



1.0 Introduction

The purpose of this document is to detail the recommendation/issue and response of the project team to each of the submissions received relating to the Picton High School redevelopment (SSD 17_8640). The project was on public exhibition between 10 May 2018 and 8 June 2018. Three public submissions were received in addition to formal submissions from the following agencies:

- Department of Planning and Environment;
- Government Architect of NSW;
- NSW Environment Protection Authority;
- Office of Environment and Heritage – separate submissions for heritage and environment; NSW Rural Fire Service;
- Roads and Maritime Services;
- Transport for NSW;
- Wollondilly Shire Council; and
- Sydney Water

A response to the Department of Planning and Environment's submission has been provided in detail in the covering letter to this Response to Submissions. The tables on the following tables outline each of the recommendations of the remaining submissions in further detail.

2.0 Agency Submissions

Government Architect of NSW

Recommendation/Issue	Comment
Recommend the following additional information is requested:	
Plans of the proposal including key dimensions – site at minimum 1:1000 and buildings at minimum 1:200 scale including dimensions (overall building dimensions, setbacks, etc.), RLs, indicative furniture layouts	These drawings have been provided at Attachment B to the Response to Submissions letter. The drawings include further information on the dimension of the overall building dimensions. Indicative furniture layouts have not been provided, as the Department of Education in its role of providing adequate duty of care will continue to work on providing safe and effective learning environments to students external to the planning process.
Sections and elevations of the proposal at minimum 1:200 scale incorporating site context, key dimensions, materials and finishes proposed, key RLs	These drawings have been provided at Attachment B to the Response to Submissions letter. The drawings include 1:200 scale elevations showing the relation of new high school redevelopment to the adjacent existing residential areas and Argyle Street and annotation of the proposed material selection.
A physical materials sample board where materials are shown in the proportion they are intended to be used in the project	A physical materials board has been prepared and will be submitted to the DP&E under separate cover . The materials included are listed on drawing AA-0007.
Clearer outline of sustainability targets and demonstrated expression of these in design approach (e.g. Diagrammatic section illustrating natural light and ventilation strategies, sunshading, thermal mass etc)	<p>The following summary of sustainability targets supplement the previously issued ESD Report, prepared by Northrop at Appendix M of the initial EIS:</p> <ul style="list-style-type: none"> • Adopting passive solar design with new buildings are North South orientated; • Using low VOC, Low formaldehyde products and promoting Global Greentag Certified interior finishes products; • Promote effective waste management through providing facility that enable implementation of Waste Management Strategies. This aligns with the school's current education policies on Waste Minimisation through the existing "Avoid – Reduce – Reuse – Recycle" Campaign; • Providing natural light into the central Open Learning Spaces as demonstrated on the appended supplementary diagram; • Providing access sufficient access to natural ventilation through openable windows to achieve the desired optimal air quality; • Promote the use of renewable energy using 100 KW solar panelling system to offset energy consumption. The school is encouraged to capitalise on the renewable energy system and the architectural build environment for educational purposes; • Conduct post construction and post occupancy building tuning during the initial 12 months of occupation; • Implementing waterwise sanitary fixtures & fittings; and • Select and use waterwise plantation. <p>Updated sustainability drawings have been provided at Attachment B to the Response to Submissions letter</p>

