Section 6.5.1 Section 4	Appendix 9 Appendix 4 Appendix 10 Appendix 15 Appendix 16 Appendix 10 Appendix 10 Appendix 13 Appendix 28 Appendix 6 Appendix 22 Appendix 12 Appendix 7 N/A Appendix 9
Consultation During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with: - Camden Council; - Transport for NSW; and	Section 5	Multiple Appendices

1 Introduction

Table 1 Location of Response to SEARs within this EIS

Requirement	Response within this Report	Relevant Supporting Documentation
• Roads and Maritime Services; and • NSW Rural Fire Service. Consultation with TfNSW and RMS should commence as soon as practicable to agree the scope of investigation. The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.		
Further Consultation after 2 Years If you do not lodge a development application and EIS for the development within two years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EIS.	N/A	N/A
References The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified.	See Above	See Above

2 Background

2.1 Urban Land Release

The Site is located within the Turner Road Growth Precinct (within the South West Priority Growth Area) and was rezoned for development in December 2007 pursuant to *State Environmental Planning Policy (Sydney Region Growth Centres) 2006* (the Growth Centres SEPP).

As a consequence of the Site's rezoning under the Growth Centres SEPP, *Camden Local Environmental Plan 2010* (LEP 2010) does not apply to the Site.

2.2 Relevant Development Applications

DA No. 854/2013 was approved on 28 January 2014 for remediation of contaminated land around the central and north-eastern portion of The Hermitage Way. This consent approved works to Area of Environmental Concern (AEC) No's 9, 10, 11, asbestos pipes and soils. This consent allowed for the remediation of the majority of The Hermitage Way, the area in which the proposed DA relates. Details are provided in the Site Audit Statement at **Appendix 8**.

DA No. 1230/2015 was approved on 19 January 2016 for the construction of a 490m section of The Hermitage Way, provision of local roads, drainage, landscaping, subdivision of land to create 8 superlots and associated site works. The subdivision plan approved under this DA includes the formation of the current Lot 3 DP 1227491, which is the subject of the proposed DA. The works approved under DA 1230/2015, including construction of The Hermitage Way and subdivision of land, have been completed. The Hermitage Way has been dedicated to Camden Council as a public road.

DA No. 1230/2015/2 was approved on 11 September 2017 as a Section 96 modification to the original consent. The approved modification adjusted the size of Lot 3 of the future school site. The boundary adjustment proposed as part of this application has not been carried out at the time of lodgement of this application and so the plans supporting this EIS reference the boundaries of Lot 3 as determined by the original DA.

DA No. 1230/2015/3 was submitted to Camden Council on 11 October 2017 and was still under assessment at the time of lodgement of this application. This Section 96 application seeks to modify the existing stormwater basin to the west of the school site (across MC-06) to create a formal rain garden, and will have no impact on the scope of work proposed under this proposal.

3 Site Context

3.1 Location

The Site is located within the South West Priority Growth Area and more specifically, within the Turner Road Precinct, within the Camden Local Government Area (LGA). The Site is immediately east of the future Gledswood Hills Town Centre (see **Figure 1**).

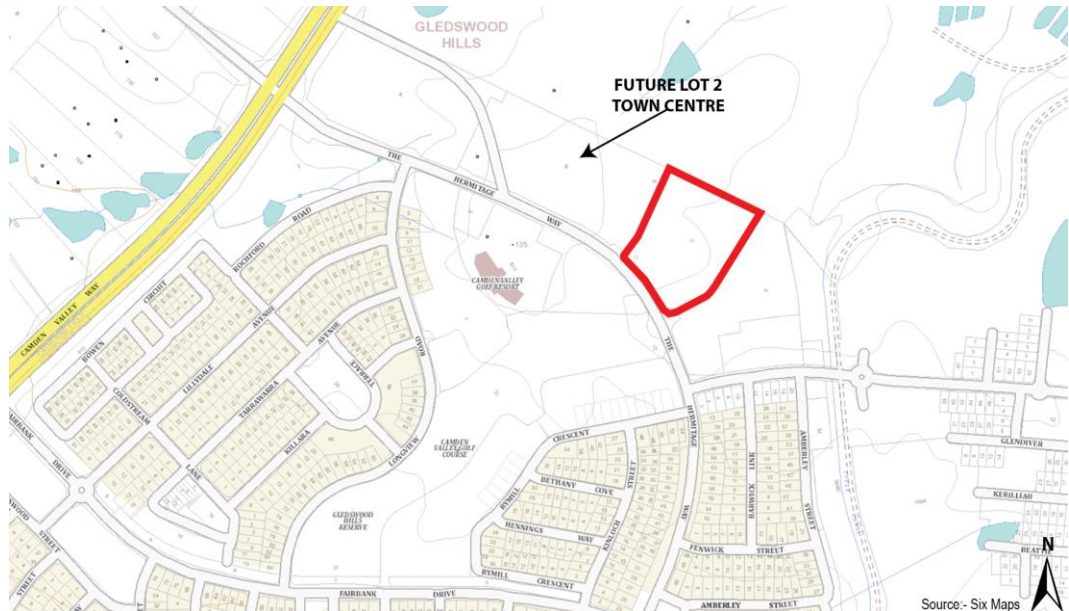


Figure 1 Site Location

3.2 Site Description

The Site is legally described as Lot 3 in Deposited Plan (DP) 1227491 and also currently known as C The Hermitage Way, Gledswood Hills, NSW 2557 (see **Figure 2**).

The site has a southern frontage to The Hermitage Way of 100.47 metres, a western frontage to MC07 of 105.26 metres, an eastern frontage to MC06 of 111.04 metres and a total area of 24,850m². From east to west, the site has a slope of approximately -7% (see Survey Plan at **Appendix 4**).

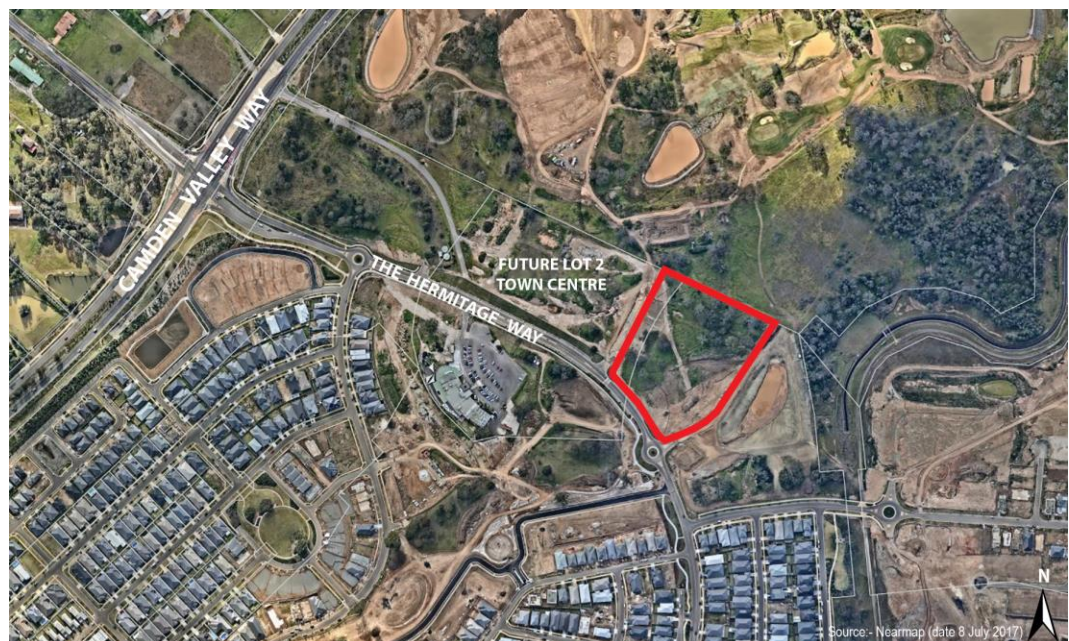


Figure 2 Site Context

3 Site Context

3.3 Surrounding Development

The surrounding area is in the process of transforming from rural land uses to urban land uses. Existing development generally comprises undeveloped land or the first stages of low density residential housing development (see **Figure 3**).



Figure 3 Surrounding Development

To provide a more accurate vision of the future surrounding development including the adjoining Village Centre, this report considers the draft master plan for Gledswood Hills being developed by Sekisui House in consultation with Camden Council.

The draft master plan (see **Figure 4**) indicates a variety of retail, community, mixed use and residential development around the school site, with building heights varying from two to five storeys.

To the west of the Site is the Village Centre/Entertainment Precinct. As developer of the Precinct, Sekisui House has established guiding principles for development within this Precinct, which include:

- *Deliver an authentic local street based neighbourhood centred on a high street and village square*
- *Develop a socially and economically successful Village;*
- *Create a place that is inviting, interesting and encouraging community interaction and life;*
- *Deliver a family friendly evening economy and create a place that is vibrant throughout the day and night;*
- *Create a place that is emotionally connected to residents of The Hermitage and the broader regional community;*
- *Deliver a place that is physically connected with the Precinct and to the surrounding community;*
- *Encourage active and healthy lifestyles; and*
- *A strong events layer to deliver a range of experiences and opportunities for people to gather and build community.*

These principles demonstrate that the new Primary School and Village Centre/Entertainment Precinct are compatible and seen as a joint community hub, rather than two distinct uses.

To the south and east of the site will be residential development. The site will adjoin medium-rise residential development to the south across The Hermitage Way.

3 Site Context



Figure 4 Extract of draft Masterplan indicating proposed development surrounding the Primary School (prepared by Sekisui House)

Photos of the Site and surrounds are provided at **Appendix 5**.

3.4 Amendment to Turner Road DCP 2007

The Turner Road DCP 2007 includes an Indicative Layout Plan (ILP) for Gledswood Hills (dated 21 January 2016), which identifies a Primary School in the southern end of the suburb (**Figure 5**). The Department of Education understands that discussions between Sekisui House and Camden Council regarding the location of a primary school on the Site the subject of this DA first took place in 2013.

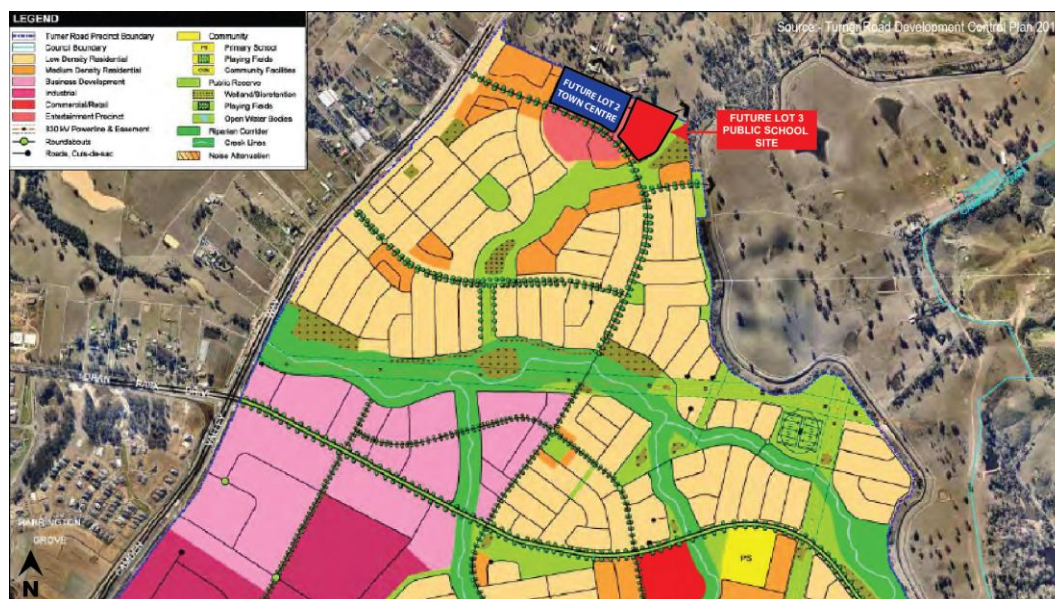


Figure 5 Turner Road Precinct Indicative Layout Plan (Original School Site Shown in Yellow)

In reference to the guiding development principles for the Town Centre/Entertainment Precinct discussed at Section 3.3 above, these “support and encourage use of the new Primary School and Entertainment Precinct as a joint offering to the community, rather than two distinct uses”. In addition, as a supporting use to the Village centre the Draft Proposition outlines that

3 Site Context

“Community uses provide a civic focus to the overall village experience and generate activity and patronage that supports local business and increases public safety” (Sekisui House, 2 June 2017).

The suitability of the Site for the proposed school use is discussed in further detail at **Section 6.7**, however for the purposes of understanding the site context it is important to understand the status of the proposed amendments to the Tuner Road DCP 2007, particularly how they relate to the Gledswood Hills Precinct, and the Village Centre/Entertainment Precinct. This section concludes that the proposed amendments to the Turner Road DCP 2007 incorporates the school site into the community network of the Village Centre/Entertainment Precinct and the amended location of the School is considered suitable within the Gledswood Hills Precinct.

3.5 Surrounding Road Network

The surrounding road and public transport network is described in more detail within the Traffic and Parking Assessment Report prepared by Woolacotts (see **Appendix 17**) although the following provides a brief description for ease of reference.

The Gledswood Hills Precinct is located to the east of the north/south-running Camden Valley Way. Fairbank Drive and The Hermitage Way are to the primary arterial roads which connect the Precinct with the main road.

At present, the Precinct is in the process of subdivision and construction, with only initial stages of works begin carried out. This means that local roads are currently being constructed to service new subdivisions.

For the Site, the southern boundary adjoins The Hermitage Way, while the eastern boundary adjoins future local road MC06 and the western boundary adjoins future local road MC07. Both of these local roads will connect to the northern future subdivision of Gledswood Hills, and MC06 will have a roundabout connection at the north-eastern corner of the site, providing improved circulation.

4 Project Description

4.1 Project Summary

The proposed development comprises:

- Construction of a new Gledswood Hills Public School over two (2) stages to cater to up to 600 students initially but with room for future expansion to a capacity of approximately 1,000 students;
- Pedestrian access from The Hermitage Way, MC06 and MC07. Regular vehicular access is from both MC07 (to the visitors car park) and MC06 (to the staff car park);
- A student drop off/ pick up area is located along MC06, with a roundabout in the northern section of the street to allow safe and easy circulation in and out of the area;
- Promotion of the use of sustainable transport, including servicing with public bus transport services and connectivity to the regional cycling and walking pathway network;
- A bus stop is located on The Hermitage Way suitable for three buses at one time and an accessible bus stop suitable for a 22-seater bus with accessible access to the school grounds is located on MC07;
- Landscaping works including the retention of two (2) trees, the removal of 22 trees, and the planting of 145 new trees along with a range of scrubs, clumping plants and ground covers; and
- Connection of new public school buildings and stormwater drainage system into the public stormwater network, which links into the precinct-wide water retarding and treatment basin designed for up to 1 in 100 year ARI storm events. The public stormwater system and precinct-wide basin have been designed to include the catchment of the school site.

The key development statistics of the development are detailed in **Table 2**.

Table 2 Development Statistics	
Site Area	24,850m ²
Public School GFA	6,533.02m ²
Car Parking Supply	75 spaces
Building Height (Maximum)	Up to 14.4m (+4.9m above height control)
Site Coverage	2,967.03m ² (11.93%)
Landscaped Area	16,618.12m ² (66.88%)
Impervious Areas	8,231.88m ² (33.12%)

4 Project Description

Perumal Pedavoli Architects has prepared a suite of Architectural Plans (**Appendix 9**) and a Design Analysis Report (**Appendix 10**) which detail the works proposed under this application. An extract of the Site Plan is provided at **Figure 6**.

