

Miss Alejandra Rojas
Principal Planner

DEPARTMENT OF EDUCATION
SUITE 9 259
GEORGE STREET
SYDNEY New South Wales 2000

29/11/2021

Dear Miss Rojas

New Liverpool Primary School (SSD-10391)

Request for additional information

I refer to Response to Submissions for the New Liverpool Primary School (SSD-10391). After careful consideration, the Department of Planning, Industry and Environment (Department) is requesting that you provide additional information to address issues identified in the Response to Submissions (RtS) as detailed below:

1. The RTS indicates that approval is requested for the shell space of the preschool. This is not considered acceptable. The Department's childcare guidelines require that the unencumbered indoor play area for child care centres (such as the proposed preschool) comply with certain criteria. Compliance with this criteria cannot be ascertained if the details of internal layout is not provided. Please submit amended plans with the internal layout to demonstrate compliance with the required unencumbered play area for 40 preschool children.
2. The open space area allocation for preschool students is not clear. The Additional Architectural Drawings (submitted with the RTS) show a combined encumbered play area 856sqm for the 'support unit' within the school and the preschool students. This is not accepted, as the preschool play area should be clearly delineated to with the requirements identified in the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP). Please submit amended plans, clearly delineating the open space for the preschool children and demonstrating compliance with the relevant guidelines.
3. The location of the trees in the submitted drawings NLPS-AR-DRG-SSD-0202 and NLPS-LA-SD-0101-DRG(05) are inconsistent. Please submit consistent landscape and architectural plans.
4. The RTS states that the proposal has been amended to reduce the setback of the Lachlan Street entry link (L1 and L2) . However, the RTS documents do not identify the amount of reduction and any resultant effect on the streetscape and/or change to the elevations. Please address this issue and submit amended plans, where needed.
5. The overall building footprint has been reduced and internal layout has been changed, compared to the original drawings. However, the RTS does not identify whether this would

have any effect on the size or layout of classrooms, reduction of amenity of the users or limitation to accommodate 1280 students.

6. The Waste Hardstand Site Plan (Appendix K) includes details of a medium rigid vehicle (MRV) turning circle, which would access the site for waste collection in the future. However, the Department notes that the allocated hardstand space is not sufficient for MRV manoeuvring and that the MRV would encroach into the bike rack area and the ELC play area. Please address this issue and relocate/resize the hardstand area or relocate the vehicle turning circle area to allow for adequate manoeuvring of MRV within the site.
7. The architectural plans show that the ground level is designed to be at Liverpool Central Business District (CBD) overland flow Probably Maximum Flood (PMF) level. The supporting report indicates that it is difficult to construct the building above this PMF and therefore a flood evacuation plan would be needed. The evacuation plan has not been submitted with the application. A preliminary flood report is required to be submitted for review, given the sensitive use of the site.
8. Chapter 3.3.1 of the amended noise impact report, states that the Development Near Rail Corridors and Busy Roads – Interim Guideline, presents an internal noise criteria for sensitive receivers of 40dB(A). However, the report does not provide information regarding the internal noise level that would likely be achieved within the pre-school and/or school buildings to comply with the above requirement (compared to the existing noise level at the rail corridor). Details of acoustic treatments to achieve this noise level have also not been described. A detailed noise assessment is required to demonstrate that the proposed preschool, playground areas and the school buildings can achieve the required noise levels and are suitable to be constructed at this location, considering the criteria of the Development Near Rail Corridors and Busy Roads – Interim Guideline.
9. Parking facility for the preschool users would be required or else an alternate areas are to be identified where parents can park during arrival / departure (when coinciding with the school drop-off/pick-up times). Please address this issue, as the opposite side of Burnside Drive has a 'No Stopping' zone and parents cannot park on this street at any time.

The submitted Traffic Report proposes reduction in car usage in the adjacent high schools in the future, to improve the performance of the Lachlan Street/Hart Street roundabout. However, the current Student Transport Plan only applies to the proposed new school and not the high schools adjacent to the site. You are requested to clarify how the reduction in the car usage for the high schools would be achieved, reviewed, monitored in the context of the current development application of the primary school. The Department has requested this information previously, however a suitable response has not been provided. You are also requested to demonstrate the practical feasibility of this mitigation measure to enable the improvement of the level of service of the Lachlan Street/Hart Street intersection.

10. The Traffic Report states that, in order to ensure intersection performance improvements in 2033, an alternative physical mitigation measure may be proposed, which includes an additional short approach lane on the northern approach of the roundabout on Lachlan Street / Burnside Drive / Hart Street. Currently the RTS does not clearly iterate whether the high school modal shift or this physical mitigation would be pursued. Please confirm whether this mitigation measure is proposed to be pursued in 2033 and if the modal shift is the preferred option, how would that be implemented and under what circumstance would it trigger the need for physical upgrade to this intersection.
11. The Department also notes that the Traffic Report has already considered a physical infrastructure upgrade at the Lachlan Street/ Burnside Drive/ Hart Street roundabout. Despite this upgrade, the intersection appears to be performing in LoS D, in 2033. Please clarify this issue and provide clear information regarding the level of service at this intersection in the future years as well as the proposed mitigation measures.

