LIVERPOOL CITY COUNCIL

Our Ref: SSD1-4/2019/A
Contact: Masud Hasan
Ph: 8711 7383
Date: 21 July 2021

Department of Planning, Industry and Environment
Planning and Assessment
Locked Bag 5022
SYDNEY NSW 2124

Sent by email: michelle.niles@planning.nsw.gov.au

Re: Public Exhibition of State Significant Development (SSD10224) – New Primary School at Edmondson Park

Dear Ms. Niles,

I refer to the request to provide response to the public exhibition of a State Significant Development (SSD10224) for a new primary school at Buchan Avenue, Edmondson Park (Lot 1 and 2 DP1257105). The proposal is for the construction and operation of a new primary school with capacity for 1,012 students, a pre-school facility and ancillary infrastructure.

The site is zoned R1 (General Residential) and development for the purposes of an Education Establishment, inclusive of ancillary uses, is permitted with development consent under SEPP (State Significant Precincts) 2005.

Council notes the Environmental Impact Statement (EIS) including the associated technical assessment reports prepared in support of the proposal. Noting the above, Council staff provide a number recommendations relating to strategic context, community facilities, open space and recreation, urban design and public domain, land contamination, acoustics, traffic and transport as well as development engineering requirements. These detailed comments are provided in the attachments to this letter and are to be considered in the assessment of the proposed development.

Should you require further information or clarification, please contact Masud Hasan, Senior Strategic Planner on 8711 7383.

Yours sincerely,

Luke Oste
Coordinator Strategic Planning

Attachment A – Detailed Comments

Strategic context

Council's population forecast modelling for the suburb, developed by both Council and Informed Decisions Consulting (Forecast I.D), indicates that Edmondson Park will experience a growth in primary and high school age groups of approximately 2,500 and 2,200 primary and high school age groups respectively by 2030. The new primary school is designed to accommodate 1012 primary school students, which is under the projected primary school age group population. These numbers could further increase if additional uplift is approved in the Landcom Town Centre (north precinct). Hence it is important that the capacity of the school takes into consideration the forecasted population of school age group students, particularly residents aged between 4 and 18 years of age.

Recommendation

- The proposed development should consider increasing the capacity of the proposed facility based on the population projection of school going children within Edmondson Park and students from any surrounding suburbs who fall within the catchment of the proposed educational facility.

- It is important that the location and size of the future high school in Edmondson Park town centre is confirmed, so that the interface and design of the primary school can be properly considered with respect to the potential high school location.

Community Planning

Council acknowledges the potential of the proposed development for becoming a place of community interaction. It is understood that an appropriate plan of management integrating the local community will achieve its full potential in providing community benefit.

Recommendation

- A plan of management for the school playground and associated community facilities is prepared with the integration of the local community in the plan.

Open Space and Recreation

There is currently no sports field within 5-8 minutes walking distance of the proposed primary school to support the outdoor recreation need of 1012 primary school students.

Recommendation

- It is recommended that the proposed primary school site is expanded to accommodate the additional sports fields for shared use by the primary school and the future high school students.
- Council staff recommends allowing for additional two full size soccer fields along the proposed basketball court.

Urban Design and Public Domain

It is noted within the submitted documentation that *'Landcom is responsible for the delivery of Street Trees and Footpaths'.* Subsequently, no footpath upgrades and/or street trees are being proposed within the public domain frontages of Buchan Avenue and Faulkner Way. Given the significance of this development it is expected that a contribution to the public domain (along Buchan Avenue and Faulkner Way frontage) be included within the scope of works.

The landscape master plan 'LA-W-REP-100-A' (as prepared by Oculus) indicates street trees within the frontage of Buchan Avenue. However, this is not consistent with all other drawings within the Landscape Package, with no street trees being proposed. As per the submitted solar diagrams, Buchan Avenue and Faulkner Way are the most susceptible to high levels of sun exposure across the site. By incorporating street trees into the public domain it will ensure that pedestrians (i.e., staff, students, parents, and residents) are provided with shade to establish a more comfortable microclimate when using these vital spaces (e.g., pick-up/drop-off, waiting for the bus, cycling/walking to & from school etc) around the school.

