

Mr Anthony Manning
Chief Executive
Level 8, 259 George Street

Sydney New South Wales 2000

10/05/2019

Attention: Sam Werner

Dear Mr Manning

Alex Avenue Public School (SSD-9368)
Response to Submissions

The exhibition of the Environmental Impact Statement (EIS) for the redevelopment of Alex Avenue Public School, (SSD 9368) ended on Wednesday 1 May 2019. Submissions received from Blacktown City Council and the public, and all Government agency advice received by the Department of Planning and Environment (the Department) during the exhibition of the project is available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/10036>

In accordance with clause 85A of the Environmental Planning and Assessment Regulation 2000, the Secretary requires the Applicant to respond to all issues raised in these submissions and Government agency advice, and where necessary, technical supporting documents must be revised.

The Department has also undertaken a preliminary assessment of the EIS and, in addition to the issues raised in agency submissions, requires the matters at **Attachment 1 and Attachment 2** be addressed in full. You are requested to provide the Department with a response to the submissions as soon as possible.

Note that under clause 113(7) of the Environmental Planning and Assessment Regulation 2000, the days occurring between the date of this letter and the date on which you provide your Response to Submissions to the Department are not included in the deemed refusal period.

If you have any questions, please contact Iona Cameron at iona.cameron@planning.nsw.gov.au.

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Yours sincerely

A handwritten signature in black ink, appearing to read 'KH', with a stylized flourish extending to the right.

Karen Harragon
Director, Social And Other Infrastructure Assessments
Social & Other Infrastructure Assessments
as delegate for the Secretary

ATTACHMENT 1 – KEY ISSUES

Site reference and planning

1. The EIS and associated documentation refer to an historic Lot and DP. All relevant documentation, including the application form, must be updated to reflect the correct Lot and DP and submitted to the Department. Details of the adjoining land should also reflect current cadastre.
2. The proposed layout of the school has not taken into consideration the 6m wide easement for access and services located along the eastern boundary of the site in favour of the adjoining land. The layout of the school must be redesigned taking into consideration the right of access over the subject site.

Long-term planning

3. The Environmental Impact Statement (EIS) included an Options Analysis with three designs, including two options which provided the main entrance to the future Pelican Road and the third option providing the main entrance from Farmland Drive.

Farmland Drive is a local road which is approximately 9m wide and has no pedestrian or cycling facilities within the road reserve. The Department considers Farmland Drive an inappropriate main frontage to the site given the classification of the road and lack of supporting infrastructure to assist with accessing the site. The Department considers that the main frontage to the school should be designed to facilitate the long-term functioning of the school (not the short-term) and should be redesigned to address the future Pelican Road, which has been identified as a major road under the Alex Avenue Precinct Plan. A staged approach to operation may be considered to reflect the timing of delivery for Pelican Road

Design excellence

4. The design outcomes outlined within the Urban Design Report is entirely inconsistent with the design proposal reviewed by the State Design Review Panel (SDRP) and cannot be supported. The current proposal presents large areas of monolithic blank façades of undefined materiality to the public domain, without contribution to the streetscape and without a positive impact on the quality and character of the neighbourhood.

The proposal has been stripped of all design quality, lacking in articulation, detail, sophisticated materiality and aesthetic appeal. The original proposal of pavilion forms in a landscape setting has been replaced by forms of undifferentiated scale with little indication of how landscaping is integrated into the project.

The buildings do not demonstrate consideration of Ecologically Sustainable Development (ESD) principles with no indication of how access to natural light, ventilation and other passive design strategies would be achieved.

The drawings provided as part of the ESD analysis and report are for the original Hayball design, not the proposed Group GSA design and therefore the ESD analysis is not representative of the proposal.

Other issues raised at the SDRP not addressed by the proposal include:

- addressing Pelican Drive as a primary street frontage.
- bus drop-off and pick up zones.

- carparking and bicycle parking provisions including potential conflicts between vehicles and pedestrians.

The issues raised above must be addressed prior to review by GANSW. Additionally, the Department requires the Applicant to consult further with GANSW.

