



**Camden Council**

70 Central Avenue, Oran Park NSW 2570

PO Box 183, Camden 2570

Telephone: 02 4654 7777

Email: [mail@camden.nsw.gov.au](mailto:mail@camden.nsw.gov.au)

DX 25807

ABN: 31 117 341 764

Fax: 02 4654 7829

RPRI

2 March 2018

Attention: Director - Social and Other Infrastructure Assessments  
Department of Planning and Environment  
(via e-mail to [aditi.coomar@planning.nsw.gov.au](mailto:aditi.coomar@planning.nsw.gov.au))

Dear Madam,

**RE: State Significant Development Application SSD 8378**

**PROPERTY: C The Hermitage Way, Gledswood Hills  
Lot: 3, DP: 1227491**

I refer to the above state significant development application currently being assessed by your department and thank you for the opportunity to comment.

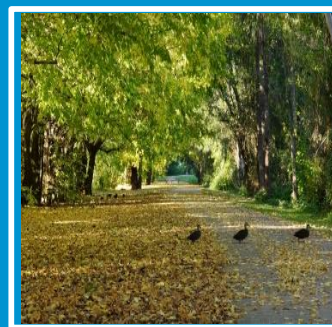
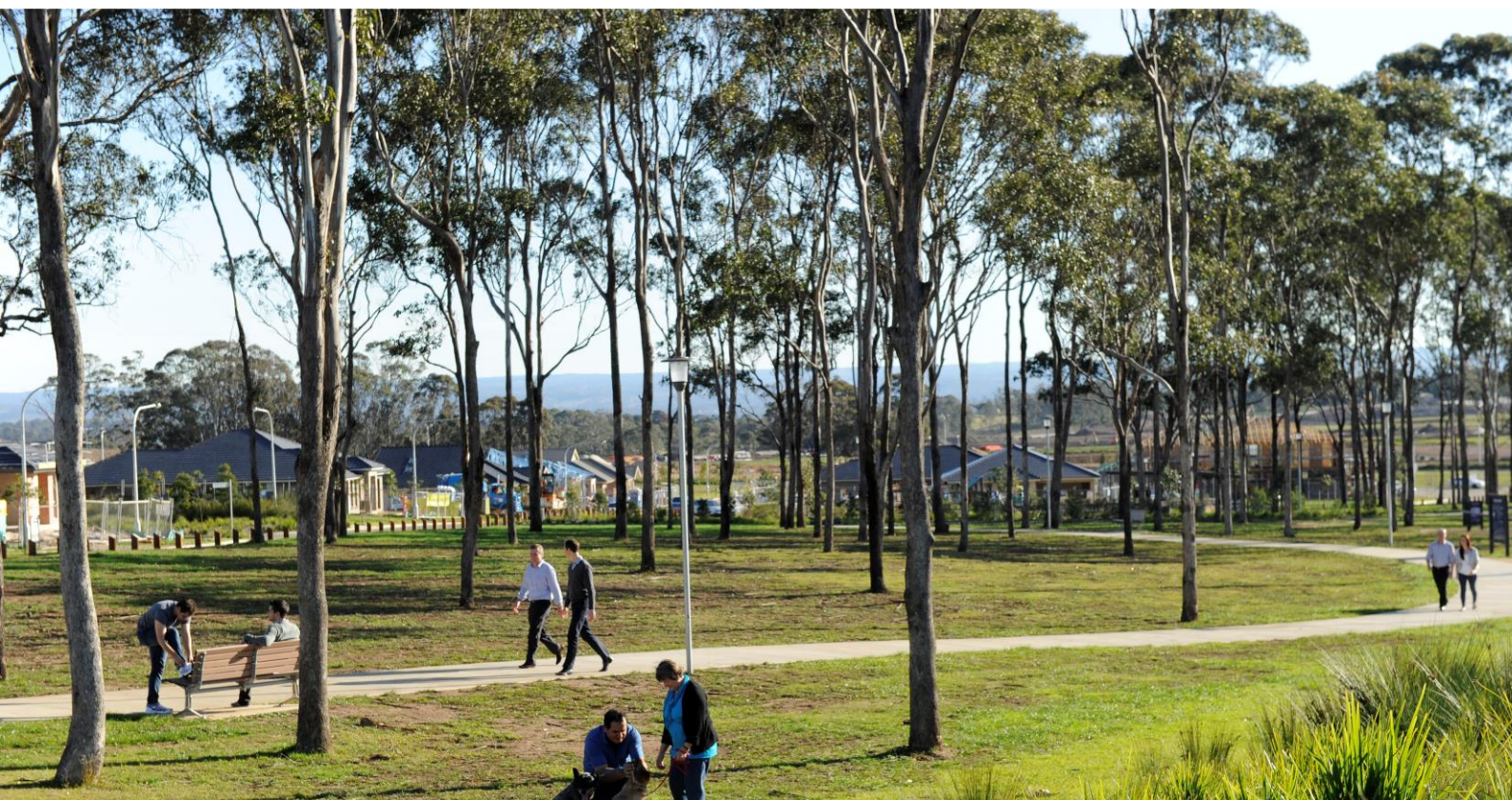
Please find enclosed a submission from Council regarding the proposed development. This submission was formally endorsed by Council at the Ordinary Council meeting of 27 February 2018.