There are several dedicated cyclist facilities located throughout the proposed design. There must be a clear and direct path of travel for students to arrive safely at each entry point across the site and connect to the bike facilities.

Council staff support the proposed solar panels on the roof of the Hall & COLA building. However, the Hall and COLA building appears to have a skillion roof with a south easterly aspect, which is not conducive to efficient solar power production.

Recommendation

- It is strongly recommended that the proposal incorporates suitable street trees, tree pits and tree grates within the public domain frontages of Buchan Avenue and Faulkner Way.

- The proposal should consider how the dedicated cyclist facilities connects (safely) to the surrounding cycleway network, as well as the interaction it may have with the public domain (i.e., footpaths, kerb and gutter, trees, parked cars etc).

- The proposal should consider future pedestrian/cyclists' connections along the proposed 'future road' (to the south of the site) and how it will connect to the school and the frontage of Faulkner Way.

- The proposal should consider locating the pedestrian crossing along Buchan Avenue closer to the main school entry/exit point and playground in Clermont Park to help prevent any children running across the road.

- The proposal should consider locating solar panels on all buildings with a north facing roof, to optimise the efficiency of the solar panels.

- Council staff are generally supportive of the comprehensive landscape scheme submitted. However, the following suggestions should be taken into consideration, to enhance the overall success of the proposal:

    - The 'Sensory Garden' should be located further away from the secondary entrance point and roadway (Faulkner Way), ideally within a quiet/calm area of the site as to not interfere with the sensory experience.
    - The shape of 'Active Open Recreational Space' should be a more traditional form (i.e., rectangular) to facilitate multiple uses and encourage adaptability for a variety of sports, games, and outdoor activities.
    - The 'Amphitheatre and Assembly Area' should incorporate a shade structure to facilitate all weather activities including but not limited to, outdoor assemblies, performance, events, outdoor classrooms, sports, and games etc.
    - Boundary planting should be multi-layered and used to establish a multi-purpose barrier for the school (from the surrounding sites). Below the proposed canopy plantings (i.e., trees with a mature height of 8m or greater), barriers should be established through planting, to provide students a sense of visual safety and noise protection from the surroundings (i.e., train line, roadways, adjacent schools, members of the public, public transport etc).

<u>Contamination</u>

The DPIE SEARs issued on 10 December 2020 (SSD-10224) required contamination assessments be prepared by certified consultants recognised by the NSW Environment Protection Authority (NSW EPA). No information has been provided by the consultant confirming that the report has been prepared, reviewed and certified by a suitably qualified consultant as recognised by NSW EPA.

The Environmental Site Assessment (ESA) has been prepared as a review of a number of previous contamination reports undertaken on the site. One of those reports is a recent contamination assessment titled *Soil Contamination Assessment – Edmondson Park Precinct 9, Buchan Avenue, Edmondson Park NSW,* prepared by JBS&G Australia Pty

Ltd, dated 27 April 2021 (ref. JBS&G 2021). This report appears to have covered the proposed development site however has not been included in its entirety in the ESA. It would be prudent for the most recent report to be provided.

Recommendation:

- It is recommended that the most recent soil contamination assessment report prepared by a suitably qualified consultant as recognised by the NSW EPA is provided for Council review.

Acoustics

It is noted that an adequate quantitative assessment considering all noise sources generated by the proposed development at any given time has not been provided and that further modelling should have been undertaken by the consultants to confirm whether the development will result in offensive noise and affect the amenity of nearby sensitive receivers.

External mechanical plant noise has not been considered in accordance with the SEARs. The consultant has advised in the Noise & Vibration Assessment, '*at this stage mechanical plant selections have not been made; therefore, it is not possible to undertake a detailed assessment of the mechanical plant noise emissions.'* A quantitative assessment of operational noise has therefore not been undertaken.

Recommendation

- Given that the noise modelling is, in most cases, conducted using noise modelling software, it would be useful for the consultant to provide recommendations on an appropriate location for plant rooms and plant equipment and the maximum Sound Power Level outputs that should be for such equipment.

- The public address and school bell system of the proposed educational facility should be modelled and a maximum sound pressure level at a certain distance should be indicated.

- The façade sound insulation performance should be assessed to determine the materials proposed and to ensure the activities within the classrooms do not result in offensive noise.

