

## RPRT

8 October 2019

Mr Andrew Beattie  
Team Leader School Infrastructure Assessments  
NSW Department of Planning, Industry and Environment  
(via e-mail to [navdeep.singhshergill@planning.nsw.gov.au](mailto:navdeep.singhshergill@planning.nsw.gov.au))

Dear Andrew,

**RE: Amity College New School Campus, Leppington (SSD-9227)**

**PROPERTY: 85 Byron Road, Leppington  
63 Ingleburn Road, Leppington  
Lots: 1 and 2, DP: 525996**

I refer to the above State Significant development application (DA) currently being assessed by your department and thank you for the opportunity to comment.

Council officers have undertaken a review of the DA and supporting information. This letter provides feedback on the DA for your consideration.

**Of note, as the submission deadline concludes on Tuesday 8 October 2019, this submission has not been reported to Council for formal consideration and endorsement.**

### Planning

1. The site is identified in the Leppington precinct's indicative layout plan as a public school site and is zoned SP2 Infrastructure (Educational Establishment).

The concept of developing a school on the site is supported in principle however concern is raised regarding the loss of an identified *public* school site. This is particularly so given the rapidly urbanising Leppington and Leppington North precincts of the South West Growth Area and the need to provide public school facilities for future residents.

The department is currently reviewing the planning for the Leppington North precinct which may affect demand for public school facilities. Furthermore, the advice from the Department of Education advising that the site is not required for a public school was provided in 2017 (two years ago) and so the currency of this position should be reviewed.

Prior to approving the development of a private school on the site, it must be demonstrated how and where adequate public school facilities will be made available for future residents.

2. As the site is zoned SP2 Infrastructure (Educational Establishment), the site is excluded from the calculation of net developable area by the Camden Growth Areas Contributions Plan (CGACP). However, this is on the basis that the site is to be developed for a public school. As the site is proposed to be developed for a private school, Council's view is that Section 7.11 contributions should be levied to help provide for the public amenities and services envisaged by the CGACP.
3. The environmental impact statement suggests that the adjoining land zoned RE1 Public Recreation at 69 Ingleburn Road may be used by the school for recreational activities. This land will ultimately be a public reserve in Council's ownership. Such a co-use proposal would require further detailed discussions with Council. Council recommends that the school provides sufficient on-site open space to cater for its own demands without needing to rely upon the adjoining public reserve which will be provided to meet the recreation needs of the wider community.
4. The school will be developed in eight stages. The following concerns are raised regarding the staging:
  - the practical management of the school's staged construction including potential impacts upon staff and students attending the site and surrounding residents. It is proposed to develop the school over 15 years however there may ultimately be a longer timeframe,
  - the delayed delivery of infrastructure and amenities, including off-street car parking, bus bays (stage 4), the northern local road (stage 5), the playing field (stages 5 and 7), the primary school hall (stage 6) and the secondary school hall (stage 8). These works should be delivered early in the development of the school to provide better amenity for staff and students, and
  - the long-term use of demountable buildings in lieu of permanent buildings and the consequent reduction in amenity for staff and students.

It is recommended that the proposed staging be reviewed and that the development is completed in a lower number of more substantial stages.

5. Roads 1 and 2 must be designed in accordance with Figure 3-14 of the Camden Growth Centre Precincts Development Control Plan (Growth DCP).
6. The dedication of road 2 to Council must include the footpath abutting the angled parking spaces along the north eastern side of the site.
7. The Growth DCP requires the development to provide 109 off-street car parking spaces and 104 have been proposed (excluding the on-site drop-off spaces along the south western side of the site). The development must provide a minimum 109 dedicated off-street car parking spaces in accordance with the Growth DCP.

