

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
A. PLANNING	
<p>The subject site is zoned RU4 Primary Production Small Lots. The proponent has not adequately demonstrated how the development is sympathetic to the rural environment, and how the development is of minimal risk from natural and man-made hazards.</p>	<p>The consolidation of internal learning areas and other internal facilities within a single, two (2) storey built form enables unbuilt-upon area and landscaping to be maximised over the site. Through the provision of vast open spaces and extensive landscaping, the site responds to its rural surrounds and maintains a 'green' and vegetated character.</p> <p>By contrast, the provision of multiple, detached buildings dispersed across the site in an arrangement more typical of older schools which have needed to provide additional facilities over many years to accommodate growth that was not initially planned for, would deplete the available open space and reduce landscaping. Such an approach to the design of the school would contribute to a site characterised by buildings rather than a green landscape, thereby compromising the rural character of the site.</p> <p>Importantly, the design of the school and concentration of built form in the east of the site also responds to site constraints including bushfire, flood, land contamination, the riparian zone and topography. The design and siting of buildings best allows for the continuation of natural processes and maintenance of natural landscapes, whilst also mitigating potential hazards and risks for future school students and staff. This represents an informed approach to planning in a currently rural locality.</p> <p>Additionally, whilst the school incorporates built form that is larger than existing buildings in the immediate area, the overall appearance of the density, bulk and scale of the development has been managed through façade articulation, appropriate massing of different building elements, the equitable treatment of level changes to create appropriate transitions across the grounds, and landscaping to soften the appearance of built form. Façade articulation, which contributes to positive aesthetics and creates a 'human' scale to the development, has been achieved through the application of contrasting render and face brick textures in facades, glazing, appropriate massing of different building elements, clearly defined building entries, modulated canopies and alternating skillion roof forms.</p>

Table 1. Response to RTS Fairfield City Council

Matter Raised	Comment
	<p>With specific reference to the eastern elevation, the appearance of the length and overall scale of the building wall has been mitigated through the articulation of classroom spaces as separate building volumes, varied façade finishes, modulated roof forms, outdoor learning courtyards and boundary landscaping providing 'green screening'. Also of note, the building wall has been setback a minimum of 20m from the eastern side boundary, which significantly exceeds the 5m side setbacks required pursuant to FDCP and offers significant building separation from the adjoining property. Extracts showing the eastern elevation are provided at Figure 1-2 below.</p> <p>Therefore the design of the eastern elevation and eastern boundary setbacks are <i>not</i> considered to be in any way 'inappropriate'.</p> <p>Similarly, the proposal would <i>not</i> be inconsistent with the objectives of the RU4 zone. Council have specifically queried the proposal's consistency with the following zone objective:</p> <p><i>To ensure that development is sympathetic to the rural environment and minimises risks from natural and man-made hazards.</i></p> <p>As described in the above paragraphs, the development is <i>sympathetic to the rural environment</i> on the following basis:</p> <ul style="list-style-type: none"> ▪ The design integrates with the rural environment through maximising open space, unbuilt-upon area and landscaping over the site. ▪ The appearance of the bulk and scale of the built form has been managed through façade articulation, massing of different building envelopes, treatment of level changes, modulated roof forms, setbacks and landscaping. ▪ Vegetation planting adjacent to the site boundaries will soften views toward the site, riparian planting will enhance the environmental quality of the corridor in the site's west, and more than half of the site will be retained as open space.

Table 1. Response to RTS Fairfield City Council

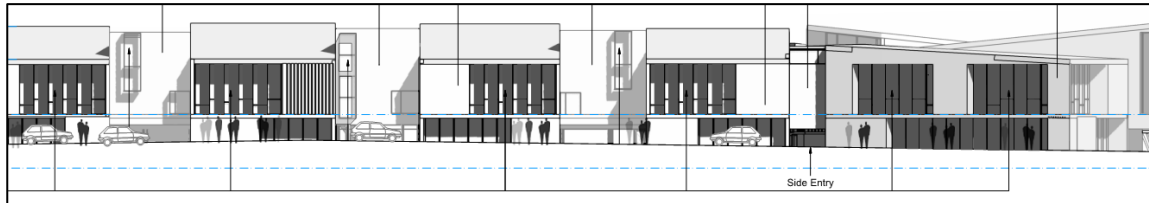
Matter Raised	Comment
	<ul style="list-style-type: none"> Canopy trees proposed to be planted will extend above the height of the roofline, thereby assisting the scale of the development to integrate with its landscape. The amenity of surrounding rural properties has been safeguarded through generous boundary setbacks, extensive landscaping and planting of canopy trees. <p>Also consistent with the zone objective, the development has been designed to minimise risk from hazards through:</p> <ul style="list-style-type: none"> Compliant Asset Protection Zones (APZs); Siting buildings outside of the flood zone and minimising cut/fill in the flood zone; Remediation of land contamination on Lot 2321; Compliant riparian setbacks and planting within the riparian corridor; Balancing cut and fill and managing level changes. <p>At the same time as minimising risk to students and staff, these measures will protect natural processes, maintain natural landscapes and improve the environmental quality of the site.</p> <p>The proposal therefore achieves the zones objectives and offers an appropriate response to the rural character of the immediately surrounding context.</p>  <p>Figure 1. Eastern Elevation (PMDL, 2018)</p>