- External glazing has been proposed facing Buchan Avenue and Faulkner Way to achieve internal noise levels, however a further review will still be required.

- Preliminary advice has been provided with regards to construction noise and vibration. A comprehensive Construction Noise and Vibration Management Plan prepared by a suitably qualified acoustic consultant will be required.

Traffic and Transport

Council staff have reviewed the Transport and Traffic Assessment report and the School Transport Plan submitted with the Environmental Impact Study and provide the following recommendations with respect to the traffic and transport impacts of the proposed development.

Recommendation

- The report should assess traffic impacts of additional vehicular trips generated from the subject development on the surrounding road network and intersections, particularly Buchan Avenue/Faulkner Way intersection.

- Buchan Avenue/Faulkner Way intersection is currently a sign-controlled intersection. The intersection in its current configuration will not safely accommodate the expected traffic movements generated from the school. As such, a roundabout treatment is requested at this intersection with provision for pedestrian and cyclists crossings.

  The design of the proposed roundabout is to be submitted to Council for "in principle" approval.

- Details of the proposed traffic and parking management schemes shall be submitted to Council for "in principle" approval and to Council's Pedestrian, Active Transport and Traffic Committee for endorsement, which include:

  a) The roundabout at Buchan Avenue/Faulkner Way intersection with pedestrian/cyclist crossings;
  b) The proposed bus zones along Buchan Avenue;
  c) The proposed raised marked pedestrian crossings (wombat crossing) on both Buchan Avenue and Faulkner Way;
  d) The proposed pick up and drop off parking area along Buchan Avenue and Faulkner Way; and
  e) The proposed right turn restriction from Lacey Street into Buchan Avenue with a traffic management plan.

- An application for a new school crossing supervisor should be lodged with TfNSW prior to the opening of the new school.

- Details of the proposed road to the South of the proposed development is to be submitted to Council for review.

Public Transport

- The proposed bus route to the school will travel along Buchan Avenue and Soldiers Parade. The Buchan Avenue/Soldiers Parade intersection is designed as left in/left

out only. A right turn movement is required at the intersection for the proposed bus route. The revised intersection design which permits the right turn movements for bus is to be submitted to Council for review.

- Details of the proposed bus zones along Buchan Avenue are submitted to Council's Pedestrian, Active Transport and Traffic Committee for endorsement.

- It is noted that approximately 170 students will require the public bus transportation and will need 3 regular buses for the ultimate school operation. Hence, a bus zone or bay which can accommodate at least 2 buses at any time is required for the school operation.

- An updated school transport plan is to be provided to Council prior to opening of the school. The proposed bus timetable in Table 3 of Traffic and Transport Assessment report is to be submitted to TfNSW and bus operator for endorsement.

Active Transport

- It is noted that two marked foot crossings are proposed near the intersection of Buchan Avenue and Faulkner Way. These pedestrian crossings should be incorporated into the required roundabout at the intersection.

- It is recommended that the school crossing is to be installed on Buchan Avenue, east to Lacey Road (Pedestrian connectivity 1). The marked pedestrian crossing on Faulkner Way is to be located further south to the intersection and close to the proposed pedestrian gates.

Car Parking

- The proposed school will have 1,012 students and 40 pre-school places. The school will employ 59 staff and 7 pre-school facility staff. According to Council's DCP requirements, the primary school will require a total of 104 car parking spaces.

  - 59 staff @ 1 space per staff = 59 spaces
  - 1012 students @1 space per 30 students = 34 spaces
  - Childcare: 7 staff @1 space per staff = 7 spaces
  - 40 children @ 1 space per 10 children = 4 spaces
  - 2 accessible car parking spaces

  Since the proposed development has provided for 48 on-site car parking spaces, there is a shortfall of 56 spaces. This on-site car parking space shortage needs to be addressed in the proposed development and to Council satisfaction.

Car Parking Design

- It is noted that the waste collection vehicle is to use the proposed future south road to exit the subject site. Sufficient turning area should be provided on site to cater for the movement of the waste collection vehicle. Service facilities should be provided on site and located close to service entrances. A designated service vehicle parking space should be provided on site.