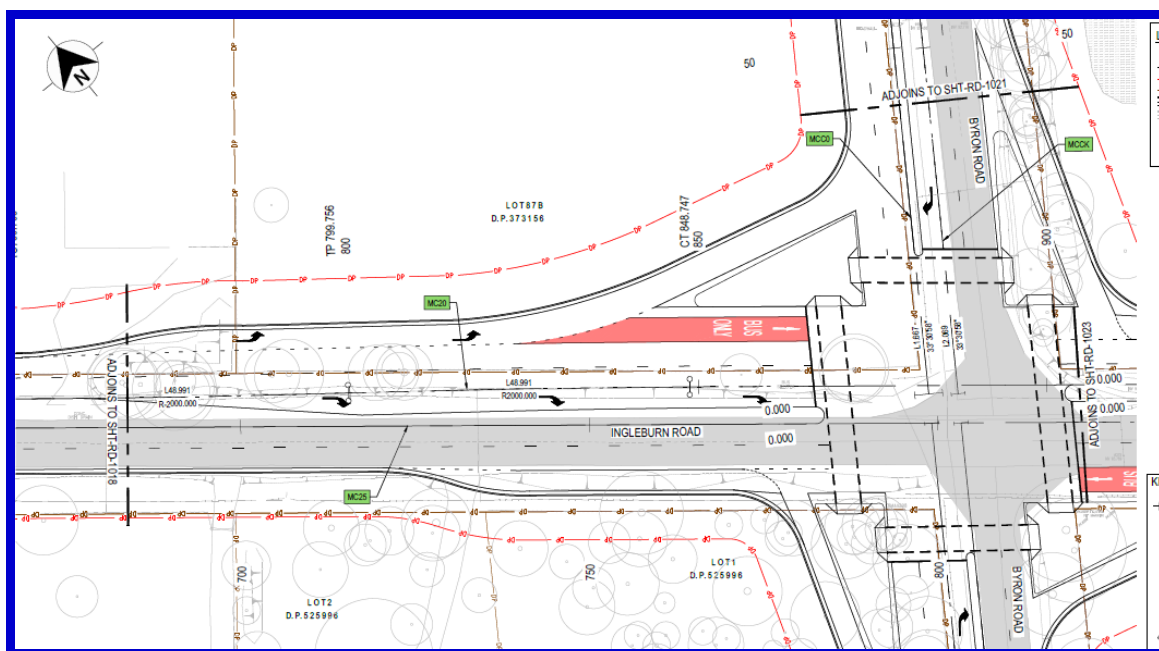
Off-street car parking spaces compliant with the Growth DCP must be provided for the capacity proposed in each stage of the development.

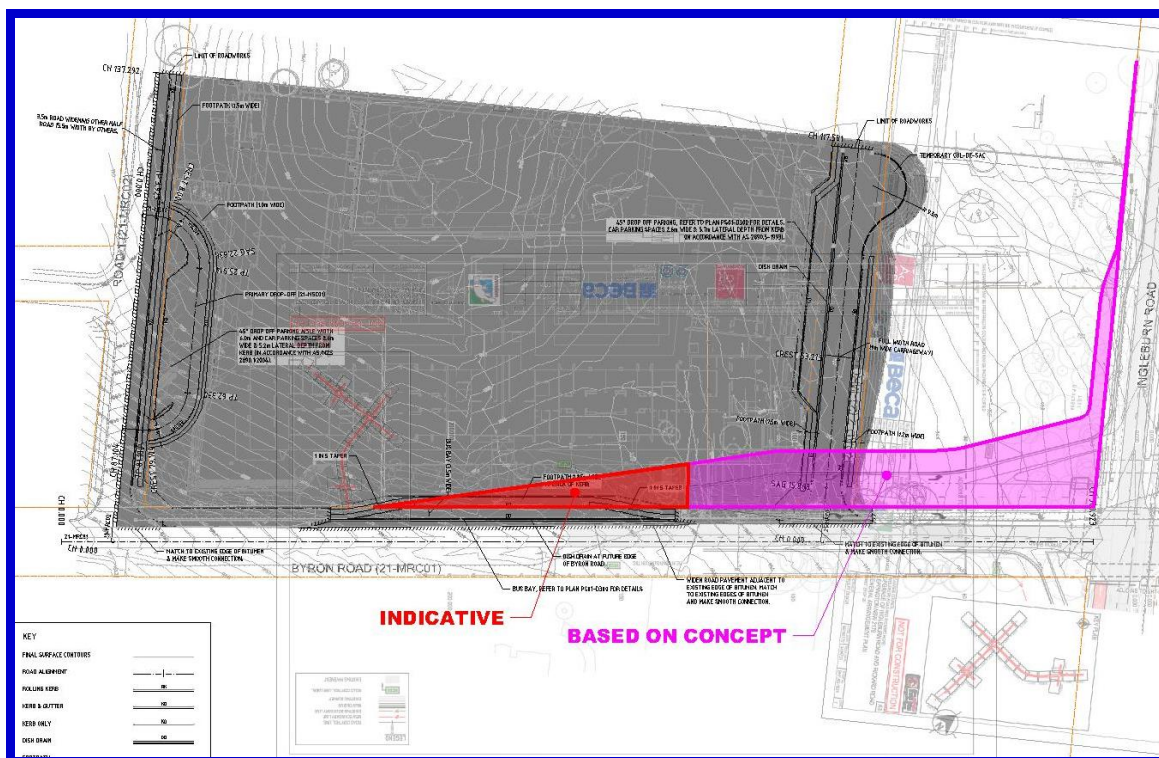


8. Council is concerned about the development's interface with the future public open space to the north east at 69 Ingleburn Road. It is proposed for the site to undergo extensive filling which will result in terraced retaining walls to a height of 3.3m along the shared boundary with the open space. The proposed levels should be reviewed and changes from existing ground level minimised to improve this interface. This feedback should be read in conjunction with the feedback provided in the "Engineering" section of this letter.
9. The development's interface with the public domain at the corner of Byron Road and road 1 on the first floor level should be reviewed. As proposed this interface is defined by relatively blank walls screening toilets and common rooms.
10. Once the proponent has addressed the issues outlined in this letter, and if approval is recommended, Council would welcome the opportunity to provide feedback on potential conditions of consent.