Should you have any enquiries in relation to this matter, please do not hesitate to contact Ryan Pritchard, Principal Planner, on (02) 4654 7715.

Yours sincerely,

**Mr R Pritchard**  
**PRINCIPAL PLANNER**  
(Planning and Environmental Services)





**Submission to:**  
**Proposed Gledswood Hills Primary**  
**School**





## Submission on Proposed Gledswood Hills Primary School – Key Issues

The following are the key issues that need to be addressed if development consent were to be granted for the proposed development:

### Urban Planning

1. Council requests that the proposed development be undertaken in one stage (having a capacity of approximately 1,000 students) as opposed to two stages (up to 600 students in Stage 1 before expanding to approximately 1,000 students in Stage 2).
2. The maximum building height development standards for the site are 9.5m and 18m. The proposed development will have a maximum height of 14.4m. This represents a significant height variation of up to 4.9m (a 51.6% variation). The merits of this variation and its impacts upon the surrounding area must be carefully assessed by DPE.
3. All required roof mounted equipment should be integrated into the overall design of the proposed development to ensure it is neither visually dominant nor prominent. The proposed plans, including the assessment of the proposed maximum building height development standard variation, should reflect all roof mounted equipment that will ultimately be required.
4. Part B1, Figure 3 of the Turner Road Development Control Plan 2007 identifies south eastern view corridors across the site from The Entrainment Precinct to the north west. The additional building height proposed by this development may impact views across the site to the surrounding area. This potential loss of identified views should be assessed by the applicant
5. Additional building modulation and articulation should be considered for the proposed development's frontage to road MC-07. The building along this frontage will be approximately 105m long, contain only one recess/break and have a limited materials/colour palette. Combined with a single roof plane and the shallow sunshade projections, Council is concerned that this frontage will present as overly two dimensional and 'box like'. It is suggested that this building length be further broken down into smaller modules by additional recesses, projections, architectural features and materials/finishes variation. A feature corner element near the corner of road MC-07 and The Hermitage Way should also be considered.
6. In the event that the proposed development is ultimately undertaken in two stages, the required facilities for each stage must be provided upon the development of each stage, e.g. sufficient off-street car parking in accordance with Camden Development Control Plan 2011, disabled access to all developed areas of the site, etc.
7. Council is currently assessing Section 96 Modification 2015/1232/4 for modifications to an approved residential subdivision to the north east of this site. This modification will include the construction of a roundabout at the end of road MC-06. The subject school application relies upon this roundabout. The modification application must be determined prior to the determination of the subject application and the roundabout constructed and dedicated to Council prior to the school becoming operational.
8. Council has previously approved the construction of road MC-06, including its indented car parking bays, under DA/2015/1230/1. Council notes that the proposed plans show indented car parking bays along the north western side of this road (near the intersection with The Hermitage Way) that were not approved by the aforementioned DA. These additional works in the road reserve will need to be approved by the subject DA.

9. Awning/ pergola structures should be provided for wet weather protection along the main pedestrian travel path that connects from/to road MC-06.
10. The environmental impact Statement (EIS) makes reference to the school having capacity for approximately 1,000 students. It is recommended that the maximum number of students for the school be capped at 1,000 to ensure that the proposed car parking provision and other impacts assessed by the EIS are accurate.