Recommendation/Issue	Comment
1:50 section / elevation details of other key façade types	These drawings have been provided at Attachment B to the Response to Submissions letter. Specifically, key façade types are shown in Drawing AA21-001.
1:20 section / elevation of all fence and entry / perimeter wall types, including relationship to adjacent planting, paving and levels.	These drawings have been provided at Attachment B to the Response to Submissions letter. The drawings demonstrate the extent of perimeter fenced and pictorial reference to the various proposed fence types.
Further detail of opportunities to integrate Aboriginal culture and heritage should be developed with specific elements incorporated in the architectural and landscape works, and detailed on the plans.	Further detail on this matter has been provided at Attachment B and Attachment F to the Response to Submissions letter. Subject to resolution at detailed design stage, the attached site plans show the proposed location where existing Aboriginal artefacts and ceremonial ground are being integrated within the landscape design.
Recommend the design team consider the following amendments	
Further integration of security fencing and landscape strategy, and opening up of the entry forecourt as per earlier design proposals. Specifically, we recommend integrating planted elements alongside of fencing and barriers to soften these elements and provide a welcoming street address. Other improvements to integrate and soften security measures are also encouraged.	Further detail on this matter has been provided at Attachment B and Attachment F to the Response to Submissions letter. The site plan shows the proposed location where existing Aboriginal artefacts and ceremonial ground are being integrated within the landscape design.
Confirm the location of end of trip facilities and bike parking to support active transport strategies for staff and students.	<p>Staff end of trip facilities are accommodated within the scope of work and intended to be located as follows:</p> <ul style="list-style-type: none"> • 1 Accessible Staff WC with Shower to be co-located in the Staff Hub Area • 1 Staff Shower to be located in the Movement and Performance Hub • 1 Staff Shower to be located in the Fitness Area • 1 Existing Staff Shower to be retained and currently located in the Main Hall • 4 Student Showers & 1 accessible student shower to be located in the Movement and Performance Hub • 4 Student Showers & 1 accessible student shower to be located in the Fitness Area • 1 Existing Staff Shower to be retained and currently located in the Main Hall • 14 Existing Student Showers & 1 Existing accessible student shower to be retained and located in the Main Hall • The extent of bike racks are shown on drawing AA03-0002
Integrate landscaping and canopy tree planting for shade into the required on-street carparking.	The area subject to on-street car parking is outside of the site area and not under the ownership of the proponent. The proponent is willing to contribute to such planting via contributions as a condition of consent.
In addition to the above, we also recommend that the proponent provide a statement outlining how design quality will be developed and protected throughout the detail design, documentation and construction phase.	The design team has been engaged to prepare a full design & documentation services. The project will undergo rigorous design process to maintain the pedagogical and the architectural design intents as well as develop practical construction solutions.

NSW Environment Protection Authority

Recommendation/Issue	Comment
Site contamination (incl. hazardous materials)	
<p>The proponent be required to ensure that following relocation or demolition of any existing structures, infrastructure and in ground utilities, further investigation be undertaken of soil contamination (including within the footprint and immediate surrounds of those structures, infrastructure and utilities prior to undertaking any construction) to address the contamination with proper regard to the -</p> <ul style="list-style-type: none"> (i) NSW EPA Sampling Design Guidelines (ii) Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017 (iii) Guidelines for Consultants Reporting on Contaminated Sites, 2011 (iv) The National Environment Protection (Assessment of Contamination) Measure. 	<p>An investigation of the building footprint areas can be carried out after existing structures to be demolished are removed and with reference to guidelines referenced by Council. Douglas Partners (contamination consultant) provided a recommendation in report reference 92254.00 (February 2018) that the site is subject to a detailed site walkover after demolition – this can be carried out as part of the investigation works.</p>
<p>The proponent should comply with the processes outlined in <i>State Environmental Planning Policy 55 - Remediation of Land (SEPP55)</i> when assessing the suitability of the land and any remediation required in relation to the proposed sensitive use.</p>	<p>It is confirmed that investigations have been completed with reference to SEPP 55 on the advice of contamination consultant Douglas Partners.</p>
<p>The proponent be required (prior to commencing any work on the development site) to prepare and implement a procedure for identifying and dealing with unexpected finds of site contamination (including asbestos containing materials, lead contaminated dust and soil, leadbased paint and PCBs). That procedure should include details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved.</p>	<p>An unexpected finds protocol (UFP) can be prepared for use during earthworks and development works. The proponent is willing for this to be provided as a condition of consent.</p>
<p>The proponent be required to:</p> <ul style="list-style-type: none"> (a) engage a site auditor accredited under the <i>Contaminated Land Management Act 1997</i> (CLM Act) to review the adequacy of the site investigations, unexpected finds protocol, any remedial works or management plan required and to confirm the suitability of the land for the proposed use; (b) implement the recommendations of the Remedial Action Plan as reviewed by the accredited site auditor; (c) prepare an Asbestos and Lead Works Management Plan (ALWMP) that includes stringent requirements for controlling dust emissions in the development site so as not to affect the adjoining land with ALWMP reviewed and signed off as appropriate by an accredited site auditor; (d) provide a site audit statement (SAS) and accompanying site audit report (SAR) prepared following completion of remediation and validation, certifying suitability of the development site for the proposed use prior to undertaking any construction; (e) ensure that any contamination identified as meeting the trigger in the EPA 'Guidelines for the Duty to Report Contamination' is notified in accordance with requirements of section 60 of the CLM Act; (f) ensure the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site so as to result in significant contamination. 	<ul style="list-style-type: none"> (a) the proponent is willing for this to be a requirement as a condition of consent. (b) a Remedial Action Plan (RAP) is typically only required if contamination is identified. If the building footprint investigation does not identify any contamination, the proponent is willing to liaise with Council directly to clarify if a RAP is indeed required. (c) the proponent is willing for an ALWMP to be prepared as a condition of consent. (d) the proponent is willing for an SAS and SAR to be prepared as a condition of consent. (e) the proponent is willing for this to be required as a condition of consent. It is noted that the likelihood of this being required is low based on findings to date. (f) noted. Contamination reporting will continue to consider this duly.

