



Your ref: SSD 9440668
File no MC-20-00010

13 October 2020

Department of Planning Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Recipient Delivery nicholas.gunn@planning.nsw.gov.au

Attention: Mr Nicholas Gunn

Dear Sir

SSD 9440668 – Request for SEARs – Tallawong Primary School

Thank you for your correspondence dated 30 September 2020 requesting our advice about the proposed development for Tallawong Primary School at 91 Schofields Road, Rouse Hill, which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

We request that the matters detailed in the Attachment to this letter be included in the final SEARs letter to the applicant.

If you would like to discuss this matter further, please contact Rachel Walker, Town Planner, on 9839 6104.

Yours faithfully

Judith Portelli
Manager Development Assessment

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

Blacktown City Council submission to SSD 9440668 – Tallawong Primary School

1. Statutory context

- a. The proposal is to address compliance with State Environmental Planning Policy (Sydney Region Growth Centres) 2006 and the Blacktown Growth Centre Precincts Development Control Plan 2010, including Schedule 4 – Area 20 Precinct.

2. Planning and design requirements

- a. It is strongly recommended that the proposal be redesigned so that all elements of the proposed school are contained within the R3 zone, and comply with the ILP road pattern on the site for compatibility with adjoining and surrounding development. Further details are provided in the Pre-Application meeting (PAM) minutes which are attached.
- b. The EIS is to address operational matters including hours of operation, staff and student numbers, any before/after school care services, and use of the school facilities by the community.
- c. The EIS is to address State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.
- d. Compliance with the Department of Education and Training schools requirements for playground space for students is to be demonstrated.
- e. Submission of a detailed landscaping plan with the EIS, including fencing details.
- f. Details of external building materials, finishes and colours are to be submitted.
- g. Submission of a cut and fill plan.
- h. The proposal is to take into consideration the impact of traffic movements and noise on adjoining residential properties.
- i. The proposal is to take into consideration privacy, overlooking and overshadowing impacts on adjoining properties.
- j. Submission of a social impact statement to address the integration of the school in its local community.
- k. Submission of an Archaeological report to identify any known or potential archaeological site on the land.
- l. Submission of a Crime Prevention through Environmental Design (CPTD) report prepared by a suitably qualified security consultant. This should include consultation with Quakers Hill Local Area Police Command.
- m. Any signage proposed must be accompanied by a SEPP 64 Assessment.
- n. Submission of a Waste Management Plan for the construction and use of the site.

3. Strategic Planning requirements

- a. Zoning – School is permitted with consent in the R3 zone. The development of school/educational establishment should be strictly within the R3 zoned portion of the lot. SP2 Drainage zoned portion should remain for the purpose of drainage infrastructure to be acquired by Council.
- b. ILP road pattern – The ILP allocates the local road on all 4 sides of the property. The concept plan indicates the deviation from the ILP road pattern, eliminating the local road on the north, south and west sides. This needs justification especially when there may be more traffic generated by the school including the school buses.
- c. Location / Catchment – Location / Catchment analysis to support the proposal may be required why this location is suitable for the school considering traffic, noise etc. Particularly when deviating from the school site allocated in the ILP.

4. Engineering design requirements

- a. The proposed development appears to rely on the surrounding road and drainage infrastructure to be completed in order to facilitate access and conveyance of stormwater. This must be considered within any future submission as well as the timing of the surrounding development. The delivery of any such proposal to construct the surrounding road/stormwater network must comply with the Blacktown City Councils Growth Centre Precincts DCP as well as Councils Engineering Guide for Development.
- b. Any proposed interim access from Schofields Road is not supported by Council.
- c. The subject development must comply with the proposed road layout as detailed within the Blacktown City Councils Growth Centre Precincts DCP. No deletion of indicative layout roads is supported. This is likely to impact the proposed development configuration.
- d. Any future proposal including the delivery of the internal road layout must consider (including compatibility with site/road levels) the existing and future surrounding built and natural elements including but not limited to;
 - existing native vegetation toward the north western end of site and the adjoining RE1 zoned land
 - compatibility with Schofields Road toward the south (note TfNSW to provide comment)
 - the future design of Item No. RM6 (Road Section) toward the north of the development under Blacktown Councils Section 7.11 Contributions Plan No.22W – Rouse Hill (Works). For more information on these items please contact Councils Senior Engineer Forward Planning.
- e. the future design of Item No. S1.1, S1.2, S1.4 and S1.5 (Culvert, Channel, Bio-retention system and GPT) toward the north east section of site located within land