#### Traffic/Car Parking

1. Following consideration of the proposed plans and traffic report, the following amendments to the proposed development are recommended:

- Council notes that 75 off-street car parking spaces are required for the school under the Camden Development Control Plan 2011 and that 75 spaces have been proposed. Council maintains that a separate off-street drop-off/pick-up area within the site should be provided. This was requested in Council's response to the draft Secretary's Environment Assessment Requirements dated 3 May 2017.

It is recommended that an off-street drop-off/pick-up area, including a one-way travel lane, is provided behind the car park off road MC-07. A pedestrian path should connect this area to the main pedestrian travel path through the site. The access to this car park should be modified to incorporate a one way entry/exit arrangement to facilitate the new drop-off/pick-up area.

- Council remains concerned that the on-street drop-off/pick-up area on road MC-06 will be under-utilised. This is due to much of its length being past the pedestrian entry/exit gate (approximately 81m), separation from many of the school buildings, the sloping topography of the site and the lack of wet weather protection for children entering the school at this location. It is considered likely that parents will seek to park closer to the school buildings on the northern western side of the site irrespective of the on-street drop-off/pick up area on road MC-06.

Consequently it is recommended that an additional on street drop-off/pick-up area is formalised along road MC-07 to provide additional capacity nearer to the school buildings. It is also recommended to convert some of the drop-off/pick up area on road MC-06 past the pedestrian entry/exit gates to unrestricted parking.

There may be the potential to provide an additional on-street drop-off/pick-up area on the south eastern side of road MC-06. This should be considered, however any impact on the adjoining public open space would need to be assessed against the requirements of the Gledswood Hills Voluntary Planning Agreement.

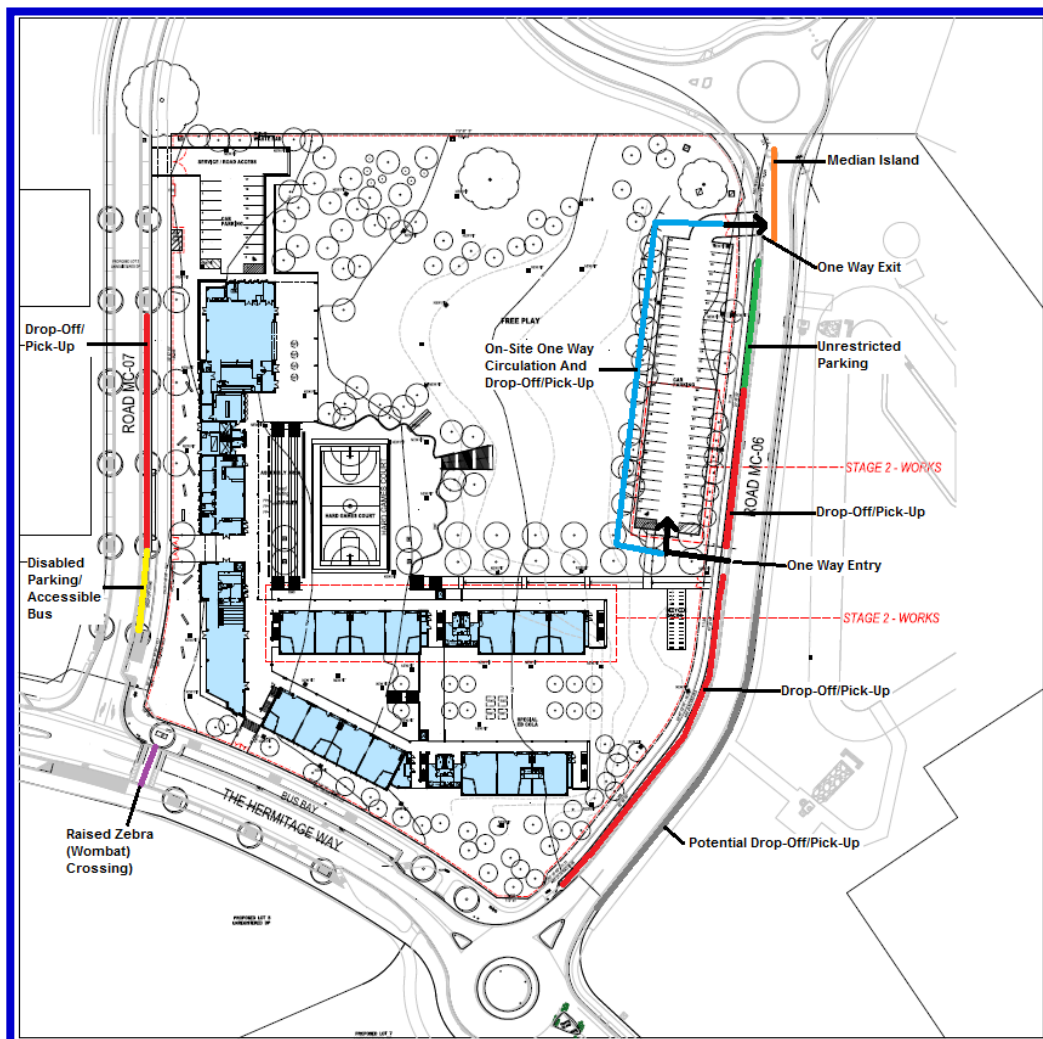
All on-street car parking must be designed to comply with AS 2890.