### Engineering

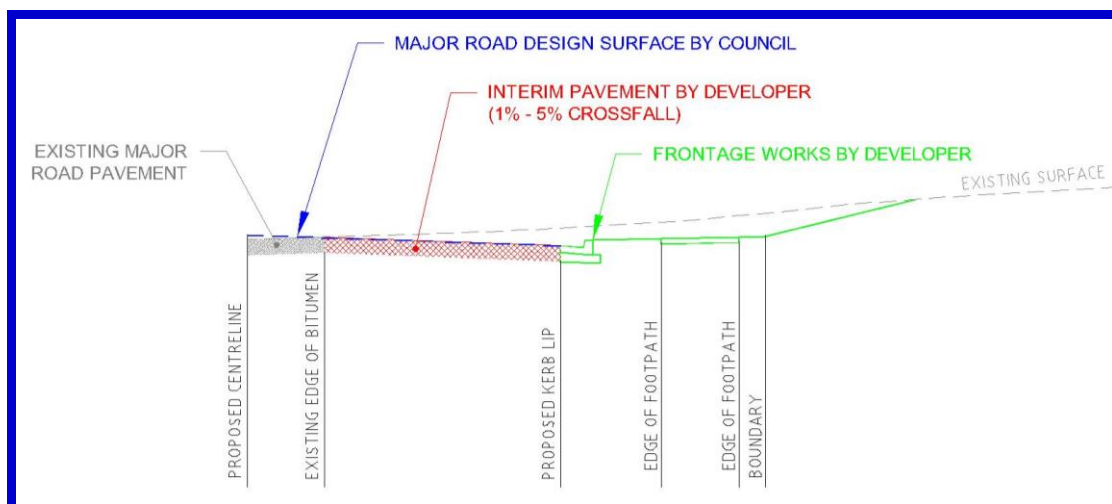
1. The development conflicts with Council's concept design for the future signalised intersection at Byron and Ingleburn Roads. The concept design is aligned with the department's Leppington Precinct Transport and Access Strategy. The concept design may require land from the site:



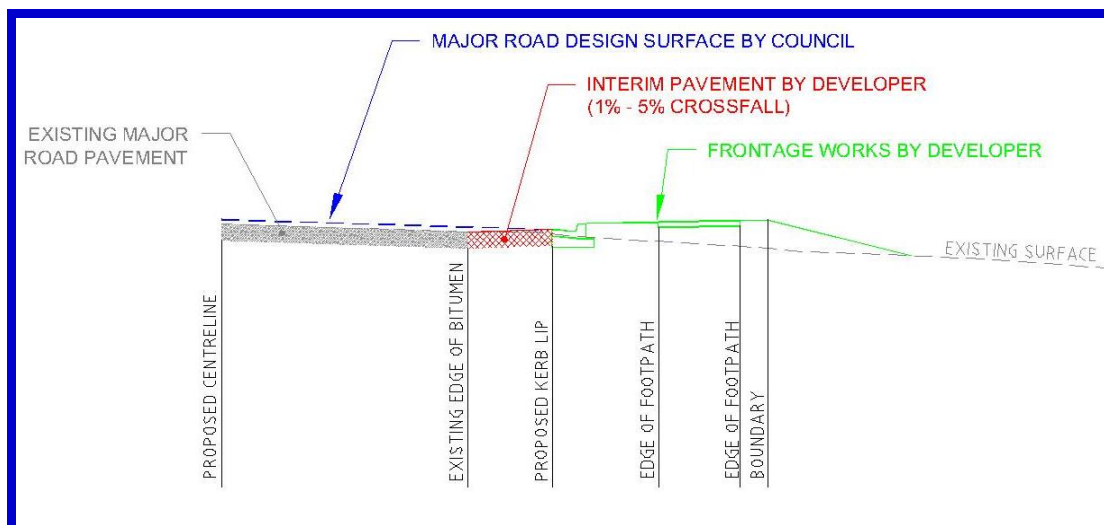


2. The proponent needs to consider Council's concept designs for Byron and Ingleburn Roads. The following works are required as part of the development:

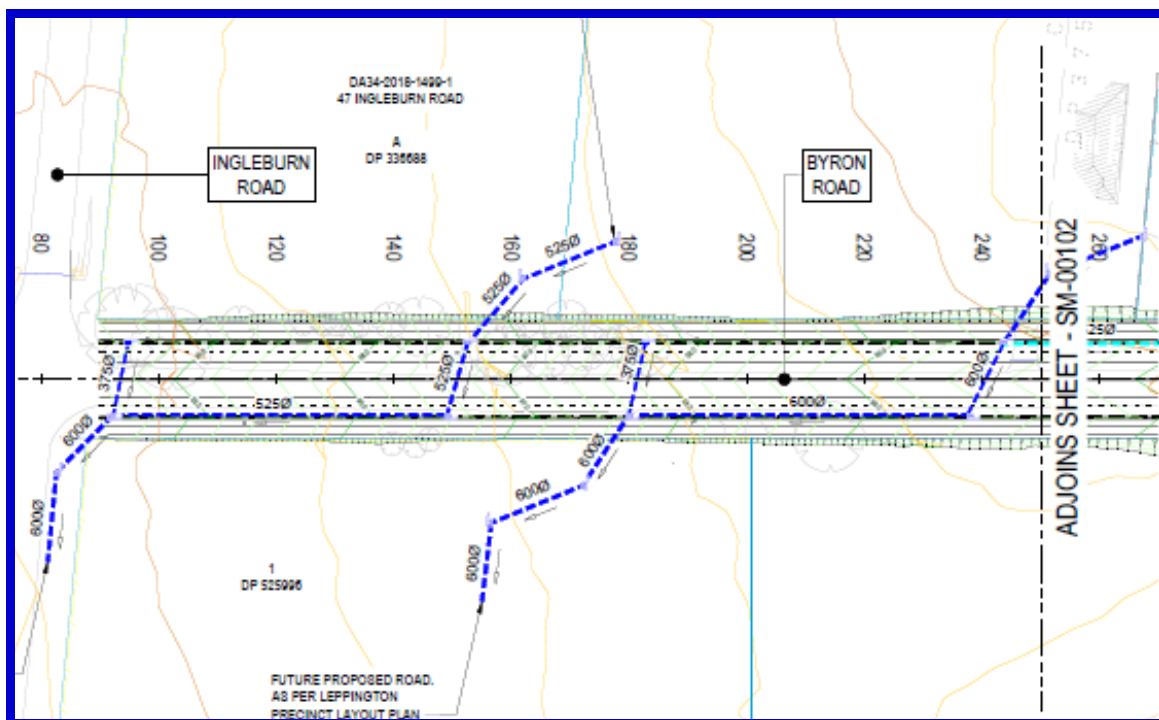
- the proponent must design and construct Byron Road's frontage footpath, kerb, gutter and verge which must match into the concept design levels for Byron Road, and
- temporary road pavement must be designed and constructed along Byron Road (matching into Byron Road's frontage gutter lip level). Temporary cross fall grades at Byron Road must be between 1% and 5%:



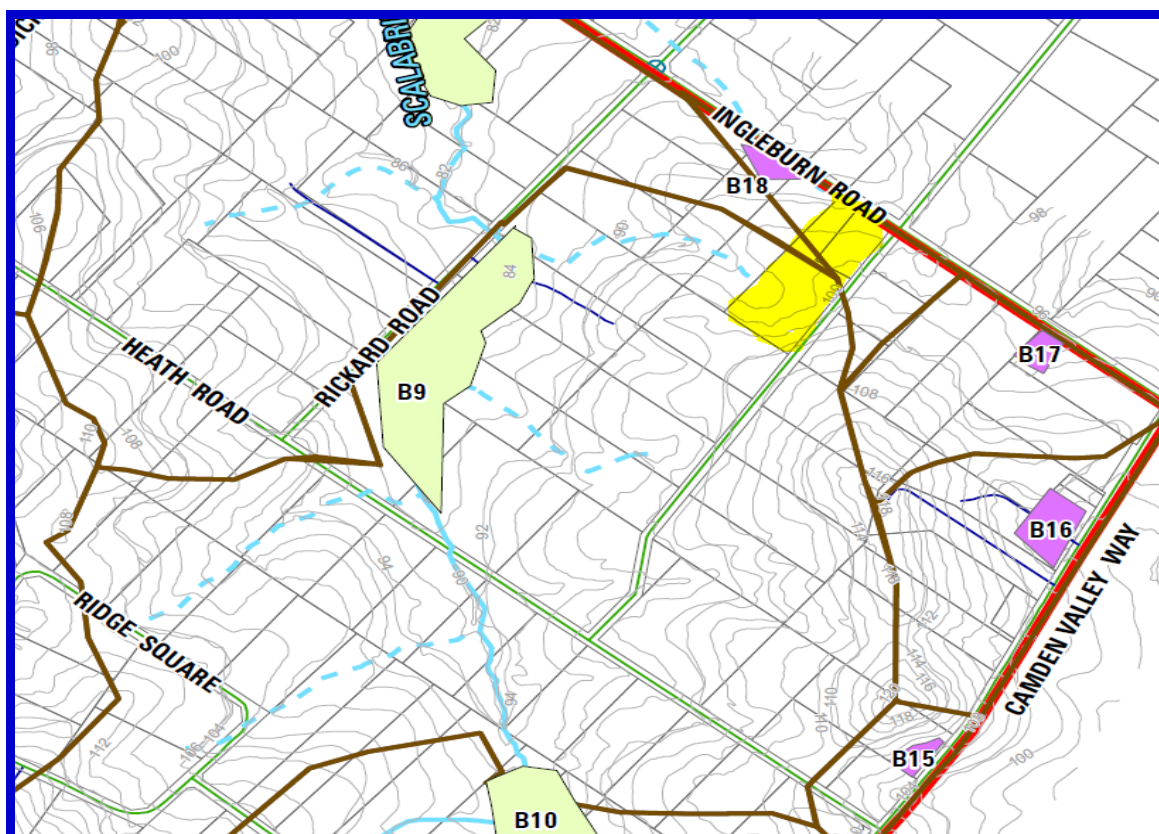


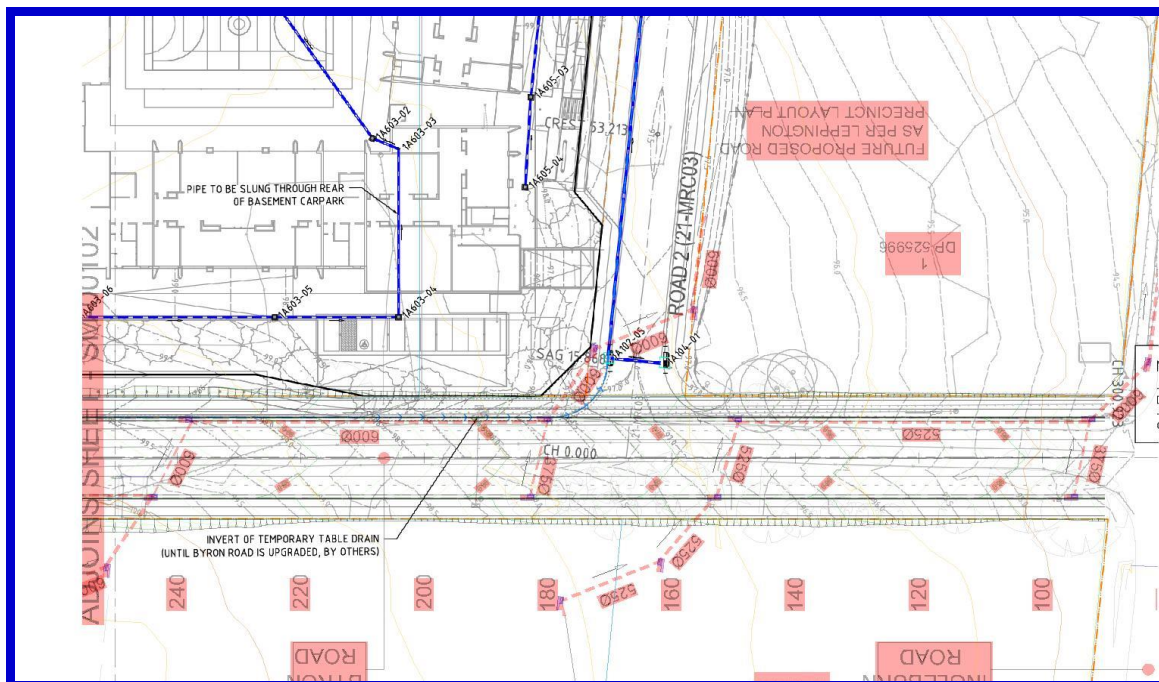


3. The proponent must design and construct a temporary 20m long taper along Byron Road at both ends of the temporary road pavement in accordance with the applicable Roads and Maritime Services' design guides.
4. Compliant swept paths for a 12.5m heavy rigid truck must be demonstrated between the local roads and Byron Road.
5. The proponent must provide sight distance assessments for the intersection of the local roads and Byron Road. Reference should be made to Section 2 of Council's Engineering Design Specifications.
6. The proponent must provide cross sections at 15m intervals along Byron Road at the property. The cross sections must show the temporary interim and ultimate Byron Road levels in relation to the development. Reference should be made to Section 2.2.3 of Council's Engineering Design Specifications.
7. The proponent must indicate locations of V5 lighting along Byron Road's frontage.
8. The submitted engineering plans detail that underground electrical, water and telephone services are located at the Byron Road frontage. The proponent must indicate the required relocation of these services as part of the design of the Byron Road frontage.