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
	 <p>Figure 2. Perspective Looking South-East (Arterra 2018)</p>
Site Locality	
<p>It is understood that the proposed primary school is associated with the adjoining Church and will deliver new educational facilities to meet the demand in Western Sydney. The 2016 ABS Census states reveal that the total population density in Cecil Park is 848 residents. In addition, the total population of primary students aged from 5-11 years in the Cecil Park is 61 (Community Profile ID). Furthermore, a search of primary schools within a 4km radius of the subject site reveal 8 primary schools within the Cecil Park area as shown in Figure 1 below. This provides an indication of the demand of primary schools within the area is low.</p>	<p>A review of the 2016 ABS Data, reveals that the total population of primary students aged 5-11 years in Cecil Park is 65 (Community Profile ID).</p> <p>The primary intent of the new School is to accommodate overflow students from its link primary school, being St Hurmizd Assyrian Primary School at 7-9 Greenfield Road, Greenfield Park, which is currently at capacity.</p> <p>Further to the above, the Site and Fairfield area situated within the Western City District, which is envisioned as 'a unique parkland city' that also offers transport, infrastructure, services, affordable housing and open spaces. Driven by the development of Western Sydney Airport, the district will experience a transforming economy, population growth, improved transport links and new jobs. Existing and new residents of the district would benefit from more jobs, better access to services and facilities, shorter commutes and a greater diversity of homes. Overall, 464,450 additional</p>


Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
 <p>Figure 1 – Primary schools within a 4km radius of 17-19 Kosovich Place, Cecil Park (Google Maps)</p>	<p>people, 77,978 additional school students and 184,500 dwellings are projected for the Western City district by 2036, and 6,000-8,000 jobs are targeted for Fairfield by 2036.</p> <p>Simultaneously, the school responds to the rapidly changing character of Sydney's south-west which is experiencing significant population and housing growth. It is this transformational character of the surrounding context that generates the need for a new primary school.</p> <p>In light of the above, in addition to accommodate the overflow of student from St Hurmizd Assyrian Primary School, the proposed new school would support the growth projected for the Western City and the new urban development identified for the greenfield areas immediately surrounding the Site. A new school on the Site would also contribute to the creation of the 30-minute city owing to the immediate proximity of the Site to future housing, jobs and transport infrastructure.</p> <p>In light of the above, there is an evident existing and future demand for the proposed primary school to provide additional educational establishment services within the area.</p>
Bulk, scale, and Built Design of the development	
<p>The development proposes a variation to exceed the permissible height limit by 3.8 metres and 4.4m cut and fill difference to the eastern portion to the site to create a uniform roofline due to the typographical sloping. The built design of the primary school is not in keeping with the rural landscape the surrounding area as reflected under the provisions of the Fairfield LEP 2013 and non-compliance with the Fairfield Citywide DCP 2013.</p> <p>The proponent responded that the landscaped treatment to the eastern portion of the site to soften the development is kept the rural character of the area.</p>	<p>The site exhibits steeply-sloping topography (falling from RL100.90 in the south-eastern corner of the site to RL89.07 in the north-western corner of the site). Cut and fill is therefore required to create a flat building pad appropriate for the school development, noting though that cut and fill in the flood zone has been minimised.</p> <p>Cut and fill has been effectively balanced and level changes across the site have been managed through landscape treatment. In particular, the level difference between the adjoining site to the east has been managed through a retaining wall which incorporates shrub and small tree planting at the base and ivy planting on the face of the wall to create a green wall. This will soften the appearance of the wall, offset the visual impact of level changes and create a green outlook. This treatment and corresponding visual outcome (refer Figures 3-4) ensure the development integrates with the rural character.</p>


Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
<p>Given the large volume of hardstand area and retaining walls on the subject site, the development is not considered sympathetic to the rural character of the area.</p>	<p>Also of note, whilst the GA NSW Design Review Panel initially expressed some concern over level changes, the later iterations of the design which included attention to the management of levels, were commended by the GA NSW.</p> <p>The design of the school has been informed by its context, both existing and future. Landscape design in particular is integral to enabling the Site to integrate with the current rural character of the immediate surrounds. Vegetation planting adjacent to the Site boundaries will soften views towards the Site, riparian planting will enhance the environmental quality of the corridor in the Site's west, and more than half of the Site will be retained as open space.</p>  <p>Figure 3. Eastern Boundary Perspective (Arterra 2018)</p>

