

11 December 2019

David Way
Senior Planning Officer, School Infrastructure Assessments
NSW Department of Planning, Industry and Environment
(via e-mail to David.Way@planning.nsw.gov.au)

Dear Sir,

RE: Notice of Exhibition - New Catherine Field Primary School (SSD 9477)

**PROPERTY: C O'Keefe Drive ORAN PARK
LOT: 1001 DP: 1234527**

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 Wednesday 11 December 2019, this submission has not been reported to Council for formal consideration and endorsement.

1. Planning

1.1 Sequencing with surrounding subdivision works

Clarification of the proposed timing of the development in relation to adjoining approved development applications is required. DA/2018/147/1 approved the perimeter road to the east, earthworks (including fill over the subject site) and subdivision. DA/2017/491/1 (and modifications) approved the perimeter road to the south, connection of O'Keefe Drive-North to O'Keefe Drive-South, earthworks (including fill over the subject site) and subdivision. It is noted that the drainage of the school site has been catered for in DA/2018/147 with the provision of drainage pipes and the basin has been designed to cater the school.

There should be restriction placed that the school cannot be opened until the southern and eastern perimeter roads, connection of O'Keefe Drive-North to O'Keefe Drive-South and the drainage / basin system are complete.

1.2 Easements – Water Detention and Transmission Lines

The existing temporary onsite detention basin to the north of the site has an easement that encroaches into the proposed site. The temporary basin should be decommissioned and the easement extinguished upon completion of final drainage solution. This should occur prior to the school's construction.

Confirmation shall be provided that the easement for overhead powerlines 9 wide through the site has been extinguished. If not, a referral to Endeavour Energy is required by State Environmental Planning Policy (Infrastructure) 2007.

1.3 Early Works

Camden Council has received a DA for early works consisting of bulk earthworks, site establishment and stock piling on the site. For Council's pre-DA advice in relation to this proposal please refer to the PDM/2019/94/1 advice attached separately.

The 'existing levels' shown on the engineering plans shall be amended to reflect the approved levels of previously approved applications (depending on proposed sequencing) as well as the proposed early works DA.

1.4 Northern Public Open Space – LS1

The land to the north will ultimately be a public reserve in Council's ownership, known as LS1. Any 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.

The development's interface with the future public open space to the north should be carefully considered. It is proposed for the site to undergo extensive earthworks which will result in a swale 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 pre-DA advice provided for early works proposal as well as the "Engineering" section of this letter.

Council is in the early stages of planning for the embellishment of LS1 and an earlier concept plan is enclosed separately for the Department's information.

1.5 Interface – South-Eastern Corner

The development's interface with the public domain at the south-eastern corner of the site should be reviewed. As proposed this interface is defined by a large batter slope and relatively blank walls on the eastern façade. There is an opportunity to lower the finished floor levels of Blocks C and D to improve this interface whilst making the ramp down from Block B both longer and steeper (still maintaining accessibility). This will also assist with reducing the height of the buildings.

1.6 Construction Access

Direct access off O'Keefe Drive is not supported due to the potential impact created by turning truck movements in and out of the site close to residential houses. A temporary access point should be located at the southern end of O'Keefe Drive. This will also protect the existing kerb and gutter. In addition to owner's consent for the subject site, owner's consent must also be provided for the relevant lot if any works or access is proposed on or from adjoining lots (rather than the road reserve).

1.7 Height

The proposed development is significantly over the height of development standard of 9 m.

1.8 Waste Pad

The design of the waste pad should be further detailed. Although labelled as a 'pad' the structure is shown to cast shadows. The waste pad is in a visually prominent location and it would be preferable for the waste area to be relocated to the south-eastern corner of the car park. The entrance gate for the staff car park can be moved to a more central location in the car park closer to space 60 (this gate could be potentially directly off a shared space catering to the required accessible spaces, discussed further in the 'Traffic' section of this letter).

1.9 Conditions

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.