- As there is a pedestrian entry gate proposed close to the car parling driveway, there is potential for conflicts between the proposed southern pedestrian access and vehicular access to the car park. This potential conflict needs to be addressed in the location and design of the driveway to the car park.

Operational Transport Accessibility Management Plan

- The Operational Transport Accessibility Management Plan (OTAMP) must be prepared and must include (but not limited to):

  a) The location of all car parking spaces on the school campus and their allocation (i.e. staff, visitor, accessible, emergency, etc.);

  b) The location and operational management procedures of the pick-up and drop-off parking located within the site, including staff management/traffic controller arrangements;

  c) The location and operational management procedures for the pick-up and drop-off of students by buses and coaches for school drop-off / pick-up, excursions and sporting activities, including staff management/traffic controller arrangements;

  d) Staggering of drop-off / pick-up times, with afternoon pick-up times staggered over a one-hour period;

  e) Delivery and services vehicle and bus access management arrangements;

  f) Management of approved access arrangements;

  g) Car parking arrangements and management associated with the proposed use of school facilities by community members;

  h) Maintaining bus accessibility and student waiting areas;

  i) Safe parent and student behaviour during drop-off and pick-up;

  j) Safe pedestrian movements to the school entrances, minimising vehicle-pedestrian conflicts;

  k) Responsibilities of various personnel executing the plan; and

  l) Evaluation and monitoring of the School Transport Plan implementation.

Construction Traffic Management Plan

- It is recommended that on-site parking is provided for all the construction vehicles to minimise impacts of construction activities along the adjacent streets.

- The design of the proposed Solider Parade/Bunchan Avenue intersection with the largest construction vehicle turning path analysis is to be submitted to Council for review as part of the CTMP approval.

Development Engineering

It is recommended that the Development Engineering conditions (**Attachment B**) are included into the development consent for the proposed development,

Attachment B – Development Engineering Requirements

The following conditions are to be included into the development consent for the proposed development, with no alterations or deletion.

General

- All roadworks, drainage works and dedications, required to effect the consented development shall be undertaken at no cost to Liverpool City Council.

Prior to the issue of a Construction Certificate

- All retaining walls shall be of masonry construction and must be wholly within the property boundary, including footings and agricultural drainage lines. Construction of retaining walls or associated drainage works along common boundaries shall not compromise the structural integrity of any existing structures.

  Where a retaining wall exceeds 600mm in height, the wall shall be designed by a practicing structural engineer and a construction certificate must be obtained prior to commencement of works on the retaining wall.

- Prior to the issue of a Construction Certificate for building or subdivision works the Certifying Authority shall ensure that a S138 Roads Act application, including the payment of application and inspection fees, has been lodged with Liverpool City Council (being the Roads Authority under the Roads Act), for the provision of drainage connection in Buchan Avenue.

  Engineering plans are to be prepared in accordance with the development consent, Liverpool City Council's Design Guidelines and Construction Specification for Civil Works, Austroads Guidelines and best engineering practice.

  Note: Where Liverpool City Council is the Certifying Authority for the development the Roads Act approval for the above works may be issued concurrently with the Construction Certificate.

- A stormwater drainage system shall be provided generally in accordance with the concept plan/s lodged for development approval, prepared by Northrop Consulting Engineers, as per table below:

Company	Job No./Drawing No.	Title	Revision/ Issue	Date
Northrop Consulting Engineers	210040 / 0401	Siteworks and Stormwater Management Plan – Sheet 01	A	18.05.21

Northrop Consulting Engineers	210040 / DAC04.02	Siteworks and Stormwater Management Plan – Sheet 02	A	18.05.21
Northrop Consulting Engineers	210040 / 0421	Stormwater Longitudinal Sections – Sheet 01	A	18.05.21
Northrop Consulting Engineers	210040 / 0422	Stormwater Longitudinal Sections – Sheet 02	A	18.05.21
Northrop Consulting Engineers	210040 / 0423	Stormwater Longitudinal Sections – Sheet 03	A	18.05.21
Northrop Consulting Engineers	210040 / 0424	Stormwater Longitudinal Sections – Sheet 04	A	18.05.21
Northrop Consulting Engineers	210040 / 0425	Stormwater Longitudinal Sections – Sheet 05	A	18.05.21
Northrop Consulting Engineers	210040 / 0426	Stormwater Longitudinal Sections – Sheet 06	A	18.05.21
Northrop Consulting Engineers	210040 / 0426	Stormwater Longitudinal Sections – Sheet 06	A	18.05.21
Northrop Consulting Engineers	210040 / 0427	Stormwater Longitudinal Sections – Sheet 07	A	18.05.21

a) The proposed development and stormwater drainage system shall be designed to ensure that stormwater runoff from upstream properties is conveyed through the site without adverse impact on the development or adjoining properties.