Table 1. Response to RTS Fairfield City Council


Matter Raised	Comment
	 <p>Figure 4. Eastern Boundary Perspective (Arterra 2018)</p>
<p>Location of open play area for Kindergarten students</p> <p>Council does not consider the location open play area for Kindergarten appropriate within the front setback of the site. It is not suitable for children to be exposed within the front setback in view from Kosovich Place more susceptible of noise and distraction from the public therefore unacceptable in its current form.</p>	<p>It is acknowledged the majority of the kindergarten play area is situated within the 15m front setback to Kosovich Place. The kindergarten play area incorporates lawn, tree planting, a sandpit, small amphitheatre seating and canopy shelters, and is separated from the street by hedge planting and integrated fencing.</p> <p>As such, the kindergarten play area incorporates landscaping that will enable it to integrate with the front setback and achieve the intent of setback and landscape controls, including contributing to 'green' views toward the site and softening the appearance of built form. In any case, the</p>

Table 1. Response to RTS Fairfield City Council


Matter Raised	Comment
	<p>kindergarten play area will be largely screened in views from the street by hedges and other planting adjacent to the boundary (refer Figure 5).</p> <p>The character of the area and streetscape will thereby in no way be undermined as a result of the kindergarten play area.</p>  <p>Figure 5. Perspective Taking in Kosovich Place Setback and Kindergarten Play Area (Arterra 2018)</p>

Table 1. Response to RTS Fairfield City Council

Matter Raised	Comment
B. TRAFFIC AND TRANSPORT	
<p>The development is situated in a rural cul-de-sac setting. The traffic generation and vehicle access arrangement will detrimentally impact the neighbouring properties and local road network based on the operation of the final development to accommodate the number of staff and students. In relation to traffic and transport, the following concerns have not been adequately addressed by the application.</p> <p>The proposed auxiliary right-turn lane on Wallgrove Road into Kosovich Place and 'No Right Turn' restriction from Kosovich Place into Wallgrove Road is considered a safety hazard for motorists at the intersection and to school children. RMS recommend that a roundabout be proposed at the intersection to improve the safety of turning traffic at Kosovich Place/ Wallgrove Road; it will also benefit the safety of the road network by reducing the approach speed by motorists.</p> <p>It should be noted that the proponent must consult with RMS regarding placing 'School Zone' signage.</p>	<p>Extensive consultation with TfNSW (RMS) is ongoing and the TfNSW (RMS) has reached the conclusion that a roundabout is not a viable treatment for this intersection due to the physical constraints present. The placement of the school-zone signage will occur along Kosovich Place, as agreed with the RMS.</p> <p>The proposed modifications to the intersection of Kosovich Place/Wallgrove Road include the following, as outlined in accompanying Traffic Assessment (Appendix B):</p> <ul style="list-style-type: none"> ▪ A 26.6m long auxiliary lane providing for the storage of vehicles waiting to turn right from Wallgrove Road into Kosovich Place: <ul style="list-style-type: none"> ○ It is noted that this does not include the taper length of 18m. ○ This length is the longest lane length that can be accommodated considering the proximity of the roundabout to the north and the narrow culvert across Ropes Creek. ○ A 26.6 long lane is sufficient to accommodate the 98th percentile queue predicted by SIDRA analysis sensitivity testing and can accommodate two 12.5m long Heavy Rigid Vehicles. ○ It should be noted that traffic exiting the roundabout travels significantly slower than the 80km/h speed restriction and deceleration facilities are not required. Southbound vehicles intending to enter Kosovich Place will not significantly accelerate after exiting the roundabout and will have ample room in which to brake safely for the right turn. ▪ A 100m long (including taper) auxiliary lane providing for the deceleration of vehicles turning left into Kosovich Place. ▪ "No Right Turn" and "Left Only" signage, complemented by a concrete island, restricting right turns out of Kosovich Place. ▪ Lane and shoulder widths will generally match the existing geometry of Wallgrove Road.

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
	<ul style="list-style-type: none"> All intersection turns have been designed to accommodate a 12.5m long Heavy Rigid Vehicle. <p>The existing and proposed intersection layout is depicted in Figure 5 and Figure 6 below, respectively.</p> <p>The proposed changes to the Kosovich Place/Wallgrove Road intersection will significantly improve the safety of the intersection by:</p> <ul style="list-style-type: none"> Restricting right turns from Kosovich Place into Wallgrove Road, which is presently an unsafe movement during peak times; Addition of deceleration facilities for the left turn into Kosovich Place from Wallgrove Road, significantly reducing the risk of rear-end collisions and side-on collisions involving vehicles making this turn; Addition of storage facilities for the right turn into Kosovich Place from Wallgrove Road, significantly reducing the risk of rear-end collisions and side-on collisions involving vehicles making this turn. <p>In light of the above, it is incorrect to assert that the proposal will detrimentally impact the traffic safety at the Kosovich Place/Wallgrove Road intersection, as the intersection will be significantly safer post upgrade. Any negative traffic safety implications related to the additional school traffic are outweighed by the significant upgrade works proposed.</p>

