URBIS

SUBMISSIONS REPORT

SSD-8571481 - INSTITUTE OF APPLIED TECHNOLOGY FOR CONSTRUCTION

PREPARED FOR

TAFE NSW

11 JUNE 2021

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Peter Strudwick
Consultant	Eliza Scobie
Project Code	P%28091
Report Number	FINAL FOR SUBMISSION

Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.

We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

urbis.com.au

CONTENTS

FIGURES

PICTURES

TABLES

1. INTRODUCTION

This Submissions Report has been prepared by Urbis on behalf of Technical and Further Education (**TAFE**) NSW in respect of the State Significant Development (**SSD**) application (SSD-8571481) for an educational facility at 2-44 O'Connell Street, Kingswood (**the project**).

This report addresses the matters raised by public agencies during the public exhibition of the Environmental Impact Statement (**EIS**) for the TAFE NSW Institute of Applied Technology for Construction (**SSDA-8571481**). The EIS was on public exhibition between 18 March 2021 – 14 April 2021. During this period, nine (9) submissions were received, and an additional one (1) late submission was received following this period. These included submissions from:

- Environment, Ecology and Science (**EES**);
- Endeavour Energy;
- NSW Environment Protection Agency (**NSW EPA**);
- Heritage NSW;
- NSW Royal Fire Service (**NSW RFS**);
- Penrith City Council (**Council**);
- Roads and Maritime Services (**RMS**);
- Sydney Water;
- Transport for NSW (**TfNSW**); and
- Western Sydney University (**WSU**).

During exhibition, no public submissions were received.

This Submissions Report has been prepared with reference to clause 85A of Division 6 of *the Environmental Planning and Assessment Regulations 2000* (**EP&A Regulations**) which states as follows:

> *(1) The Planning Secretary is to provide to an applicant for State significant development the submissions, or a summary of the submissions, received in relation to the application during the submission period.*
>
> *(2) The Planning Secretary may, by notice in writing, require the applicant to provide a written response to such issues raised in those submissions as the Planning Secretary considers necessary.*

During the preparation of this Submissions Report, guidance has been taken from the '*Preparing a Submissions Report'* Draft Guideline prepared by the NSW Department of Planning, Industry and Environment (**DPIE**) and exhibited in 2020. Accordingly, this Submissions Report provides:

- **Section 2** - An analysis of submission received.
- **Section 3** - Identification of the actions taken since the public exhibition period, including any amendments made to the project.
- **Section 4 -** A comprehensive response to the issues raised in the submissions.
- **Section 5** – An updated project evaluation and conclusion.

The proposed amendments and justification for the proposal is outlined in the specialist documentation provided as follows:

- Submissions Register prepared by Urbis (**Appendix A)**
- Updated Mitigation Measures prepared by Urbis (**Appendix B)**
- Amended Architectural Plans prepared by Grey Puksand (**Appendix C)**
- Amended Landscaping Plans prepared by 360 (**Appendix D)**

- Amended Civil Engineering Report prepared by Northrop **(Appendix E**)
- Architectural Design Statement prepared by Grey Puksand (**Appendix F**)
- Landscape Design Report prepared by 360 (**Appendix G**)
- Transport and Accessibility Impact Assessment prepared by Traffix (**Appendix H**)
- Green Travel Plan prepared by Traffix (**Appendix I)**
- Preliminary Construction Traffic and Pedestrian Management Plan prepared by Traffix (**Appendix J)**
- Aboriginal Cultural Heritage Assessment prepared by Urbis (**Appendix K)**
- Engagement Outcomes Report prepared by Elton Consulting (**Appendix L)**
- BDAR Waiver issued by EES and DPIE (**Appendix M**)

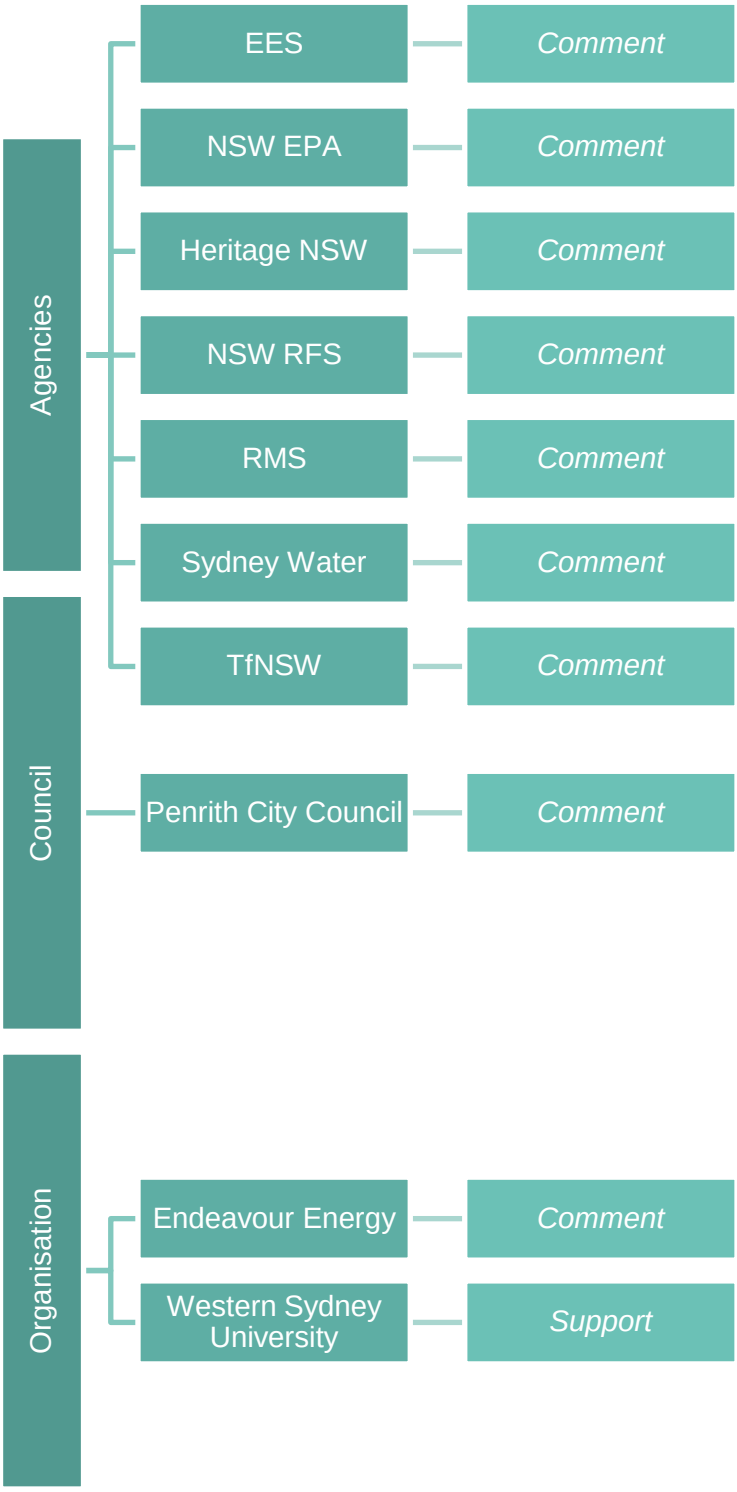
The specialist consultants have assessed the design and recommended mitigation measures to ensure the proposal will have no unreasonable or significant traffic, transport, archaeological and environmental impacts on adjoining or surrounding properties or the public domain. This documentation confirms that there are no significant adverse impacts associated with the project.

