



19 April 2022

Infrastructure Assessments
Department of Planning, Industry and Environment
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PARRAMATTA NSW 2150

Attention: tuongvi.doan@planning.nsw.gov.au

**Submission - Response to Submissions Report - New High School at
Jerrabomberra (SSD-24461956)**

Thank you for the opportunity to comment in relation to the Response to Submissions Report for the State Significant Development Application (SSD) for the new Jerrabomberra High School.

Please find attached Council's final comments on the proposal. The submission provides feedback on each of the matters previously raised by Council and the response provided by the applicant.

Notwithstanding that the applicant has generally attempted to address the issues raised by Council, Item 4.1.3 relating to the provision of off-street parking remains as the only formal objection.

Should you have any queries in relation to this preliminary submission please contact the undersigned, preferably by email at_Council@qprc.nsw.gov.au with a copy to Michael.Thompson@qprc.nsw.gov.au.

Yours sincerely,



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Portfolio General Manager
Natural and Built Character
Queanbeyan-Palerang Regional Council

Comments from Council on Response to Submissions Report – Jerrabomberra High School - SSD-24461956

Council's Ref: PR.2021.1044
DPIE Ref: SSD-24461956
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Date of Submission: 14 April 2022

Comments on Response to Submissions Report for Jerrabomberra High School

Council's Ref: PR.2021.1044

DPIE Ref: SSD-24461956

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Council Comments on Response to Submissions

1. Permissibility

1.1. Comments

No further comments. No objections.

2. Utilities

Previous Recommendation - That the consent authority impose conditions requiring the preparation of a hydraulic design plan providing details of the required sizing for all water, sewer and stormwater services required for the site.

Council Comment - Not Addressed - The proponent has made no reference to hydraulic design for potable water supply and sewer servicing. Although the school development site is within the Jerrabomberra pressure zone and has connectivity to the recently constructed 300mmØ DICL potable water main in the eastern verge of Environ Drive and norther verge of North Road, hydraulic design for potable water supply a mandatory requirement. The school development site will be serviced by the recently constructed 225mmØ PVC local sewer main in the eastern verge of Environ Drive and deemed suitable. Recommendation to stand.

Previous Recommendation - That the consent authority impose conditions requiring The preparation of an on site detention design to limit stormwater discharge from the site to pre-development flows.

Council Comment – Addressed by proponent - The proponent agrees to meet stormwater design requirements under QPRC D5 Stormwater Design specification with MUSIC modelling and water quality requirements under QPRC D7 Erosion Control and Stormwater Management Design specification. No further comment.

Previous Recommendation - That all connections and alterations to Council's utility services are inspected by Council staff prior to backfilling.

Council Comment - Addressed by proponent - The proponent agrees all utility works to be inspected by Council as the local Water and Sewer Authority. No further comment.

3. Erosion and Sediment Control

Previous Recommendation - That the consent authority impose conditions requiring the preparation, implementation and maintenance of an erosion and sedimentation plan throughout the construction of the development.

Council Comment – Addressed by proponent – Proponent has agreed to accept imposition of DPIE's standard condition regarding sediment and erosion control. No further comment.

4. Traffic and Roads

4.1.1 Traffic Assessment

No further comment.

4.1.2 Parking Facilities – Off Street

Previous Recommendation - That the consent authority request that the applicant submit a design for a minimum of 44 off street carparking spaces. (Objection)

Council Comment - Addressed by proponent - Off-street car parking increased to 44 as recommended by Council. Objection on these grounds removed.

4.1.3 Parking Facilities – On Street

Previous Recommendation - That the consent authority request that the applicant carry out an analysis of how on street parking will be catered for as a result of the school proposal. (Objection)

Council Comment - Not addressed - The proponent states visitors would need to seek alternative parking on the local road network to the south and east of the school. Although student parking is discouraged, the proponent has similarly stated parking would be on the local road network to the south and east of the school. Both existing high schools in Queanbeyan have substantial numbers of senior students driving to school. There is no evidence in the applicant's original documentation or response to suggest that Jerrabomberra will be any different. This is a problem as there is no satisfactory road network for parking to the south of the school. Also the street network to the east, whilst connected by active travel links, is already relatively congested in the school day AM and PM peak times, could be more than negligibly affected and is generally located more than 300m away from the school. Objection remains.