zoned SP2 Drainage under Blacktown Councils Section 7.11 Contributions Plan No.22W – Rouse Hill (Works). For more information on these items please contact Councils Senior Engineer Forward Planning.

- f. Permanent on-lot water quality treatment measures are required for the site generally in accordance with Councils DCP Part J, standard drawing A(BS)175M and Engineering Guide for Development.
- g. A permanent onsite stormwater detention system is required to attenuate stormwater flows from the site in accordance with Councils standard drawing A9BS)175M, BCC GC DCP and Engineering Guide for Development. The site however may not require an onsite stormwater detention system given that there is a legal and contiguous stormwater connection, capable of appropriately and safely conveying stormwater from the site to the Second Ponds Creek for all flows up to and including the 100 year ARI.
- h. The site appears to be partially flood affected toward the north western area of the subject lot. In this regard the applicant is advised to seek flood advice from Councils Floodplain and Stormwater Team.

5. Asset design engineering

- a. The concept is not consistent with the DCP road and drainage layout. The land zoned SP2 local drainage will still be required for S7.11 drainage infrastructure. The site design will need to be coordinated with our drainage design for the SP2 drainage zoned land.
- b. Permanent on site stormwater treatment measures complying with the growth centres DCP must be provided.

6. Drainage engineering

- a. The school is to provide their permanent stormwater quality treatment onsite provided they obtain an easement from the downstream owner, OSD is not required if direct discharge is made to Second Ponds Creek.
- b. The Local road adjacent to the school will be graded from Schofield Road towards the SP2 (next to Sydney Metro Viaducts).
- c. The SP2 zoned land is to remain.
- d. Furthermore, the applicant is to obtain flood advice letter from floodadvice@blacktown.nsw.gov.au as the site may be affected by flood planning controls and minimum floor levels.

- e. Applicant is to further liaise with Council's S7.11 (Georg Eberl) team for road/drainage/flood levels due to the regional infrastructure works.

7. Traffic and road design requirements

- a. Council's preference is for no change to the ILP road network. There are concerns regarding the proposed variation to the adopted ILP roads for the proposed development, in particular the deletion of the ILP road which runs east to west on the southern portion of the site and the ILP road that runs south to north on the western portion of the site. Council does not support the deletion of these ILP roads as a result of the impact on access and traffic circulations to adjoining developments of the subject site. The ILP road shown on the site are to be constructed and dedicated to Council by the developer as part of any development on the subject site.
- b. If any changes to the ILP road network is proposed, it will be submitted with justification and proper assessment of its impact on the surrounding road network.
- c. Parking provision must comply with GCDGP 2020 for primary and secondary schools:
 - 1 space per staff member plus 1 space per 100 students
- d. Every road frontage to the school requires a wombat crossing.
- e. Where proposed bus widths will be located, the carriage way is to be 13 metres wide. For the purpose of this development the carriageway of all perimeter roads for the proposed school are to be 13 metres wide to accommodate for buses.

The location of the proposed vehicle and bus 'pick-up and drop-off' area is not considered safe for school children. You are to engage a traffic consultant to determine a safe place on the subject site to locate the vehicle and bus 'pick-up and drop-off' area.

- f. Any additional intersection controls, if required, be at no cost to Council.