9. The proponent must design and construct Byron Road's drainage system, aligned with Council's concept design, which caters for the developed upstream catchment (and other DAs lodged with Council) in accordance with the Leppington Precinct Water Cycle Management Strategy (2012) by Parsons Brinckerhoff:



The Byron Road and internal site drainage system must accommodate the ultimate developed upstream catchment, in accordance with the Leppington precinct's indicative layout plan and the Leppington Precinct Water Cycle Management Strategy (2012) by Parsons Brinckerhoff:





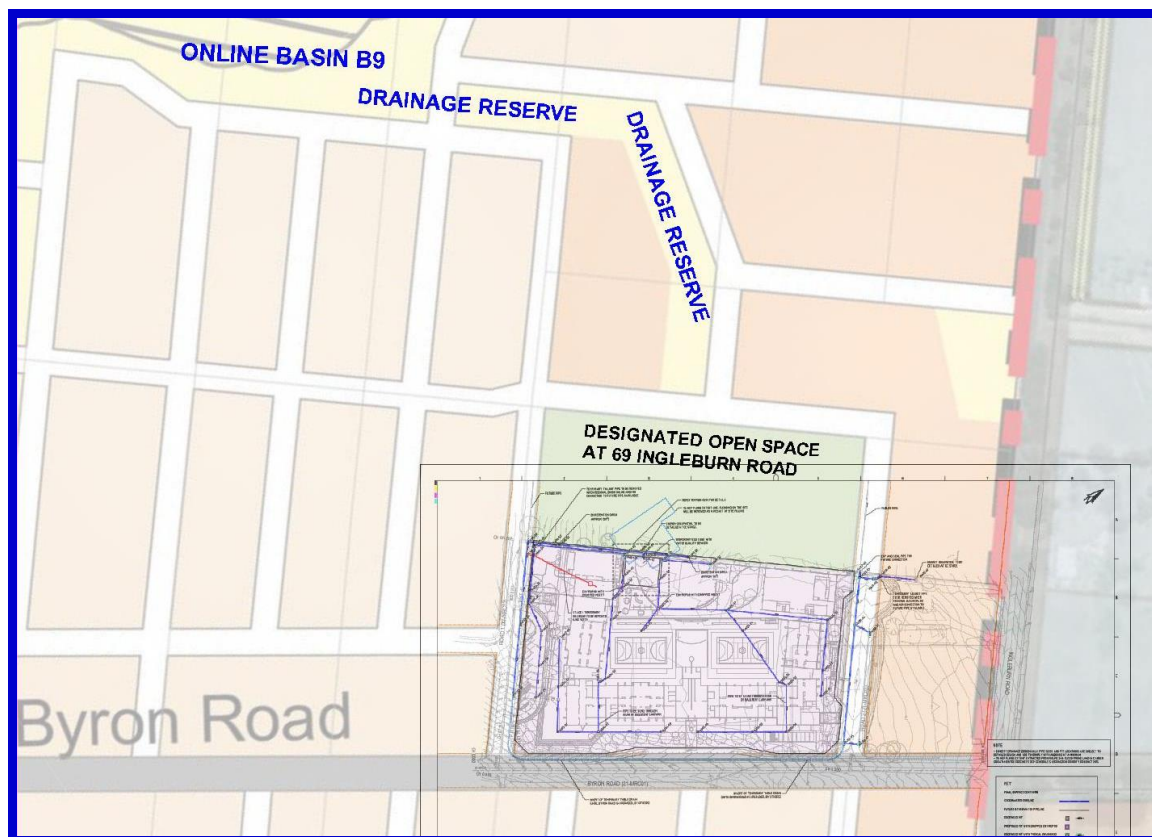
10. It is recommended that the proponent reviews and considers the following documents:

- Leppington Precinct Transport and Access Strategy (Department of Planning, Industry and Environment),
- Leppington Precinct Water Cycle Management Strategy (Parsons Brinckerhoff),
- Council's Engineering Design Specifications,
- Council's Flood Risk Management Policy,
- 100% concept designs (WSP) provided by Council, and
- 20% concept designs (Acor) provided by Council.