2. Engineering

Comments

1. Appendix A, in Key Issues states requirements of what needs to be supplied for Drainage in point 14 on page 6. Information responding to this could not be found.
2. Appendix A, in Plans & Documents, states what is required of the Site Survey Plan (page 7). Appendix C is just a deposited plan. There are no levels or features shown.
3. Appendix B shows the school site fronts three roads, of which only O'Keefe Drive on the western boundary has been built. The road to the south has been DA and CC approved via DA/2017/491 (Catherine Park Estate Stage 6) and the road to the east has been DA approved only via DA/2018/147 (Oran Park Tranche 33). The land to the north is yet to be developed. It is noted that the drainage of the school site has been catered for in DA/2018/147 with the provision of drainage

pipes and the basin has been designed to cater the school. *There should be restriction placed that the school cannot be opened until both roads and the drainage and basin system is complete.*

4. The DCP (Catherine Field Part Precinct) shows a short cul-de-sac road to the north of the site, which may provide alternate access to the school, especially for the proposed carpark and waste and other servicing activities.
5. Appendix T, in section 4.2.4 Stormwater states, 'no formal drainage on site' and 'towards bio-retention basin'. It does not indicate what is proposed or how it will connect to the basin.
6. Appendix X is a simple two paragraph statement stating a 100,000 L rainwater tank will be provided which will irrigate garden and oval. *This is considered inadequate. There are no plans showing where the tank will be located (above or below ground), how and what stormwater runoff will be collected and drained to the tank. It indicates two inclusions, yet the document only has one page?*
7. The comment in Section 3.9 of the EIS is noted about connection to the interim basin of Oran Park Tranche 33. It also claims the basin will be built first. Again, if it is not, then this development will need to provide a temporary OSD/WQ facility.
8. In the EIS, Table 8.0 (page 62) point 4.1.2 claims a cut fill plan is provided in Appendix G – it is not.
9. In the EIS Section 6.8 (page 74) states that Northrop has prepared a Concept Stormwater Design Report. Appendix G is just sediment and Erosion control plans. The statement saying "concluded that the site is not situated on flood prone" is not justifiable based on the documents supplied.

Matters to be Addressed

1. A concept drainage plan shall be provided for the development. The design shall comply with Council's Engineering Specification. Note the minor system design is considered to be a 10% AEP for a school site. A catchment plan shall be included. It shall also access the capacity of the connection point provided by the adjoining DA in the north eastern corner of the development. Should the capacity be inadequate, the design presented must show how this can cater for, by either, upgrading pipes or providing an on-site detention system.
2. A DRAINS model shall be supplied to support the design proposed.
3. A MUSIC model shall be provided for the development. Certification of the model shall be provided by using MUSIC-Link. A copy of the MUSIC link report shall be included.
4. A site plan shall be supplied that documents levels and grades across the site. In particular, the entrance driveway and access to the carpark shall be included. Sufficient details shall be supplied that show compliance with AS2890.
5. The site plan developed shall be consistent with the DA approvals issued for the adjoining roads and the bulk earthworks for the site.
6. A detail survey plan shall be supplied that conforms to the SEARs requirements.

7. A cut/fill plan for the proposed site is required.
8. Further justification is required that demonstrates that the site is not subject to flooding. And confirm that all proposed floor levels are at or above the FPL.