5. Student Pick-Up and Drop-Off

Previous Recommendation - That the consent authority request that the applicant carry out an analysis of how on street parking will be catered for as a result of the school proposal. (Objection)

Council's Comment - Partially addressed - The proponent confirms that the seven "kiss-and-drop" bays are sufficient from capacity and queuing perspectives which would be functional in the AM for up to 105 cars. However, the issue is more likely to be of concern in the PM peak window when parents will park up and wait for children to arrive which can take significantly longer than it does to drop them off in the AM. The analysis has not included any sensitivity modelling to account for the duration cars may occupy the "kiss and drop" areas in the PM peak. Objection on these grounds removed.

6. School Transport Plan

No further comments.

7. Public Transport

Previous Recommendation - That the consent authority impose a condition requiring the use of the Bus Zone to be restricted to periods during the 40km/h school zone times.

Council Comment - Addressed by proponent - The proponent accepts the recommended condition. No further comments.

8. Crossings and Pedestrian Movements

Previous Recommendation - That the applicant be requested to revisit the need and proposed location for a school crossing adjacent to the main school entry off the north road. (Objection)

Council Comment - Partially addressed - The proponent revisited the potential for a mid-block school crossing on the northern road and has determined that the “No Stopping” signage required for the crossing is inconsistent with the road’s geometry or the “kiss-and-drop” operations. The proponent states mid-block school crossing is not considered feasible, school crossing will remain at the intersection of the stub road and Environa Drive as originally proposed. Explanation accepted. Objection removed on these grounds.

Previous Recommendation - That the applicant be requested to provide further information on how the movement of pedestrian from the western side of Environa Drive can be discouraged. (Objection)

Council Comment – Addressed by proponent - The proponent has agreed to installing fencing and proposed no stopping signage on the west side of Environa Drive so that any undesirable and unsafe behaviours in this regard can be enforced by authorities. Objection removed on these grounds.

9. Waste Collection and Deliveries

Previous Recommendation - That the consent authority impose a condition of consent requiring waste collection to be between 6:00am – 7:30am or 4.00pm to 7.00pm.

Council Comment - Addressed by proponent - Submitted Operational Waste Management Plan specifies the waste collection contractor will determine the collection hours based on location and logistical access, with the hours to be scheduled outside of school peak hours 8:00 – 9:30am and 2:30 – 4:00pm as recommended by Council. No further comments.

Previous Recommendation - That the consent authority impose a condition of consent requiring deliveries (excluding waste servicing) to be scheduled outside the periods 8:00am to 9:30am and 2:30pm to 4:00pm.

Council Comment – Addressed by proponent. Proponent agrees to comply with time restrictions. No further comment.

10. Entrance and Access

Previous Recommendation - That the consent authority be requested to impose a condition requiring the carparking area to be designed in accordance with the appropriate Australian Standard.

Council Comment – Addressed by proponent - The proponent agrees to design the carparking in accordance with the appropriate Australian Standard (AS/NZS 2890.1-2004 Parking Facilities Off-Street Car Parking, AS/NZS 2890.6-2009 Off-Street Parking for People with Disabilities, and Queanbeyan DCP 2012 Section 2.2). No further comment.

11. Flooding

No further comment.

12. Developer Contributions

No further comment

13. Bushfire Assessment

No further comment.

14. Fire Services/Disability Access

No further comment.

15. Section 68 Local Government Approvals

Previous Recommendations

- *That the consent authority impose conditions requiring water, sewer and trade waste installations to be inspected by Council staff.*
- *That the consent authority impose a condition requiring that a copy of the works as executed drawings of the water, sewer, stormwater and trade waste installations be provided to Council within three months of the occupation of the site.*

Council comment – Addressed by proponent. Proponent accepts the recommended conditions.