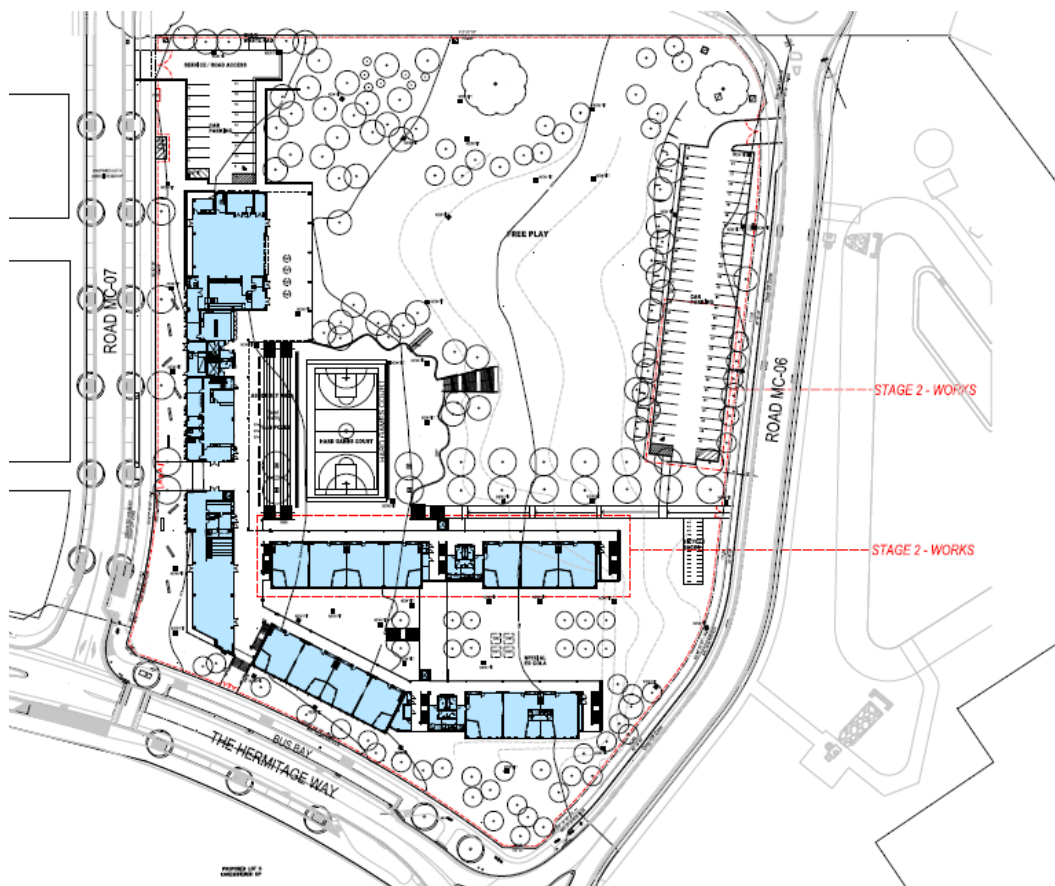


Figure 6 Extract of Site Plan for the proposed development (prepared by Perumal Pedavoli Architects)

The following subsections provide a more detailed description of the proposed development.

4.2 Site Preparation

The proposed development will not involve the demolition of any existing structures. Site preparation will involve the removal of 22 trees (see Arborist Report at **Appendix 12**) and earthworks to provide for all new building platforms, site access, open space areas (open and covered), landscaped areas and stormwater drainage features.

The preparation of land will involve earthworks to accommodate the floor levels of all structures and play areas, and throughout this period the project will implement soil and erosion sediment control measures as detailed by Woolacotts (**Appendix 16**).

4.3 Design Analysis

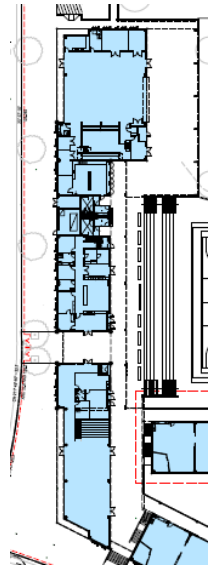
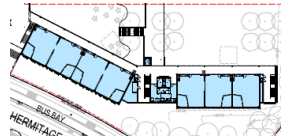
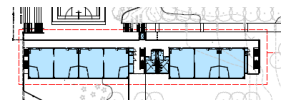
Perumal Pedavoli Architects has prepared a Design Analysis Report (**Appendix 10**) which provides an analysis of the Site context, identifies the opportunities and constraints of the Site, and details urban design strategies for the Site. The Design Analysis Report also provides details of the materials and finishes, photomontages and other information that details the design analysis which has informed the final design.

4.4 Public School Buildings

The proposed Gledswood Hills Public School will comprise the construction three (3) blocks, as summarised in **Table 3**.

4 Project Description

Table 3 Summary of Gledswood Hills Public School Buildings

Block	Description	Block Location
Block A	Part 2/3 storey building fronting MC07 (and the future Village Centre/Entertainment Precinct) comprising the library (two levels), staff offices/interview rooms/facilities, public/student reception, canteen, multi-use hall with OOSH facilities and COLA, four (4) special programs rooms, top-floor open learning area, toilets, lifts, storage, associated facilities and stairwell access.	
Block B	Part 2/3 storey building fronting The Hermitage Way comprising twenty-one (21) home-base classrooms, toilets, lift and stairwell access.	
Block C	Part 2/3 storey building with no prominent street frontage comprising twenty (20) home-base classrooms, a bulk store room/GA & cleaner room, toilets, lift and stairwell access.	

4.5 Ancillary School Works

In addition to the main buildings described above, the proposal involves the construction of the following within the Site:

- Seventy-five (75) car parking spaces (accessed from MC07 and MC06);
- One (1) hard surface outdoor sports court;
- Waste servicing area (accessed from MC07, adjacent to car parking area); and
- Associated landscaping works (discussed below).

Further, the proposal will involve the following works external to the Site:

- New driveway crossing from MC07 to school carpark;
- New driveway crossing from MC06 to school carpark;
- Kerb alignment for a bus bay to cater for three (3) buses on The Hermitage Way; and
- Accessible bus stop on MC07 for disabled bus with appropriate access onto School Site.

Further detail of these works is provided at **Section 4.10**.

4.6 Operation of the School – Staff and Students and Hours of Operation

The proposed school buildings have been designed to provide accommodation for 600 students initially, with capacity for up to 1,000 students, and 65 FTE staff.

4 Project Description

The proposed hours of operation for the Gledswood Public School will be 7am to 9pm Monday to Friday. The core school hours will be 8:30am to 3pm and core staffing hours will be 8am to 4pm.

This application considers the potential impacts arising from out-of-hours use of the School facilities, in particular the use of the multi-purpose hall and associated facilities for school or community events, such as presentation nights, drama or music recitals, or other gatherings of the public (whether one-off or periodic events). Such uses will occur after the core school hours and possibly up to 10pm. The assessment of potential impacts of these uses is included within the body of this Report.

4.7 Structural Adequacy

Woolacotts has prepared a Structural Design Statement (**Appendix 20**) which confirms that the proposed Gledswood Hills Public School will be designed to comply with relevant provisions of the BCA and relevant Australian Standards.

4.8 Signage

The proposed development will involve the erection of one (1) business identification sign, being a fence-mounted sign with the school name “Gledswood Hills Public School”, as shown on the Architectural Plans prepared by Perumal Pedavoli Architects (**Appendix 9**).

4.9 Landscaping

The proposal includes extensive landscaping works as detailed in the Landscape Plans prepared by Lorna Harrison Landscape Architects (**Appendix 13**) which can be summarised as follows:

- 145 new trees;
- Paperbark/ bottlebrush forest planting around the south-east corner and extending along the eastern boundary along MC06;
- Evergreen native trees around school campus to provide shade;
- Silver foliated Olive Grove;
- Feature entry from MC06 lined with Chinese Tallowood Trees (medium scale deciduous);
- Raised timber vegetable/ flower/ herb garden; and
- Seating and shade structures throughout the site.

The Landscape Plan is supported by a Landscape Works + Water Sensitive Urban Design (WSUD) Statement prepared by Lorna Harrison Landscape Architects (**Appendix 13**) which provides additional details of the incorporation of WSUD and integrated water management principles into the proposed development.

4.10 Vehicular Access, Car Parking and Waste Servicing

The proposed Gledswood Hills Public School development will involve the following vehicle access arrangements as seen in **Figure 7**:

- Bus Bay located at the front of the school on The Hermitage Way;
- Disabled Bus Bay located opposite the Entertainment Precinct along MC07 (footpath grades in the area will be compliant with disabled access requirements);
- Vehicular access located at the north-western corner of the Site from MC07;

4 Project Description

- Construction of 75 car parking spaces, including one (1) accessible parking space in each of the car parking areas (two (2) accessible spaces total);
- Student drop off/ pick up zone for approximately 30 vehicles located along MC06;
- Emergency access located at the north-eastern corner of the site from MC06 will provide a direct link to playgrounds and the lower part of the school; and
- Street parking for visitors will be available along MC07;
- Access for waste servicing vehicles will be via the vehicle entry at the north-western corner of the site from MC07, which has been designed to provide an appropriate manoeuvring capacity to allow the vehicles to enter and exit in a forward direction, further details are available in the Traffic Report at **Appendix 19**.

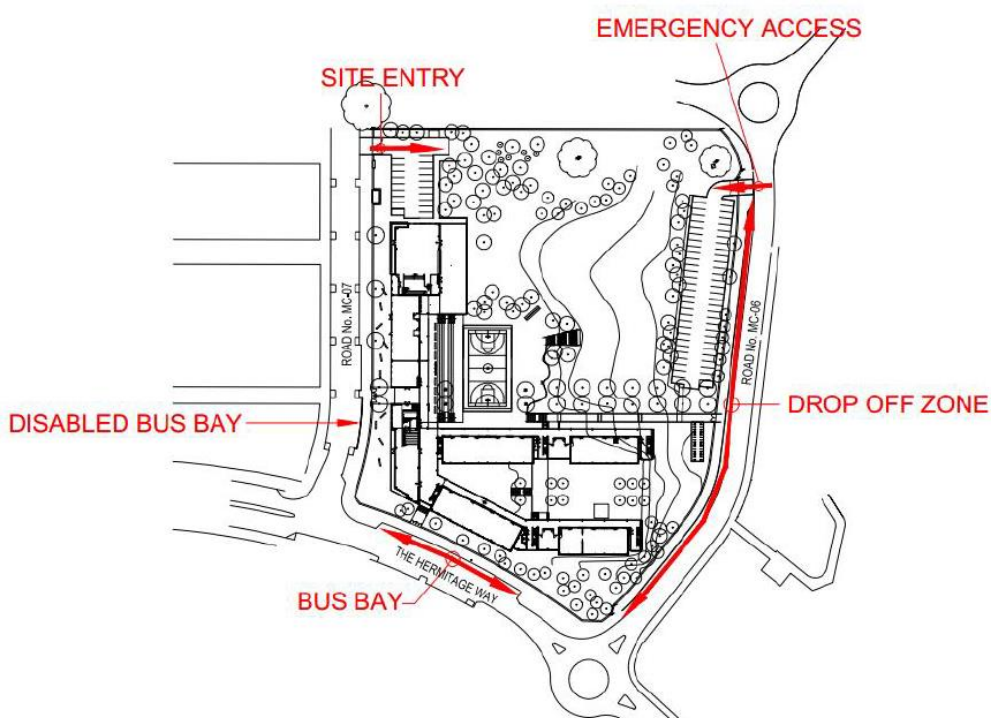


Figure 7 Extract of vehicle access diagram (Source: Traffic Report prepared by Woolacotts)

4.10.1 Alternative transport options

A Green Travel Plan has been developed by Woolacotts Consulting Engineers and is provided at **Appendix 17**. The plan includes:

- Pedestrian and cycle access from new roads MC06 and MC07;
- Connection of footpaths bordering the school with the shared cycle and pedestrian pathways throughout Gledswood Hills;
- Bicycle racks provided at the school to securely accommodate up to 60 student and staff bicycles;
- Shower, change and locker facilities available for staff who walk or cycle to school;
- Connection with bus route 841 that travels from Narellan to Leppington Station via Gledswood Hills; and
- Formalised car-pooling programme.

The green travel plan will be coordinated and implemented by an elected staff member and promoted via:

4 Project Description

- A new starter pack for staff and students including maps, timetables and green travel options;
- Forums to link walking and cycling partners and carpooling participants;
- Promotion through school newsletter, website and Facebook page

4.11 Stormwater Management

Woolacotts has prepared a Stormwater Management Report (incorporating Integrated Water Management) (**Appendix 15**). An existing precinct wide retarding/ water quality basin is located to the south-east of the site that has been designed to cater for the entire catchment, including the school, to the following requirements:

- Provide stormwater detention up to 1 in 100-year storm; and
- Provide stormwater treatment for a 1 in 3-month storm.

Accordingly, no additional stormwater treatment or detention measures are proposed for the school site.

Within the site, a network of pits and pipes will be provided to capture stormwater and drain to connection points that have been provided by the precinct developer. This system will be designed to cater for a 1 in 20-year ARI storm event and overflow paths will be provided to cater for a 1 in 100-year storm event.

Note that the proposed modifications to the adjoining stormwater basin proposed under the Section 96 modification DA No. 1230/2015/3 (currently under assessment) will not impact the proposed stormwater management measures for the Gledswood Hills Public School site.

4.11.1 Integrated Water Management

Woolacotts detail the following measures to be provided to minimise water usage and reduce energy consumption:

- Rainwater tanks to collect stormwater runoff from roofs;
- Collected rainwater will be used to flush toilets and provide irrigation water for nearby landscaped areas;
- All tapware will be AAA rated, and taps on basins will be timed to minimise water loss;
- All basins will have cold water only, unless required otherwise under the Educational Facilities Standards and Guidelines (EFSG);
- All toilets will be dual flush; and
- Selected plants within landscaped areas will have low water requirements.

4.11.2 Erosion and Sediment Control Measures

During the construction phase of works, erosion and sediment controls measures will be provided in accordance with the Blue Book, including silt fences, sediment basins and construction exists for vehicles. Woolacotts has prepared an Erosion and Sediment Control Plan to detail these measures (**Appendix 16**).

4.12 Waste Management

A Waste Management Plan has been prepared by TSA Management (**Appendix 29**), which provides details of waste management measures to be adopted during the construction and operational phases of the proposed development. The management plan also includes operational waste management measures for the Primary School.

4 Project Description

4.13 Servicing

4.13.1 Hydraulic Services

Woolacotts has prepared a preliminary engineering assessment of hydraulic services (**Appendix 19**), including details of cold water services, hot water services, gas services, sewer/waste water services, trade waste drainage, stormwater drainage, fire hydrant services, and fire hose reel services.

4.13.2 Electrical and Telecommunication Services

JHA has prepared an Electrical Infrastructure Report for the proposed Gledswood Hills Public School (**Appendix 25**). The Electrical Infrastructure Reports detail the utility services for each school, including existing and proposed arrangements for electrical and telecommunications services.

The proposed development is capable of being adequately serviced with electrical/telecommunications services.