12. Liverpool City Council (Council) previously commented that the existing facilities are fragmented and do not sufficiently provide key trunks of safe cycling infrastructure, appropriate for all ages. It includes the recommended cycling infrastructure, in alignment with the Liverpool City Council Bike Plan. Council recommended that Department of Education consults with Council in this regard and provides for cycling infrastructure.

However, satisfactory information has not been provided regarding cycling infrastructure and/or any consultation that has been undertaken with Council in this regard, although the Student Transport Plan relies on cycling to reduce the overall car usage at the school.

13. The Department notes that the Aboriginal Cultural Heritage Assessment Report and the Historical Archaeological Assessment Report have identified that the site has a moderate potential of presence of archaeological relics. Appendix FF of the Environmental Impact Statement (EIS) indicated that test excavations were conducted on the site in June 2021. Heritage NSW have reviewed the RTS and requested that the test excavation report be provided prior to further assessment in this regard.
14. The areas and dimension for waste storage should be shown on the architectural plans.
15. The Government Architect NSW (GANSW) have reviewed the RTS and raised several pending concerns regarding the design. These concerns and requested information are listed below:
- an accurate 3D perspective of the external façade and courtyard is to be provided to show the confirmed structural system and materials.
 - the most recent 3D images (submitted at the State Design Review Panel (SDRP) meeting - SDRP 03) depict steel framing to the courtyard circulation and unclear structure to the Covered Outdoor Learning Area. The submitted 'RTS Table' states the structural material is still unconfirmed, and that "the building will likely consist of a concrete in-situ structure". A concrete in-situ structure would have a very different architectural language to what has been presented in the drawings. Consequently, a comprehensive material schedule, including the structure finish, metal finishes, balustrade, fence, gate type, floor finishes, and external mesh used for screening, should be provided.
 - the Secretary's Environmental Assessment Requirements (SEARs) required the application to demonstrate that Aboriginal culture and heritage has been considered and incorporated holistically in the design. In this regard, engagement with local Aboriginal community members has occurred, but this has not influenced the design holistically. Evidence of any consultation that has been undertaken with the Aboriginal community, at a minimum on the design and spatial arrangement of the landscape design, yarning circle, bush tucker garden, and Aboriginal artwork, should be provided.
 - the yarning circle near the bike parking and bins is culturally inappropriate and in a segregated location. The drawings should be amended to relocate the yarning circle within the central courtyard or integrate it with the bush tucker garden.
 - the bush tucker garden is situated in the shade, south of the three-storey school building, resulting in poor access to direct sunlight for the garden. The garden should be relocated in an area with more sunlight access.
 - the details of the proposed percentage of tree canopy cover should be provided. The proposal should target a 40% canopy cover, particularly due to the hot and dry

context to help reduce temperatures. To meet the canopy target, the oval should be bordered with appropriately selected trees to create shade for spectators.

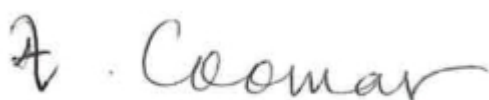
- the western façade should have additional external sun shading and drawings should be amended to include this feature.
 - the current bike parking location results in bikes being transported through the courtyard or the hardstand gate. The bike parking should be relocated closer to the student entry and away from the waste area to encourage a modal shift in the future.
 - the booster near the main entrance, should be concealed to improve the amenity of this public zone.
 - the street furniture from the public realm has been removed and this is considered a poor outcome, as the furniture provides a waiting and socialising place for parents/carers when picking up children. The street furniture should be reinstated by locating the seating away from the fence to mitigate any security concern.
16. It is noted that the proposed roundabout at the southern end of Burnside Drive forms part of a separate application. However, further information is required regarding the relationship between the primary school staff car park and the roundabout. The details of the vehicles using the roundabout, should also be provided. If buses are proposed to access the roundabout, then it should be demonstrated that the roundabout can accommodate the turning circles of the buses.
17. Please confirm whether Burnside Drive is wide enough to allow for bus access or whether an alternative access is proposed.
18. NSW South western Health Local District have advised that their comments to the EIS have not been adequately addressed. Please provide evidence of consultation with the public authority and the outcome of such consultation including addressing each of their earlier comments to the EIS.

Please note that the Department is still awaiting advice on the RTS from Council. Further information may be requested following receipt of comments from Council.

Please provide the information or notify us that the information will not be provided, by Thursday 27 January 2022. If you cannot meet this deadline, please provide and commit to an alternative timeframe for providing this information.

If you have any questions, please contact Nahid Mahmud, on 9995 5228 or at Nahid.Mahmud@dpie.nsw.gov.au.

Yours sincerely,



Aditi Coomar
Team Leader
Social & Infrastructure Assessments