16. Building Design and Amenity

No further comment.

17. Heritage

No further comment.

18. Contamination

No further comment.

19. Other Matters

No further comment.

20. Environmental Health Matters

No further comment.

Recommended Conditions of Consent - Bungendore High School

Prior to the Commencement of Site Works

1. Traffic Management

Prior to undertaking any works within a public road reserve or affecting the road reserve, a traffic management plan is to be submitted to and approved by Queanbeyan-Palerang Regional Council under Section 138 of the *Roads Act 1993*. Where occupancy of the road reserve is required, a Section 138 application shall accompany the Traffic Management Plan for Local Roads or an approved Road Occupancy Licence (ROL) from Transport for NSW (TfNSW) for State Roads.

Reason: To ensure that works carried out comply with the Roads Act.

2. Sediment and Erosion Control

Prior to the commencement of works on site, a Sediment and Erosion Control Plan (S&ECP) for all site works, including road works and access, is to be prepared and approved by the certifying authority. The plan is to cover all measures to control erosion and sediment transport in accordance with the NSW Landcom publication *Managing Urban Stormwater - Soils and Construction (4th Edition 2004 - "Blue Book")*.

Erosion and sediment controls are to be in place before the disturbance of any soils on the site, and are to be maintained during the works and for as long as necessary after the completion to prevent sediment and dirty water leaving the site and/or entering the surface water system outside of the site as follows:

- (a) divert uncontaminated run-off around cleared or disturbed areas,
- (b) erect a silt fence to prevent debris escaping into drainage systems or waterways,
- (c) prevent tracking of sediment by vehicles on roads, and
- (d) stockpile topsoil, excavated material, construction and landscaping supplies and debris within the site.

Reason: To minimise environmental impact associated with any works & to prevent soil erosion/water pollution.

3. Temporary Vehicle Access

Temporary vehicle access to the site must be stabilised to prevent the tracking of sediment onto the roads and footpath. Soil, earth, mud or similar materials must be removed from the roadway by sweeping, shovelling, or a means other than washing, on a daily basis or as required. Soil washings from wheels must be collected and disposed of in a manner that does not pollute waters.

Reason: To minimise transfer of soil from the site onto the road pavement.

4. Works Sites to be Fenced

A fence must be erected between the development site and public places before commencement of any other work.

Reason: To ensure that an effective barrier is provided to preserve the safety of people and property in public places.

Prior to the Commencement of Building Works

5. Submit an Application for Trade Waste (C5)

Prior to the issue of the commencement of building works a Trade Waste Application (C5) to install a waste treatment device or devices must be submitted to, and approved by, Council. The waste treatment devices proposed must be able to cater for discharges from the following sources:

- (a) Canteen
- (b) Science Laboratories

The application must include the following details;

- (a) Details and location of all processes, tanks, pits and apparatus associated with the generation of trade waste and,
- (b) Specifications of the treatment system including capacity/dimensions, material of construction and lining of the proposed pre-treatment facilities and,
- (c) Details of pipes and floor drainage conveying the waste and,
- (d) A detailed sewage drainage plan.

Reason: To ensure compliance with Section 68 of the Local Government Act 1993, Council's Policy for Discharge of Liquid Trade Waste into Council's Sewer 2004/05 and to protect Council's Sewerage System.

Note: For further information regarding Trade Waste treatment and discharge please contact Council's Trade Waste Officer.

6. Submit an Application for Trade Waste (C4)

Prior to the commencement of any building works a Trade Waste Application (C4) for disposal of liquid trade waste into sewer must be submitted to, and approved by, Council.

Reason: To ensure compliance with Section 68 of the Local Government Act 1993, Council's Policy for Discharge of Liquid Trade Waste into Council's Sewer 2004/05 and to protect Council's Sewerage System.