4.14 Ecologically Sustainable Development

JHA has prepared an Ecologically Sustainable Development (ESD) Report (**Appendix 24**) which identifies the ESD objectives of the proposed development and details all sustainability initiatives, including:

- Energy conservation, comprising:
 - Heat loss/gain modelling and policy;
 - Insulation;
 - Natural light;
 - Sun shading;
 - Ventilation, including natural, cross and mechanical ventilation;
 - Air cooling and heating systems;
 - Period bell light switching system;
 - Electrical lighting, including the use of motion sensors and LED lighting;
 - Appliances and equipment subject to energy efficiency policy;
 - Electricity meters; and
 - Renewable energy generation;
- Water conservation, comprising:
 - Use of products with minimum Water Efficiency Labelling and Standards Scheme (WELS) star ratings, or alternative Smart Approved WaterMark rated products;
 - Taps with timed flows;
 - Toilets with dual flushing cisterns and use of rainwater in the flushing of toilets;
 - Manual flushing or waterless urinals;
 - Rainwater harvesting and reuse; and
 - Closed loop sprinkler system;
- Other initiatives, comprising:
 - Requirement for all contractors to prepare site-specific Environmental Management Plans (EMPs);

4 Project Description

- Use of recycled timber, engineered products or timber from plantations or sustainably managed regrowth forests; and
- Design and maintenance of buildings to avoid use of chemicals for termite and other pest controls.

The ESD Report identifies how the ESD principles will be incorporated into the design and on-going operation of the proposed development, as required under Clause 7(1)(f) of Schedule 2 of the EP&A Regulation 2000.

4.15 Building Code of Australia

Group DLA has prepared a Building Code of Australia (BCA) Capability Statement (**Appendix 21**) which confirms that the works will be able to achieve compliance with the provisions of the BCA through compliance with deemed-to-satisfy provisions and where necessary, through the documentation of alternative solutions. Full certification of BCA compliance will be provided prior to the commencement of works.

4.16 Construction Works

The proposed development will involve the construction of a new public school facility, which has a project timeframe to have doors open to students in 2020. The construction programme is expected to be 12-18 months and will be carried out so as to ensure that the target delivery date is met.

Accordingly, the proposal may require the carrying out of construction works (including transporting/delivery of goods) outside of standard hours. This might involve deliveries or certain construction activities occurring before or after peak periods, or on weekends to avoid traffic or amenity conflicts and to ensure target dates for the various stages of the works are met.

Details of management of construction activities are set out in the Preliminary Construction Management Plan prepared by TSA Management (**Appendix 28**), which includes consideration of measures to be implemented to mitigate potential traffic and safety impacts. The assessment carried out in this report includes consideration of potential impacts arising from the carrying out of construction works outside of standard hours.

5 Consultation

5.1 General

In accordance with the SEARs issued by the Department of Planning and Environment, the project team has carried out consultation with the following stakeholders:

- Transport for NSW;
- NSW Roads and Maritime Services;
- Camden Council;
- Utility Providers;
- Gledswood Hills Public School Project Reference Groups (PRG);
- Relevant Community Groups.

Details of the consultation carried out by the project team are set out in the following sections.

5.2 Transport for NSW

Transport for NSW (TfNSW) issued comments for inclusion in the SEARs for the proposed development. Following issuing of the SEARs, the project team consulted with the Senior Transport Planner at TfNSW to establish what information they would require in order to provide comment on the development proposal. Following initial conversations, it was established that TfNSW would only require a copy of the preliminary Construction Management Plan (including the Construction Traffic Management Plan) for review.

A final copy of the Preliminary Construction Management Plan (including the Construction Traffic Management Plan) was submitted to TfNSW for review on 7 July 2017. TfNSW reviewed the Plan and confirmed that they “*have reviewed the preliminary Construction Management Plan (CMP) for ‘Gledswood Hills Public School’ and have no immediate issues or concerns from TfNSW perspective*”.

5.3 NSW Roads and Maritime Services

RMS issued comments for inclusion in the SEARs for the proposed development. Following issuing of the SEARs, the project team consulted with the land use planning team at RMS to establish what information they would require in order to provide comment on the development proposal. A copy of the Preliminary Construction Management Plan was submitted to RMS for review on 10 July 2017.

RMS reviewed the Plan and confirmed that they had no further comment, and that RMS will respond to the Gledswood Hill proposal as they did for the Oran Park High School proposal, i.e. to submit a Construction Traffic Management Plan to Council for approval prior to the issue of a Construction Certificate.

5.4 Camden Council

On 2 February 2017, TSA Management held a Pre-DA meeting with senior Council Planning Officers to commence an early dialogue with respect to the design of the proposed development, which at that stage was not known to be classified as SSD. Council Officers indicated that their primary consideration was likely to be in respect of car parking and traffic management, and that Option 2 (the current proposal) was the preferred option.

Council issued minutes of the meeting which set out the planning, environmental health, engineering, traffic, bush fire and building advice provided by Council staff, a copy of which is provided at **Appendix 2**.

Further discussions have been held with Camden Council to address remaining concerns, the most recent of which was a further meeting on 15 September. Council provided further feedback regarding car parking, off-street drop off and pick up areas, and visual bulk.

5 Consultation

This application has been prepared having regard to the matters raised by Council in the Pre-DA meeting minutes and subsequent discussions.

5.5 NSW Rural Fire Service

At the time the SEARs were issued, the subject site formed part of a larger arrangement of lots, some of which were identified as containing bush fire prone land on Council's bush fire prone land map. Accordingly DPE required that the project team consult with the NSW Rural Fire Service (RFS) in regard to the proposed development.

Camden Council approved the subdivision of land and construction of The Hermitage Way under DA1230/2015, which has been carried out and land forming the Site the subject of this DA was created (being Lot 3 DP 1227491). Council's bush fire prone land map has since been updated, which shows that the land on which the development is proposed does not include bush fire prone land. This has been confirmed with a recent Section 149 Planning Certificate obtained from Camden Council (**Appendix 33**).

Notwithstanding, Control Line Consulting was engaged to review the potential threat of bushfire to the Site and proposed development, and to consult with RFS. They contacted the RFS and spoke with an assessment officer, who confirmed that consultation would be undertaken by their office once DPE forwards documentation submitted with the DA to them for comment.

Accordingly, Control Line Consulting has prepared a Bushfire Hazard Assessment Report (**Appendix 14**) which provides an assessment of the characteristics of the site, providing an opinion that a more detailed Bushfire Hazard Assessment Report is not required for the purposes of Section 100B of the Rural Fires Act 1997.

5.6 Utility Providers

JHA conducted a Dial before you dig (DBYD) to investigate the presence of existing utilities, and the following utilities were notified in this process:

- Endeavour Energy;
- Jemena Gas West;
- Opticomm Co Pty Ltd (NSW);
- Sydney Water; and
- Telstra NSW.

Further consultation was carried out with Endeavour Energy in regard to electrical services, and with NBN Co in regard to telecommunications services, as detailed in the Electrical Infrastructure Assessment Reports (**Appendix 25**).

5.7 Project Reference Groups

A PRG was formed for the Gledswood Hills Public School project, which comprised the following:

- Gledswood Hills Public School PRG:
 - Director Public Schools NSW - Macarthur
 - Asset Management Unit Representative
 - Principal's Representative
 - Parent's Representative
 - Program Manager, DoE

5 Consultation

- Project Manager
- Design Consultant

The PRG has been consulted with extensively throughout the design development process, including initial design workshops with Educational Specialist, Spacelogic, and monthly PRG Meetings in which the Head Design Consultant provides an update on the development of the design and seeks input from the PRG. PRG endorsement is required at each stage of the design process. Hence, their vision is closely tied to the final proposal now submitted for assessment and determination. PRG Meetings will then continue through to completion of construction and commissioning of the new school.

This process ensures the project is carried out in accordance with the initial visions and objectives of the PRG.

5.8 Community Groups

TSA Management has held a total of seven (7) information booth sessions between 22 February 2017 and 20 July 2017 (i.e. monthly) at the Oran Park Podium, within the Oran Park Town Centre. This location was chosen as it was a highly trafficked locality likely to be attended to by stakeholders of primary education within the area, including families and parents of school-age children.

Feedback received from these information booth sessions has been taken into consideration in the preparation of this EIS, including:

- The provision of adequate car parking;
- Air conditioning of classrooms; and
- Shading of outdoor areas.

In addition to the information booth sessions, an online survey was circulated throughout the community between March and July 2017 and a total of 41 responses were received. In response to a question about what facilities should be provided in a new school, the following responses were common:

- Air conditioning of classrooms;
- Halls;
- Library;
- Canteen;
- Shaded outdoor play areas;
- Adequate car parking;
- Special need classes;
- IT/technology facilities; and
- Sports fields.

Of the 41 respondents, 36 (87%) confirmed they would consider sending their children to the proposed new school. The feedback received through the online survey responses has been taken into consideration in the preparation of this EIS.

6 Environmental Assessment

6.1 General

This section provides an environmental assessment of the proposed development in respect of relevant State policies and matters for consideration under the EP&A Act.

6.2 Environmental Planning and Assessment Act, 1979

6.2.1 Section 5 - Objects of the EP&A Act

Section 5 of the EP&A Act sets out the Objects of the Act and **Table 4** provides an assessment of the proposed development's consistency with these Objects.

Table 4 Proposed Development's Consistency with the Objects of the EP&A Act

Object of the EP&A Act	Assessment	Consistent
(a) to encourage:		
(i) <i>the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,</i>	The proposal will make use of urban zoned land for an educational establishment to service the growing residential population in the locality, will not result in significant adverse water impacts and will improve the social and economic welfare of the community.	Yes
(ii) <i>the promotion and co-ordination of the orderly and economic use and development of land,</i>	The Site is zoned for urban development and the proposal will result in the orderly and economic development of the land.	Yes
(iii) <i>the protection, provision and co-ordination of communication and utility services,</i>	The proposal will not result in any adverse impact on existing communication or utility services.	Yes
(iv) <i>the provision of land for public purposes,</i>	Whilst not zoned specifically for public purposes, the land will support the proposed use for a public educational establishment.	Yes
(v) <i>the provision and co-ordination of community services and facilities, and</i>	The proposed development does not include any community services and facilities as defined by planning legislation although the educational facilities will provide an educational resource available to all members of the community.	Yes
(vi) <i>the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats,</i>	The Site is located on land which has been granted <i>Biodiversity Certification</i> , in accordance with the Biodiversity Certificate Order dated 14 December 2007. The proposal has been assessed as being acceptable regarding its potential impacts on native animals and plants, including threatened species, populations and ecological communities and their habitats (see Section 7.3 of this Report).	Yes
(vii) <i>ecologically sustainable development, and</i>	The proposal includes various measures aimed at minimising energy and water consumption and is considered to be consistent with the objectives of ecologically sustainable development (see ESD Report at Appendix 24).	Yes
(viii) <i>the provision and maintenance of affordable housing, and</i>	This object is not applicable to the proposal.	N/A
(b) <i>to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and</i>	The proposed development has been assessed against the various Commonwealth and State statutes and local policies and has involved consultation with relevant levels of government.	Yes

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Table 4 Proposed Development's Consistency with the Objects of the EP&A Act

Object of the EP&A Act	Assessment	Consistent
(c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.	The proponent has actively engaged with relevant government agencies and further consultation will be undertaken during the statutory assessment process.	Yes

6.2.2 Section 5A – Significant effect on threatened species, populations or ecological communities, or their habitats

Section 5A sets out matters which must be considered in deciding whether a proposed development is likely to have a significant effect on threatened species, populations or ecological communities, or their habitats.

The Site is subject to biodiversity certification as described in Schedule 7 Part 7 of the *Threatened Species Conservation Act 1995* and accordingly, the proposal is taken to be “development that is not likely to significantly affect any threatened species, population or ecological community, or its habitat”.

6.2.3 Section 89 – Determination of Crown Development Applications

The proposed development is submitted by the NSW Department of Education and so is classified as a *Crown development application* under Section 88. Section 89 of the EP&A Act sets out matters to be considered by consent authorities in the determining or imposition of a condition upon a Crown development application.

The NSW Department of Education has provided a letter of commentary prepared by Hunt & Hunt Lawyers (**Appendix 32**) in relation to Part 4 Division 4 of the EP&A Act, and the determination of Crown development applications. This letter is provided in support of this SSD DA to make clear the relevant considerations of the Minister for Planning and Environment in the determination of the Crown development application.

6.2.4 Section 90 – Integrated Development

Pursuant to subsection 90(2), the proposed development is not Integrated Development as the development application is being made by or on behalf of the Crown and does not require an approval under section 57(1) of the *Heritage Act 1977*.

6.3 Biodiversity Conservation Act 2016

Part 7 of the Biodiversity Conservation Act 2016 (BC Act) sets out provisions relevant to biodiversity assessment and approvals under the EP&A Act. Specifically, Clause 7.9 applies to an application for development consent under Part 4 of the EP&A Act for SSD. This includes the proposed development.

Clause 7.9(2) and (3) set out the following requirements:

(2) Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.

(3) The environmental impact statement that accompanies any such application is to include the biodiversity assessment required by the environmental assessment requirements of the Planning Agency Head under the *Environmental Planning and Assessment Act 1979*.

OEH advises² that for major projects, “development applications can be considered under the previous legislation if assessment requirements have been issued or substantial environmental assessment was undertaken before 25 August 2017...”. The SEARs for the

² Referenced from: <http://www.environment.nsw.gov.au/biodiversity/transitional.htm>

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proposed development were originally issued by DPE on 3 May 2017, and therefore this EIS has been carried out under the 'previous legislation', namely Section 5A of the EP&A Act (see **Section 6.2.2**).

6.4 Planning Controls

The following subsections assess the proposal against the relevant provisions of applicable Environmental Planning Instruments (EPIs), Draft EPIs, Development Control Plans (DCPs), Planning Agreements and matters prescribed by the Regulation in accordance with Section 79C(1)(a) of the EP&A Act.

6.4.1 State Environmental Planning Policy (State and Regional Development) 2011

Clause 15 of Schedule 1 of the SRD SEPP identifies development for an educational establishment that has a CIV of more than \$20 million as SSD.

As detailed in the Capital Investment Value Report prepared by Turner & Townsend, the proposed development will have a CIV of \$41,311,067 and is therefore SSD (see **Appendix 3**).

Clause 11 of the SRD SEPP outlines that DCPs (whether made before or after the commencement of the SEPP) do not apply to SSD.

6.4.2 State Environmental Planning Policy (Sydney Region Growth Centres) 2006

The Site is subject to the provisions of the Growth Centres SEPP and particularly, the provisions of Appendix 1 - Oran Park and Turner Road Precinct Plan. **Table 5** provides a summary assessment of the proposed development against the relevant provisions of the Growth Centres SEPP.