11. In accordance with the Leppington precinct's indicative layout plan and water cycle management strategy, the stormwater flows from 63 Ingleburn are to drain to the zoned drainage reserve near 75 Ingleburn Road. Due to these requirements, the following needs to be considered, modelled and incorporated into the drainage design:

- overland flows should not be conveyed through 69 Ingleburn Road as this site is zoned for public open space. A drainage swale is not appropriate through this space,
- the 1% annual exceedance probability (AEP) level flows, from the post development external (in accordance with the indicative layout plan and water cycle management strategy) and internal catchment, are to discharge into the drainage reserve and eventually online regional drainage basin B9, and
- the development and internal roads need to be at or above the post development flood planning level (not the existing flood planning level).





12. The proponent must provide the DRAINS model to Council for assessment. The model must indicate the following in accordance with Council's Engineering Design Specification:

- full drainage system accommodation for 20% AEP events and full conveyance of 1% AEP event overland flows within the road reserve (<200mm depth),
- 50% blocked pits for 1% AEP events,
- post development upstream catchments without temporary on-site detention, and
- minimum 1% pipe grade.

13. The following issues are identified with the applicant's integrated water management plan and engineering plans:

- in Section 4.1, the minor storm event is the five year annual recurrence interval (ARI), not the two year ARI. Reference should be made to Section 3.4.2 of Council's Engineering Design Specifications, and
- catchment plans for the Byron Road and internal drainage systems must be provided.

14. The ramps to the basement car parks must be designed in accordance with AS 2890.1-2004. Insufficient information has been provided to assess this.



15. The basement car park areas must be designed in accordance with AS 2890.1-2004. Insufficient information has been provided to assess this.
16. The basement car park areas shall be provided with suitable stormwater drainage systems. This is likely to be a pump out system which must be designed in accordance with AS 3500.3.2-1998. This must discharge into the on-site detention tank and appropriate additional water quantity provision will be required to achieve the targets set in Council's Engineering Design Specifications.
17. Road 1 is an already constructed half road known as Pluto Avenue. The design of road 1 (extension of the pavement) must be consistent with the as built levels.
18. The half road construction of road 1 must provide the crown at the middle of the road carriageway. Appropriate keying into the existing pavement is required (300mm bridging at each layer (3 layers)). The new pavement width must be approximately 4.5m instead of the 3.5m shown on civil plan no. PS01-D201 revision E.
19. The design for road 2 shall be extended 50m into the adjoining property (69 Ingleburn Road) to demonstrate that the design is suitable for the adjoining property and vicinity.
20. A bond should be provided to decommission the temporary turning head at end of road 2 and reconstruct it to its ultimate condition when the adjoining property is developed and the turning head is no longer required. This can be addressed via a condition of consent.
21. A road works application pursuant to Section 138 of *Roads Act 1993* is required for works carried out along Pluto and Byron Roads.
22. The Byron Road road pavement must be constructed at the same stage as the bus bay.
23. The final pavement design shall be carried out in accordance with a geotechnical site investigation by a suitably qualified engineer.
24. Road designs are to be in accordance with Council's Engineering Specifications.
25. Stormwater drainage designs are to be in accordance with Council's Engineering Design Specifications.
26. All sag pits must have minimum 2.4m lintels and on-grade pits must have minimum 1.8m lintels.
27. Drainage line 1A701 (stage 1) must be clarified (refer to drainage longitudinal section drawing no. PS01-E310 revision A).
28. A MUSIC model must utilise Council's Music Link parameters when modelling the water quality aspect of the stormwater management system.
29. The proponent needs to obtain drainage easements over downstream properties where stormwater discharges into those properties.
30. The on-site detention discharge point, with headwall and energy dissipater, must be located within the site. The dissipater system must be designed to comply with Council's Engineering Design Specifications.

## Traffic

1. The south western side of the site will have multiple driveway crossovers in close proximity to each other. These are potential hazard points for pedestrians and children in particular. These should either be modified or measures devised to ensure safety.
2. The primary student drop-off area must ensure safety for pedestrians. The proposed angled parking bays indicate that vehicles will reverse near the student access gate. Measures should be devised to ensure safety and that vehicles manoeuvre with caution in this area.
3. The primary student drop-off area must provide relevant signage to ensure that the proposed one-way system is adhered to and the potential for conflicts is minimised.
4. The loading bay accessed off the north eastern side of the site requires vehicles to undertake a reversing manoeuvre onto a public road. It is recommended that the development allows all vehicles to enter and exit the site in a forward direction. If this is not reasonably achievable, measures should be devised to ensure the safety of children is not compromised. This may be achieved through a loading bay management plan or other effective measures.
5. Plans should be provided detailing any proposed on-street signage/parking restrictions for consideration.