Accordingly, the content contained in this Submissions Report and the original EIS demonstrates that the proposal balances environmental impact with community benefit and should be approved subject to appropriate conditions.

2. ANALYSIS OF SUBMISSIONS

The EIS was placed on public exhibition between 18 March 2021 – 14 April 2021. During this period, government agencies, Council, key infrastructure stakeholders and the community were invited to make written submissions on the project to NSW DPIE. As outlined in the summary below, a total of ten submission were received from agencies, Council and organisations during the public exhibition of the proposal. Of these, nine neither supported nor objected the proposal, and one supported the proposal.

There were no objections to the proposal, and no submissions from members of the public.



The following items were identified as requiring a detailed response from the proponent:

- Design evolution.
- Traffic, parking and vehicular access.
- Sustainable transport measures, including the submitted Green Travel Plan.
- Construction traffic management.
- Aboriginal cultural heritage.

These submissions related to the project, and the economic, environmental and social impacts of the project. For each submission that has been received, **Section 4** provides a description of the matters raised in the submission, a summary of the response, and a reference to where these issues have been addressed in the detailed documentation as required. The identified issues have been discussed further in **Section 5,** which provides additional justification where warranted.

3. ACTIONS TAKEN SINCE EXHIBITION

An overview of the actions taken since the public exhibition of the project is outlined in **Table 1.**

Table 1 Summary of actions taken since exhibition

Action	Description
Project refinements	Since lodgement and public exhibition of the SSDA, the proponent has further developed the design of the proposed development and made some minor amendments to the landscaping, built form and access of the facility. These primarily arise in response to the comments received from the SDRP to close out all unresolved items from the design review process. Some additional updates have also been made as a result of ongoing design development and refinement of the scheme. In summary, the changes relate primarily to improving the access (pedestrian and cycle), internal connectivity and proposed landscaping of the scheme and include: ▪ Minor increase to the lower ground floor slab by 500mm. The lower ground floor height will be RL52200 rather than the previous lodged submission of RL51700. ▪ Incorporation of a cycle path in response to submissions received providing access from the Great Western Highway to the new building, with some bicycle parking relocated to the northern aspect ▪ Relocation of stairway 1 access from the western elevation to provide direct access to the northern elevation to improve clarity of pedestrian access. ▪ Rationalisation of the internal planning through the development of the design and functional relationships across the lower ground and ground floor workshop and learning spaces ▪ Identification of waste collection room on the plans in accordance with Waste Management guidelines. ▪ Amalgamation and reconfiguration of internal learning spaces and storage areas to improve functionality in accordance with TAFE NSW spatial learning requirements. ▪ Incorporation of a bifold door adjacent the eastern ground floor entry to strengthen the outdoor – indoor relationship when weather permits and activate the interface with the Western Sydney University shared boundary. ▪ Refinement of the roof top solar strategy to algin with green star targets and demonstration of positioning of PV cell systems on the roof. ▪ Refinement of the roof light strategy to improve daylight penetration. ▪ Refinement of the roof design to ensure suitability roof pitch and constructability. ▪ Refinement of the glazing strategy to the façade to reinforce the internal connection to landscape and capture views to the landscape beyond the campus. ▪ Provision of an additional building identification pylon signage on the northern elevation of the building. This provides a total of **14 x signage zones** on the site. Due to internal design refinements, the amended scheme has a reduced GFA of 7,836sqm compared to the GFA of the exhibited scheme of 7,857sqm. The amendments are illustrated in the amended Architectural Drawings **(Appendix C**) and Architectural Design Statement (**Appendix F**) prepared by Gray Puksand. An updated photomontage of the proposed development is provided in **Figure 1.**

Action	Description
	Figure 1 Revised photomontage  Picture 1 View from the north-eastern corner of the site *Source: Grey Puksand*  Picture 2 View from the south-western corner of the site *Source: Grey Puksand*
Further engagement	**Community Consultation** In addition to the statutory public exhibition period, Elton Consulting were engaged by TAFE NSW to conduct targeted engagement with the community on the proposed development. An overview of the engagement activities and outcomes is provided in the Outcomes Report at **Appendix L.** In summary, the following methods of consultation were undertaken to provide further information to the community on the project:

Action	Description
	▪ Project webpage, including a project contact. ▪ Project information fact sheets. ▪ Project postcard. ▪ Letterbox drop to approximately 100 neighbouring residents and businesses on 23 March. ▪ Direct contact with adjacent landholders including Legacy Property (landholder of Caddens Hill redevelopment to the south of the site), NSW State Archives (landholder to the east of the site), and WSU (landholder to the direct east and south of the site). ▪ Email contact issued to all WSU staff and students on 30 March. ▪ Pop up information session on 30 March. The feedback received was largely positive, with members of the public indicating support for the proposed design and the provision of learning courses specific to the construction trade. A number of recommendations were raised in regard to operational practices, such as library services and provision of a student services desk. These recommendations will be considered in detailed design and operational stage and incorporated where possible to improve the student experience in the facility. It is noted that engagement with Legacy Property continues, who expressed a desire to keep their property owners informed as the project progresses. In addition, the project webpage and the Campus online group will continue to be operational throughout construction of the project to ensure property managers remain informed.
	SDRP The proponent team met with the SDRP on 14 April 2021 for the third session to discuss the proposed development. The DRP provided the below feedback following the presentation: *The thorough presentation of the project as it has developed over multiple SDRP sessions is appreciated. The design team's willingness to engage in the process has meant the majority of issues raised via previous sessions have been successfully addressed and good design outcomes have resulted.* Accordingly, the Panel did not consider there a need to review the proposal again prior to DPIE assessment and determination. Minutes of this meeting and subsequent resolution of these items are outlined in the Architectural Design Statement (**Appendix F**) and in **Section 4**.
	Western Sydney University The proponent has continued to consult with the adjacent landholder WSU due to both the physical proximity of the site and the functional synergies between the institutions. Workshops with WSU were conducted on 12 April and 3 May. Key matters of discussion included an update on the project progress, Green Travel Plan, vehicular traffic (during both construction and operation of the facility), and the integration of the site with a future precinct master plan. In accordance with the submission submitted by WSU during the public exhibition period, WSU continued to express support for the proposal during these workshops.