Table 5 Assessment against Relevant Provisions of the Growth Centres SEPP		
Clause	Assessment	Consistent
2.2-2.3 – Zoning, Permissibility and Land Use Objectives - R1 General Residential and B4 Mixed Use	The Site is zoned part R1 General Residential and part B4 Mixed Use (see Figure 8). Educational establishments are permissible in the R1 and B4 zones and the proposal is consistent with the relevant objectives of the zones, particularly as it will: - enable an educational land use to meet the day to day needs of residents; and - support the wellbeing of the community, being an educational land use where there will be no significant adverse effect on the amenity of proposed or existing nearby residential development.	Yes
4.3 – Height of Buildings Part 16m residential flat buildings 9.5m all other development, and part 17m	The proposed development will involve works up to 14.4m above existing ground level, exceeding the maximum building height controls of 9.5m by up to 4.9m.	No (see discussion below and Cl.4.6 Variation Statement at Appendix 27)
4.6 – Exceptions to Development Standards Height of Buildings	This is further discussed below and in the written request for a variation to the height of buildings development standard pursuant to Clause 4.6 (Appendix 27).	
5.9 – Preservation of Trees	Clearing of 22 trees on site is necessary to enable the earthworks required for construction of the school buildings and open space areas as well as to reduce the risk of trees inappropriate within playground areas. An Arborist Report is included at Appendix 12 .	Yes (see Appendix 12 and Appendix 13)

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Table 5 Assessment against Relevant Provisions of the Growth Centres SEPP

Clause	Assessment	Consistent
	The Landscape Plans included at Appendix 13 details the planting of 145 trees as well as associated shrub and ground cover planting.	
5.10 – Heritage Conservation	The Site is not identified as containing any heritage items or archaeological sites and is not within a heritage conservation area.	N/A
6.1 – Public Utility Infrastructure	The precinct is in the process of urbanising and therefore there is no existing public utility infrastructure within the Site. However, the Site has ready access to water, power and sewerage services to facilitate the proposed development (see Section 6.5.3).	Yes
6.6 – Development in Special Areas Clause 6.6 sets out specific development controls for development occurring within a special area or riparian protection area.	The development will involve works partially within land identified as within the 'Entertainment Precinct' on the Special Areas Map (see Figure 9). The Turner Road DCP 2007 provides detailed development controls for the land, which are addressed at Section 6.5.2 .	Yes

Clause 2.2 – Land Use Zoning

The Site is zoned part R1 General Residential and part B4 Mixed Use, as shown in **Figure 8**.

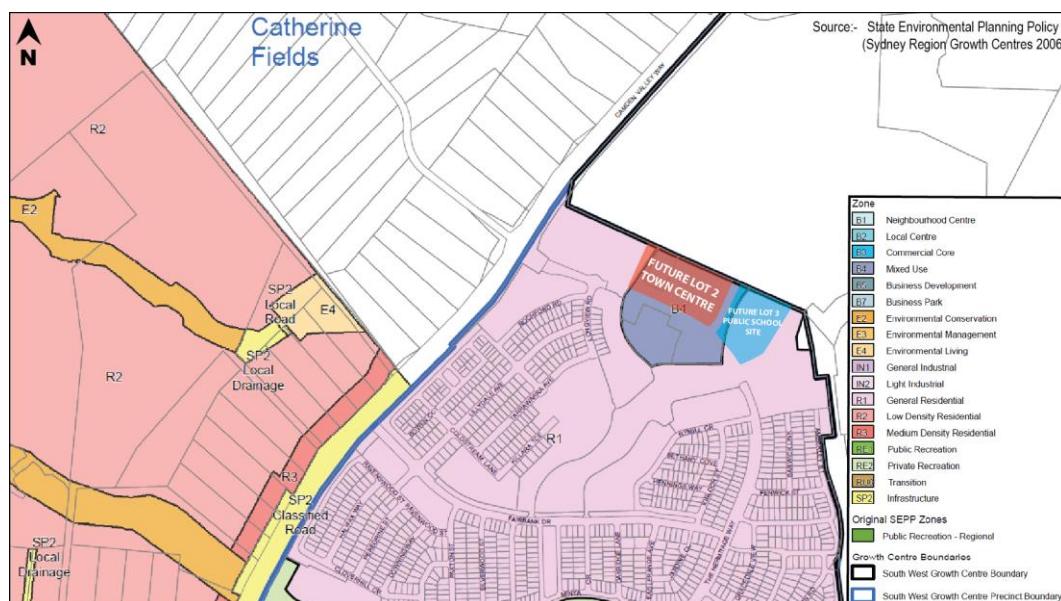


Figure 8 Zoning Map

The use of Lot 3 as an educational establishment is permissible with consent within both the R1 and B4 land use zones.

The R1 General Residential Zone is guided by the following objectives:

- To provide for the housing needs of the community.
- To provide for a variety of housing types and densities.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To support the well being of the community, including educational, recreational, community, religious and other activities and, where appropriate, neighbourhood shops if

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there will be no adverse effect on the amenity of proposed or existing nearby residential development.

- To allow for small scale kiosks, function centres, restaurants and markets that support the primary function and use of recreation areas, public open space and recreation facilities located within residential areas.*
- To allow for small scale intensity tourist and visitor accommodation that does not interfere with residential amenity.*
- To provide for a variety of recreational uses within open space areas.*

The B4 Mixed Use Zone is guided by the following objectives:

- To provide a mixture of compatible land uses.*
- To integrate suitable business, office, residential, retail and other development in accessible locations so as to maximise public transport patronage and encourage walking and cycling.*
- To encourage development that supports or complements the primary office and retail functions of the Neighbourhood Centre Zone and the Local Centre Zone.*
- To encourage development providing services to the surrounding community.*
- To permit development that adds to the vitality and diversity of commercial and retail centres while not prejudicing their principal function.*

The proposed development will be consistent with the objectives of both the R1 and B4 land use zones having regard to the following:

- The proposal will enable an educational land use to meet the day to day needs of residents; and
- The proposal will support the wellbeing of and provide services to the surrounding community, being an educational land use where there will be no significant adverse effect on the amenity of proposed or existing nearby residential development.

Clause 4.6 – Exceptions to Development Standards

The development proposes new building work which will exceed the 9.5m building height control applicable to the site, pursuant to Clause 4.3 of the Growth Centres SEPP, by up to 4.9m.

Despite the provisions of Clause 42 of the Education SEPP, DFP Planning has prepared a Clause 4.6 variation request (**Appendix 2**) which concludes as follows:

- Strict compliance is considered to be unreasonable and unnecessary in the circumstances of this case as the proposal achieves the relevant objectives of the development standard and land use zones;
- Strict compliance would limit the student capacity of the school facilities such that they would not be able to cater for future demands and therefore result in an inefficient use of the land or result in an inferior outcome;
- Strict compliance with the development standard is considered to hinder the promotion and co-ordination of the orderly and economic use and development of the Site; and
- Notwithstanding the non-compliance the proposed development will not adversely impact on the natural or built environment and therefore, the objection is considered to be well founded.

Clause 6.6 – Development in Special Areas

The development will involve works partially within land identified as within the 'Entertainment Precinct' in the Special Areas Map (see **Figure 9**).

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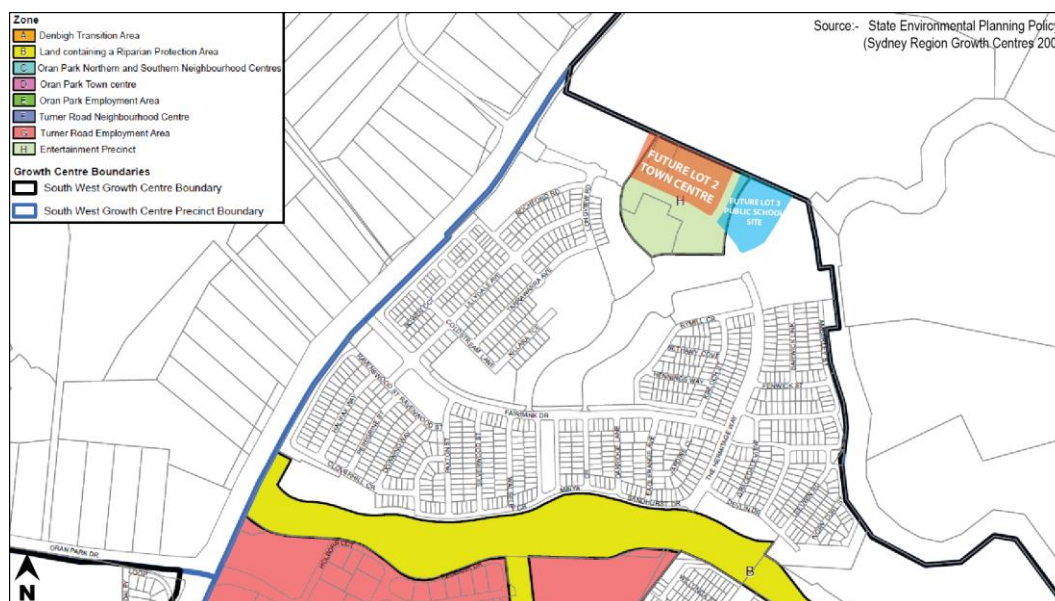


Figure 9 Special Areas Map

Clause 6.6(2) sets out that “the consent authority must not grant development consent for development on land in a special area unless a development control plan that provides for detailed development controls has been prepared for the land”.

The Turner Road Development Control Plan 2007 provides detailed development controls for the land, and in particular controls which relate to the Entertainment Precinct. Therefore Council may grant consent for development within the Special Area known as the Entertainment Precinct.

An assessment of the proposal against the relevant provisions of the Turner Road DCP 2007 is provided at **Section 6.5.2**.

6.4.3 State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017

Part 4 of the Education SEPP sets out specific development controls for schools. Clause 35(6) sets out the following provisions:

- (6) *Before determining a development application for development of a kind referred to in subclause (1), (3) or (5), the consent authority must take into consideration:*
 - (a) *the design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4, and*
 - (b) *whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.*

In response to Clause 35(6)(a), Perumal Pedavoli Architects has prepared a Design Quality Statement as part of the Design Analysis Report which assesses the proposal against the 7 design quality principles set out Schedule 4 of the Education SEPP (see **Appendix 10**).

In response to Clause 35(6)(b), the proposed development does not identify a specific use of the school (including any part of its site and any of its facilities) for the physical, social, cultural or intellectual development or welfare of the community (pursuant to Clause 35(5)). This does not, however, preclude the future opportunity to request such a use of the school facilities, were it to form part of a future development application.

Clause 42 of the Education SEPP sets out the following provisions which have been considered in the preparation of this EIS:

Development consent may be granted for development for the purpose of a school that is State significant development even though the development would contravene a

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development standard imposed by this or any other environmental planning instrument under which the consent is granted.

The effect of Clause 42 is such that if a development standard under the Growth Centres SEPP was proposed to be varied, the Development Application would not need to be supported by a Clause 4.6 variation statement. Notwithstanding, a Clause 4.6 variation statement has been prepared in support of this application (**Appendix 27**) to ensure sufficient consideration is given to the justification behind the proposed building height variations.

Part 7 of the Education SEPP sets out general development controls for traffic-generating development as follows:

- (1) *This clause applies to development for the purpose of an educational establishment:*
 - (a) *that will result in the educational establishment being able to accommodate 50 or more additional students, and*
 - (b) *that involves:*
 - (i) *an enlargement or extension of existing premises, or*
 - (ii) *new premises,*

on a site that has direct vehicular or pedestrian access to any road.
- (2) *Before determining a development application for development to which this clause applies, the consent authority must:*
 - (a) *give written notice of the application to Roads and Maritime Services (RMS) within 7 days after the application is made, and*
 - (b) *take into consideration the matters referred to in subclause (3).*

The proposed development involves the construction of new school buildings at Gledswood Hills so as to accommodate 50 or more additional students. Accordingly, Council must give written notice of the application to RMS and take into consideration the matters set out under Clause 57 of the Education SEPP.

6.4.4 State Environmental Planning Policy (Infrastructure) 2007

Clause 102 of the Infrastructure SEPP relates to the impacts of road noise or vibration on non-road development, and is triggered for land which adjoins a road corridor with an annual average daily traffic (AADT) volume of more than 40,000 vehicles. If triggered, it requires the consent authority to consider the potential effects of road noise or vibration on an educational establishment.

No roads surrounding the Site currently experience an AADT volume of more than 40,000 vehicles nor are they likely to in the future as they are local and collector roads, rather than higher order arterial roads. AECOM prepared a memo (**Appendix 17**) which provides estimated AADT volumes for surrounding roads taking into account the various land uses such as residential, entertainment (retail, commercial), club land and education. The estimated AADT volumes are well below the 40,000-vehicle trigger set out within Clause 102 of the Infrastructure SEPP.

6.4.5 State Environmental Planning Policy No.55 – Remediation of Land

SEPP 55 relates to remediation of contaminated land and requires, amongst other things, investigations to be undertaken as part of the development assessment process, to determine whether the subject land is likely to be contaminated and if so, what remediation work is required.

The State Government publication, *Managing Land Contamination: Planning Guidelines* sets out the process for consideration of land contamination. Based on an initial consideration of known historical land uses, the guidelines may require, in certain circumstances, one or more of the following steps:

- A Preliminary Investigation – where contamination is likely to be an issue;

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- A Detailed investigation – where a Preliminary Investigation highlights the need for further detailed investigations or where it is known that the land is likely to be contaminated and/or that the proposed use would increase the risk of contamination;
- A Remedial Action Plan (RAP) – to set the objectives and process for remediation;
- Validation and Monitoring – to demonstrate that the objectives of the RAP and any conditions of development consent have been met.

The Precinct and the Site have been the subject of significant investigation, remediation and validation, including the removal of the tees and greens from the former golf course and an underground asbestos irrigation pipe network throughout the former golf course.

Dr Ian C Swane (from Jacobs Group) as accredited site auditor empowered by the EPA has prepared a Site Audit Statement for the Site (Lot 3 DP 1227491) (**Appendix 8**) which states as its purpose to determine land use suitability to suite the classification of “Residential A in NEPM 2013”, which includes children’s day care centres, preschools and primary schools.

The Site Audit Statement references review of some 72 documents relevant to the auditing of the Site. The Site Audit Statement certifies that “*the site is suitable for the following uses: day care centre, preschool, primary school, secondary school...*” in accordance with the Contaminated Land Management Act 1997.

Having regard to the above, the consent authority can be satisfied that the land is suitable for the purposes of a primary school, pursuant to Clause 7 of SEPP 55.

6.4.6 State Environmental Planning Policy No.64 – Advertising and Signage

SEPP 64 applies to all signage that can be displayed with or without development consent and is visible from any public place or public reserve.

The proposal includes one (1) business identification sign comprising the school name located on the fence at the main entry from The Hermitage Way, as detailed in the Architectural Plans (**Appendix 9**). The proposed sign is required to comply with the aims of clause 3(1) of SEPP 64 and the assessment criteria in Schedule 1 to the SEPP.

An assessment of the proposed signage against these objectives and assessment criteria is provided in **Table 6**.

Table 6 Assessment under SEPP No. 64 – Advertising and Signage	
Provision	Assessment
Clause 3 – Aims, Objectives	
(a) to ensure that signage (including advertising): (i) is compatible with the desired amenity and visual character of any area, and (ii) provides effective communication in suitable locations, and (iii) is of high quality design and finish, and	The character of the locality in the vicinity of the Site is generally developing from a rural setting to an urbanised precinct, consisting of low and medium density residential development and mixed use development within the nearby Town Centre. The proposed sign identifies the name of the new school at the main entrance, providing effective communication in a suitable location. The sign is of a high quality design and will utilise a high quality metal finish.
(b) to regulate signage (but not content) under Part 4 of the Act	An assessment of the proposed signage in respect to Part 4 of the EP&A Act, in particular the relevant matters for consideration under Section 79C(1) is provided within this EIS.
(c) to provide time-limited consents for the display of advertisements in transport corridors, and	N/A
(d) to regulate the display of advertisements in transport corridors, and	N/A

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Table 6 Assessment under SEPP No. 64 – Advertising and Signage

Provision	Assessment
(e) to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.	N/A
Schedule 1 Criteria	
Character of the Area	The character of the locality in the vicinity of the Site is generally developing from a rural setting to an urbanised precinct, consisting of low and medium density residential development and mixed-use development within the nearby Town Centre. The proposed signage is of a scale which is considered suitable for the length and height of the school entry and the size of the Site and will not dominate the streetscape. The proposed sign is simple and provides the name of the school. Accordingly, the proposed signage is considered to be consistent with the developing visual character of the area.
Special Areas	N/A
Views and Vistas	No views or vistas will be adversely affected by the proposed signage.
Streetscape, Setting or Landscape	The proposed signs are of a scale which is considered suitable for the length and height of the buildings, size of the Site and the expansive frontages and will not dominate the streetscape.
Site and Building	The extent of the signage is reasonable having regard to the scale and street-front distribution on the Site. In terms of area, the signage will comprise an almost negligible proportion of the street frontage of the site, in this case to MC07.
Associated devices and logos with advertisements and advertising structures	No associated devices are proposed.
Illumination	There will be no illumination of the signage and therefore, no adverse impact on road users or surrounding properties.
Safety	The proposed signage will be of metal construction fixed to the entry fence and therefore there will be no adverse public safety concerns for pedestrians, cyclists or motorists. In addition, the proposed signs will not obscure or interfere with road traffic signs and signals.