7. Submit a Construction Management Plan

Prior to the commencement of building works a Construction Management Plan for the management of soil, water, vegetation, waste, noise, vibration, dust, hazards and risk for the construction works must be submitted to and endorsed by the certifying authority. The plan must:

- (a) describe the proposed construction works and construction program and,
- (b) set standards and performance criteria to be met by the construction works and,
- (c) describe the procedures to be implemented to ensure that the works comply with the standards and performance criteria and,
- (d) identify procedures to receive, register, report and respond to complaints and,
- (e) nominate and provide contact details for the persons responsible for implementing and monitoring compliance with the plan.

Reason: To ensure that satisfactory measures are in place to provide for environmental management of the construction works.

8. Stormwater Disposal and Water Quality Requirements

All stormwater from the site must be trapped and piped to the street gutter/stormwater pit/other via an On-Site Detention (OSD) system to limit the discharge from the site to the pre-development rate in accordance with Council's D5 Development Design Specification. Prior to the commencement of building works the design of the OSD service shall be determined by a suitably qualified hydraulic consultant at no cost to Council.

An in-ground Gross Pollutant Trap (GPT) targeting litter is to be installed in accordance with Council's D7 Erosion Control and Stormwater Management Specification.

Reason: To provide satisfactory stormwater disposal and water quality.

9. Protection of Council Sewer/Stormwater Easements

Prior to the commencement of building works structural plans must be provided to Council for concurrence as the sewer and water authority. The plans are to demonstrate that the footings of any structure will not be located within the zone of influence of Council's water, sewer and stormwater assets.

Reason: To allow for safe access and maintenance of services within future easements by Council personnel.

10. Improve Water Quality

Water quality improvement devices and landscaping are to be integrated into the development including:

- Gross Pollutant Traps to capture litter from car parks, roads and outdoor space.
- Construction of biofiltration swales along the eastern boundaries of the site to filter overland flow
- Native trees to be selected where leaves may enter the stormwater system. Deciduous exotic trees planted along eastern walkway to David Madew Oval to be replaced.
- A buffer is to be provided between mown lawns in public space and stormwater drains. This aims to reduce grass clippings entering the creek and Lake Jerrabomberra.

Reason: To assist in reducing impact on water quality of Lake Jerrabomberra and Jerrabomberra Creek, in accordance with Jerrabomberra Site Watercourse and Riparian Impact Assessment dated 22 September 2021.

11. Submit a Design and Construction Plan for Canteen Food Preparation Area

Prior to the commencement of building works a detailed design for the construction of the canteen food preparation area must be submitted to, and approved by Council. Fixtures, fittings, and equipment must be provided so as to be capable of being easily and cleaned without causing a risk to food safety.

The plan should include the following details:

- Floor plan - to a suitable scale (e.g. 1:50).
- Finishes to floors, walls and ceilings
- Sectional elevation drawings - to a suitable scale (e.g. 1:50) showing all fittings and equipment.
- Hydraulic plans (plumbing details) - to a suitable scale (e.g. 1:50).
- Mechanical exhaust ventilation drawings (i.e. plans, elevation and schematic diagrams, where applicable) - to a suitable scale (e.g. 1:50).

Reason: To ensure compliance with Food Act 2003 and Regulations 2015, Food Standards Code and relevant Australian Standards.

Conditions to be Complied with During Construction

12. Hours of Operation for Works

All works associated with the construction and/or demolition of this development must be carried out between the following hours unless Queanbeyan-Palerang Regional Council agrees in writing. A written application shall be made to Queanbeyan-Palerang Regional Council if a variation of hours is required.

Weekdays: 7.00am to 6.00pm

Saturdays: 8.00am to 4.00pm

Sundays and Public Holidays: NIL

Reason: To reduce the chance of offensive noise being created and to minimise the impacts of the development in its locality.

13. Approval Documents

Keep a copy of all stamped approved plans, specifications and documents on site while work is being undertaken.

Reason: Relevant documentation is available for perusal on site by a council officer, for compliance check.

14. Work in Accordance with Engineering Specifications

All construction and restoration work must be carried out strictly in accordance with the approved drawings and Council's Design and Construction Specifications.

Reason: To ensure construction and restoration work is in accordance with Council's requirements.