8. Environmental health requirements

- a. Submission of a Site Contamination Report
- b. Submission of a comprehensive acoustic report addressing construction and operational noise prepared by a suitably qualified professional.
- c. Submission of a Salinity Investigation Report
- d. Details in regard to decommissioning OSM-1791 Onsite Sewage Management Facility registered to property.

- e. Confirmation that canteen will be constructed in accordance with;
 - a) Food Act 2003 and Regulations there under.
 - b) Australian Standard 4674-2004 Design, construction and fit-out of food premises.
 - c) Australian Standard 1668.2-2002 The use of ventilation and air conditioning in building Ventilation design for indoor air contaminant control.

9. Biodiversity requirements

- a. As the development is a State Significant Development, the proposal will need to provide a Biodiversity Development Assessment Report, in line with the Biodiversity Scheme requirements. The report should also address the Native Vegetation Retention requirements as per Appendix 6: Control 6.3 of the State Environmental Planning Policy (Sydney Region Growth Centres) 2006.
- b. Any proposed de-watering of the dam, will require a Dam Dewatering Plan which identifies the following:
 - The requirement to undertake a survey prior to dam dewatering.
 - Proposed relocation sites for native species. Additional release points must be considered if large numbers of predatory fish (e.g. Long-finned Eels) are recovered.
 - Identification of the licence details required under the Fisheries Management Act 1994 and / or the Biodiversity Conservation Act 2016.
 - Methods to prevent injury to fauna during pumping of water from the dam.
 - Details of how exotic pest species will be humanely euthanised in a manner consistent with the Prevention of Cruelty to Animals Act 1979.
 - Methods for disposing of dam water and preventing the spread of carp eggs, juvenile pest species or eggs into the catchment and natural waterways.
 - Details on how fauna will be rescued from dam sediments or allowed to relocate from the dam.
 - Details of the appropriate timing (season) for dewatering.
 - Details on reporting of actions undertaken with tallies of fauna removed from the dam with details of their relocation destination (or destruction).
 - Discharge limits as per relevant ANZECC guidelines

10. Recreation Planning Design requirements

- a. The school development must not encroach into RE1, ENV & NVP area.
- b. The applicant must demonstrate:
 - Transition from the development to RE1 area;
 - Community access to the proposed courts and hall in accordance with the departments Share our Space policy;

- Fencing and gate layout to enable community after hours use of the courts and hall;
- Future use and landscape design of the northern area shown as Free Play Area;
- No level changes to adjacent RE1 area;
- Streetscape design.

11. Building design requirements

- a. National Construction Code (Building Code of Australia) 2019 compliance report

12. Property section requirements

- a. The site is proposed over RE1 and SP2 land where Council is the acquiring authority.
- b. It is likely that the application will seek to co-use the open space land next door, details are to be submitted as part of the application.
- c. The road to the north of The Ponds Boulevard and Schofields Road intersection and surrounding road network does not exist.
- d. There is a shortage of approximately 300ha of open space. The school proposed within the RE1 zone which will further reduce this will impact on high density proposed in Area 20.

13. Section 7.11 contribution matters

- a. The proposed primary School development for Tallawong falls within CP 22.
- b. The development would be charged the full contribution for traffic & drainage that would have been due to the development of the site as R3 – this would follow IPART advice concerning schools.
- c. The concept design has ignored the RE1 and SP2 zones on the northern end of the site. The SP2 (Local Drainage) in particular, appears to accommodate a small basin while the concept plans treat this requirement of no consequence.
- d. Unless, there is confirmation that the drainage land is no longer required, or can be reduced in size to accommodate the school, then the following advice is provided:

The proposed development can only be supported if it will pay the necessary contributions and make provision for the northern area of the site to be transferred to Council in order to accommodate the drainage and open space requirements.

14. Pre-Application Meeting

- a. A Pre-Application meeting (PAM) was held on 24 August 2020 with Council officers and the applicant. All issues arising from the PAM are to be addressed in the EIS.