6.4.7 Deemed State Environmental Planning Policy No. 20 – Hawkesbury-Nepean River

DSEPP 20 applies to all land within the Camden LGA and contains various provisions aimed at protecting the environment of the Hawkesbury-Nepean River system.

Clause 4 of the DSEPP requires that certain ‘General Provisions’ under clause 5 and ‘Special Planning Policies and Recommended Strategies’ under clause 6 must be taken into consideration by a consent authority determining an application for development on land to which the DSEPP applies. These provisions primarily relate to managing water quality and quantity, protecting flora and fauna, protecting cultural heritage and protecting riverine scenic qualities.

It is considered that the environmental assessment within this EIS report satisfactorily considers these matters and that the proposal is acceptable in these regards.

6.4.8 Camden Local Environmental Plan 2010

Clause 1.3 of LEP 2010 states that the LEP “*applies to the land identified on the Land Application Map*”. The ‘Land Application Map’ accompanying the LEP excludes the land within the South West Priority Growth Area (which includes the Site) and accordingly, the LEP does not apply to the Site or the proposed development.

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6.4.9 Australian Standard AS2601 – Demolition of Structures

Clause 92 of the EP&A Regulation designates AS 2601-1991: *The Demolition of Structures* as a prescribed matter for consideration in the determination of a development application.

All demolition works will be undertaken in accordance with Australian Standard AS 2601-2001: *The Demolition of Structures*. Further details on demolition practices, identification and management of hazardous substances and recycling of materials can be provided with an application for a construction certificate. This can include a Work Plan and a Hazardous Substances Audit and Management Plan in accordance with AS 2601 and demonstrating compliance with applicable Environmental Protection Agency (EPA) requirements.

6.5 Policies

6.5.1 State Policies

Table 7 provides a summary assessment of the proposed development against the relevant provisions, goals and objectives of relevant State policies.

Table 7 Response to Provisions, Goals and Objectives of State Policies	
State Policy	Response
NSW State Priorities: • Creating Jobs • Building Infrastructure • Reducing Domestic Violence • Improving Service Levels in Hospitals • Tackling Childhood Obesity • Improving Education Results • Protecting our Kids • Reducing Youth Homelessness • Driving Public Sector Diversity • Keeping our Environment Clean • Faster Housing Approvals • Improving Government Services	The proposal will: • Create new jobs for construction workers, teachers, support staff and maintenance workers • Up to 180 jobs each day will be created including construction personnel and consultant team; • Up to 65 staff required for the new School; • Support new housing infrastructure in the locality; • Provide education to children to help reduce domestic violence now and in the future; • Provide intellectual and physical education to children with the aim of reducing reliance on health services in the future; • Provide physical education programmes to children to encourage active living and reduce obesity; • Provide a balanced education in line with prevailing public education curriculum; • Provide a safe learning environment and education regarding personal protection and welfare; • Provide support to our youth and education to enable them to transition to meaningful employment or high education post school; • Provide employment opportunities for people of all backgrounds, races or religion; • Promote, through educational programmes, protection of our environment; • Provide a high-quality environment to enable a high quality publicly funded education.
A Plan for Growing Sydney • Direction 1.10: Plan for education and health services to meet Sydney's growing needs • Subregional Priorities - Camden Support planning of the Turner Road Precinct as a focus for facilities, services and community life to support population growth.	• The proposal involves new school facilities in an urban growth area to meet the growing residential population in the locality. • The proposal has been designed to ensure an appropriate balance between learning spaces and open spaces is achieved, given the need to accommodate 1,000 students on the site;
NSW Long Term Transport Master Plan 2012	The proposal will support the Actions identified in the NSW Long Term Transport Master Plan by: • Being located adjacent to the Gledswood Hills Entertainment/ Town Centre, thereby minimising walking and cycling distances and encouraging multi-purpose trips; • Being located within the centre of the Gledswood Hills residential area thereby providing for ease of access by walking and cycling;

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Table 7 Response to Provisions, Goals and Objectives of State Policies

State Policy	Response
	• Providing for bus facilities to facilitate students being transported to distances where walking and cycling are less likely; • Adopting green travel initiatives to discourage private car use in favour of more sustainable means.
Sydney's Cycling Future 2013	The proposal will promote cycling to school by provision of over 60 bicycle racks and lockers, as well as ensuring integration with the precinct-wide cycle and pedestrian footpath network.
Sydney's Walking Future 2013	The proposal will promote walking to school through the Site's location close to residential areas, provision of pedestrian crossing facilities and through in-school programmes such as walking buses.
Sydney's Bus Future 2013	The proposal provides for bus facilities including indented bus laybys that will enable students to embark and disembark in a safe and efficient manner. Sydney's Bus Future 2013 identifies rapid bus routes connecting existing and new major centres and rail stations as well as suburban bus routes. Currently the 841 service travels from Leppington to Narellan via Gledswood Hills. More suburban services will be implemented as the urbanisation continues.
Crime Prevention Through Environmental Design (CPTED) Principles	This report provides a CPTED assessment of the proposal at Section 6.6.5.1 .
Healthy Urban Development Checklist, NSW Health	The proposal will be consistent with the relevant aspects of the Healthy Urban Design Checklist as it will: • Make use of land zoned for urban development and not reduce the availability of agricultural land; • Include recreational facilities promoting physical activity; • Promote walking and cycling through provision of appropriate infrastructure within and immediately adjoining the site; • Promote public transport use through provision of bus laybys and implementation of green travel plan initiatives; • Be on a site located close to housing and employment thereby reducing trip generation and car dependence; • Include CPTED principles in its design to promote a safe environment for students and visitors to the school; and • Provide equitable access to facilities.
Greater Sydney Draft South West District Plan	The proposal will be consistent with the relevant aspects of the Greater Sydney Draft South West District Plan as it will: • Grow jobs in the education sector • Respond to people's needs for services – developing complete communities - Meet the demand for school facilities - Support innovative school planning and delivery

6.5.2 Turner Road Development Control Plan 2007

It is noted that Clause 11 of the State and Regional Development SEPP excludes the application of Development Control Plans to SSD DAs. Notwithstanding, **Table 8** provides a summary assessment of the proposed development against the provisions of DCP 2007 that may otherwise be deemed relevant.

Table 8 Assessment against Relevant Provisions of Turner Road Precinct DCP 2007

Provision	Assessment	Consistent
2.1 Indicative Layout Plan - Objectives + Controls	The location of the proposed Gledswood Hills Public School is in a different location to the adopted ILP for the Turner Road Precinct. Having regard to the discussion at Section 3.3 and Section 3.4, the location of the new Gledswood Hills Public School is considered to be justified in its	Justified Inconsistency

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Table 8 Assessment against Relevant Provisions of Turner Road Precinct DCP 2007

Provision	Assessment	Consistent
	inconsistency with the objectives and controls of Chapter 2.1 of Turner Road DCP 2007.	
2.2 Vision and Development Objectives	The proposal is consistent with the vision and key development objectives for the Turner Road Precinct by providing facilities of educational excellence in an accessible location which will promote community interaction and achieves a high standard of urban and architectural design quality.	Consistent
2.4 Infrastructure Delivery and Development Staging	The timing and location of the proposed Gledswood Hills Public School are consistent with the objectives and controls of Chapter 2.4, as the development is timed to ensure the orderly development of the land and provide adequate education facilities and opportunities for local residents in response to the present and future demand.	Consistent
3.1 Street Network Layout and Design	The proposed development will not result in an outcome which prohibits or inhibits the attainment of the objectives and controls for the Street Network Layout and Design of the Turner Road precinct. All civil works are designed in accordance with the minimum requirements set out in the Camden Council Engineering Design and Construction Specifications.	Consistent
3.2 Pedestrian and Cycle Network	The proposal will connect to and promote the use of the pedestrian and cycle network to provide safe accessibility for students.	Consistent
3.3 Public Transport Network	The proposed development encourages the use of public transport within Gledswood Hills and will take advantage of the existing and planned access routes for bus services from Gledswood Hills to Narellan and Leppington.	Consistent
4.1 Public Parks and Landscape Strategy	The Landscape Plan (Appendix 13) provides details of the proposed site landscaping and street tree planting, detailing how the proposal will integrate with the open space network of the Turner Road precinct. The proposal will not detract from the public domain, but rather includes landscape works which will elevate the landscape character of the precinct and is consistent with the objectives and controls of Chapter 4.1.	Consistent
4.2 Education, Civic and Community Facilities	The proposal will ensure the provision and equitable distribution of primary school education facilities within the Turner Road precinct. The design of the proposed school buildings will encourage community identity and way-finding through the Primary School site to provide an active connection to The Hermitage Way and MC07 opposite the Entertainment Precinct (refer to Architectural Plans at Appendix 9).	Consistent
6.2 Flooding and Watercycle Management	Woolacotts has prepared a Stormwater Management Plan (Appendix 15) which provides an assessment of the proposal against potential flood risk, and details the watercycle management measures to be implemented with the proposal. Accordingly the proposal is consistent with Chapter 6.2 of the DCP.	Consistent
6.3 Salinity and Soil Management	The construction of the proposed development will be carried out in accordance with the recommendations contained in the Salinity Investigation and Management Plan (Appendix 7).	Consistent
6.4 Aboriginal and European Heritage	The DCP establishes areas and elements of identified Aboriginal and European archaeological	Consistent

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Table 8 Assessment against Relevant Provisions of Turner Road Precinct DCP 2007

Provision	Assessment	Consistent
	heritage in the precinct. The Site does not comprise and is not located proximate to an item of European heritage. The Site does not comprise and is not located proximate to an Aboriginal Archaeological Conservation Area as identified by the DCP. Notwithstanding, an Aboriginal Cultural Heritage Assessment Report is currently being prepared pursuant to advice provided by OEH. The findings and recommendations of this report will be incorporated into the Development Application upon completion. The proposal will not result in conflict with the objectives or controls of Chapter 6.4 of the DCP as a result of this.	
6.6 Bushfire Hazard Management	A Bushfire Hazard Assessment Report has been prepared by Control Line Consulting (Appendix 14) which confirms that the Site does not comprise bush fire prone land and is not subject to bushfire hazard management controls of the DCP or PBP.	Consistent
6.7 Tree Retention and Biodiversity	The proposal includes the removal of trees on site in order to undertake earthworks necessary for construction of the school buildings and playground areas. The Landscape Plan (see Appendix 13) details the revegetation of native trees and other plants to improve the local biodiversity of the precinct, which will be undertaken upon completion of construction activities. The Site does not comprise or adjoin a biodiversity corridor and therefore a Vegetation Management Plan (VMP) is not required to accompany this application.	Consistent
6.8 Contamination Management	Matters relating to contamination management are discussed in detail at Section 6.4.5 . The proposal is consistent with the objectives and controls of Chapter 6.8 of the DCP.	Consistent
6.9 Odour	The development will not impact on odour amenity for future residents of the precinct	Consistent
7.1 Neighbourhood and subdivision design – residential density	The Site is zoned part R1 General Residential. The proposal will not prevent surrounding residentially zoned land from being developed in accordance with the residential density controls set out under Chapter 7.1.	Consistent
7.5.2 Cut and Fill	The Design Analysis Report (Appendix 10) shows that development has been designed to respond to the natural topography of the site, stepping the storeys of buildings down as the site levels increased, resulting in reduced cut and fill.	Consistent
7.4.10 Fencing	Fencing will be provided to street-front boundaries, as required by the Department of Education.	Consistent
8.1 Sustainable Building Design	JHA has prepared an ESD Report (Appendix 24) which concludes that the proposal has been designed to achieve ESD outcomes in line with those under the Green Star – Education V1 tool.	Consistent
8.2 Stormwater and Construction Management	Stormwater Plans and Sediment Erosion Control Plans (SECPs) have been prepared by Woolacotts (Appendix 16) which detail the management of stormwater discharge from the site in accordance with Council's requirements.	Consistent
8.3 Waste Management	TSA Management has prepared a Waste Management Plan (Appendix 29) which details management of waste during the construction and operational phases.	Consistent

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Table 8 Assessment against Relevant Provisions of Turner Road Precinct DCP 2007

Provision	Assessment	Consistent
8.4 Site Facilities and Servicing	The proposed Gledswood Hills Public School will be provided with adequate site facilities and servicing, as detailed in the Electrical Infrastructure Assessment Reports (Appendix 25).	Consistent
8.6 Safety and Surveillance	A CPTED assessment has been carried out for the proposed development at Section 6.6.5.1 where it is concluded that the proposal will achieve appropriate site safety, reduce the opportunity for crime and promote community interaction within and surrounding the Site.	Consistent
Site Specific DCPs: B1 The Entertainment Centre	The proposed development is located adjacent to and partially includes land identified within the Entertainment Centre, which includes the following vision and development objectives: • Provision of a variety of recreation, entertainment, residential and support uses • Provision of support retail and commercial facilities • Create a mixed-use entertainment, leisure, support retail and amenity services and residential precinct focused around and adjacent to the Entertainment Precinct The proposed development is appropriately located adjacent to this area as the school provides critical support and amenity to the residents. Pursuant to the discussion at Section 3.3 and Section 3.4, the future context of the Gledswood Hills Village Centre/Entertainment Precinct is being developed by Sekisui House in consultation with Camden Council. The draft master plan indicates a strategic and community-led approach to village design, which reflects the Council-approved subdivision of land including Lot 3, and promotes the connectivity between community uses to the overall village experience. Having regard to the future characteristics of the Village Centre/Entertainment Precinct, the proposal is considered to be consistent with the intended outcomes for The Entertainment Centre as set out in the Turner Road DCP 2007.	Consistent

6.5.3 Camden Development Control Plan 2011

Table 9 provides a summary assessment of the proposed development against the relevant provisions of Camden DCP 2011.