Table 1. Response to RTS Fairfield City Council

Matter Raised	Comment
	 <p>Figure 6. Existing Intersection Layout</p>  <p>Figure 7. Proposed Intersection Layout</p>

Table 1. Response to RTS Fairfield City Council

Matter Raised	Comment
Off-street parking	
<p>It is estimated that the traffic generation of the final development will generate 579 trips during the morning and afternoon peak based off the occupancy rate similar to St Hermizd Primary School. St Hermizd is within an urban setting and therefore the occupancy rates need to be justified as the proposal is situated in a rural cul-de-sac setting adjoining an arterial road.</p> <p>The proponent responded that installation of a right turn bay at Wallgrove Road onto Kosovich Place, 'No Right Turn' at Kosovich Place onto Wallgrove Road, and 30 pick-up/drop-off car spaces will reduce the traffic impact onto Kosovich Place. Given the limited number of pick-up/drop-off spaces to accommodate the final development, the traffic mitigation measures proposed are considered unacceptable as it will likely impact on-street parking and the local rural road network.</p> <p>In addition, the 37 car parking spaces for staff will result in conflict between parents/carers using those spaces. The overall off-street parking for the primary school is non-compliant with the car-parking rate in the Fairfield Citywide DCP 2013 and should be considered as part of the application.</p> <p>It is understood that the school parking will be utilised during church events adjoining the site based on the association and history of overflow on-street parking.</p>	<p>The car occupancy of 1.85 students per vehicle is based on data provided by the St Hurmizd Assyrian School regarding the number of siblings that each student has at the school. The St Hurmizd School caters to the same community and a significant proportion of the initial population of the school will be comprised of students moving from St Hurmizd to the proposed school. It is therefore likely that the number of siblings each child has at the school will remain similar to the St Hurmizd School. The 1.85 students per vehicle assumes that no students walk or catch public transport as applied to the "Stage 1" population of 210 students.</p> <p>With regards to the "Final Development" scale of 630 students, it has been assumed that 20% of these students will catch the bus, with a 1.85 car occupancy rate applied to the remainder. A 20% uptake of school bus services is typical for primary schools, with a higher rate of bus usage usually observed for children in years 3 – 6 or for students in years K – 2 with older siblings. In this case, the proposed bus service will be shared with the St Narsai Assyrian Christian College, which the proposed school will feed. There will, therefore, be a higher than usual proportion of students with siblings catching the bus and it is expected that the 20% bus usage assumed will be easily achieved.</p> <p>In light of the above, the forecast traffic generation is deemed to be reasonable for the Site.</p> <p>In relation to car parking, the Fairfield City Council DCP provides the following guidelines for the provision of car parking for Educational Establishments:</p> <p style="text-align: center;"><i>1 space per employee plus 1 space per 10 students in Year 12 (where applicable)</i></p> <p>The proposal includes a total of 35 staff, with no Year 12 students to be on-site. The parking requirement for the proposed school is therefore 35 spaces. A total of 37 spaces are provided for use by staff, with an additional two (2) allocated for disabled visitors. Surplus to the requirements of the DCP, a total of 30 kiss and drop spaces are proposed to cater to the drop-off and pick-up</p>

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
<p>The proposed parking for the school should take also consider the impact of overflow of parking for the adjoining Church.</p>	<p>operations of the school. On this basis, it is unclear under what pretences Fairfield City Council regards to the proposal to have a “limited number of pick-up/drop-off spaces”, as the proposal far exceeds the requirements of the FCC DCP which <i>does not require the provision of any kiss and drop facilities</i>.</p> <p>The Traffic and Parking Impact Assessment by McLaren Traffic Engineering submitted with the application provides a robust analysis of the requirements of the school in terms of kiss and drop facilities, with the results demonstrating that the 30 spaces will be sufficient to serve the needs of the school without overflow into Kosovich Place. The 39 spaces in the car park were not included in this analysis and are not needed to provide for sufficient car parking for parents during drop-off and pick-up times.</p> <p>With regards to the proposed usage of the school’s parking by the adjacent Church, it is emphasised that this will occur outside of school operational hours only. With this in mind, the use of the school’s on-site parking will substantially reduce the chance that parking associated with the Church will overflow onto the street, without any negative ramifications.</p>
Site Servicing Vehicles	
<p>Bus services are proposed at the bus bay/zone on Kosovich Place via ‘piggy-back’ off the existing bus services for St Narsai Assyrian Christian Collage. Given the bus services for St Narsai Assyrian Christian Collage are privately operated, the bus service will not benefit other stakeholders therefore the bus bay/zone must be providing within the boundary of the subject site.</p> <p>A heavy rigid vehicle for loading / deliveries and waste operations will also service the site. Swept path for heavy rigid vehicles enter/ exiting the site and onto Kosovich</p>	<p>The proposed bus parking along Kosovich Place is to be used by a state-operated school bus service. Discussions with Transit Systems the present provider of school bus services in the area indicate that the most cost-efficient option is to modify the existing state-funded bus route servicing St Narsai Assyrian Christian College to include the proposed school.</p> <p>Transit Systems indicated that it would not accept on-site facilities, as entering and leaving the site would unacceptably delay the service. In view of this, the proposal includes an indented on-street facility which will provide sufficient width to cater for buses whilst maintaining two-way passing along Kosovich Place.</p>