b) Engineering plans and supporting calculations for the stormwater drainage system are to be prepared by a suitably qualified engineer and shall accompany the application for a Construction Certificate. The plan shall indicate the method of disposal of all stormwater and must include rainwater tanks, existing ground levels, finish surface levels and sizes of all pipes.

c) Prior to the issue of a Construction Certificate the Certifying Authority shall ensure that the stormwater drainage system has been designed in accordance with Liverpool City Council's Design Guidelines and Construction Specification for Civil Works.

- Prior to the issue of a Construction Certificate the Certifying Authority shall ensure that details of a stormwater pre-treatment system have been provided on the stormwater plans and that the design meets pollutant retention criteria in accordance with Council's Development Control Plan.

The Construction Certificate must be supported by:

- Specification & installation details of the stormwater pre-treatment system
- The approval of an operation and maintenance manual/ schedule for the stormwater pre-treatment system

A copy of the approved operation and maintenance manual/ schedule shall be submitted to Liverpool City Council with notification of the Construction Certificate issue.

- Prior to the issue of a Construction Certificate the Certifying Authority shall ensure that vehicular access, circulation, manoeuvring, pedestrian and parking areas associated with the subject development are in accordance with AS 2890.1, AS2890.2, AS2890.6 and Liverpool City Council's Development Control Plan.

- Prior to the issue of a Construction Certificate the Certifying Authority shall ensure that all bus stops have been designed in accordance with the requirements of the Disability Discrimination Act 2002 (DDA), Disability Standards for Accessible Public Transport (DSAPT) and the Guidelines for assessing compliance of bus stops with the Disability Standards for Accessible Public Transport 2002.

- Prior to the Commencement of Works a dilapidation report of all infrastructure fronting the development in Buchan Avenue and Faulkner Way is to be submitted to Liverpool City Council. The report is to include, but not limited to, the road pavement, kerb and gutter, footpath, services and street trees and is to extend 50m either side of the development.

Prior to commencement of works

- Prior to commencement of works sediment and erosion control measures shall be installed in accordance with the approved Construction Certificate and to ensure compliance with the Protection of the Environment Operations Act 1997 and Landcom's publication "Managing Urban Stormwater – Soils and Construction (2004)" – also known as "The Blue Book".

  The erosion and sediment control measures shall remain in place and be maintained until all disturbed areas have been rehabilitated and stabilised.

- Prior to commencement of works a Traffic Control Plan including details for pedestrian management, shall be prepared in accordance with AS1742.3 "Traffic Control Devices for Works on Roads" and the Roads and Traffic Authority's publication "Traffic Control at Worksites" and certified by an appropriately accredited Roads and Traffic Authority Traffic Controller.

Traffic control measures shall be implemented during the construction phase of the development in accordance with the certified plan. A copy of the plan shall be available on site at all times.

Note: A copy of the Traffic Control Plan shall accompany the Notice of Commencement to Liverpool City Council.

Requirements during Construction

- Erosion and sediment control measures shall remain in place and be maintained until all disturbed areas have been rehabilitated and stabilised.

- Street lighting is to be provided for all new and existing streets within the proposed development to Liverpool City Council's standards.

  The developer shall submit a Public Lighting Design Brief to Council for approval for the provision of street lighting on all new public roads dedicated to Council. A street lighting design plan must be prepared by an accredited service provider for approval prior to construction. All street lighting must comply with the electricity service provider Street Lighting Policy and illumination requirements and Council's Street Lighting policy.

  All cost associated with the installation of street lighting shall be borne by the developer.

- Prior to the connection of private drainage to Council's drainage system, an inspection is to be carried out by Liverpool City Council's Land Development Engineering Unit. A fee will be charged in accordance with Council's adopted Fees and Charges and is to be paid prior to the inspection.