15. Provide Water Service and Water Meter

A new main water meter and water service shall be installed by Council at no cost to the Council. The size of the meter and service shall be determined by a suitably qualified hydraulic consultant at no cost to Council.

The main meter shall be installed in an easily accessible position in the common property at the front of the site, or other accessible position approved by Council.

Reason: To ensure that the development is appropriately water metered.

16. Inspection of Council Utility Services

All connections and alterations to Council's water, sewer and stormwater services shall be inspected by Council's Development Engineering Team prior to backfilling. This includes the inspection of the orifice plate and connection to Council stormwater infrastructure.

Reason: Ensure on-site detention is constructed in accordance with the Council specification.

17. Dust Management

Throughout construction works undertake all measures as appropriate to provide dust suppression on roads leading to, adjacent to and within the site in the event that weather conditions, construction activities and associated traffic to and from the site are giving rise to abnormal generation of dust.

Reason: To ensure that local residents and activities are not disadvantaged by dust during hours of operation.

18. Unauthorised Use of Public Land

No building materials are to be stored or construction activities undertaken on public or adjoining land without prior written approval from Council.

Reason: To prevent unnecessary disturbance to public land.

19. Work on Adjoining Land is Limited

The verge and other adjoining lands must not be used for storage of materials or disturbed by construction activities except for;

- a) Installation of a temporary, stabilised construction access across the verge,
- b) Installation of services,
- c) Construction of an approved permanent verge crossing.

Reason: To minimise interference with the verge and its accessibility by pedestrians.

20. Construction Waste Management

All waste materials generated on-site during construction are to be stored in enclosed containers and deposited in an approved landfill at regular periods.

Reason: To ensure adequate waste management practices are in place during the construction phase.

21. Surface Water

Do not re-direct surface water onto adjoining private land. Alterations to the surface contours must not impede or divert natural surface water run-off, so as to cause a nuisance to adjoining property owners or create an erosion or sediment problem.

Reason: Stormwater disposal does not impact on the building or neighbouring properties.

22. Construction And Fitout Requirements

Canteen food preparation, sale and storage areas must be constructed and fitted out to comply with the requirements of the:

- (a) *Food Act 2003;*
- (b) *Food Regulations 2015;*
- (c) *Australia New Zealand Food Standards Code; and*
- (d) *AS1668.2 - The use of ventilation and air conditioning in buildings - Part 2: Ventilation design for indoor air contaminant control*

Reason: To ensure safe and hygienic food preparation/storage and compliance with Food Act 2003 and Regulations 2015, Food Standards Code and relevant Australian Standards.

23. Car Parking to Comply with AS/NZS 2890

All car parks must comply with AS/NZS 2890.1-2004 Parking Facilities Off-Street Car Parking, AS/NZS 2890.6-2009 Off-Street Parking for People with Disabilities.

Pavement line marking with bay dimensions to comply with AS/NZS 2890.1-2004 and AS/NZS 2890.6-2009, must be shown within the car parking areas to delineate parking bays, including signage for the accessible parking bays.

Reason: To provide adequate off-street car parking.

24. All Surfaces to be Concrete or Asphalt Surfaced

All parking spaces, loading bays, driveways and turning aisles must be concrete or asphalt surfaced, with all parking spaces line marked.

Reason: To ensure car parking spaces are functional prior to use of the premises.

25. Lighting in Car Parks and Public Spaces

Lighting throughout the car parking area and in public spaces must comply with AS/NZS 2890.1:2004 - Parking Facilities - Off-Street Car Parking, and AS/NZS 1158 - Lighting for Roads and Public Spaces.

Reason: To ensure the provision of adequate lighting within the development

Prior to Occupation of the Site as an Operational High School

26. Works as Executed (On-Site Detention System)

Prior to occupation Works as Executed drawings of the constructed on site detention system certified by the designer are to be submitted to Council accompanied by evidence of any restriction of land use of the land and positive covenant over the lot in favour of Council.