Action	Description
	Internal TAFE NSW Workshops The design development as outlined in **Table 1** has been informed by advice received from educational consultants and TAFE NSW workshops including teaching staff from the construction sector and industry relationship managers. These workshops occurred on 31 March, 19 April and 20 April and ensure the final design reflects the functional and andragogical requirements of future students.
	Registered Aboriginal Parties In accordance with Part 6 of the *NSW National Parks and Wildlife Act 1974* and the Consultation Requirements prepared by Department of Premier and Cabinet (2010), Stage 4 of the four-stage consultation process has occurred subsequent to the lodgement of the SSD. As discussed in the updated Aboriginal Cultural Heritage Assessment Report (**ACHAR**) prepared by Urbis and provided at **Appendix K,** stage 4 consultation occurred from 4 May 2021 – 1 June 2021. This formally concludes the RAP engagement process for the project.
Further assessment	**Archaeological investigations** Subsequent to the lodgement of the SSD on 12 March 2021, additional test excavation was undertaken from 25th March 2021 - 30th March 2021. This test excavation was deemed necessary due to the environmental context and minimal disturbance across the subject area identified within the field survey undertaken on 23 February 2021. The test excavation program was restricted to the area of proposed development, which comprised largely undeveloped grassy hillslopes, formerly agricultural land, where disturbance was estimated to be minimal. The excavation was undertaken in line with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010). In total, 56 test pits were excavated from 11 transects providing a sample of the site. **The test excavation identified no Aboriginal archaeological deposits**. While the subject area may have been utilised by Aboriginal people throughout history, the results of the test excavation suggest if this was the case, it was likely in a transitionary manner, where tool manufacturer which may leave archaeological evidence was not undertaken or was undertaken rarely with low density of archaeological material removed through disturbance. As no deposits were identified, it is anticipated that the proposed works **will not result in harm to any Aboriginal archaeological materials, either indirect or direct**. As no harm is proposed, no mitigation measures are deemed necessary, beyond a chance finds procedure. Refer to further discussion of the investigations within the Archaeological Technical Report prepared by Urbis and appended to the ACHAR, provided at **Appendix K.**
	Traffic Traffix have undertaken updated intersection modelling using SIDRA 9 software and have conducted additional parking surveys on site in response to commentary received from the DPIE and TfNSW. Refer to the Traffic Impact Assessment at **Appendix G** and **Table 2** for further discussion of these results.

4. RESPONSE TO SUBMISSIONS

The following **Table 2** provides a summary of all submissions received and provides a respective response.

Table 2 Response to submissions table

Issue	Referral comment	Response to submission	Reference to information
Department of Planning, Industry and Environment			
1. Traffic, Parking and Transport	Concerns are raised regarding the traffic including the appropriateness of the traffic model used to inform the Traffic Impact Assessment and of the proposal's impact on the performance of the Great Western Highway (GWH) / O'Connell Street intersection. The Department requires you to address these concerns, including but not limited to the provision of:	This Submissions Report is supported by an updated Transport and Accessibility Impact Statement (**Appendix H**) which contains a detailed response to each of these matters.	Transport and Accessibility Impact Statement **(Appendix H)** Preliminary CTPMP (**Appendix J)**.
	- an updated traffic model to reflect a consistent cycle time of 120s at the GWH / O'Connell and French Street intersection.	SIDRA Intersection 9 modelling has been updated to incorporate a cycle time of 120 seconds – 140 seconds for all signalised intersections as per TfNSW requirements.	
	- detailed mitigation measures should queuing exceed the length of the right turn bay GWH / O'Connell Street, and any mitigation measures required to improve LOS to an acceptable level.	The updated SIDRA Intersection 9 modelling indicates the queue length of the right turn bay at the Great Western Highway / French Street / O'Connell Street intersection exceeds the length of the bay by 10m during the 95th percentile. However, as discussed in response to Item 13 raised by TfNSW in this table, Traffix do not consider mitigation measures necessary as the exceedance of the right-hand turn bay length will only occur in a worst-case, conservative scenario in the 95th percentile and as such is unlikely to be occurring frequently. Further, the level of service of this intersection is 'D' (defined as 'operating near capacity'), and as such does not require mitigation.	

Issue	Referral comment	Response to submission	Reference to information
	- modelling of the GWH / Western Sydney University intersection, demonstrating the results of the intersection performance during each stage of construction work.	Modelling of the GWH / Western Sydney University intersection is provided in the Preliminary Construction Traffic and Pedestrian Management Plan (**CTPMP**) (**Appendix J)**. The analysis demonstrates performance of this intersection during the construction period will not reduce the level of service or cause an increase to the level of delay.	
	- additional evidence to demonstrate that the swept paths of construction vehicles can be achieved without crossing the centreline of O'Connell Street and other internal roads.	Construction vehicles will not utilise the Gate 2 access on O'Connell Street. Rather, access for construction vehicles is provided through the adjacent WSU site, via a signalised turn off on Great Western Highway. Notwithstanding this, updated swept path analysis has been appended to the Transport and Accessibility Impact Statement (**Appendix H**). This analysis demonstrates the largest vehicle requiring access to the site does not cross the centreline of O'Connell St.	
2. Car parking	The Department also notes Council's concerns that the proposal does not provide sufficient on-site car parking when existing parking rates are applied to the proposal, compounded by TfNSW's comments regarding a lack of adequate information provided within the Green Travel Plan (GTP). Please provide the following:	This Submissions Report is supported by an updated Transport and Accessibility Impact Statement **(Appendix H**) Green Travel Plan (**Appendix I**) to illustrate the suitability of the on-site parking provision.	Green Travel Plan (**Appendix I**), amended Architectural Plans **(Appendix C**) and amended Landscaping Plans **(Appendix D).** Transport and Accessibility
	- further justification and details regarding the target driver modal split of 70 per cent for the 2030 scenario.	The updated Transport and Accessibility Impact Statement **(Appendix H)** provides further justification of the target driver modal split of 70% for the 2030 scenario. As discussed in response to Item 7 raised by Penrith City Council in this table, Traffix have conducted additional parking surveys during the student semester to determine the existing demand	