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
Place must be provided to ensure servicing vehicles are able to manoeuvre in a suitable manner. The proponent has only provided swept paths for B85 vehicles within the car parking area therefore unable to assess the application. It is noted that the plans also do not depict a designated loading area for servicing vehicles.	<p>Swept path testing has been undertaken to demonstrate the circulation of a 12.5m long Heavy Rigid Vehicle through the site and accompanies the submission as Appendix B.</p> <p>The occasional loading operations will be undertaken in the staff car park adjacent to the Bin Store outside of peak drop-off and pick-up hours.</p>
C. CATCHMENT MANAGEMENT	
The proponent has not submitted further information to adequately address part 18 Flooding of the Secretary's Environmental Assessment Requirements (SEARs). Council's TUFLOW model has been established as part of the Rural Area Flood Study (2013). It has not been relied on to model the existing and proposed scenarios for the subject site therefore the information provided remains deficient to address Council's flooding concerns.	<p>As previously documented in the Flood Management Assessment prepared by Martens (Appendix 35 of original SSD 9210 submission) and reiterated in the RTS Submission documentation, the proposed earthworks will result in a very minor <i>increase</i> in flood storage volume. Therefore, no adverse impact on flood conditions on adjacent properties would result.</p> <p>As part of the Flood Management Assessment, a review of the available Flood Planning Certificates and modelling results provided by Fairfield City Council for the Site was carried out.</p> <p>Importantly, the design of the school and concentration of built form in the east of the Site also responds to Site constraints including flooding. The design and siting of buildings best allows for the continuation of natural processes, whilst also mitigating potential hazards and risk for future school students and staff.</p>
D. DEVELOPMENT ENGINEERING	
The proponent has not provided further information and conclude that the information provided is insufficient for Council to consider the proposal as detailed further below.	Refer to the ensuing section of this report.

Table 1. Response to RTS Fairfield City Council

Matter Raised	Comment
<p>Flooding</p> <p>The proposed 'recreation portion of the site' is situated within partly high, medium, low and partly no risk mainstream flood precinct that forms as part of the school therefore is considered as 'Sensitive Uses and Facilities, and must address Chapter 11 – Flood Risk Management of the Fairfield Citywide DCP 2013. Furthermore, the proposal has not relied on Council's established TUFLOW model as part of the Rural Area Flood Study (2013) and must approach Council Catchment Branch to undertake the modelling. In this regard, Council is unable to conduct a further assessment until Council's flooding concerns have been addressed.</p>	<p>As previously addressed in the Flood Management Report, controls for site recreation areas are located in Low and Medium Flood Risk Precincts. The very small area of High Risk Flood Precinct has no development proposed.</p> <p>The previously provided Flood Management Assessment prepared by Martens (Appendix 35 of original SSD 9210 submission) confirmed the development was located outside of the Georges River and Cabramatta Creek Floodplains and therefore the flood planning controls in Schedule 6 of Chapter 11 of the Fairfield City Wide DCP 2013 was applied.</p> <p>Controls for site recreation areas in Low and Medium Flood Risk Precincts was outlined in Table 4 of the Flood Management Assessment and compliance with these controls was confirmed in Table 5 of the Flood Management Assessment.</p> <p>It is acknowledged that the playing fields and other site recreation areas relate to a school (being a type of Educational Establishment), however, given these areas will not include any school buildings, access or car parking, and will be used for recreation purposes only, it is considered appropriate for the Site recreation areas to be considered under the flooding requirements for Recreation Areas.</p> <p>Importantly, the suitability of Site recreation areas having regard to flood characteristics, is ensured through the proximity of the recreation areas to non-flood-affected areas of the Site. Distances to flood-free site areas are not more than 250m from furthest area proposed to be used for recreational purposes. In a flood emergency, adequate warning time is expected to be available to evacuate Low and Medium Risk Precinct areas on Site with evacuation initiated by the onset of rain (at which stage the normal school process would be for students to move indoors - given all buildings are above the PMF this would achieve the safe evacuation of potentially flood effected lands long before any inundation).</p>