Recommendation/Issue	Comment
Asbestos Waste	
The proponent be required to satisfy the requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 'asbestos wastes'.	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
The proponent be required to consult with Safework NSW concerning the handling of any asbestos waste that may be encountered during the project.	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
Polychlorinated Biphenyl (PCB) materials and waste	
The proponent be required to ensure that any PCB material or waste kept on the development site – <ul style="list-style-type: none"> (a) is stored and handled in accordance with the <i>Polychlorinated Biphenyl (PCB) Chemical Control Order 1997</i>, and (b) is assessed, classified and managed in accordance with the EPA "Waste Classification Guidelines Part 1: Classifying Waste" November 2014 and the 2016 Addendum thereto. 	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
Noise and vibration	
The proponent be required to ensure that as far as practicable all demolition, site preparation, bulk earthworks, construction and construction-related activities likely to be audible at any noise sensitive receivers such as surrounding residences are only undertaken during the standard construction hours, being: <ul style="list-style-type: none"> (a) 7.00 am to 6.00 pm Monday to Friday, (b) 8.00 am to 1.00 pm Saturday, and (c) no work on Sundays or gazetted public holidays. 	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
Intra-day respite periods	
The proponent be required to schedule intra-day 'respite periods' for construction activities identified in section 4.5 of the Interim Construction Noise Guideline as being particularly annoying to noise sensitive receivers, including surrounding residents.	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. Respite periods are considered as a form of mitigation when the highly affected noise management level (75 dBA) is exceeded. There are a small number of occasions when this occurs during loud noise activities such as bulk earthworks (excavators etc), use of jackhammers, and compaction works (vibratory rollers). Where activities such as these are predicted to exceed the highly affected noise management level, respite periods may be considered at affected residents. Should noise levels not exceed this level, the existing noise mitigation recommendations provided in the acoustic report are considered appropriate.
Idling and queuing construction vehicles	
The proponent be required to ensure construction vehicles (including concrete agitator trucks) involved in demolition, site preparation, bulk earthworks, construction and construction-related activities do not arrive at the project site or in surrounding residential precincts outside approved	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently

Recommendation/Issue	Comment
construction hours.	in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
Reversing and movement alarms	
The proponent be required to consider undertaking a safety risk assessment of site preparation, bulk earth works, construction and construction-related activities to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety.	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
Dust control and management	
The proponent be required to: (a) minimise dust emissions on the site, and (b) prevent dust emissions from the site.	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
Waste control and management (general)	
The proponent be required to ensure that: all waste generated during the project is assessed, classified and managed in accordance with the EPA "Waste Classification Guidelines Part 1: Classifying Waste", November 2014 and the 2016 Addendum thereto;	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
the body of any vehicle or trailer, used to transport waste or excavation spoil from the premises, is covered before leaving the premises to prevent any spill or escape of any dust, waste, or spoil from the vehicle or trailer; and	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site, is removed before the vehicle, trailer or motorised plant leaves the premises.	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
Waste control and management (concrete and concrete rinse water)	
The proponent be required to ensure that concrete waste and rinse water are (a) not disposed of on the development site, and (b) prevented from entering waters, including any natural or artificial watercourse.	The proponent is willing for this to be required as a condition of consent, as it is relevant during construction works only. These requirements are being pursued by the proponent independently in the construction contract currently being prepared. It is fair and reasonable to expect this to be covered by relevant policy.
Out of hours community use of school facilities	
The proponent be required to ensure that the school hall, performance, fitness and music facilities are not made available for community use between 10.00 pm and 8.00 am.	The proponent is willing for this to be required as a condition of consent. Additionally, it is noted that all community use will be in accordance with the Department of Education's policy on the community use of school facilities.