Issue	Referral comment	Response to submission	Reference to information
		profile, and application of this profile to the future 2030 scenario.	Impact Statement **(Appendix H)**
	- a revised GTP to provide clear actions with timeframes for how each initiative would be implemented to achieve mode shift targets.	A revised Green Travel Plan has been prepared by Traffix and is provided at **Appendix I** in response to issues received in the agency submissions.	
	- consideration of additional actions to ensure the mode shift targets are achieved.	The Green Travel Plan provides further detail and discussion on the current on-site facilities such as pedestrian and cycling infrastructure which will support a shift of travel mode, in addition to the previously proposed internal upgrades to the pedestrian and bicycle footpath network. A new shared path is also proposed providing access to the facility from Great Western Highway, to further ensure the mode shift targets are achieved. Detail of the proposed pathway is provided in the amended Architectural Plans **(Appendix C**) and amended Landscaping Plans **(Appendix D).**	
	- additional information regarding the capacity/usage of the existing north/central campus carpark (west of the pond), and proposed methods of improving connections between the carpark and the proposed building site, if any. Note: this carpark appeared to be somewhat under-utilised during a Department officer visit to the site.	Additional parking surveys were conducted by Traffix each weekday between Monday 19th April 2021 – Friday 23rd April 2021. These surveys (in addition to the November surveys previously completed), were conducted for the whole of site and as such included surveying the identified car park located to the north-east of Building A. As identified in the Transport and Accessibility Impact Statement (**Appendix H**) the maximum parking demand was for 65% of the total parking spaces on the site. This car park is available for student use. Where future students need to use this identified car park, suitable connectivity to the	

Issue	Referral comment	Response to submission	Reference to information
		IATC facility is already accommodated through the existing internal footpath.	
3. Aboriginal Cultural Heritage	The Department notes that the Interim Aboriginal Cultural Heritage Assessment Report provided does not adequately address the project SEARs. A finalised ACHAR which addresses the SEARs must accompany the Response to Submissions.	A revised ACHAR is provided at **Appendix K.**	ACHAR Report **(Appendix K)**
4. Design evolution	The Department requests that you address any outstanding issues raised by GANSW during the SDRP process and identify where the design of the development has been amended in response to these issues, if applicable.	In response to the SDRP Session 3, the following amendments have been made: - Rearrangement of internal spaces with direct relationship to functional requirement, functional relationships and collegiate interactions. - Resolution of the northern aspect to integrate external stairways, building structure and landscape design. - Provision of a variety of evergreen large canopy trees along the western and northern landscapes, and a mix of evergreen and deciduous trees along the eastern and southern landscapes. Endemic Cumberland Plain species, and NSW Natives consist of 80% of the planting selections. Additional information in response to the commentary provided by the Panel is provided in the Architectural Design Statement at **Appendix F.**	Architectural Design Statement (**Appendix F**)
Penrith City Council			
5. Development Engineering Considerations	The following engineering considerations have been raised for address in the progression of the assessment: - A driveway access/hardstand area for maintenance vehicles to access and clean of out the GPT is required.	Based on discussion with the product supplier (Ocean Protect) the gross pollutant trap does not require a formal vehicular access for the purposes of maintenance. The system proposed can be accessed by the supplier utilising a standard ute with trailer	N/A

Issue	Referral comment	Response to submission	Reference to information
		mounted equipment to service and maintain the device - which can traverse the existing landscaped / grassed areas. No further amendment to the design to include a hardstand area is required.	
	- The submitted Floodplain Management Report (Clause 5.2) details that the AEP 1% flood level is RL 47.65m AHD. The submitted Civil Engineering Report (Clause 2.6) states it is Rl47.00m AHD. Council Records indicate that the 1% AEP level of RL 47.65m AHD is the correct level at this current time. The proposed floor level of RL51.70m AHD complies with Council's freeboard requirements.	Noted.	
	- Although the site is outside the OSD mandatory area, Council requires developments to have the same pre-development vs post-development flow rates at the outlet before the Great Western Highway. This would need to be demonstrated for the 5, 10 and 100 year storm events. The current proposal of the single building and associated hardstand areas however may not increase the flow rates due to the overall size. Based on the future concept plans for the site, this will need to be addressed in the future, and some form of controlling discharge will be required. The applicant should be made aware of this aspect.	Noted.	
6. Biodiversity Considerations	No concerns or objections are raised with the proposal on biodiversity grounds however the following matters should be addressed as conditions of consent if the application is favourably determined.	Noted. In response to the conditions of consent recommended by Council, the proponent does not consider the preparation of a Vegetation Management Plan as identified in the following condition necessary for the proposal: *A VMP should be prepared in consideration of the National Recovery Plan for the Grey-headed Flying-fox to contribute to foraging opportunities. In addition,*	BDAR Waiver Request submitted with the EIS and BDAR Waiver issued by EES

Issue	Referral comment	Response to submission	Reference to information
		the VMP should address weed management requirements. The BDAR Waiver Request prepared by Ecological and submitted with the original EIS package conducted an assessment of the habitat suitability of the site in accordance with the requirements of the *Biodiversity Conservation Act*. The BDAR Waiver Request stated: *The removal of 0.18 ha planted natives and exotics, which may provide marginal seasonal foraging habitat for the Grey-headed Flying-fox,* ***will not result in a significant impact to the species****. The footprint lacks geological features, hollow bearing trees, derelict human-made structures or non-native vegetation with the potential to provide nesting or roosting habitat for any threatened fauna species. Therefore, the proposed development will not compromise habitat suitability for threatened species* As the BDAR Waiver Request Report was reviewed and accepted without comment by EES through the issue of the BDAR Waiver on 19 January 2021, mitigation measures for this species is not required for the site. The condition is therefore not relevant to the project or the site.	
7. Traffic Management and Parking	The proposal has been considered having regard to traffic management and car parking considerations and the following aspects are identified for further address: - The proposal currently does not provide sufficient on-site parking to cater for the proposed development when existing car parking demand rates are applied to the proposal.	Traffix have undertaken additional analysis and investigations of the current parking demand on site to determine the suitability of the proposed parking provision of 16 spaces. This will increase the current parking supply from 907 spaces to a total of 923 spaces within the site.	Transport and Accessibility Impact Statement **(Appendix H)** Green Travel