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
	Therefore, the proposed site recreation areas are shown to be suitable for use by students in association with the school and have been appropriately assessed in accordance with Chapter 11 of the Fairfield City Wide DCP 2013.
Kerb, Gutter, and Stormwater Drainage	
<p>The proposal involves road widening onto Kosovich Place to allow buses to enter and exit in a two-way direction with upgrades to kerb and gutter and associated drainage. The site is within the rural region of the Fairfield LGA that has no kerbs, table drains used in road reserves or easements over properties. The proposal is committed to road kerb and gutter and drainage upgrades however inadequate information is submitted on where the drainage system would be connected and where will the drainage be discharged.</p> <p>In addition, no plans have been provided detailing the typical road cross-section, including one with the bus bay and associated road stormwater drainage. The plans must depict piped drainage system under the kerb and gutter including kerb inlet pits, discharge points for the road and treatment of the stormwater to stop erosion for Council to further consider the proposal.</p>	<p>It is acknowledged that as part of the proposed upgrade to Kosovich Place, new kerb, guttering and associated drainage, would be required.</p> <p>The proposed upgrade works would be subject to further detailed design, post-approval of the SSDA, based on ongoing consultation with RMS and Council.</p> <p>Concept plans showing the proposed upgrades to Kosovich Place are included at <i>Annexure G</i> of the Traffic and Parking Impact Assessment (Appendix 13 of the original SSDA). The proposed upgrade works would be subject to further detailed design, post-approval of the SSDA, based on ongoing consultation with RMS and Council.</p>
Restriction on the Use of Land	
The proposed development is situated on both Lot 2320 and 2321 DP 1223137. Lot 2321 is subject to a Restriction on the Use of Land in effect upon restriction on the title until unauthorised fill, potential	It is acknowledged that the site is contaminated with asbestos impacted material. This material was initially observed during investigation works which informed Council's approval of the land subdivision that created the subject lot. As a result of the identified contamination on Lot 2321 a

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
contamination and flooding issues have been determined and resolved. It is acknowledged that Lot 2320 is not burdened however, Council is not in the position to support the application in its current form until confident that the land is suitable for the proposed use or remediation until the flooding concerns and contamination issues have been resolved for the final development.	restriction on title was placed on the site requiring the contamination issue to be resolved prior to the development of the site.
E. ENVIRONMENTAL MANAGEMENT	
Council Environmental Management Branch have reviewed the proponent's response to site contamination and noise impact, and note that the information was not satisfactorily addressed as detailed below.	Refer to the ensuing section of this report.
Site Contamination	
<p>Historical images of the approximate 3ha subject site show significant filling on site between 1995 and 1999 (see figures 2 & 3) thus considered an Area of Environmental Concern (AEC).</p> <p>The AEC requires at least 40 sample point for a 3ha site in accordance with Contaminated Sites- Sampling Design Guideline NSW EPA (1995), however the current Detailed Site Investigation (DSI) prepared by Martens Consulting Engineers, dated July 2018, ref P1705798JR01V03 shows only 24 sample points. The current DSI should be conducted in a systematic targeted approach as the previous DSI by SESL in 2015.</p>	<p>Two (2) investigations of site contamination have been undertaken on the land which now forms Lots 2320 and 2321. One by SESL (2015) and a Detailed Site Investigation by Martens (July 2018). In these investigations a total of 40 locations were investigated (14 by SESL and 26 by Martens).</p> <p>As Council states under E. Environmental Management in their October 1, 2019 letter, a compliant investigation of 3 ha site requires analysis of 40 locations based on NSW EPA (1995) sampling guidelines. The investigations completed to date have assessed a total of 40 locations and are therefore compliant with NSW EPA (1999) Sampling Guidelines.</p> <p>Investigations by Martens were designed to address limitations in the investigations as undertaken by SESL (2015), in particular to better characterise the areas of previous filling and market garden use in the west of the site. Historical aerial photograph review identified that, as late as 1994, there were very severe erosion gullies in the western portion of the site. In 2007, in the same</p>

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
<p>The current DSI both identify the Asbestos Containing Material in a specific area and should have utilised additional sampling points in its sampling regime to target this AEC for site characterisation; an updated Remediation Action Plan taken into account of the results in the DSI. In saying that, Council is unable to conduct an assessed until a detailed site investigation with required sampling has been conducted for a valid site characterisation for review.</p>	<p>area, market gardens were operating. It is surmised that the gullies were filled, likely introducing the observed asbestos containing material (ACM) fragments observed on the site. Martens (2018) concluded the site required remediation.</p> <p>A Remedial Action Plan (RAP) was prepared by Martens (August 2018). This RAP provides a methodology for the remediation and validation of the site. Provided the reconditions of this RAP are implemented the contamination on the site shall be remediated and the site shall be rendered fit for the intended use.</p> <p>Clause 7 of State Environmental Planning Policy No. 55 (Remediation of Land) (SEPP 55) provides a statewide planning approach to the remediation of contaminated land. Clause 7 of SEPP 55 identifies the criteria for contamination and remediation to be considered in determining a development application. When considering Clause 7 it is clear that, with the provided documentation, that the consent authority can be satisfied it has complied with the requirements of SEPP 55.</p> <p>It is therefore concluded that the consent authority has adequate information to allow for an assessment of the Site's land contamination status in accordance with the requirements of SEPP 55. The documentation provided to dated including the SESL, DSI and RAP adequately categorise the land as being contamination, and pursuant to SEPP 55 provides certainty and confidence to both Council and the Department that remediation works are to occur and once completed the Site will be rendered for future use. Additional testing locations will only further quantify the categorisation of the site as being contaminated.</p> <p>To provide further clarity the implementation of the RAP can be conditioned. By conditioning the implementation of the RAP as prepared by Martens (2018), the consent authority shall be satisfied that the Site shall be rendered fit for the intended use. Therefore, in accordance with the provisions of SEPP 55, we recommend the consent authority address the matter of land contamination on the site by way of consent conditions as follows:</p>