- The proposed accessible bus parking area on road MC-07 should be modified to be a general disabled car parking area that is available for both the accessible bus and disabled car parking. The accessible bus parking times should be staggered to ensure they do not conflict with general disabled parking for the school.

The special education components of the school should be located in close proximity to the accessible bus parking area.

- A median island should be provided in front of the access to the car park on road MC-06 and adjacent to the future roundabout to the north. The purpose of this is to ensure that vehicle movements into and out of this car park are restricted to left in/left out only.
- The existing speed hump on The Hermitage Way frontage should be converted to a raised zebra (wombat) crossing.

The above amendments are shown in the marked-up plan below:



2. The proposed development should provide capacity to accommodate five buses. This is in consideration of similarly sized schools in the Camden LGA and their bus accommodation capacity/needs. Reliance upon staggered bus arrivals is not supported as a means of addressing bus capacity issues

On-street bus bays must be designed in accordance with the applicable schools facilities standards.

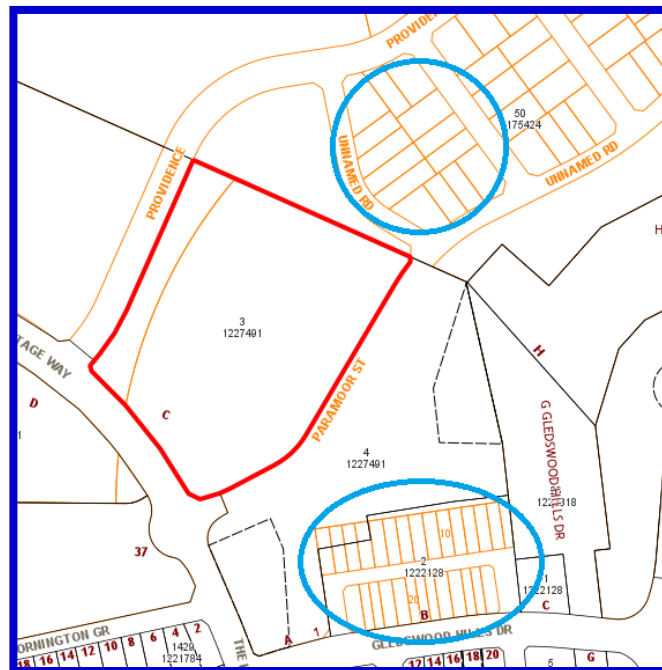
3. Children's crossings must be provided along roads MC-06 and MC-07 at suitable locations.

### Ecological

1. The site is subject to biodiversity certification and therefore the impact to endangered ecological communities (of which the remnant vegetation may be comprised) does not need to be assessed. However no survey has been undertaken of the habitat value of the remnant trees. A survey of the trees to be removed should be undertaken to determine their habitat value, removal requirements and habitat replacement/offsetting.

### Environmental Health

1. An additional acoustic assessment, prepared in accordance with Council's Environmental Noise Policy, must be completed to assess the potential noise impacts upon two proposed nearby residential developments (locations circled in blue on the plan below). The additional assessment must also include recommendations for any required noise mitigation measures.