Table 9 Assessment against Relevant Provisions of Camden DCP 2011

Provision	Assessment	Consistent
B1.1 Erosion and Sedimentation	SECPs have been prepared by Woolacotts (Appendix 16) which detail the management of stormwater discharge from the site in accordance with Council's requirements.	Consistent
B4.1 General Requirements for Signs	The proposed school sign at the main entry from MC07 will not detract from the amenity/character of the locality (including future character), and will be in scale with development in a location which is within the property boundaries.	Consistent (see also Section 6.4.6)
B5.1 Off-street Car Parking Rates and Requirements	This application is accompanied by a Traffic Report (Appendix 17) which addresses the impact	Consistent

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Table 9 Assessment against Relevant Provisions of Camden DCP 2011

Provision	Assessment	Consistent
	of the proposed development on the local road system and car parking requirements. Car parking is discussed further at Section 6.6.3. In summary, Camden DCP requires 1 car parking space per full time equivalent (FTE) staff member, and 1 car parking space per 100 students. The proposal comprises 65 FTE staff (i.e. 65 spaces) and a total of 1,000 students (i.e. 10 spaces), requiring a total of 75 car parking spaces. The proposal provides a total of 75 car parking spaces and therefore satisfies the requirements of the DCP.	Refer to Section 6.6.3

6.6 Likely Impacts of the Development

The following subsections assess the likely impacts of the development in accordance with Section 79C(1)(b) of the EP&A Act.

6.6.1 Built Form and Urban Design

Perumal Pedavoli Architects has set out the approach to the analysis of the site constraints and opportunities, as well as the design response to these matters, in a Design Analysis Report (**Appendix 10**). The Design Analysis Report identifies the urban context of the Site and surrounds, and sets out the site strategies for proposed built form, including:

- A clear and well defined entry for the public school entry;
- Clear and well defined pedestrian and vehicle access points which respond to the surrounding road, pedestrian and bicycle networks;
- Utilising the Site levels to locate the form;
- Increasing the building height from west to east in accordance with the natural fall of the land;
- Addressing the street to provide a positive streetscape that defines the public space of the existing street network;
- Providing improved connections at the corners of the site, particularly between the school site and the Village Centre/Entertainment Precinct; and
- Providing a variety of open spaces for various activities, learning environments and free play.

The resultant built form promotes a strong streetscape frontage to The Hermitage Way and MC07 to present the corner of these streets as the focal point for the Site. The built form also provides multiple play spaces and utilises the topography of the site to terrace play areas from the hall, COLA, hard-stand sports court and down to the open grassed play area. This is shown in the 3D model perspectives at **Figures 10-12**.

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Figure 10 Extract from 3D Model Perspective (prepared by Perumal Pedavoli Architects)



Figure 11 Extract from 3D Model Perspective – Corner of MC07 and The Hermitage Way (prepared by Perumal Pedavoli Architects)

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Figure 12 Extract from 3D Model Perspective – View from MC06 (prepared by Perumal Pedavoli Architects)

In terms of design quality, the building frontages to The Hermitage Way and MC07 have been given a distinctive, contemporary and colourful façade modulated into defined blocks, articulated with low profile sloping roofs, inset windows and differing materials and finishes. These architectural features create visual interest. The design is open, allowing for good ventilation and solar access to all learning spaces.

Perumal Pedavoli Architects has prepared a Design Compliance Statement (**Appendix 11**) which certifies that the design has been carried out in compliance with the EFSG, ensuring that the proposed educational establishment will meet all necessary design requirements for a primary school.

The Design Analysis Report includes a Design Statement prepared by Perumal Pedavoli Architects in response to the proposed design quality principles for schools set out in the Education SEPP. The Design Statement confirms that the proposed development is consistent with the proposed design quality principles set out under Schedule 4 of the Education SEPP.

The assessment of building height carried out by this submission concludes that the proposal will achieve a better planning outcome through flexibility in the application of the building height development standard and that the proposal in its current form is in the public interest. Accordingly the proposed 2-3 storey built form is considered suitable for the Site and unlikely to result in any significant adverse amenity impacts in terms of overshadowing, view loss or bulk and scale.

The waste management zone has been located off-street with access from MC07 and includes a separated and clearly delineated manoeuvring area. This area is out of bounds for students and is visually and physically separated from playground space to ensure there are no conflicts arising between waste servicing vehicles and students.

6.6.2 Environmental Amenity

The proposed development has been designed with the objective to uphold and improve the environmental amenity of the site and surrounds as part of the building works and throughout the operation of the school.

With regard to the protection of environmental amenity through construction, appropriate sediment and erosion control measures have been incorporated to ensure that the stormwater runoff and movement of vehicles across and out of the site does not result in unacceptable

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sedimentation or dust impacts. Details are provided in the Sediment and Erosion Control Plan prepared by Woolacotts (**Appendix 16**).

In addition, the PCMP prepared by TSA Management (**Appendix 28**) outlines that the head contractor will implement a comprehensive Environmental Management Plan (EMP) to ensure compliance with all relevant statutory requirements and those of the Department of Education.

Waste handling and management throughout construction will be carried out in accordance with the Waste Management Plan (**Appendix 29**) which aims to avoid the generation of unnecessary waste, minimise the volume to be collected and recycle, reuse and recover waste which is generated.

With regard to the protection of environmental amenity during the operation of the school, JHA has prepared an ESD Report (**Appendix 24**) which outlines how the proposal has been designed in accordance with the ESD principles of the EFSG, in line with the NSW Government Resource Efficiency Policy, which is to reduce Government's operating costs and lead by example by increasing resource productivity. The ESD Report discusses the various sustainability initiatives incorporated into the proposed development, including energy conservation, water conservation and other initiatives.

The Acoustic Assessment Report prepared by Day Design (**Appendix 23**) demonstrates that the proposal will achieve compliance with the noise criteria at The Hermitage Way, MC06 and MC07 receptor locations for both play time and hall use, including the use of the hall after house by the School or community groups.

Perumal Pedavoli Architects has prepared shadow diagrams (**Appendix 9**) which confirm that the proposed 2-3 storey built form will not reduce the solar access of principal living areas and principal private open space areas of existing or future residential development to the south at the winter solstice.

The Stormwater Management Report prepared by Woolacotts (**Appendix 15**) identifies that the site has been adequately catered for in the precinct-wide design of stormwater infrastructure. The site will be serviced by three (3) pits to the east and a catchment basin further to the east, all designed to accommodate more impervious surface area than proposed in this application. In addition, Lorna Harrison Landscape Architects has provided a Landscape Statement (**Appendix 13**) which provides details of the stormwater management in the landscaping. The extent of landscaping proposed will improve local biodiversity.

The proposal will not result in adverse impacts relating to visual privacy due to the separation of the Site from surrounding residential zoned land, or adverse impacts relating to view loss or wind impacts as the building height of 2-3 storeys will not block views to/from any significant environmental features and is not of sufficient size to generate wind impacts within the locality.

In summary, the proposed development achieves the objective to uphold and improve the environmental amenity of the Site and surrounds through both the construction and operational phases.

6.6.3 Transport and Accessibility

Woolacotts has prepared a Traffic Report (**Appendix 17**), which provides details of transport and accessibility impacts relating to the proposed Gledswood Hills Public School.

The Traffic Report outlines the existing transport, parking, traffic and accessibility conditions for the Site and surrounds, including details of current and future peak hour vehicle movements and assessment of existing and future transport networks.

The Report discusses the proposed development and potential impacts arising from the construction and operation of the school developments. This includes details of improvements to the road required to accommodate the proposal, and other details including proposed access arrangements, car and bicycle parking provision, emergency vehicle access arrangements and a Construction Traffic Management Plan.

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Chapter B5.1 of Camden DCP 2011 sets out the following car parking requirements for educational establishments:

1 car parking space per full time equivalent staff member, plus

1 car parking space per 100 students, plus

1 car parking space per 5 students in Year 12 where appropriate

The proposed development comprises a primary school (i.e. no Year 12 students) with 65 FTE staff and up to 1,000 students. Therefore, Camden DCP 2011 requires the following car parking supply for the proposed development:

- 65 FTE staff x 1 = 65 car parking spaces
- 1,000 students / 100 = 10 car parking spaces
- Total car parking required = 75 car parking spaces

The proposed development will provide a total of 75 car parking spaces on the site to meet the demand of the proposed School as it is constructed, in accordance with Chapter B5.1 of Camden DCP 2011.

The Traffic Report provides an assessment of both current and future transport and accessibility impacts, and provides the following conclusion:

The proposed new Public School will result in increased traffic volumes in the area compared with current volumes...the site location was planned as a school site, which allowed for traffic volumes associated with a school.

The following transport provisions have been made:

- A drop off zone for 28 vehicles along new road MC06;
- A drop off zone for disabled students along new road MC07;
- A bus zone with space for up to three buses provided along The Hermitage Way;
- Off-street parking for 75 vehicles, in accordance with Council's DCP requirements and designed in accordance with AS2890.1; and
- Preparation of a Green Travel Plan for the Site.

6.6.3.1 Drop Off Area Query from Camden Council

Camden Council has raised a query about the location of the drop-off area on MC06 citing its distance from the school buildings and the natural fall of the land at that point, meaning the access pathway will be uphill potentially making it difficult for parents and children to traverse.

In response to this concern, the rationale for selecting this location has been set out by Sekisui House below:

- *Separation of traffic movements between the Entertainment Precinct and the School Site, to relieve demand on MC07 (which will serve as an access road between the village and adjoining El Caballo Blanco)*
- *The intersection of The Hermitage Way and MC06 is under roundabout control, facilitating convenient access movements between both roads;*
- *A roundabout is proposed at the NE corner of the School Site allowing parents to undertake a U-turn and access The Hermitage Way at the roundabout controlled intersection;*
- *The design of the School Site has been developed in conjunction with the Department of Education's stake holders including representative from the community and school staff; and*
- *Consideration has also been given to those parents and grandparents who are less mobile, in this regard the design of the school accommodates for these through alternative options to drop off via street parking on MC07 and the bus bay.*

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To this end, it was deemed the most appropriate location considering projected future traffic demand on The Hermitage Way and MC07 and the ease of vehicular access in and out of MC06 from The Hermitage Way as a result of the construction of a roundabout at either end of this section of road.

6.6.4 Ecologically Sustainable Development

JHA has prepared an Environmentally Sustainable Development (ESD) Report (**Appendix 24**) which identifies the ESD objectives of the proposed development and details all sustainability initiatives, including:

- Energy conservation, comprising:
 - Heat loss/gain modelling and policy;
 - Insulation;
 - Natural light;
 - Sun shading;
 - Ventilation, including natural, cross and mechanical ventilation;
 - Air cooling and heating systems;
 - Period bell light switching system;
 - Electrical lighting, including the use of motion sensors and LED lighting;
 - Appliances and equipment subject to energy efficiency policy;
 - Electricity meters; and
 - Renewable energy generation;
- Water conservation, comprising:
 - Use of products with minimum Water Efficiency Labelling and Standards Scheme (WELS) star ratings, or alternative Smart Approved WaterMark rated products;
 - Taps with timed flows;
 - Toilets with dual flushing cisterns and use of rainwater in the flushing of toilets;
 - Manual flushing or waterless urinals;
 - Rainwater harvesting and reuse; and
 - Closed loop sprinkler system;
- Other initiatives, comprising:
 - Requirement for all contractors to prepare site-specific Environmental Management Plans (EMPs);
 - Use of recycled timber, engineered products or timber from plantations or sustainably managed regrowth forests; and
 - Design and maintenance of buildings to avoid use of chemicals for termite and other pest controls.

The principles of ESD (as set out under Clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000) are addressed below:

- **The Precautionary Principle:** The proposal does not present any threat of serious or irreversible environmental damage, as detailed within this assessment. In this regard,

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the precautionary principle does not need to be exercised in regard to the proposed works.

- **Inter-Generational Equity:** The works proposed as part of this DA will ensure that the health, diversity and productivity of the environment are maintained and enhanced to the benefit of future generations, having regard to the ESD initiatives discussed above and environmental outcomes achieved through architectural and engineering design.
- **Conservation of Biological Diversity and Ecological Integrity:** The Site does not present any issues of biological diversity or ecological integrity as the land has been operating as a golf course and therefore is already cleared. The impacts external to the site (such as noise, shadowing, stormwater) have been assessed and the outcomes determined to be supportable.
- **Improved Valuation, Pricing and Incentive Mechanisms:** All up front and ongoing costs associated with the environmental performance of the proposed development have been considered in the design of the proposal, and are considered reasonable and acceptable.

6.6.5 Social Impact Statement

The proposed development will improve the social wellbeing of the Turner Road Precinct community through the provision of new high quality public educational facilities which are designed to achieve best practice outcomes pursuant to the EFSG, BCA, Australian Standards and other relevant standards and guidelines. The community of Oran Park and Gledswood Hills has shown keen interest in the development of a Primary School within the Precinct, as it will add to the social infrastructure of the locality.

In addition to community expectations for a school within the Gledswood Hills Precinct, the future Gledswood Hills Village Centre/Entertainment Precinct is in the master planning process (in consultation with Council and the community) to integrate the desired future function of the village centre and connections to the community. This includes improving the civic focus of the village, generating activity and patronage which supports local business and increasing public safety, through direct links with a public school.

The proposal will meet this need with a high quality and highly durable outcome that will assist in meeting the educational needs of the wider precinct for the foreseeable future. Accordingly, the proposal will have substantial positive social impacts.

6.6.5.1 CPTED Assessment

CPTED consists of four (4) universal design principles which are aimed at assessing crime risk and reducing preventable risk before a development is approved. The proposed development has been designed having regard to the CPTED principles, an assessment of which is provided below:

Territorial Re-enforcement

The Site has considerable frontage to the public domain along The Hermitage Way, MC07 and MC06, with major pedestrian access ways from all three streets. The design of the Gledswood Hills Public School will re-enforce public access territory from the public domain (roadways) and the interior of the Site.

Gledswood Hills Public School will have its primary pedestrian and vehicular access on MC07, with pedestrian access adjacent to the bus stop on The Hermitage Way and the drop off zone on MC06.

Fencing, landscaping, street trees, a striking façade and signage will establish a 'civic' domain, encouraging communal responsibility for the public areas and clearly communicating to people where they should and should not be.

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Surveillance

The principles relating to surveillance relate to spaces in public areas where people can see and interact with others. This is often a deterrent for criminals committing a crime in that place.

The proposal promotes strong natural surveillance of both the public domain (The Hermitage Way, MC07 and MC06) and the interior of the Site, through the response of the built form to the design analysis (refer to Design Analysis Report, **Appendix 10**).

During periods of high pedestrian movement (i.e. start and finish times) the natural surveillance of these areas is at its highest. During learning/teaching periods, the location and orientation of classroom and administration spaces promotes a connection with the exterior of the Site. In particular, the administration facilities are situated at the primary Site entrance off MC07. This ensures that the pedestrian thoroughfare located opposite the Village Centre/Entertainment Precinct has a high degree of natural surveillance before during and after school hours.

The proposal does not include technical/mechanical surveillance due to the high level of natural surveillance resulting from the use of the site by 1,000 students and 65 staff. Technical surveillance could be employed in the future if considered necessary.

During weekend and after-hours periods, the site will be secured with site fencing and the buildings will be fitted with a Back to Base Alarm System. Further, JHA has prepared a memo (**Appendix 26**) which notes that external lighting for night time crime deterrence will be designed to the relevant Australian Standard, and provides recommendations on the specific lighting category that should be adopted for all external areas.

The presence of a General Attendant through the week also acts as an ongoing form of active surveillance.

Access Control

The key goals of the principle of access control are to restrict, channel and encourage people and vehicles into, out of and around the development. Effective access control can be achieved by using physical and symbolic barriers.

The proposed development proposes to primarily utilise physical barriers, including 'buildings as boundary' barriers, fencing to all other boundaries, gates, built form and landscaping to provide access control. Fencing around the boundary of the site will not restrict surveillance opportunities and will be constructed of optically permeable materials in accordance with EFSG.

Symbolic barriers will also be utilised including landscaping (where appropriate), waste servicing areas and natural direction of pedestrian traffic to the administration office. In addition, appropriate directional signage will be installed in and around the car parks and public access points.