- All earthworks shall be undertaken in accordance with AS 3798 and Liverpool City Council's Design Guidelines and Construction Specification for Civil Works.

  The level of testing shall be determined by the Geotechnical Testing Authority/ Superintendent in consultation with the Principal Certifying Authority.

Prior to the issue of an Occupation Certificate

- Prior to the issue of an Occupation Certificate, the Principal Certifying Authority shall ensure that all works associated with a S138 Roads Act approval or S68 Local Government Act approval have been inspected and signed off by Liverpool City Council.

- Prior to the issue of an Occupation Certificate the following compliance documentation shall be submitted to the Principal Certifying Authority. A copy of the following documentation shall be provided to Council where Council is not the Principal Certifying Authority:

  a) Work as Executed (WAE) drawings of all civil works. The WAE drawings shall be marked in red on copies of the stamped Construction Certificate drawings as well as signed, certified and dated by a registered surveyor or the design engineer. The Work as Executed drawings shall be prepared in accordance with Council's Design Guidelines. Electronic copies of the WAE shall be provided in DWG format and PDF format to Council along with two hard copies of the WAE plans.

  b) The WAE drawings shall be accompanied by plans indicating the depth of fill for the entire development site. The plans must show, by various shadings or cross hatchings, the depth of any fill within 0.3m depth ranges.

  c) CCTV footage in DVD format to Council's requirements and a report in "SEWRAT" format for all drainage within future public roads and public land. Inspections are to be carried out in accordance with the Conduit Inspection Reporting Code of Australia WSA 05-2006. Any damage that is identified is to be rectified in consultation with Liverpool City Council.

  d) Surveyor's Certificate certifying that all pipes and services are located wholly within the property or within appropriate easements and that no services encroach boundaries.

  e) Documentation for all road pavement materials used demonstrating compliance with Council Design Guidelines and Construction Specification.

  f) A Geotechnical Report certifying that all earthworks and road formation have been completed in accordance with AS3798 and Council's Design Guidelines and Construction specifications. The report shall include:
     - Compaction reports for road/carpark pavement construction
     - Compaction reports for bulk earthworks and lot regrading.
     - Statement of Compliance

  g) Structural Engineer's construction certification of all structures

- Prior to the issue of an Occupation Certificate the Principal Certifying Authority shall ensure that the:
  a) Stormwater pre-treatment system/s
  - Have been satisfactorily completed in accordance with the approved Construction Certificate and the requirements of this consent.
  - Have met the design intent with regard to any construction variations to the approved design.
  - Any remedial works required to be undertaken have been satisfactorily completed.

- Details of the approved and constructed system/s shall be provided as part of the Works-As-Executed drawings.

- Prior to the issue of an Occupation Certificate the stormwater pre-treatment system shall be registered on the title of the property. The restriction as to user and positive covenant shall be in Liverpool City Council's standard wording as detailed in Liverpool City Council's Design and Construction Guidelines and Construction Specification for Civil Works.

- Prior to the issue of an Occupation Certificate, any damage to Council infrastructure not identified in the dilapidation report, as a result of the development shall be rectified at no cost to Liverpool City Council.

  Any rectification works within Buchan Avenue and Faulkner Way will require a Roads Act application. The application is to be submitted and approved by Liverpool City Council prior to such works commencing.

- A maintenance bond in the form of a bank Guarantee or cash bond ($TBA), shall be lodged with Council prior to the issue of an Occupation Certificate. The bond shall cover maintenance and any damage to roads, drainage lines, public reserves or other council property or works required as a result of work not in accordance with Council's standards, and /or development consent conditions. The bond will be held by Council for a minimum period of 12 months from the date of Council acceptance of final works.

Advisory

- Before any excavation work starts, contractors and others should phone "Dial Before You Dig" service to access plans/information for underground pipes and cables. www.1100.com.au

- The cost of any necessary adjustments to utility mains and services shall be borne by the applicant.

- Care shall be taken by the applicant and the applicant's agents to prevent any damage to adjoining properties. The applicant or applicant's agents may be liable to pay compensation to any adjoining owner if, due to construction works, damage is caused to such an adjoining property.