Table 1. Response to RTS Fairfield City Council

Matter Raised	Comment										
	<p><i>Prior to issue of the first construction certificate:</i></p> <ul style="list-style-type: none"> <i>A site validation report be provided to the consent authority confirming that site remediated and validated has been undertaken to remediate land contamination identified in the Martens (2018) DSI. The Validation report is to confirm that the remediation works have been undertaken in general accordance with the Martens (2018) Remedial Action plan and that the site has been rendered fit for the intended use.</i> <p>Refer to Appendix C for further detail.</p>										
Noise Impact											
<p>The updated Noise Assessment prepared by SLR Consulting Australia Pty Ltd, dated 24 April 2019, ref 610.171101-R01-V4.0 does not adequately address the noise impact for the overall development in accordance with the relevant Australian Standards and regulation guidelines. The Noise Assessment must include noise impact to all sensitive receivers, and the accumulative effect of differing noise producing scenarios that include but not limited to:</p> <ul style="list-style-type: none"> Patrons, public and private vehicles at drop offs, People entering and exiting vehicles the carpark and surrounding areas, Traffic generation onto surrounding roads including private and public transport, 	<p>The Noise Assessment Report prepared by SLR Consulting has been updated and accompanies this application as Appendix D.</p> <p>The nearest property to the school will be the Saints Peter & Paul Parish Church. The property is a related entity to the School and therefore will not be considered a sensitive receptor with regard to noise emissions from the School.</p> <p>The remaining surrounding properties are generally rural residential and are identified below:</p> <table data-bbox="891 1118 2029 1385"> <tr> <th colspan="2">Table 1. Nearest Sensitive Receptors</th></tr> <tr> <th>Receptor</th><th>Separation Distance, m</th></tr> <tr> <td>20-30 Kosovich Place</td><td>70</td></tr> <tr> <td>15 Kosovich Place</td><td>90</td></tr> <tr> <td>56 Cecil Road</td><td>135</td></tr> </table>	Table 1. Nearest Sensitive Receptors		Receptor	Separation Distance, m	20-30 Kosovich Place	70	15 Kosovich Place	90	56 Cecil Road	135
Table 1. Nearest Sensitive Receptors											
Receptor	Separation Distance, m										
20-30 Kosovich Place	70										
15 Kosovich Place	90										
56 Cecil Road	135										

Table 1. Response to RTS Fairfield City Council

Matter Raised	Comment
<ul style="list-style-type: none"> ▪ Events that may potentially occur associated with adjoining Saints Peter and Paul Park Church ▪ Noise from the school bell, PA system, school children in outdoor play areas, mechanical plant associated with the site, waste collection and maintenance activities, ▪ Noise from after-house extra-curricular activities i.e arts and music, school meetings, sporting events, ▪ Construction noise, etc. 	<p>The significant sources of noise ingress or emission associated with the school may be:</p> <ul style="list-style-type: none"> ▪ Noise from Noise from M7 Motorways into school buildings; ▪ Noise from air-conditioning plant associated with the new buildings to nearby residences; ▪ Noise from school bell and PA system, waste collection, maintenance using powered equipment; ▪ Noise from music performance events at the School Hall; ▪ Noise from school children in outdoor play areas; ▪ Noise from traffic generated by the School on Kosovich Place to existing residents; ▪ Noise from aircraft utilising the proposed Western Sydney Airport; and ▪ Construction noise emissions, including construction-related traffic on Kosovich Place. <p>Two key areas of consideration are vehicles on the internal road between the carpark and Kosovich Place and school children in outdoor play areas.</p> <p>Fairfield City Council has previously nominated the use of Noise Policy for Industry 2017 (NPfI) for the assessment of noise emissions during the School operations and the potential impact to surrounding residential receptors. It is appropriate to consider mechanical plant noise emissions with regard to NPfI. However the NPfI was not intended to be used to assess children in school outdoor play areas.</p> <p>Vehicles on the internal road between the carpark and Kosovich Place may result in noise emissions twice a day for drop-off and pick-ups of children, It would also be appropriate to consider such noise in relation to the NPfI intrusive noise criterion. The NPfI states that the noise level of the source in question, measured over a period of 15 minutes, must not exceed the ambient background noise level (in terms of RBL) at the applicable sensitive receptors.</p>