Space/Activity Management

CPTED principles promote the adoption of space/activity management strategies as a way to develop and maintain natural community control. The proposed development achieves this through the design of buildings orientated to the exterior of the Site and promotion of interior open spaces not accessible or visible from the public domain. The Site will be maintained by a General Attendant which will discourage criminal behaviour. Graffiti resistant materials will be used wherever practicable. External lighting will also be provided to deter the carrying out of anti-social and criminal activities both within and along the boundaries of the Site.

6.6.6 Noise and Vibration

Day Design has prepared an Acoustic Assessment Report (**Appendix 23**) which establishes the noise emission criteria under which the assessment should be carried out, predicts school noise emission, and provides an assessment of construction noise.

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The Acoustic Assessment Report identifies the sound power levels of children at play based on a number of other projects, including levels for 1,000 primary children at play (based on 2/3 of students engaging in active play at the one time). Various uses of the proposed school hall have also been modelled to as to provide an accurate model of predicted noise, including student bands, fitness classes and indoor ball sports during and outside of school hours. The report also includes consideration of construction-phase noise and vibration impacts.

As the buildings act as a sound barrier to surrounding residential receivers on The Hermitage Way and MC07 and the buildings are located a good distance from residential receivers on MC06, the proposal will achieve compliance with the noise criteria at receptor locations on all three streets for both play time and hall use.

JHA has prepared a memo regarding the use of public address and period bell systems as required by the EFSG (**Appendix 26**), which sets out design strategies to be used including the placement, number and timing of each system. Day Design recommends that the design strategies outlined by JHA are implemented to minimise potential acoustic impacts resulting from these systems.

With respect to construction noise, the Acoustic Assessment Report identifies all relevant considerations for the carrying out of construction activities and the minimisation of noise and vibration impacts. The Report goes on to recommend that a Construction Noise Management Plan will be prepared by the head contractor to minimise the noise impact from all construction activities.

The Acoustic Assessment Report concludes as follows:

"Measurements and calculations show that the level of noise emitted by the proposed Gledswood Hills Public School will be able to meet the acceptable noise level requirements of the EPA Noise Guide for Local Government as detailed in Section 4 of this report, with the exception for outdoor play, and will therefore be considered acceptable."

6.6.7 Stormwater Management

Woolacotts has prepared a Stormwater Management Report (incorporating Integrated Water Management) (**Appendix 15**). An existing precinct wide retarding/ water quality basin is located to the south-east of the site that has been designed to cater for the entire catchment, including the school, to the following requirements:

- Provide stormwater detention up to 1 in 100 year storm; and
- Provide stormwater treatment for a 1 in 3-month storm.

Accordingly, no additional stormwater treatment or detention measures are proposed for the school site.

Within the site, a network of pits and pipes will be provided to capture stormwater and drain to connection points that have been provided by the precinct developer. This system will be designed to cater for a 1 in 20 year ARI storm event and overflow paths will be provided to cater for a 1 in 100 year storm event.

Stormwater quality improvement measures form part of the above network, and have been modelled with MUSIC to ensure compliance with the treatment levels required by Council.

6.6.7.1 Sediment, Erosion and Dust Control

The Stormwater Management Report includes a SECP (**Appendix 16**) which details the management strategies to be implemented during the construction phase to minimise the impacts of sedimentation and erosion across the site.

The Preliminary CMP prepared by TSA Management (**Appendix 28**) sets out additional considerations for the environment and amenity, including dust mitigation measures, details of which will be set out in the EMP prepared by the head contractor.

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6.6.8 Waste

A Waste Management Plan has been prepared by TSA Management (**Appendix 29**) which identifies the likely waste streams to be generated during the construction and operation phases of the development. The Waste Management Plan outlines measures to avoid the generation of unnecessary waste, minimise the volume of waste to be collected, and recycle, reuse and recover waste generated by the proposed works. The Plan includes appropriate servicing arrangements for the site.

6.6.9 Bushfire

At the time the SEARs for this project were issued by DPE, the land the subject of this application had not yet been subdivided, and the parcels of land forming part of the initial Precinct comprised land that was bush fire prone as shown on Council's bush fire prone land map. Accordingly the SEARs included reference to the need for bushfire assessment and consultation with the RFS (refer **Section 5.5**).

Camden Council approved the subdivision of land and construction of The Hermitage Way under DA1230/2015, which has been carried out and land forming the Site the subject of this DA was created (being Lot 3 DP 1227491). Council's bush fire prone land map has since been updated, which shows that the land on which the development is proposed does not include bush fire prone land. This has been confirmed with a recent Section 149 Planning Certificate obtained from Camden Council (**Appendix 31**).

Control Line Consulting has prepared a Bushfire Hazard Assessment Report (**Appendix 14**) which provides an assessment of the characteristics of the site, providing an opinion that a more detailed Bushfire Hazard Assessment Report is not required for the purposes of Section 100B of the Rural Fires Act 1997.

6.6.10 Contributions

6.6.10.1 Oran Park and Turner Road Section 94 Contributions Plan

The Oran Park and Turner Road Section 94 Contributions Plan applies to the Site, however the provisions of the Plan were set aside by the Gledswood Hills Planning Agreement, as discussed below.

6.6.10.2 Special Infrastructure Contribution

The Site is within a Western Sydney Growth Centre and is therefore in an area that is subject to Special Infrastructure Contribution (SIC) levies. SIC levies were determined on 14 January 2011 by the then Minister for Planning under the *Environmental Planning and Assessment (Special Infrastructure Contribution – Western Sydney Growth Areas) Determination 2011* (the Determination). Section 5(2) of the Determination outlines that a SIC is not required to be made for the following development:

“(a) Government school (within the meaning of the Education Act 1990)”.

As the proposal comprises a government school within the meaning of the *Education Act 1990*, SIC levies do not apply to the proposed development.

6.6.10.3 Gledswood Hills Planning Agreement

The Gledswood Hills Planning Agreement (PA) applying to the Precinct (and the Site) was executed on 8 February 2013 and sets aside the provisions of the Oran Park and Turner Road Section 94 Contributions Plan. A deed of variation to the Gledswood Hills Planning Agreement was executed on 12 October 2015.

The land subject to this DA is located in Stage D as identified in Schedule 1 of the Planning Agreement. The Site is not included in the Net Developable Area (NDA) figure identified by the PA and as such, neither a cash component or works-in-kind requirement applies to the proposed development.

6 Environmental Assessment

6.7 Suitability of the Site for Development

The following subsections assess the suitability of the Site in accordance with Section 79C(1)(c) of the EP&A Act.

6.7.1 Contamination, Salinity and Acid Sulfate Soils

The Site is the subject of a Site Audit Statement dated 5 October 2017 (**Appendix 8**), confirming the site is fully remediated of prior contamination and suitable for future “Residential A” land uses (under NEPM 1999), including use for the purpose of a primary school.

The potential for salinity has been investigated by Douglas Partners in a Salinity Investigation and Management Plan (**Appendix 7**). The works will be carried out in accordance with the findings and recommendations of the Salinity Management Plan.

With respect to acid sulfate soils (ASS), the Site is not located on land identified as under Class 1-5 ASS and is some 16km southwest of the nearest land mapped as Class 5 ASS. In addition, the proposed works will not involve the major excavation of land below 2-3m from existing ground level. Given the separation from land identified as comprising ASS and the limited earthworks proposed, an Acid Sulfate Soils Management Plan is not considered necessary.

6.7.2 Utilities

6.7.2.1 Hydraulic Utilities and Services

Woolacotts has prepared a preliminary engineering assessment of hydraulic services (**Appendix 19**), including details of cold water services, hot water services, gas services, sewer/waste water services, trade waste drainage, stormwater drainage, fire hydrant services, and fire hose reel services.

The Site has access to suitable water and gas utilities (a 200mm PVC water main is located on the southern side of MC07 and a 210kPa Nylon gas main is proposed to be installed in a similar location), will be fitted out with suitable water services and will provide for adequate stormwater drainage servicing. A proposed sewer main will be installed at the south-eastern corner of the Site.

The proposal includes a component of rainwater storage and reuse. As detailed in the ESD Report prepared by JHA (**Appendix 24**), the development will incorporate practical water conservation systems which contribute to Green Star credit WAT-1.

6.7.2.2 Electrical and Telecommunication Utilities and Services

JHA has prepared an Electrical Infrastructure Report for the proposed new Gledswood Hills Public School (**Appendix 25**). The Electrical Infrastructure Reports detail the utility services for the Site, including proposed arrangements for electrical and telecommunications services.

JHA conducted a Dial-before-you-dig (DBYD) to investigate the presence of existing and proposed utilities, and the following utilities were notified in this process:

- Endeavour Energy;
- Jemena Gas West;
- Sydney Water;
- Opticomm – NBN provider; and
- Telstra NSW, Central.

A new electrical substation will be installed adjacent to the carpark entrance on MC07 to power the Site. JHA advise that “*the utility review process revealed that no major assets exist on the site and therefore services in the area will unlikely be interrupted during development*”.

6 Environmental Assessment

The proposed development is able to achieve access to adequate electrical/ telecommunications services required for the new School.

6.7.3 Accessibility

An Accessibility Report has been prepared by du Chateau Chun (**Appendix 22**) which provides a review of all aspects of access to and within the Site with respect to the Building Code of Australia (BCA), *Disability Discrimination Act 1992 (Cth)* (DDA), Universal Guidelines and relevant Australian Standards.

The Accessibility Report concludes as follows:

du Chateau Chun has endeavoured to ensure all key aspects of access provision have been addressed and all reasonable attempts have been made to identify the main matters pursuant to the DDA. It is our opinion that the development is capable of meeting the deemed-to-satisfy provisions of the BCA and the spirit and intent of the DDA.

Therefore, accessibility to and within the Site is considered to be acceptable at this planning stage of documentation.

6.8 Public Interest

In accordance with Section 79C(1)(e) of the EP&A Act, the proposed development is in the public interest as it:

- Will meet the current and future primary education demands for residents of Gledswood Hills and the surrounds;
- Will provide high quality learning and teaching spaces with flexible layout arrangements and durable finishes ensuring the proposal operates as a long-life, high utility and low maintenance educational establishment;
- Has been designed in accordance with the visions, objectives and expectations of the community, the Department of Education and relevant experts;
- Incorporates appropriate design and urban design analysis to ensure that the best design outcome is achieved for the Site, students and surrounds, including the use of a 2-3 storey built form and car parking supply in accordance with Council's requirements;
- Is permissible in the land use zone and is generally consistent with relevant planning controls and legislation;
- Will minimise the potential for environmental amenity impacts and incorporate ESD initiatives through both the construction and operational phases;
- Achieves appropriate environmental performance outcomes in relation to acoustic amenity, stormwater drainage, bushfire, flooding and waste management;
- Will be provided with adequate connection to necessary infrastructure and servicing to ensure the development operates smoothly at full capacity; and
- Is capable of meeting the deemed-to-satisfy provisions of the BCA and the spirit and intent of the DDA.

7 Other Statutory Approvals

7.1 General

The proposed development may require, or may be construed as requiring, several approvals, consents, licences, permits or permissions from various government departments, pursuant to legislation other than the EP&A Act and accordingly, this section provides a brief assessment of relevant other legislation.

7.2 Commonwealth Department of Environment and Energy

7.2.1 Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

Part 3 Division 1 Subdivision C of the EPBC Act provides, amongst other things, that a person must not take an action that has, will have or is likely to have a significant impact on:

- a listed threatened species included in the extinct in the wild, critically endangered, endangered or vulnerable categories; or
- a listed threatened ecological community included in the critically endangered or endangered categories;

unless a '*controlled action*' approval has been granted under Part 9 Section 133 of the EPBC Act. The Commonwealth Minister for the Environment and Energy is responsible for the decision on such an approval.

Pursuant to section 45 of the EPBC Act, a bi-lateral agreement has been signed between the Commonwealth Department of Environment and Energy and the NSW Office of Environment and Heritage (OEH) which authorises the OEH to undertake the environmental assessment required pursuant to the EPBC Act and to furnish the Commonwealth Minister with an assessment report which may recommend whether approval should be granted and conditions that may be imposed on any approval. The Commonwealth Minister is responsible for the final decision.

The Site does not contain any Endangered Ecological Community (EEC) under the EPBC Act and accordingly, a controlled action approval is not required under section 133.

7.3 NSW Department of Planning and Environment (DPE) – Office of Environment and Heritage (OEH)

7.3.1 Heritage Act 1977

The *Heritage Act 1977* contains provisions relating to the protection of items of heritage significance or items of potential significance.

Section 57 relates to items listed in the State Heritage Register or to which an interim heritage order applies and development relating to such items triggers the integrated development provision of the EP&A Act. There are no such items on the Site.

Section 139 of the Act requires that an Excavation Permit is required prior to undertaking any development which involves excavation of land where there is reasonable cause to expect that a relic³ will be discovered or disturbed.

Pursuant to Section 89J(1)(c) of the EP&A Act, granting of development consent to a SSD exempts a proponent from the requirement to obtain a Section 139 permit.

Notwithstanding, the European heritage assessment undertaken as part of the Turner Road Precinct Plan did not identify any reasonable cause to expect a relic to be discovered on this Site. This is reflected in the Turner Road Precinct DCP, which identifies areas of European heritage significance. The Site does not comprise and is not located adjacent to any of these

³ **relic** means any deposit, artefact, object or material evidence that:

(a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and
(b) is of State or local heritage significance.

7 Other Statutory Approvals

identified areas and accordingly, no further assessment of European heritage is considered to be warranted.

7.3.2 National Parks and Wildlife Act 1974 (NPW Act)

The NPW Act contains provisions relating to the protection of native terrestrial fauna, flora and Endangered Ecological Communities (EEC) and contains the primary statutory controls relating to Aboriginal heritage in NSW.

Section 90 of the NPW Act requires an Aboriginal Heritage Impact Permit (AHIP) to be granted by OEH for any works likely to impact on an Aboriginal Place or Aboriginal object⁴.

Pursuant to Section 89J(1)(d) of the EP&A Act, granting of development consent to a SSD exempts a proponent from the requirement to obtain an AHIP.

Notwithstanding, archaeological investigations undertaken as part of the Turner Road Precinct Plan are reflected in the Turner Road Precinct DCP, which identifies areas of Aboriginal heritage significance and Potential Archaeological Deposit (PAD) sites. The Site does not comprise, and is not located adjacent to any of these identified areas.

In response to the requirements of the SEARs, the project team liaised with OEH through DPE to clarify the required extent of assessment and investigation that will be required. On 18 July 2017, the following advice was provided from OEH:

OEH cannot accept a Due Diligence report to satisfy the ACH assessment requirements because Due Diligence is not an archaeological or cultural assessment; it is a legal defence against prosecution if Aboriginal objects are harmed in an area where it was considered unlikely that they would exist. Due diligence in relation to Aboriginal objects is a legal concept only that exists in the National Parks and Wildlife Act (NPW Act). The level of assessment that is considered sufficient to address the requirements of Due Diligence is quite minimal and is not comparable to the level of assessment required in the SEARs.

The purpose of the archaeological and cultural assessment required under the SEARs is to identify what, if any, Aboriginal objects and cultural places are likely to be located within the proposed development area. The likelihood of their presence is dependent on a number of factors, including, but not limited to, previous activities and previous Aboriginal Heritage Impact Permits (AHIPs) within the development area, all of which are identified during the assessment process. Aboriginal objects may still be present in a location once an AHIP has expired and if they are, they need to be managed appropriately. The purpose of the assessment is to identify this.