Issue	Referral comment	Response to submission	Reference to information
	The submitted traffic report states that 84% of students and staff currently drive to the TAFE campus however in suggesting a reduced parking rate, the report assumes that the percentage of students and staff driving to the site will reduce down to 70% by 2030. There does not appear to be a strong basis for this assumption, noting specifically that there is no station proposed to be constructed at this campus or WSU as part of the Metro works. Further clarification and justification is sought from the applicant on the reasoning and rationale for the suggested parking reduction as there does not appear to be sufficient basis for the parking supply proposed. This justification should be based on projected modelling post Metro construction and any other information or modelling associated with similar facilities that has informed the proposed reduced parking rate as now proposed.	In addition to the 2020 on-site parking survey, Traffix conducted additional on-site parking surveys each weekday from Monday 19th April – Friday 23rd April, which is within a typical TAFE NSW semester. The highest-parking demand (and worse-case scenario) occurred at 11am, with 586 parking spaces (65% of spaces) occupied. This demonstrates an existing demand profile of 1 space per 1.8 daily persons. During the 2030 development scenario, application of the demand profile would result in demand for an additional 267 spaces. Traffix conclude as this can be accommodated within the existing parking surplus of 321 spaces. It is further noted that there will be likely be a reduction in use of private vehicle use following application of the Green Travel Plan (**Appendix I**), and connection of St Mary's train station to the Aerotropolis and through to the Sydney Metro Greater West project. These factors will result in a significant reduction in the demand for parking spaces, which Traffix assume will result in a significant shift of current modal splits. The proposed parking provision is therefore suitable for the site and future parking demands resulting from the new facility.	Plan (**Appendix I**)
	- The traffic report outlines that key intersections surrounding the development will be reduced to a level of service D which indicates that mitigation measures should be investigated for implementation as part of the development.	The results of the SIDRA Intersection 9 modelling indicates that the intersection of Great Western Highway / French Street / O'Connell Street and the intersection of Caddens Road / Gipps Street / Kent Road will have a predicted level of service D in the morning peak during the 2030 + development	

Issue	Referral comment	Response to submission	Reference to information
		scenario. It is noted that level of service D is defined as “operating near capacity”, and that this represents a worst-case scenario. Traffix confirm this is manageable and no external road upgrades are considered necessary at either of these key intersections. Refer to further discussion in the Transport and Accessibility Impact Statement **(Appendix H).**	
	- The provided swept paths in the traffic report appear to show the service vehicle taking up the majority of the width of the circulation roadways and driveway. This is not appropriate, is unsafe and the driveway and circulation roadways should be widened to accommodate passing of the service vehicle and a passenger vehicle.	Traffix confirm all internal roads and car park areas are consistent with AS2890.1 (2004) and AS2890.2 (2018). In addition, a Loading Dock Management Plan will be prepared prior to OC to safely manage use of the driveway, loading dock and car park.	
8. Waste Management	All developments are required to provide a waste collection room integrated wholly within the built form to permit a safe and efficient waste collection service. The room will need to incorporate infrastructure into its design in accordance with section 3.4 of the ‘Industrial, commercial and mixed-use waste management guideline’ document. At present this has not been included in the development. The plans should be revised to provide for this integrated infrastructure and address the Council’s Penrith DCP 2014 – Waste Guideline.	A nominated waste collection room has been provided on the southern elevation of the building, adjacent to the vehicular loading bay. The waste collection room has an approximate area of 16sqm, which satisfies the spatial requirements of 13.6sqm as identified in the Waste Management Plan prepared by Waste Audit and submitted within the SSDA package. This is consistent with Section 5.3.4 of the Penrith DCP 2014 as follows: - Waste collection can occur in the adjacent loading area. As identified in the swept paths provided in the Transport and Accessibility Impact Assessment **(Appendix H)**, vehicles can enter and exit the loading area via forward direction with only one reverse entry manoeuvrer required.	Amended Architectural Plans (**Appendix C)**

Issue	Referral comment	Response to submission	Reference to information
		- The waste storage area will be concealed by the adjacent sliding gate and services area. - Access to adequate hot and cold-water supply is available for washing purposes. - Signposting will be incorporated during detailed design.	
Environment, Ecology and Science (EES)			
9. Biodiversity	A Biodiversity Development Assessment Report (BDAR) Waiver request was approved on 19 January 2021.	The BDAR waiver issued by EES on 19 January 2021 has been provided at **Appendix M** for completeness.	BDAR Waiver (**Appendix M**)
10. Flooding	EES has referred to College, Orth and Werrington Creek Flood Risk Management Study Plan which is currently being undertaken by Penrith City Council and reviewed the Floodplain Management Report prepared by NORTHROP dated February 2021. The site is inundated by a shallow depth up to 0.1m for events up to the 0.5% AEP. This is considered a minor drainage issue. In rarer events in addition to the shallow inundation, two overland flow paths are formed with flow depth not exceeding 0.3m in the PMF event. EES considers the report is reasonable, and no further comments are required.	No further comment.	N/A
Heritage NSW			
11. Aboriginal Cultural Heritage	A complete and finalized ACHAR must be provided in accordance with the project SEARS. The ACHAR must contain: - The results of the archaeological test excavations. The results of the test excavation should be presented in an Archaeological Technical Report appended to the final ACHAR.	A final ACHAR Report is provided at **Appendix K.** The ACHAR contains: - The results of the archaeological test excavation, in addition to an appended Archaeological Technical Report. The report summarises the results of test excavation of 56 test pits, which were excavated from 11 transects across the site area, and concludes as follows:	ACHAR Report (**Appendix K),** Mitigation Measures (**Appendix B**)

Issue	Referral comment	Response to submission	Reference to information
	- The results of the consultation with the Registered Aboriginal Parties. Any comments received from Registered Aboriginal Parties must be incorporated into the final version of the report. - Appropriate management and mitigation measures that reflect the significance of any Aboriginal cultural heritage values identified within the project area must be developed and included in the ACHAR and the EIS.	*No deposits were identified, it is anticipated that the proposed works will not result in harm to any Aboriginal archaeological materials, either indirect or direct.* - The results of the fourth and final RAP consultation process. In summary, 18 Aboriginal organisations registered for the project and 6 responses were received to the Stage 2 and 3 period. These responses generally identified support for the recommendations and methodology. Whilst one stakeholder expressed concern of the impact on Aboriginal objects, it is noted that as no artefacts have been identified, display is not possible. However, it is noted the submitted EIS proposed the incorporation of Aboriginal art in the site landscaping, with an option to provide a cultural walk along the internal pathway leading to the building. This will be further developed during detailed design. - The recommendations of the Archaeological Technical Report and ACHAR are provided in the updated Mitigation measures table at **Appendix B**.	
WSU			
Letter of support.	Refer to WSU submission.	No further comment.	N/A