Reason: To ensure on site detention is constructed in accordance with the designed system and that its ongoing maintenance is enforceable by law.

27. Repair Damaged Public and Private Property

All damage caused to public and private property during the construction operations and associated activities must be repaired or reinstated prior to occupation of the development.

Reason: To ensure that all public and neighbouring private property in the vicinity of the development is maintained in its pre-development condition.

28. Water and Sewer Compliance Certificate - Construction

Prior to occupation of the development a compliance certificate in accordance with the Water Management Act 2000 must be obtained from Council.

Reason: To ensure the constructed infrastructure and services have been completed to Council's specifications.

29. Sewage Connection

Prior to occupation of the development connect the premises to Queanbeyan-Palerang Regional Council's sewerage infrastructure.

Reason: To ensure that premises are connected to available domestic sewerage system.

30. Comply with Waste Management Plan

The development is to comply with the submitted Operational Waste Management Plan dated 17 September 2021.

Reason: To ensure the impacts of waste generated by the development are managed accordingly.

31. Submission of Litter Management Plan

Prior to occupation of the development the applicant shall submit to Council a litter management plan detailing how the school will manage litter around the school and fringes of the building and property boundary. The plan shall include a regular schedule for litter pickup and a maintenance schedule for litter bins placed around the facility. Following occupation this litter management plan shall be adhered to.

Reason: To ensure that the school and building surrounds are kept free from litter whether generated onsite or from surrounding sites.

32. Waste Conditions

The school is encouraged to contact Council's Waste Officer to assist with the following elements of the school's waste management plan:

- Signage for waste bins at school to ensure it is consistent with Council's waste service so that students are getting the same message at home and at school.
- Council provides a number of waste education programs that are available for the school
- To assist with finding option for recycling plastic wrap, soft plastics and polystyrene. *Reason: To maximise waste reduction strategies at the school.*

33. Installation of No Stopping Signs

No stopping signs shall be placed on all sections of the north road not occupied by drop off and pick up parking.

Reason: Ensure that the north road does not become congested and impact on the safety of school students..

34. Provision of Works as Executed Drawings

Within three months of the occupation of the site, works as executed drawings for all internal water, sewer, stormwater and trade waste installations be shall be provided to Council for its records.

Reason: To ensure that Council has permanent records of internal services for the future reference of trade and other professionals.

Conditions Applying to the Ongoing Operation of the School

35. Maintain Car Parking Areas and Driveway Seals

All sealed car parking areas, loading bays, manoeuvring areas and driveways must be maintained in a trafficable condition, including pavement line marking

Reason: To ensure car park areas are useable.

36. Vehicle and Goods Storage Confined to the Site

All loading and unloading activities in connection with the development must be carried out wholly within the site and all goods and vehicles associated with the development must be accommodated wholly within the site.

Reason: To ensure free flow of vehicular and pedestrian traffic on the road and the verge.

37. Car Parking Spaces to be Kept Free at all Times

All car parking spaces, loading and unloading areas, vehicle manoeuvring and driveway areas must not be used for the storage of any goods or materials and must be available for their intended use at all times. The operator of the development must ensure that all vehicles associated with the development are parked within the site in the approved car parking area as line marked.

Reason: To ensure such areas are available for occupants and visitors of the site and parking on site is used for the development.

38. Delivery Times to Canteen

Deliveries to the school site shall not be carried out between 8.00am-9.30am and 2.30pm-4.00pm.

Reason: To ensure that deliveries are carried out at times when they do not create a danger to students.

39. Waste Collection Hours

Waste collection shall be limited to between 6:00am to 7:30am and 4.00pm to 7.00pm Monday to Saturday.

Reason: To ensure that waste collections are carried out at times when they do not create a noise nuisance to neighbours or a danger to students.

40. Bus Bay Hours

The Bus Zone shall only be operational during the 40km/h school zone times and shall be signposted accordingly.

Reason: Due to site constraints the construction of the bus zone was unable to include the required deceleration and acceleration lanes required for a 70km/h zone and as such is only suitable for use at times when the 40km/h limit is in place.