3. Traffic

1. Signage and line marking plans would need to be submitted and Local Traffic Committee concurrence sought.
2. The traffic report states that the disabled parking will be accommodated within the staff car park, which provides 68 spaces. Accessible spaces will impact on the number of spaces provided as shared spaces would need to be provided (as per AS289). This does not seem to have been considered in the car park layout. The number of accessible spaces provided shall be based on assessment of similar sites. It should also be specified if a special needs stream would be provided at this school.
3. A footpath should also be provided along the 'future road' on the eastern frontage. Particularly considering there is a gate access on that frontage.
4. Pedestrian crossings shall be provided. Locations shall be specified. Crossing points should be provided on O'Keefe Drive and crossing points on the southern boundary road.
5. The number of bus bays required has not been specified. The extent of the bus bay shall be based on anticipated demand and based on similar developments within the LGA. For example Gledswood Hills Public School (scheduled to open in Jan 2020) proposed three bus bays. Most other schools in the LGA have similar configurations.
6. Camden DCP rates were used to calculate parking rates - requiring 66 car parking spaces. The provision of 68 may be compromised upon provision of Disabled bays to accommodate the disabled pick-up and drop-off areas (as discussed in Point 2). The minimum required number of spaces shall be satisfied.
7. The distribution of peak hour traffic flow has not been discussed or justified.

4. Noise and Vibration

1. Trucks collecting waste and garbage should be limited to daytime operation (after 7am).
2. Noise from the proposed school bell and public address system should be controlled to not add to noise from children when they are outdoors.
3. There will be a significant exceedance of construction noise criteria and temporary acoustic fences of 2.4m high are recommended to mitigate this impact.
4. A construction noise management plan will be required to address noise.

5. Vibration is likely to cause discomfort for the closest residents who may only be 10m away from works during piling operations. A vibration management plan is recommended to address this impact.

5. Public Health

1. The proposed development is intended to cater for 1012 students and associated staffing.
2. The development includes both a canteen servicing the general school community and an "Out of School Hours" (OSHC) facility separately servicing the before and after school hours community. Both facilities provide food for sale and will be regulated under the provisions of the Food Act 2003.
3. OSHC services are generally operated separately to the school administration and are considered as stand-alone retail food premises.
4. Both the school canteen and the OSHC are required to comply with the Australia and New Zealand Food Standards Code and AS 4674-2004 "Design construction and fit-out of food premises".
5. Detailed plans and specifications for the proposed construction and fit-out of the food premises have not been provided. In the absence of plans and specifications the Applicant's particular attention is drawn to:
 - i) Clause 2.1.3 of AS 4674-2004 which requires **adequate space** be provided on the premises for the following:

Space shall be provided for-

- a) Food preparation and service;
- b) Separation, preparation and storage of raw food, from preparation and storage of cooked, and other ready to eat foods; and
- c) Washing and sanitizing operations for utensils and equipment.

Space shall be provided for storage of-

- d) dry goods;
- e) chilled and frozen food;
- f) fresh fruit and vegetables;
- g) returned/recalled food;
- h) packaging material;
- i) utensils, equipment;
- j) cleaning equipment and chemicals;
- k) clothing and personal belongings of staff;
- l) garbage and recyclable material;
- m) hot water (and cold water if storing on site); and

n) any other goods or materials that are associated with operating the food business on the premises.

Cool room, refrigerator and freezer capacity (including display equipment) and storage and display capacity for hot food shall be adequate for the business.

- ii) Clause 3.2.1 AS 4674-2004 - **solid wall construction**
- iii) Section 4 AS 4674-2004 - provision of **sinks** including minimum double bowl sink for washing and sanitising of equipment, a separate sink for food preparation, facilities for cleaning premises (cleaners' sink or equivalent),
- iv) Clause 4.4 - **handwashing facilities**.

6. Building Certification

1. The plans are not detailed enough to complete a thorough assessment but the application includes BCA capability statement and access report to demonstrate compliance with the BCA without the need for significant alterations.
2. This development will require an automatic fire suppression system and a fire hydrant system as well as a sub-station. This will likely require the provision of a sprinkler and hydrant pump room. These key pieces of infrastructure should be shown at DA stage to understand their location and any impacts upon the external appearance of the development.
3. 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.

7. Landscaping

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.

8. Conclusion

Should you have any enquiries in relation to this matter, please do not hesitate to contact the undersigned on 02 4654 7777.

Yours sincerely,

A handwritten signature in black ink, appearing to read "M Rawson".

Mr M Rawson
Team Leader DA Assessments West
(Planning and Environmental Services)