Issue	Referral comment	Response to submission	Reference to information
TfNSW			
12. Green Travel Plan	The applicant should be able to determine any required mode shift target changes to achieve the 5-Star rating by referring to the Design & As Built V1.3 released by Green Building Council Australia. If the applicant does not consider this possible, a specific revision date should be provided rather than saying "at a later stage". This revision should be undertaken in consultation with TfNSW.	As identified in the updated Green Travel Plan (**Appendix I**), the proposal achieves a 5-Star Green Star rating under the Design & As Built V1.3.	Green Travel Plan (**Appendix I**)
	a. Sustainable Transport Options – The GTP has not identified existing cycling infrastructure connecting to the site which staff and students currently use in their journey to the site. Promoting these routes will be important in achieving the proposed 2% mode share shift to cycling. b. Existing Travel Modes – The GTP has not stated how many responses were received to the interview questionnaire survey that was used to establish the existing travel mode splits. A high response rate would provide an accurate base case scenario. c. Strategies and Transport Initiatives – The GTP has not provided clear actions with timeframes for how each initiative would be implemented to achieve mode shift targets. d. Green Travel Plan Maintenance – Travel mode targets should not be revised in favour for private car use. Targets should only be revised in favour for the other travel modes including public transport, walking, cycling. Additional actions should be considered by the applicant to ensure mode shift targets are achieved. The applicant should provide Transport for NSW with the name and contact details of the Travel Plan Coordinator once appointed.	The Green Travel Plan has been revised to incorporate the following amendments in response to TfNSW comments: a. Identification of existing cycling infrastructure within 800m of the site. This includes off-road shared paths along the Great Western Highway and O'Connell Street (east-west), cycle paths along O'Connell Street (north-south); and the WSU internal bicycle friendly road network. In addition, the development proposes an internal pedestrian and bicycle footpath network providing access from the Great Western Highway to the site. b. The interview questionnaire survey received 291 results from staff and students. c. The following actions are identified in the updated Green Travel Plan: • Preparation of a Transport Access Guide. A preliminary Transport Access Guide is appended to the Green Travel Plan. The TAG will be implemented upon	

Issue	Referral comment	Response to submission	Reference to information
	e. Summary of the GTP – The GTP states the long-term targets should be achieved by 2030. It is unclear when the applicant considers the short-term targets should be achieved. If dependant on each stage of construction, indicative milestones could be provided as to ensure mode shift targets are on track to being achieved. Recommendation TfNSW requests the abovementioned information be addressed and the GTP be updated to reflect the outcomes.	commencement of construction works on site and continue during operation. • Use of bicycle networks and facilities through the provision of additional infrastructure on the site. This will occur once the facility is operational. • Shared shuttle bus with WSU providing access from Werrington station. This will occur within the first 2 years of operation. • Encourage use of car-pooling through provision of notice boards in the campus. This will occur once the facility is operational. • Accommodation of two electric vehicular charging bays. This will occur once the facility is operational. d. The Green Travel Plan will be monitored and reviewed throughout the operation of the facility. This will occur every 2 years, managed by the nominated Travel Plan Coordinator. The details are as follows: *Cameron Lang* *Investment Project Director, TAFE NSW* *NSW Institute of Applied Technology for Construction* *TAFE Infrastructure NSW* *M +61 408 406 919* *E cameron.lang2@tafensw.edu.au*	

Issue	Referral comment	Response to submission	Reference to information
		e. Traffix has confirmed within the updated Green Travel Plan the ability of the short-term targets to be achieved. Whilst this is not dependent on particular stages of construction, the Green Travel Plan will be updated to reflected improvements in public infrastructure and transport services.	
13. Transport Assessment	a. It is noted that the cycle times at Great Western Highway (GWH)/O'Connell & French streets are all over the place, they vary from 120s in the existing to 90s in 2026 to 100s in 2026+development. For major arterial roads like GWH, 120s to 140s cycle time is recommended. The modelling should be updated to reflect a consistent cycletime of 120s.	For all signalised intersections, revised traffic modelling to a cycle time of 120 seconds – 140 seconds has been undertaken using SIDRA Intersection 9 modelling. The results of this are provided in the Transport and Accessibility Impact Statement (**Appendix H).**	Transport and Accessibility Impact Statement **(Appendix H),** Amended Architectural Plans (**Appendix C**), Amended Landscape Plans **(Appendix D**), Preliminary CTPMP (**Appendix J)**
	b. The existing right turn bay on the western approach is currently at around 80% capacity, once the model is updated to reflect the correct cycletimes it is likely that the queue length will exceed the length of the bay. Should the queuing exceed the length of the bay, mitigation measures should be investigated and may be required for this movement.	The updated SIDRA Intersection 9 modelling indicates the queue length of the right turn bay at the Great Western Highway / French Street / O'Connell Street intersection exceeds the length of the bay by 10m during the 95th percentile. Notwithstanding this, Traffix consider it is unlikely the queuing length will exceed the length of the bay during operation and that no upgrades of the right hand turn bay is required. The following is obtained from the Transport and Accessibility Impact Statement **(Appendix G):** a. *The model has assumed the current travel modes for the trip distributions including the 84% of students/staff driving to TAFE. However, the Green Travel Plan has established a car driver target of 69.3% by 2030 through the use of a number of strategies to encourage alterative transport modes. Therefore, the model is overestimating the traffic generation of the*	

Issue	Referral comment	Response to submission	Reference to information
		development in 2030 as the reduction in the number of car drivers has not been taken into account. It is emphasised that the model split changes will apply to the entire campus population, current and future, resulting in significant traffic demand suppression. *b. The 95th percentile is the maximum queue length and as such unlikely to be occurring frequently.* *c. The model has assumed a 2% growth rate along the Great Western Highway, however volumes along the Great Western Highway has declined over the past few years since 2017 in accordance with daily traffic count volumes obtained from TfNSW Traffic Volume Viewer Station ID 7123-PR located on the Great Western Highway, and therefore the model is a conservative assessment of the future intersection performance.* *d. The intersection with an average delay of 44.4 seconds during the 2030 + development scenario is only marginally within the LoS D range of 43 to 56 seconds.* The proponent therefore does not consider mitigation of the queue length at the intersection of Great Western Highway / French Street / O'Connell Street necessary. Refer to further discussion in the Transport and Accessibility Impact Statement (**Appendix H**).	
	c. From the information presented in the traffic report the number of trips should be about 30% higher than what was concluded in	Estimated vehicle trips is based on survey data and future staff/student population data provided by TAFE NSW.	

Issue	Referral comment	Response to submission	Reference to information
	section 6.5, the applicant is to clarify how they arrived at the numbers they present in section 6.5.		
	d. Table 6 - The intersection performance of GWH/O'Connell St intersection is worsens to LOS D in the 2030 + Dev scenario (PM Peak). Applicant to propose mitigation measures may be required to improve LOS to an acceptable level. TfNSW advises to have all movements at each approach to have LOS C or better if possible.	A response to this matter is provided in response to Item 7 and discussed in the Transport and Accessibility Impact Statement at **Appendix H.** In summary, Traffix confirm the estimated level of service of this intersection is manageable and no external road upgrades are considered necessary.	
	e. It is unclear if the swept paths can be achieved without crossing the centreline of O'Connell St and other internal roads involved. To determine if the swept paths of the largest vehicle are able to be achieved without crossing the centreline the swept path analysis shall include details of lane lines, kerb, gutter and median/centreline.	Updated swept path analysis provided in the Transport and Accessibility Impact Statement **(Appendix H)** indicates that the largest vehicle accessing the site (a 12.5m long heavy rigid vehicle) does not cross the centre line of O'Connell Street. To ensure vehicular access complies with AS 2890.1 and AS 2890.2, minor works to remove the existing median in site and to widen the internal roadway adjacent to Gate 2 are proposed.	
	f. The reports claim to encourage active transport, however there has been no attempt to entice active transport to the site apart from providing additional bicycling parking at the proposed development. Great Western Highway has a shared path this however reduces to a 900mm path along O'Connell with no bicycle facilities at the entrance. A shaded path along O'Connell should be provided to encourage active transport to the site, the verge back of kerb to property line is 3.5m. In addition it is noted that the footpaths provided on site are inadequate to be used as shared paths.	In response to TfNSW submission, a shared pathway is proposed providing connectivity from Great Western Highway to the site. The pathway width is between 2.5m – 3m to comply with the TfNSW guidelines for shared pathways, and to ensure suitable access is provided for users.	
	g. Connection from the site to the shared path on GWH should be considered along the eastern boundary to the site.	As above, the design has incorporated a cycle path providing access from Great Western Highway.	