Transport, traffic and parking

5. The Department has concerns with regard to the potential impacts traffic generation of the proposed school would have on the local road network prior to the construction of Pelican Road, particularly given the lack of public transport options that would be available to the site.

Council's Development Control Plan (DCP) requires the provision of one car parking space per staff member, and one space for every 100 children. Based on these requirements, 80 car parking spaces are required. It is acknowledged that a joint parking strategy is proposed for a future Council car park adjacent to the eastern boundary of the site and that these parking spaces would be provided within the Council reserve to the east of the site. However, no information has been provided in relation to the design and timing of construction of the car park. Details of the proposed joint parking strategy are required. This should include details on the timing of the construction of the car park and who would be responsible for the construction of the car park. The car park including the proposed drop-off/-pick-up bay should be operational prior to the opening of the school.

6. The Department raises concern with regard to the location of the proposed drop-off/pick-up for students with disabilities on Farmland Drive which is a narrow road that would carry a significant volume of traffic

Additional details, including the design and timing of construction, are required demonstrating that the proposed drop-off/pick-up facilities would be provided prior to the operation of the school to cater for the proposed for 1,000 students and 70 staff without impacting on the surrounding residential roads.

7. The EIS indicates that a bus bay would be located along the future Pelican Road, as buses are not proposed to access Farmland Drive. Insufficient information has been provided in relation to the design, timing of construction and who would construct the bus bay. These details are required.
8. The proposal includes a "walking school bus" as an interim public transport measure until the future Pelican Road is constructed. The Green Travel Plan (GPT) states that footpath provision in the area is relatively limited at the moment, with expansion of infrastructure in the area coming alongside the Alex Avenue Public School development. It is expected that Farmland Drive, as a connection from Alex Avenue, will have footpaths provided leading to the school.

The Traffic Impact Assessment (TIA) stated that "A recently constructed footpath on the south side of Farmland Drive between Fortunato Street and Prairie Street is indicative of an intention to provide footpaths along the length of Farmland Drive." This section of footpath is approximately 75m long and is currently the exception, with no other footpaths provided in the Alex Avenue precinct between Schofields Road and Jerralong Drive.

While the Department recognises that the provision of infrastructure is the responsibility of Council, no information has been provided by demonstrating that the expected infrastructure would be in place prior to the operation of the proposed school. Given it is proposed to utilise

assumed future pedestrian infrastructure in lieu of public transport, the Department requires additional information be provided relating to the design and delivery of the required infrastructure as well as the proposed “walking school bus” routes. Without appropriate pedestrian infrastructure, the Department raises serious concerns with regard to safety of children using the “walking school bus” model.

ATTACHMENT 2 – OTHER MATTERS

1. The EIS indicates that the “previous scheme provided in earlier project states” was assessed for “compliance with the thermal performance requirements of Section J of the NCC 2019.” The Department requires the Applicant to demonstrate that the development as proposed can achieve the minimum 4-Star Green Star rating (or equivalent) as required by conditions of consent for other recent school approvals.
2. Concerns are raised regarding the Noise Impact Assessment prepared by Acoustic Logic, including the location of noise monitoring, being within the school site and not at the most affected noise sensitive receivers. Monitoring is required to be undertaken in accordance with the NSW Industrial Noise Policy. An amended Noise Impact Assessment which addresses these deficiencies (including those raised by the EPA) should be provided.
3. A detailed assessment of the predicted operational noise impacts on surrounding residential developments, including out of hours use of school facilities (including but not limited to the hall and sports courts) is required.
4. The EIS includes proposed construction hours exceeding those times given in the EPA’s Interim Construction Noise Guidelines. The Department does not support extended construction hours. All relevant Construction Management Plans must be updated to reflect the Interim Construction Noise Guidelines.
5. Details of the location, length and width of the proposed bus layover area on the future Pelican Road should be provided.
6. The landscape plans are to be amended to provide a key for each different species proposed on the site. The Indicative Plant Schedule is to be updated to identify the number of trees to be planted on site.

To assist with the State government’s goal to plant an additional five million trees in greater Sydney, the landscape plan is to be updated to provide 55 locally endemic trees including 25 trees of intermediate mature size up to 12m and 30 larger native trees with a minimum mature size of 15m and a potential mature size of 25m.