Recommendation/Issue	Comment
<p>The proponent be required to ensure that the sports field and outdoor sports courts are not made available for community use –</p> <ul style="list-style-type: none"> (i) during week day mornings, (ii) later than 6.00 pm on week nights, (iii) other than between the hours of 8.00 am and 6.00 pm on Saturdays, and (iv) during Sundays and public holidays. <p>The proponent be required to –</p> <p>undertake comprehensive noise compliance monitoring of representative uses of the sports field and outdoor sports courts and associated facilities (e.g. parking) outside school hours to demonstrate that the level, nature, quality and character of noise emitted by those uses and the time at which and frequency of those uses would not interfere unreasonably with or be likely to interfere unreasonably with the comfort or repose of persons not on the development site, especially the occupants of nearby residences.</p>	<p>The proponent is willing for this to be required as a condition of consent. Additionally, it is noted that all community use will be in accordance with the Department of Education's policy on the community use of school facilities.</p> <p>At completion of the Picton High School Redevelopment, the outdoor sports fields and courts will remain on the south east portion of the school site where they are currently located. It is a reasonable assumption that the after-school hour use of the sports fields and outdoor sports courts is expected to remain status quo.</p> <p>Consider conditional approval subject to the supply of supplementary noise compliance monitoring.</p>
<p>submit a detailed noise compliance monitoring report with noise measurements reported against relevant noise criteria and the outcomes of appropriate community consultation together with detailed recommendations concerning any additional feasible and reasonable noise mitigation and management measures, including further (or more relaxed) restrictions on the times at which and the frequency of each type of use of the sports field and outdoor sports courts and associated facilities (e.g. parking) outside school hours.</p>	<p>The proponent is willing for this to be required as a condition of consent, subject to the supply of supplementary noise compliance monitoring.</p>
<p>ensure that noise compliance monitoring referred to in paragraph (a) above, would include quantitative noise impact assessment to address noise emissions arising from amongst other things –</p> <ul style="list-style-type: none"> • audience/spectator noise, • referee whistle noise, • training sessions as well as sporting events, • any amplified sound during sporting events and any associated training sessions, and • post-event audience/spectator noise, including vehicle door slamming and departure noise. 	<p>The proponent is willing for this to be required as a condition of consent, subject to the supply of supplementary noise compliance monitoring.</p>
Mechanical plant and equipment	
<p>The proponent be required to:</p> <p>provide a comprehensive quantitative assessment of operational noise impacts on surrounding noise sensitive receivers, especially adjoining residences;</p>	<p>GHD (Acoustic Consultant) has established the relevant noise emission criteria in accordance the Design Guideline (DG11) and the EPA's Noise policy for Industry. Mechanical plant will be designed to achieve these requirements.</p>
<p>The proponent be required to:</p> <p>ensure mechanical plant and equipment (including agricultural plant and equipment) installed on the development site does not generate noise that –</p> <ul style="list-style-type: none"> (i) exceeds 5 dBA above the rating background noise level (day, evening and night) measured at the western boundary of the development site, and (ii) exhibits tonal or other annoying characteristics. 	<p>GHD (Acoustic Consultant) has established the relevant noise emission criteria in accordance the Design Guideline (DG11) and the EPA's Noise policy for Industry. Mechanical plant will be designed to achieve these requirements.</p>