Issue	Referral comment	Response to submission	Reference to information
		Bicycle racks are also proposed adjacent to this path, to improve convenience and access for users.	
	h. The intersection of GWH/Western Sydney University has not been assessed. Should there be access between the TAFE and University, students can rat run to access the parking closer to the development. In this regard the intersection of GWH/Western Sydney University should be considered in the model. Recommendation TfNSW requests the abovementioned information be addressed and the TIA be updated to reflect the outcomes.	Traffix have undertaken modelling of the Great Western Highway/ WSU intersection. The results of this are provided in the Preliminary CTPMP, and illustrate that despite an increase in the average delay of 0.3 seconds in the morning peak and 0.2 seconds in the evening peak, the level of service will remain at Level A. This will have a negligible impact on the operation of the road network.	
14. Construction Traffic Management Plan (CTMP)	a. Section 5.1.2: The truck routes will be using the GWH/Western Sydney University intersection. Modelling of this intersection is required to show the results of the intersection performance on each stage of work.	Discussion on this item is provided in response to Item 13 above.	Preliminary CTPMP (**Appendix J)**
	b. Appendix C Loading Zone Swept Paths: Traffic Controller is recommended to ensure there is no conflict between construction trucks and vehicles / pedestrians using the carpark. Recommendation TfNSW requests the abovementioned information be addressed and the CTMP be updated to reflect the outcomes	As identified in the preliminary CTPMP, an RMS-certified traffic controller will be on-site during work hours to ensure there is no vehicular / pedestrian conflict.	
15. Property	Transport for NSW has previously acquired a strip of land for road along the Great Western Highway frontage of the subject site, as shown by blue colour on the attached Aerial – "X". TfNSW (Roads) has previously vested a strip of land as road along the Great Western Highway frontage of the subject site, as shown by grey colour on the attached Aerial – "X". As at the date of this response TfNSW has no other proposal which currently requires any part of this Site.	No further comment.	N/A

Issue	Referral comment	Response to submission	Reference to information
Sydney Water			
16. Sydney Water Servicing	A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water. The proponent is advised to make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways or landscape designs. Applications must be made through an authorised Water Servicing Coordinator. For help either visit www.sydneywater.com.au > Plumbing, building and developing > Developing > Land development or telephone 13 20 92.	A Section 73 Compliance Certificate will be obtained post-determination of the SSDA in accordance with the conditions of development consent. It is noted that the proponent has submitted a pressure enquiry and an early assessment application to Sydney Water via Water Servicing Coordinator to commence this process.	N/A
17. Building Plan Approval	The approved plans must be submitted to the Sydney Water Tap in™ online service to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.	This process will be completed post-determination in accordance with a relevant condition of development consent. No further comment.	N/A
NSW RFS			
18. Bushfire	The NSW RFS raises no specific concerns with the proposal relating to bush fire protection.	No further comment.	N/A
Endeavour Energy			
19. Network Capacity / Connection	Endeavour Energy has noted the following in the EIS addressing the suitability of the site for the development in regard to whether electricity services are available and adequate for the development. As such, Endeavour Energy's Network Connections Branch are managing the conditions of supply with the proponent and their Accredited Service Provider (ASP). The applicant will need to complete the application for connection of load process and in due course address the list of requirements included in the Supply Offer in order to comply with Endeavour	This process will be completed post-determination in accordance with a relevant condition of development consent. It is noted that the proponent has lodged a connection application and a Proposed Method of Supply to Endeavour Energy via Level 3 ASP designer, and Endeavour Energy have provided design package information. Final detailed design will be issued to Endeavour Energy for approval and	Amended Architectural Plans (**Appendix C)**

Issue	Referral comment	Response to submission	Reference to information
	Energy's standards and with the Terms and Conditions of the Model Standing Offer for a Standard Connection Service. Further advice can be obtained from Endeavour Energy's Network Connections Branch (via Head Office enquiries on business days on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm.	certification - further completing Endeavour Energy list of requirements.	
	Endeavour Energy has also noted that whilst not shown in the Architectural Plans, as shown in the following extract of Landscape Plan 1 - Lower Ground provision has been made for a 'Proposed Substation Location'.	The Architectural Plans have been updated to illustrate the proposed location of the substation.	
NSW EPA			
20. Environmental protection	Based on the information provided, the proposal does not appear to require an environment protection licence under the Protection of the Environment Operations Act 1997 (the POEO Act).	No further comment.	N/A
	The receipt and use of additional fill material must be Virgin Excavated Natural Materials (VENM), Excavated Natural Material or approval approved under a specific Resource Recovery Order/Exemption (issued by the EPA). The definition of these materials must be consistent with the POEO Act.	No further comment.	

5. UPDATED EVALUATION AND CONCLUSION

This Submissions Report has been prepared to address the matters raised by government agencies during public exhibition of the proposed NSW Institute of Applied Technology for Construction (SSDA-8571481).

In summary, no significant material changes are proposed to facilitate the approval and construction of the TAFE NSW Institute of Applied Technology for Construction than previously outlined in the SSDA package. Following lodgement of the SSDA and receipt of the DPIE's identification of key issues and submissions on the proposed development, the proponent has:

- Provided updated technical information and additional justification where requested to address questions and community concerns.
- Proposed minor design refinements to the architecture and landscaping of the proposal, including an amendment to the ground floor slab level and provision of a new shared pathway providing access from Great Western Highway to the facility to encourage sustainable modes of transport, and subsequently documented these within the amended package.
- Presented to the SDRP for the third session to confirm the achievement of design excellence and resolution of key matters identified in the previous two sessions.
- Continued to engage with adjacent landholders including WSU, Legacy Property and NSW State Archives to address matters raised and ensure the proposal benefits the broader precinct, as well as engaged a specialist consultant to conduct targeted engagement with the community and TAFE NSW staff and student population.
- Attempted to liaise with TfNSW and Penrith City Council relating to traffic and pedestrian matters associated with the proposed development.
- Positively concluded the RAP consultation process, concluding that the proposed works will not result in harm to any Aboriginal archaeological materials, either indirect or direct.