### Social Planning

1. A social impact assessment should be prepared in support of the proposed development. The site is in close proximity to the existing Country Club Gledswood Hills (a licensed premises) and the Entertainment Precinct which may ultimately contain additional licensed premises. Council also has child safety/protection concerns regarding the multiple entry/exit points to/from the school.

A social impact assessment was requested in Council's response to the draft Secretary's Environment Assessment Requirements dated 3 May 2017.

### **Submission on Proposed Gledswood Hills Primary School - Other Feedback**

The following is other feedback that should be considered if development consent were to be granted for the proposed development:

1. It is strongly recommended that the Camden Local Area Command is consulted regarding the proposed development. This recommendation was previously made in Council's response to the draft Secretary's Environment Assessment Requirements dated 3 May 2017.
2. All lighting must comply with AS 4282 and AS 1158.
3. All glazing used externally must not exceed 20% reflectivity.
4. The proposed development should achieve a 40% reduction in baseline potable water consumption in accordance with Section 8.1 of the Turner Road Development Control Plan 2007.
5. Some bicycle parking should be provided on the site near road MC-07 for staff and students.
6. All proposed batters must have a gradient of 1:4 in accordance with Council's Engineering Design Specification.
7. Very low California bearing ratios (CBR) have been recorded by the geotechnical engineering survey of the site. The proposed pavement areas must incorporate subgrades with a CBR of 4% in accordance with Council's Engineering Design Specification.
8. A 12.5m single unit truck must be used as the minimum sized vehicle when assessing turning path templates for the waste and parking areas for the proposed development.
9. Turning paths for all parking areas have not been provided. Vehicles manoeuvrability, including entry and exit manoeuvres, must be achieved without conflicting with other vehicles.
10. All entry and exit driveways must be designed in accordance with Council's driveway specifications for industrial/commercial developments.
11. The site is not currently mapped as bush fire prone land. Council's is currently updating the Bush Fire Prone Land Map for the Camden LGA and is awaiting certification from the NSW Rural Fire Service Commissioner. The northern part of the site is proposed to be classified as vegetation category 3 as it is currently unmanaged grassland. Council notes that upon the development of the school this area will be operated as managed land.
12. It is recommended that the following condition be imposed:
  - All trees to be removed should be surveyed for hollows and nests. If hollows and/or active nests are present, a nest box installation and active nest relocation plan must be prepared in addition to the tree survey plan. The nest box installation and active nest relocation plan shall provide fauna with short-term habitat requirements during vegetation clearance. Each individual tree hollow must be replaced at a minimum 1:1 ratio with nest boxes.

Any hollow-bearing and active nest trees removed from the site are to be inspected prior to removal. Measures must be taken to ensure that fauna inhabiting tree hollows or active nests are treated humanely and relocated before development activities commence in accordance with the *National Parks and Wildlife Act 1974*. A qualified ecologist or wildlife carer must be present throughout vegetation clearing activities to relocate fauna, or take fauna into care where appropriate (i.e. juvenile or nocturnal fauna).

13. It is recommended that a condition be imposed that requires that, if any Aboriginal objects are discovered during the course of construction work:
  - work in the vicinity of the discovery must immediately cease,
  - the Office of Environment and Heritage (OEH) must be advised of the discovery in accordance with Section 89A of the *National Parks and Wildlife Act 1974*, and
  - any requirements of OEH must be implemented.
14. Noise from activities in the proposed school hall will only be compliant with the applicable noise criteria if the roller doors are kept closed. A condition should be imposed to ensure that this occurs.
15. The maximum sound pressure level from the public address system and the school bell should be no greater than 80dB(A) at 3m. A condition should be imposed to ensure this.
16. A condition should be imposed that requires the proposed construction noise management procedures to be complied with.
17. A salinity assessment and management plan titled "Report on Salinity Investigation and Management Plan - Stage 25, Stage 18B, Entertainment Precinct and Proposed School Site 34295.75" dated June 2016 and prepared by Douglas Partners was previously approved for this area by Council. The proposed development should be designed and constructed in accordance with this assessment and management plan.
18. The proposed development must be designed to comply with the *Food Act 2003* and AS 4674-2004 Design, Construction and Fit Out of Food Premises. The following non-compliances with AS 4674-2004 have been identified on the proposed plans:
  - The "OOSH kitchenette" has not been provided with a designated hand wash basin which is required in addition to the double bowl sink (AS 4674, page 29, clause 4.4.1 (a) and (f)).
  - The canteen has only been provided with one hand wash basin which is required to be within 5m of each food handling area. A second hand wash basin is required to achieve compliance (AS 4674, page 29 clause 4.4.1 (f)). It is recommended that this second hand wash basin be located directly adjacent to the canteen's entry door.
  - The bin store area/room must comply with the requirements of AS 4674, pages 10 and 11, clause 2.4.
  - Mechanical ventilation complying with AS 1668 may be required for areas over cooking equipment.