## Environmental Health

1. The acoustic report includes some errors regarding the criteria adopted for the car park and break out noise from the use of school halls. Council's Environmental Noise Policy adopts L90+5dB(A) for this but the report adopts L90+10dB(A).

Given the above, the use of the secondary school hall exceeds criteria for future residents on the northern boundary by up to 10dB(A). This should be addressed by additional noise control for the hall in addition to that of the recommended absorption material to the internal walls and ceilings. Council suggests that hall windows and doors remain closed during evenings or use after daytime school hours.

Furthermore, noise from the use of the car park during the AM period will exceed the criteria by up to 7dB(A). However, Council notes that the duration will be limited to the period immediately before school commences and shortly thereafter.

The school will generate additional traffic noise from the use of surrounding roads. The exceedance is 7dB(A) however Council notes that the Leppington area is developing rapidly from a rural residential to an urban environment where existing background noise will increase over time.

2. The proposed use of school bells and public address systems will require further assessment as this issue has been understated in the acoustic report.

3. The noise exceedance levels from the proposed construction works is of serious concern and it is considered that a construction noise management plan is essential for this development. The plan must include the installation of temporary acoustic barriers/hoarding along the construction site boundary to limit offensive noise for residents.
4. Further contamination testing should be carried out around the perimeter of the site's existing dwelling house and sheds which have been identified in the contamination assessment and remediation action plan. An unexpected finds protocol has been included for asbestos but there may be additional unidentified contaminants that should be tested for.
5. Council understands that the site has been subject to unauthorised material placement which is evident from a review of recent aerial imagery. Council also understands that the NSW Environment Protection Authority (EPA) is investigating the matter. Council recommends that the department seeks advice from the EPA on this matter if not already done so. It should be clearly demonstrated that the unauthorised placement of any material on the site has not contaminated it and rendered it unsuitable for the development. This may necessitate additional contamination testing and remediation.
6. Information detailing any proposed air conditioning and/or cooling tower systems should be provided for consideration.
7. All food handling areas, including food technology kitchens, must be designed to comply with the *Food Act 2003*, the *Food Regulation 2015* and the Food Standards Code.

#### National Construction Code

1. More detailed plans are required to demonstrate how the buildings will be accessible and comply with the premises standard, Part D3 of the National Construction Code - Building Code of Australia (BCA) and AS 1428.1 and 4 - Accessibility. In particular it must be shown where the lifts will be.
2. The BCA capability statement is outdated as BCA 2016 which the report references has been comprehensively updated by BCA 2019 on 1 May 2019. However, for Section J, the applicant may still use the assessment criteria of BCA 2016 until 1 May 2020, at which time the assessment criteria of BCA 2019 must be used.
3. This development will require an automatic fire suppression system and a fire hydrant system. This will likely need to include a sprinkler and hydrant pump room which should be detailed at DA stage to understand its location and any impacts upon the external appearance of the development. A design statement from a suitably qualified hydraulic engineer should also be provided.
4. The plans should be amended to detail accessible car parking spaces that comply with Part D3 of the BCA and AS 2890 to ensure that at least the minimum required car parking spaces are provided.

#### Waste Management

1. The DA has modelled the use of a medium rigid vehicle to collect waste bins from the site. However, Council requires access for a heavy rigid vehicle. The submitted swept



path diagrams should be updated to model a heavy rigid vehicle and ensure that they do not overlap with any buildings or landscaped areas.

2. The waste bin storage area should make allowance to increase the waste bins to 4.5m<sup>3</sup> to accommodate fluctuations in waste generation.

### Ecological

1. Retention of hollow bearing trees and active nests should be a priority. Where hollow bearing trees are to be removed, nest boxes should be installed within retained trees to offset the loss.

### Landscaping

1. No street tree details have been provided. Street trees are to be provided in accordance with the Growth DCP's street tree species.
2. Sheet 4, drawing no.LC3/6 Rev A Landscape Oval shows planting of native and non-native species. It is recommended that at least half the number of native canopy trees be substituted with large deciduous species that will provide seasonal change and climatic amelioration.
3. It is critical for the Eucalyptus species stock to be checked for any defects or poor branch formation. Such stock must be rejected to avoid future risk. This can be addressed via a condition of consent.

Should you have any enquiries in relation to this matter, please contact Ryan Pritchard, Principal Planner, on (02) 4654 7715 or e-mail [ryan.pritchard@camden.nsw.gov.au](mailto:ryan.pritchard@camden.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink that reads 'n magurren'.

Nicole Magurren  
**DIRECTOR PLANNING & ENVIRONMENT**