These actions have resulted in the final design outcome presented within the amended Architectural Plans at **Appendix C,** and the amended Landscape Plans provided at **Appendix D.** The amendments primarily relate to improving pedestrian access, internal connectivity, internal design refinements and landscaping and result in a reduction of GFA by 21sqm to provide a final total GFA of 7,836sqm. This additional information does not modify the conclusions of the planning assessment provided in the Environmental Impact Statement submitted with SSDA-8571481.

In summary, the proposal as amended is considered suitable for the site and worthy of support by the Minister for the following reasons:

- The land is zoned SP2 Educational Establishment pursuant to *Penrith Local Environmental Plan 2012*. The proposal is permissible with consent and consistent with the land use objectives of SP2 Educational Establishment zoning. The proposal does not seek to vary any development standards contained in the *Penrith Local Environmental Plan 2012*.
- The design of the proposal has been reviewed by the SDRP and the design has been amended accordingly. As such, it is considered the proposal achieves 'design excellence' in accordance with the SEARs requirements issued by the DPIE for the project. The proposal is high in quality in terms of built form and architectural treatment and responds positively to the existing character and future scale of the area. The introduction of one additional signage zone within the amended Architectural Plans will assist with internal wayfinding and building identification, consistent with the current TAFE NSW theme adopted across the site.
- The minor increase to the height of the lower ground floor slab from RL51700 to RL52200 is negligible. The increase in slab height will have no impact on the overall building height, overland flow paths or connectivity with the adjacent public domain and landscaping. This has been documented within the updated Architectural, Civil and Landscape Plans as appended.
- The proposed landscaping concept will mitigate the potential for urban heat island effect, will re-introduce native Endemic Cumberland Plain species (over half of the proposed planting selection) and NSW Natives into the site, and will provide a shaded canopy for the building, landscaping and outdoor areas.

- The proposal has responded to traffic and transport matters raised by the DPIE, PCC and TfNSW to ensure the proposal will not adversely impact the surrounding road network or local parking supply. In summary:
  - SIDRA intersection 9 modelling has been conducted on affected intersections for the 2020, 2026 and 2030 development scenarios to assess the potential impacts of the proposed development. The results of the modelling indicates that additional vehicle trips during the AM and PM peaks can be readily accommodated in the road network, with all intersections operating at a level of service 'D' or better. Whilst traffic queues at the right hand turn on Great Western Highway into O'Connell Street may exceed the length of the bay in the 95th percentile, the exceedance will only occur in a worst-case, conservative scenario and as such is unlikely to be occurring frequently.

    The submitted specialist traffic documentation also emphasises that the actual rate of traffic generation will be significantly less than estimated due to external factors that will cause a modal shift change and a reduction in traffic flow within the surrounding area. The proponent therefore submits that the future traffic impacts are manageable and no external road upgrades are required at any key intersections.
  - The proposed parking provision of 16 additional spaces is adequate to service parking demand. Based on an online questionnaire conducted in November 2020 and parking surveys conducted in November 2020 and April 2021, the site experiences a maximum of 65% occupation of available parking spaces and an existing parking demand profile of 1 space per 1.18 day. Application of these rates in the 2023 and 2030 development scenario indicates the site can accommodate parking demand, with a surplus of more than 60 spaces in the 2030 development scenario. No additional spaces greater than the proposed 16 spaces will be required and the proposal adequately responds to and accommodates likely car parking demand.
  - A revised Green Travel Plan has been prepared by Traffix. The additional measures outlined in the plan, most notably including the amendment of the design to include construction of a shared pathway from the Great Western Highway directly to the facility, ensures that the proposal will achieve the targeted 5-Star Green Start certification. The Green Travel Plan will be monitored and reviewed throughout the operation of the facility. This will occur every 2 years, managed by the nominated Travel Plan Coordinator.
  - The Construction Trafic and Pedestrian Management Plan has been amended to ensure the safety of pedestrians and motorists in the surrounding road network during construction. Specifically, this includes analysis of the WSU and Great Western Highway Intersection (the results indicating its service level will not change as a result of the construction vehicle use), and the nomination of a traffic controller to ensure safety throughout construction.
- A total of 14 x signage zones are proposed within the SSD application. All signage is simple in design with a key purpose to provide building identification and wayfinding assistance within the site, are compatible with the scale of the site and are consistent with the relevant assessment criteria of SEPP 64.
- The Stage 4 RAP consultation process concluded on 1 June 2021, thereby concluding the formal consultation period for the project. As outlined in the updated Mitigation Measures at **Appendix B**, it is recommended that consultation with the RAPs continues through construction to ensure the registered parties remain informed. In addition, the completion of the archaeological digs has demonstrated that anticipated that the proposal will not result in harm to any Aboriginal archaeological materials, either indirect or direct.
- All utilities and servicing (specifically water and energy supply) can be adequately resolved post-determination in accordance with a condition of development consent.
- Subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unacceptable impacts on adjoining properties, the public domain or end users in terms of traffic, heritage, social and environmental impacts. Identification of the final Mitigation Measures proposed for the project is provided in **Appendix B** for clarity.

As outlined throughout this report, the proposed development as sought within the SSDA is in the public interest, responds to the statutory requirements under the *Environmental Planning and Assessment Act 1979* and has adequately addressed and responded to the issued SEARs for the project and each of the submissions received during the public exhibition period. As such, the proposal in its current form is considered appropriate for the site and should be supported by the Minister for Planning as the consent authority for State Significant Development.

DISCLAIMER

This report is dated 11 June 2021 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of TAFE NSW **(Instructing Party)** for the purpose of SSDA **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A SUBMISSIONS REGISTER

URBIS

APPENDIX B UPDATED MITIGATION MEASURES

APPENDIX C AMENDED ARCHITECTURAL PLANS

APPENDIX D AMENDED LANDSCAPING PLANS

APPENDIX E AMENDED CIVIL ENGINEERING REPORT

APPENDIX F ARCHITECTURAL DESIGN STATEMENT

APPENDIX G LANDSCAPE DESIGN REPORT

APPENDIX H TRANSPORT AND ACCESSIBILITY IMPACT ASSESSMENT

APPENDIX I GREEN TRAVEL PLAN

APPENDIX J PRELIMINARY CONSTRUCTION TRAFFIC AND PEDESTRIAN MANAGEMENT PLAN

APPENDIX K ABORIGINAL CULTURAL HERITAGE ASSESSMENT

APPENDIX L ENGAGEMENT OUTCOMES REPORT

APPENDIX M BDAR WAIVER