Rectification of the above issues will require amendments to the internal space within the building and should be reflected on amended plans rather than dealt with by way of conditions.

19. The following public health advice is provided in relation to specifications that have not been detailed on the proposed plans:
  - AS 4674 requires solid construction, including solid walls with no cavity areas, solid plinths under cupboards with no cavity areas and installation of all fixtures with no cavity areas.
  - Solid ceilings must be provided (no drop in panels).
  - All doors and shutters will need to be properly pest proof.
20. The bulk waste pad in the north western car park on the site should have the same RL as the internal carriageway to ensure there are no health and safety issues with moving bins from the pad to the collection point and achieve access to the front lift truck.
21. Litter bins should be provided throughout the site and their number and location should be designated in the waste management plan.
22. Waste can be collected from the north western car park on the site provided this occurs outside of the proposed development's core operational hours. A condition should be imposed to ensure that this occurs.
23. A greater collection capacity for commingled recyclables should be added via greater collection frequency, a greater number of recycling bins and/or greater sizes of recycling bins.
24. It should be clarified why there is a separate collection stream proposed for cardboard to general commingled wastes. These wastes would usually be collected within the same waste stream.
25. The swept path diagrams for the waste truck show a transport path with sufficient room for a truck only if the template is sized for a front lift, heavy rigid, dual rear axle waste collection truck at 11.5m long.
26. A construction waste management plan should be developed for the site that outlines the types and amount of wastes that will be generated during the construction of the proposed development.
27. It should be clarified whether the estimated waste generation rates are for both stages of the proposed development or only for the first stage.
28. The bulk waste pad will need to be larger to accommodate the estimated number of bins designated for the proposed development. The pad is only large enough to safely accommodate a 3m<sup>3</sup> skip bin for the site.
29. The bulk waste pad should be fenced to ensure waste bins are contained for security and pollution minimisation purposes.
30. There are a large number of stairs that will transition staff and students between levels given the sloping topography of the site. Accessible ramps should be provided adjacent to the stairs to facilitate convenient disabled access.

31. It should be clarified how disabled persons can access the outdoor space on the site as the main access to these areas appear to require traversing stairs.
32. An accessible entrance should be provided at the main entrance to the school.
33. It should be clarified if anyone (i.e. the public) can access the lifts and gain access to the meeting rooms and classrooms, etc. This presents a safety/child protection issue as it appears that the ground floor lift by the main entrance can be accessed without passing through the public reception area.
34. A site evacuation plan should be developed. This should include procedures for the evacuation of individuals with temporary and permanent disabilities and high level mobility needs. It is noted that in an emergency situation there is no use of lifts; therefore the plan must make provision for accessible equipment to enable disabled persons to exit via the stairs. This will require storage space to be built in and allocated for the equipment to be stored.
35. The following issues should be clarified:
  - Management of the four entry/exit points for safety and child protection, e.g. will they be closed and locked between certain hours?
  - The school hall being used by other user groups (possibly after hours) and how access will be restricted to the rest of the school.
  - The potential for access to school grounds from the visitor car park without passing through the reception area.
  - Adequate disabled access from the main entrance to the special education outdoor covered learning area.
  - Sight lines and passive surveillance of the special education outdoor covered learning area. This area is separate from the main play area with limited sight lines and will therefore require additional supervision of students.
  - There appears to be very little storage space proposed for the classrooms.
36. The proposed architectural plans contain insufficient information to allow for a full assessment against the Building Code of Australia (BCA). The applicant should consult a BCA consultant and obtain design advice on the ability of the proposed development to comply with the BCA.