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
	<p>It is expected that approximately 300 vehicles would use the internal road during the morning drop-off and afternoon pick-up period. This may equate to approximately 75 vehicles in any 15 minute period and a vehicle would travel at approximately 10 km/h. A sound power level of 85 dBA LAeq per car pass-by (approximately 30 seconds) has been used in this assessment. Based on the above, the predicted noise level at the nearest existing receptor would be 47 dBA LAeq(15minute). That level would comply with the NPfI intrusive noise criterion of 49 dBA.</p> <p>With respect to children in the School playground, as detailed in the Noise Assessment, the NPfI is not intended to be applicable to schools. Further, SLR is not aware of any studies that quantify noise levels generated by outdoor play areas of schools.</p> <p>Further to the NPfI principles, it is reasonable to conclude that noise associated with children involved in outdoor play would not be considered “offensive” in the context of the NSW Protection of the Environment Operations Act (POEO Act), nor would it be expected to interfere with regular domestic activities.</p> <p>Notwithstanding the above, it is becoming common, given the similarities between educational facilities and Child Care Centres in terms of land use, business hours and general operations (ie playtime hours etc), to demonstrate the potential acceptability, or otherwise, of noise from school aged children in outdoor play areas by considering the level of noise likely to be received at nearby sensitive receptors in relation to the criteria within the AAAC guideline.</p> <p>Based on the criterion for outdoor play areas in use for less than two hours per day, and the existing ambient background noise level, a noise limit of 54 dBA LAeq(15minute) would apply.</p> <p>The outdoor play areas would be at large separation distances from the existing residences and tend to be screened from the nearest receptors by intervening school buildings. This screening would reduce the likelihood of significant noise emissions being observed at the nearby receptors.</p>

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
	<p>Source noise levels were derived from octave band sound power data obtained from <i>ANSI 3.5:1997 - Methods For the Calculation of The Speech Intelligibility Index</i>. The following source noise levels were used:</p> <ul style="list-style-type: none"> 105 dBA LW for 200 students in an outdoor area; and 96 dBA LW for activities on the sports fields. <p>The Noise Impact Assessment confirms the outdoor play areas would comply with the AAAC criterion and would not be expected to result in adverse noise impact.</p> <p>The following factors will also further reduce the likelihood that outdoor play area noise would be considered unacceptable or offensive when observed at the residences:</p> <ul style="list-style-type: none"> The outdoor area would generally be used for only short periods throughout the day; The outdoor area would be used only within school hours; and The ambient noise at the nearby residences is relatively high due to the M7 Motorway which would provide a degree of 'masking' of playground noise. <p>Overall, as reiterated in the amended Noise Impact Assessment (Appendix D), noise emissions associated with the operation of the School would be acceptable, having consideration to the general use of classrooms and administration facilities, activities in the School Hall, the school bell and PA system, children in outdoor play areas and mechanical plant.</p>
F. COMMUNITY HEALTH	
Council requested that the proponent engage an independent wastewater treatment consultant to conduct a peer review of the Wastewater Assessment submitted as part of the original SSD, prepared by	As previously advised, the proposed wastewater system for the site has been informed by detailed analysis of site conditions and the school's requirements, as detailed in the Wastewater Assessment at Appendix 34 of the original SSDA.

Table 1. Response to RTS Fairfield City Council	
Matter Raised	Comment
<p>Martens Consulting Engineers dated September 2018, Ref: P1705798JR05V03.</p> <p>The proponent response has no objection to conduct a peer review of the wastewater treatment and management system of the proposed development however, no documentation is provided for Council comment on the matter thus insufficient.</p>	<p>It is noted that the Wastewater Assessment for this SSDA was prepared by the same specialist Engineering consultants as St Narsai Assyrian Christian College. Therefore, the previous peer review findings have been learnt and incorporated into the more recent proposal. However the proponent has no objection to a peer review of this proposal as the safety of the wastewater treatment and management system is critically important for the environment and therefore to this project.</p> <p>On the basis of the proponent's agreements that a peer review be completed we recommend that the development consent including the following conditions:</p> <p><u>Prior to issue of the first Construction Certificate</u></p> <ul style="list-style-type: none"> ▪ A peer review of the wastewater assessment submitted as part of the original SSD be undertaken and that any required amendments to the wastewater management solution be made. <p><u>Prior to issue of Occupation Certificate</u></p> <ul style="list-style-type: none"> ▪ A Local Government Act s68 approval to install and operate a wastewater management facility be obtained from Fairfield Council for the Site wastewater management system. ▪ The wastewater management facility be installed, constructed and commissioned. <p>Refer to Appendix E.</p>