



Our reference: ECM 9813259
Contact: Kathryn Saunders
Telephone: (02) 4732 8567

3 December 2021

Department of Planning, Industry and Environment
Attn: Teresa Gizzi
Email: Teresa.Gizzi@planning.nsw.gov.au

Dear Ms Gizzi,

**Response to Submissions: SSD-11070211 - Proposed New Public School
in Mulgoa Rise, Glenmore Park at 60-78 Deerubbin Drive and 1-23
Forestwood Drive, Glenmore Park**

I refer to the Department's request to provide comments in relation to the above application. Thank you for providing Council with the opportunity to comment.

The following comments are provided for the Department's consideration in their assessment of this application.

1. Planning Considerations

- (a) Council strongly and most seriously objects to the proposal to install any at grade school crossings. Council disagrees with the applicant's stormwater consultants reasoning behind the adoption of at grade crossings, and the elevation of minor stormwater considerations above child safety and risk to life.

Council, being the local roads authority and who have in-depth knowledge of the local stormwater infrastructure and flooding/overland flow behaviour in the precinct strongly objects to at grade crossings for all new schools and sees no adequate justification for the design proposed.

Council has recently approved, as part of the shopping Centre development consent to the north (opposite the subject site), a raised pedestrian crossing connecting the shopping centre and the school site and therefore it is not understood as to why the applicant maintains the at grade crossing, when TfNSW and the roads authority and local Council for the area has advised there is no issue in relation to stormwater and overland flow/flooding or raised crossings.

- (b) The Department is urged to have strong regard to the need to ensure (in line with the Premiers Priorities and the Minister's recently issued Planning Principals), the need for high levels of canopy tree planting and green streets,

Council raises that regard is to be had to Council's previous comments provided in cover letter dated 1 October 2021 including:

- (i) It is critical that planting within the front setback at this location is proposed where there are no street trees (also refer comments below in relation to street tree removal and recommended actions). The

development of the site shall achieve and provide continuous canopy tree planting around the periphery of the development to screen the hard stand / manoeuvring area associated with the waste facilities.

- (ii) The plant and infrastructure should be relocated away of the frontage location and could be reorientated and relocated to the east of the waste / loading area.
- (iii) It has previously been raised that the application foreshadows additional parking for Stage 2 works. It is inappropriate to push back the delivery of necessary parking.

All parking must be provided up front as part of the stage 1 works. This will negate unnecessary reliance on the public road network for parking and reduce potential overflow into Council's adjacent car parking facilities.

2. Traffic Management and Pedestrian Safety Considerations

- (a) It is noted that, in response to Council's comments from 1 October 2021, the proposal has been amended respond to various matters.

The primary points of disagreement remaining include:

- The proposal for pedestrian crossings to be at-grade rather than raised "wombat" style crossings,
- The proposal not to use a dedicated school bus service, but rather to use an existing bus route which causes children to have to cross the road, and
- The positioning of bus infrastructure.

As is raised above, the issue of the at grade crossing has been raised in all meetings and correspondence to date.

The proponent is relying on flooding advice from a consultant which Council fundamentally disagrees with.

It is disappointing that the proponent has refused to attend a recent meeting arranged with Council's development engineers to seek clarity on this issue, particularly given the importance of raised crossings in protecting the safety and lives of students and the greater school community.

3. Environmental Management Considerations

- (a) The Environment Team have reviewed the Response to Submissions Report, architectural and landscape plans, the Electromagnetic Energy (EME) assessment and the Noise and Vibration Assessment (NVA).

With regard to the EME report, it is agreed that the design measures and recommendations are incorporated into the design of the development. With regard to the NVA, there appears to be a discrepancy with section 5.6 stating that windows and doors of library and hall are to be closed at 8pm, whereas section 7.1.5 states this is to occur from 10pm. This needs to be clarified and amended.

- (b) It is agreed that a construction noise and vibration management plan is required to be developed prior to works commencing.

4. **Landscape Design Considerations**

- (a) Landscape plans and cross sections represent proposed level changes and thus must take into consideration proposed engineering and infrastructure and this is to be demonstrated in detailed sections and details.

- (b) **Streetscapes**

Fencing details are lacking - for streetscape amenity fences should be setback from the boundary with landscaping to reduce the visual impact of the fence.

Street trees are proposed to be removed to enable accessible parking bays.

These street trees should be replaced at a 2 for 1 ratio. Council supports street trees of a suitable size above and below ground in between kerb ramps at accessible parking bays. Additional street trees should be considered in the verge north of playing courts.

To further support amenity in the streetscape and wayfinding, the site corner has capacity for large feature trees in association with walls and signage

Consistent with Council's Cooling the City Strategy, a continuous and effective street tree canopy is preferred. Street trees should be planted in accordance with Council's Street and Park Tree Management Plan and Appendix. Protection of existing street trees to be retained should be in accordance with Australian Standards and documented.

- (c) **Tree Canopy Cover**

There is a lack of detail regarding tree species and the corresponding canopy dimensions on the plan. Whilst the canopy cover appears to meet targets, large tree species are not identified on the plan, nor their mature canopy spread represented on the plan.

Depending on the species and where they are planted, there is potential for tree canopies to damage building awnings or impact building maintenance regimes, and rootzones to damage paths and paving. Tree locations should be appropriate for the available volume above and below ground for canopies and rootzones respectively and the minimum 40% cover target would still be achievable.

Assuming the unidentified open space along the access to Forestwood Drive is intended for parking, additional shade planting is appropriate to cast shade onto pavement areas. A kerb edge is required to contain parking to formalized carparks. Overflow and unauthorized parking in landscaped areas compromises soil compaction and tree health.

- (d) **Play spaces**

Shade from structures should be provided on day one providing protection and safety for children, not later. Structural components need to be integrated with other elements in detailed design phase as well as during construction - it would be very difficult to retrofit.



- (e) Accessibility
DDA compliant seating, incorporating universal design principles, should be provided in close proximity to accessible drop-off and pickup parking areas.
- (f) Maintenance and operational
Details of maintenance access have not been provided and are required. A plant establishment period of 52 weeks is considered minimum industry practice.

5. Public Health Considerations

- (a) The Canteen, OSCH Kitchenette and any other food preparation or food handling areas must comply with Standard 3.2.3 of the Australian and New Zealand Food Standards Code, and AS4674-2004 *Design, Construction and Fitout of Food Premises*. Conditions will be applied to ensure the development complies.

It should also be noted that the hand wash basin located in the Sick Bay, Building A, should be supplied with soap, warm water from a single spout and disposable paper towels to facilitate adequate hand washing for students who may be ill.

All amenities should be high quality, light filled, highly ventilated and high amenity. Amenities for children shall have easy to operate taps, hand soap dispensers and hand drying amenities which promote and encourage hand washing.

Design heights and user-friendly fittings are to be considered.

6. Water Quality Management Considerations

- (a) The bioretention systems downstream are already online, as such it will be important that adequate erosion and sedimentation plans are in place to protect the downstream basins for the full extent of the works.

It is recommended that during construction, erosion and sediment control measures are to be provided in accordance with the requirements of "Managing Urban Stormwater Soils and Construction, 4th Edition (Blue Book)".

It is also recommended that adequate conditions be provided to the consent (should it be issued) to ensure the sediment and erosion measures are implemented and maintained during the development of the site and that they are sufficient to manage and control sediment discharge from the site.

7. Development Engineering Considerations

- (a) Development engineering comments will follow under separate cover.

Should you wish to discuss any aspect of Council's comments further, please do not hesitate to contact me directly on (02) 4732 8567.



Yours sincerely,

Kathryn Saunders
Principal Planner