If this area has been subject to a number of previous assessments, then any assessment will primarily consist of summaries of these assessments and considerations of what these mean in relation to the proposed development and any Aboriginal objects and cultural places/values that may remain on the development site.

In response to this advice, Aped Archaeology has undertaken consultations and investigations required to inform an Aboriginal Cultural Heritage Assessment Report (ACHAR) (**Appendix 32**) and Archaeological Technical Report (ATR) (**Appendix 33**) in accordance with the following OEH publications:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, April 2010); and
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW, September 2010).

The ACHAR identifies a total of 18 Aboriginal people and organisations which registered an interest in being consulted for the project (registered Aboriginal parties (RAPs)). Apex Archaeology have detailed the consultation carried out with the RAPs pursuant to the requirements of the OEH Guidelines, including timeframes within which the RAPs were consulted and allowed time for a response. The methodology of the consultation has been

⁴ **Aboriginal object** means any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.

7 Other Statutory Approvals

established to satisfy the requirements of OEH, in particular those required within an ACHAR and therefore are deemed suitable for the purposes of this assessment.

The ATR details the results of the archaeological assessment completed in accordance with the OEH Code of Practice, required to support an application for an AHIP, if required. The ATR details background research into previous archaeological work which has been carried out within the area, and was supported by a site inspection of the land subject to the proposed works.

Apex Archaeology concluded that, based on the background research and results of the site inspection, the site was assessed as having no potential for archaeological deposits to be present. In addition, the ATR found that no archaeological material was identified within the study area boundaries, and the area was assessed as being highly disturbed. The methodology of the archaeological investigations satisfies the relevant guidelines published by OEH and therefore are deemed suitable for the purposes of this assessment.

The ACHAR and ATR provide the same four (4) recommendations based on the results of the cultural heritage and archaeological assessments, summarised with commentary as follows:

1. *No further archaeological assessment is required as the archaeological potential of the site has been assessed as nil. No AHIP application is necessary.*

Comment: Recommendation noted and endorsed by the EIS.

2. *The proposed development works must be contained within the assessed boundaries, if any change to boundaries is proposed, further investigation should be completed.*

Comment: Recommendation noted and can be addressed should any change to the boundaries of the site be proposed. This does not form part of the current proposal and so does not need to form part of the conditions of consent for this development application.

3. *If unanticipated archaeological material is encountered during site works, all work must cease, and an archaeologist be contacted. Further archaeological assessment and Aboriginal community consultation may be required. This recommendation should be included in any Construction Environmental Management Plan developed for the site.*

Comment: Recommendation endorsed by the EIS and its inclusion as a condition of consent is supported.

4. A copy of the ACHAR and ATR be forwarded to OEH for inclusion on the Aboriginal Heritage Information Management System (AHIMS), and one copy be forwarded to each of the RAPs.

Comment: Recommendation endorsed by the EIS and its inclusion as a condition of consent is supported.

The investigations, consultations, findings and recommendations of the ACHAR and ATR have addressed the requirements of the SEARs in accordance with the guidelines and framework established by OEH. No AHIP application is necessary. No further assessment of Aboriginal cultural significance or archaeology is required.

Under Section 120 of the Act a licence may be issued by OEH to harm protected fauna (other than a threatened species, population or ecological community). Previous development applications and consents for subdivision of the Site have assessed and determined that the overall impact on any fauna that may have previously been within the Site was not significant and that a Section 120 Licence was not required.

7.3.3 Threatened Species Conservation Act 1995 (TSC Act)

As discussed at **Section 6.3** in regard to the Biodiversity Conservation Act 2016, the proposal is being assessed under the legislation in force prior to 25 August 2017, which includes the TSC Act (now repealed).

7 Other Statutory Approvals

The TSC Act contains provisions requiring the identification of any vulnerable, endangered or critically endangered flora or fauna species, populations or ecological communities associated with a proposed development site.

Section 91 of the TSC Act requires a licence to be issued by OEH before any action may take place which may harm or damage a threatened species, population or ecological community although this does not trigger the Integrated Approval provisions of the EP&A Act. Furthermore, if a proposal is considered to have a significant impact, the Act requires a Species Impact Statement (SIS) to be prepared and that appropriate recovery and management strategies be implemented.

However, the Site is subject to biodiversity certification as described in Schedule 7 Part 7 of the TSC Act and accordingly, the proposal is taken to be “*development that is not likely to significantly affect any threatened species, population or ecological community, or its habitat*”.

7.4 Department of Primary Industries – NSW Office of Water

7.4.1 Water Management Act 2000 (WM Act)

The object of the WM Act is the “*sustainable and integrated management of the State's water for the benefit of both present and future generations*”.

Part 3 of Chapter 3 of the WM Act relates to Approvals and Section 91(2) requires a ‘controlled activity approval’ (CAA) for works at a specified location in, on or under ‘waterfront land’.

Pursuant to Section 89J(1)(g) of the EP&A Act, granting of development consent to a SSD exempts a proponent from the requirement to obtain a CAA.

Section 91(3) requires an ‘aquifer interference approval’ (AIA) for an aquifer interference activity⁵. Granting of development consent to a SSD does not exempt a proponent from the requirement to obtain an AIA.

The Geotechnical Investigation report prepared by JK Geotechnics (see **Appendix 6**) indicates that groundwater was not observed during or after completion of auger drilling and that the excavations required for the proposed development are considered unlikely to intersect any aquifer and accordingly, an AIA is not required.

7.5 NSW Department of Transport (DoT) - NSW Roads and Maritime Services (RMS)

7.5.1 Roads Act 1993

Section 138(1) of the *Roads Act 1993* relates to works associated with public roads and provides that a person must not:

- “(a) erect a structure or carry out a work in, on or over a public road, or
 - (b) dig up or disturb the surface of a public road, or
 - (c) remove or interfere with a structure, work or tree on a public road, or
 - (d) pump water into a public road from any land adjoining the road, or
 - (e) connect a road (whether public or private) to a classified road,
- otherwise than with the consent of the appropriate roads authority.”*

⁵ **aquifer interference activity** means an activity involving any of the following:

- (a) the penetration of an aquifer,
- (b) the interference with water in an aquifer,
- (c) the obstruction of the flow of water in an aquifer,
- (d) the taking of water from an aquifer in the course of carrying out mining, or any other activity prescribed by the regulations,
- (e) the disposal of water taken from an aquifer as referred to in paragraph (d).

7 Other Statutory Approvals

The Hermitage Way, MC07 and MC06 are public roads and the proposal includes works to these roads including a pupil drop off area on MC06, a disabled bus bay on MC07 and a bus stop for three buses on The Hermitage Way.

Council is the relevant roads authority for these roads for the purposes of the *Road Act 1993* and it is expected that the final design will be resolved with Council as part of the DA consultation process. An assessment regarding traffic impacts has been undertaken by Woolacotts which outlines that the traffic generated by the proposal was included in the initial traffic planning for roadways and intersections. This is further discussed in **Section 6.6.3** of this Report.

In addition, pursuant to Section 89K(1)(f) of the EP&A Act, should development consent be granted to the proposed SSD, consent under s138 cannot be refused if it is necessary for carrying out of the development and must be substantially consistent with the SSD development consent.

8 Environmental Risk Assessment

8.1 Risk Assessment

Table 10 below is an assessment of potential environmental impacts associated with the proposed development and specifies the nature of the impact, its level/scale, consequence, likelihood and level of risk.

Table 10 Risk Assessment				
Potential Impact	Level/Scale of impact	Consequence	Likelihood	Risk
Construction Phase				
Spillage of fuel or oils from or for use in Machinery	Limited to small capacity fuel tanks of on-site machinery	Minor	Unlikely	Low
Excessive noise or vibration resulting from use of construction machinery	Subject to machinery used, level of impact is limited to school site and immediate surrounds	Minor	Occasionally	Moderate
Increase in construction traffic	Limited to roads immediately surrounding the site, including the Hermitage Way, adjacent side streets (as yet unnamed) and nearby intersections.	Minor	Likely	Moderate
Safety of the public	Personal injury due to construction practices/materials	Severe	Unlikely	Moderate
Potential identification of items of archaeological significance during construction phase	Disturbance of archaeological artefacts (unexpected finds)	Minor	Occasionally	Moderate
Potential identification of acid sulfate soils during construction phase	Potential unknown, if present only likely to be very localised.	Negligible	Unlikely	Low
Potential identification of contaminated materials during construction phase	Potential unknown, if present only likely to be very localised.	Minor	Unlikely	Low
Potential for reduced air and water quality during construction phase	Movement of vehicles and construction material (particularly at early stages) will stir up and displace earth/dust, potentially impacting surrounding development.	Moderate	Occasionally	Moderate
Visual or amenity impacts resulting from new built form	Limited to public domain (of The Hermitage Way and unnamed side streets) and surrounding residential development.	Minor	Unlikely	Low
Operational Phase				
Noise - Traffic	Increase in noise due to vehicular traffic	Minor	Likely	Moderate
Noise – School	Increase in noise due to children's use of outdoor play spaces and/or PA systems	Minor	Likely	Moderate
Reduction in solar access	Limited overshadowing of the road reservation	Negligible	Likely	Low
Increase in parking demands on local roads during operation phase	Limited to surrounding road network at peak drop off and pick up periods	Minor	Unlikely	Low

8 Environmental Risk Assessment

8.2 Risk Management

A Risk Management Plan has been prepared in respect of any impacts identified above as carrying Moderate, High or Extreme risk. **Table 11** sets out these potential impacts, the level of control/s required and a control strategy for each risk.

Table 11 Risk Management Plan		
Potential Impact	Level of Control	Control Strategy
Construction Phase		
Increase in construction traffic	Engineering controls, Procedures and training	A preliminary CMP, incorporating a Construction Traffic Management Plan, has been prepared (Appendix 28) which details the controls and procedures relevant to the minimising of risk associated with construction traffic movements resulting from the proposed development. These include clear identification of entry/exit crossing and traffic management
Excessive noise or vibration resulting from use of construction machinery	Isolation Reduction	1. Construction Hours to be limited to: - 7am to 7pm Monday to Friday - 8am to 5pm Saturdays - No work on Sundays or Public Holidays without permission 2. Site Access and vehicles routes to avoid (as far as possible) residential receptors 3. Construction vehicles to be parked on-site and workers instructed not to park in surrounding residential streets 4. Use of barriers, enclosures and/or silencers where necessary to meet EPA noise limits
Potential for reduced water quality during construction phase	Engineering controls, procedures and training	The development will be the subject of sediment and erosion management practices as detailed in the Plans at Appendix 16 , as well as site preparation works which minimise the disturbance and transport of earth/dust within and outside of the site, including the use of water trucks, wheel wash bays and other measures as appropriate.
Potential for reduced air quality during construction phase	Elimination Reduction Engineering Controls	1. Construction Hours to be limited to: - 7am to 7pm Monday to Friday - 8am to 5pm Saturdays - No work on Sundays or Public Holidays without permission 2. Haulage trucks to be covered 3. Earthworks to be restricted during high wind periods 4. Watering down of exposed soils; 5. Truck shaker grids to be installed at exit points
Safety of the public	Isolation Procedures and Training	1. Site fencing and hoarding to be used. 2. Secure fences/gates to prevent unauthorised site entry 3. Training of workers responsible for use of heavy machinery/cranes or the like.
Potential identification of items of archaeological significance during construction phase	Procedures and Training	1. Where relevant, workers to be trained in unexpected finds protocols. 2. In the event of an unexpected find, work to cease until approval is granted to proceed.
Operational Phase		
Noise - Traffic	Reduction Engineering Controls Procedures and Training	1. All staff and service vehicles to use designated entry/exit points to the Site. 2. Staff and students to be encouraged to use sustainable transport modes 3. All student drop off/pickup activities to be undertaken using the dedicated vehicle and bus laybys.
Noise – Play spaces	Isolation Reduction Procedures and Training	1. Outdoor activities to be undertaken primarily in the designated play spaces oriented away from the southern and eastern frontages. 2. Staff and students to be informed regularly of residential neighbours and advised to keep noise to a minimum. 3. Public announcement systems not to be used outside of core school hours.

8 Environmental Risk Assessment

8.3 Cumulative impacts

Gledswood Hills is in the process of transforming from a rural environment to an urban environment. Therefore, considerable construction works are underway throughout the suburb and the wider Turner Road Precinct. In addition to civil works to construct the road network and necessary public infrastructure, and extensive residential construction, other significant developments in the vicinity include the Camden Medical Campus Precinct on The Hermitage Way, which was approved by The Minister for Planning on 27 April, 2017 and the construction of the entertainment/town centre adjacent to the Gledswood Hills Public School Site.

All of these projects will contribute to short-term cumulative environmental impacts due to the nature of urbanising a greenfield site. However, the construction and operation of Gledswood Hills Public School is considered to be of great social and economic benefit to the region and will have minimal environmental impacts.

9 Conclusion

The NSW Department of Education proposes the construction of Gledswood Hills Public School (1,000 students) at The Hermitage Way, Gledswood Hills. The proposal has a CIV exceeding \$20 million and therefore must be assessed as SSD, pursuant to the State and Regional Development SEPP.

The NSW Department of Planning and Environment issued the SEARs for the proposed development in October 2016, and the requirements of the SEARs have formed the basis of the design development process as well as the assessment carried out within the body of this EIS Report. A response to all requirements set out in the SEARs has been provided, as referenced at **Section 1.4**.

The project team has carried out consultation with a wide range of stakeholders, including State government departments, local government, community and experts in the design of schools. The advice received throughout the consultation process has been incorporated into the current proposal where possible and reflects a commitment to provide a quality and objective-driven outcome.

The proposed development has been assessed in accordance with the provisions of Section 79C of the EP&A Act 1979 and is generally consistent with the relevant objectives and planning controls, with the exception of building height as required by the Growth Centres SEPP. Despite the provisions of Clause 42 of the Education SEPP, the application is supported by a Clause 4.6 Variation which is considered to be well founded.

In response to the opportunities and constraints of the site, the requirements of the EFSG and the design requirements of the NSW Department of Education, the proposal has been designed to meet the current and future education demands for residents of Gledswood Hills by providing 6,533.02m² of student and staffing accommodation, and over 16,000m² of play areas.

In addition, the proposed building works will provide high quality learning and teaching spaces with flexible layout arrangements and durable finishes ensuring the proposal operates as a long-life, high utility and low-maintenance educational establishment.

The proposal will provide a total of 75 car parking spaces for the public school, meeting the requirements of Camden Council's DCP. This parking supply is supported by a range of sustainable transport initiatives including improved access to public bus services and integration with the precinct-wide pedestrian and cycle pathway network. Traffic impacts of the proposal are expected to meet the demand forecast for this site as part of the initial precinct traffic planning studies.

The proposal achieves acceptable environmental amenity outcomes, including desirable outcomes for acoustic amenity (both internal and external to the site), stormwater drainage, flooding and waste management. Furthermore, the proposal will incorporate ESD initiatives considered to be best practice within the Australian building industry.

The works proposed under this development application will be subject to the recommendations of specialist reports so as to ensure appropriate Aboriginal heritage, archaeological, geotechnical, contamination and salinity outcomes are achieved.

The proposed works have been designed to, and will be carried out in the interests of the public. The Development Application will meet the project objectives to provide additional primary school accommodation in a high quality built form which has safe and efficient access for children, teachers, visitors and service personnel.

Accordingly, it is recommended that the Minister for Planning and Environment approve the proposed SSD DA.