Recommendation/Issue	Comment
Public address and school bell system	
<p>The proponent be required to design, install and operate the school public address/bell system to implement all such other measures as may be necessary to ensure use of that system does not interfere unreasonably with the comfort and repose of occupants of nearby residences.</p>	<p>The existing school currently utilises a bell and separate public-address system. The current arrangement has been operating successfully, in that no interference with nearby residences is known to the proponent. At this stage, the proponent proposes to use the same system in the redevelopment. The design of the school is considered to assist in retaining the acoustic impact of the redevelopment, in that noise is emitted into internal courtyards. However, the exact location of the new school bell system is subject to detailed coordination.</p>
Waste collection services	
<p>The proponent be required ensure waste collection services are not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.</p>	<p>The proponent is willing for this to be required as a condition of consent.</p>
Grounds maintenance using powered equipment	
<p>The proponent be required ensure grounds maintenance involving the use of powered equipment is not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.</p>	<p>The proponent is willing for this to be required as a condition of consent.</p>
Waste management	
<p>The proponent be required to identify and implement feasible and reasonable opportunities for the re-use and recycling of waste, including food waste.</p>	<p>The design intent is to provide the school with facility that enable implementation of Waste Management strategies as outlined in Appendix F of the original EIS, being the Waste Management Plan prepared by SMEC dated February 2018. It is intended for the school to be educated in waste minimisation through avoid-reduce-reuse-recycle policies. Each hub is intended to be equipped with centralised landfill, general waste and paper waste bins. A separate wood dust extractor system forms an integral design component for collection of wood dust and waste from the Woodwork material workshops.</p> <p>The above comments align with DoE – Environmental Education Policy for School (2001), NSW Sustainable Schools NSW: A curriculum focused resource hub for environmental education and Picton High School's Policy on 'Going Green'.</p> <p><i>'School environmental management plans work across the key learning areas of the curriculum and the whole school community. We start with local sustainability and over time develop student understanding of how their work contributes globally. Students and staff manage, observe and monitor our school's resources, waste and physical surroundings, then take on activities to protect and improve our school and the local environment.</i></p> <p><i>Your child will develop an understanding about:</i></p> <ul style="list-style-type: none"> <i>the relationship between human activities and natural systems</i> <i>sustainable management of the earth's resources</i> <i>the inter-related nature of processes in the natural environment</i> <p><i>We encourage you to support your child's 'going green' activities, and to help them to learn to care for the environment as part of their everyday lives.'</i></p>

Recommendation/Issue	Comment
	http://www.picton-h.schools.nsw.edu.au/our-school/going-green
Agricultural activities and grounds maintenance (water pollution)	
The proponent be required to ensure that runoff from the 'Agriculture Zone' and sports field does not pollute Stonequarry Creek and any other waters, including any artificial watercourses such as stormwater drainage channels.	The proponent is willing for this to be required as a condition of consent.
Agricultural activities and grounds maintenance (odours)	
The proponent be required to ensure that livestock are housed in such a manner and at such distance from adjoining residences as may be necessary to minimise the emission of odours at the development site.	The proponent is willing for this to be required as a condition of consent.
The proponent be required to ensure that any highly odorous fertilisers (e.g. aged/processed poultry manure) are applied to the development site by such means as may be necessary to: <ul style="list-style-type: none"> (a) minimise the emission of odours at the development site, and (b) prevent the emission of odours from the development site. 	15m ² of a fully enclosed Garden Store and 20m ² of a Bulk Store have been allocated in the scheme of the high school redevelopment. The Garden & Bulk Store will be located in the General Assistant shed and should only be accessible by authorised school maintenance staff.
Agricultural and grounds maintenance activities (pesticides)	
The proponent be required to ensure that any pesticide, including any insecticide, herbicide, fungicide, and any veterinary chemical used for external control of ectoparasites of animals, is only stored, prepared for use or used on the development site in such manner as may be necessary to prevent – <ul style="list-style-type: none"> (a) injury to a person, (b) damage to the property of any person other than the proponent, (c) harm to a non-target animal, and (d) harm to a non-target plant. 	15m ² of a fully enclosed Garden Store and 20m ² of a Bulk Store have been allocated in the scheme of the high school redevelopment. The Garden & Bulk Store will be located in the General Assistant shed and should only be accessible by authorised school maintenance staff.
The proponent be required to ensure that all pesticides on the development site are stored and prepared for use in a dedicated weather-proof structure designed and constructed – <ul style="list-style-type: none"> (a) to prevent unauthorised access to any stored pesticide, (b) to prevent overheating of any stored pesticide, (c) to prevent any spilled pesticide being released to the environment, (d) to be adequately ventilated for pesticide storage in accordance with relevant material safety data sheets and pesticide labelling, and (e) to be adequately ventilated for pesticide preparation in accordance with relevant material safety data sheets and pesticide labelling. 	15m ² of a fully enclosed Garden Store and 20m ² of a Bulk Store have been allocated in the scheme of the high school redevelopment. The Garden & Bulk Store will be located in the General Assistant shed and should only be accessible by authorised school maintenance staff.

Office of Environment and Heritage

Recommendation/Issue	Comment
It is recommended that although the Department of Planning and Environment did not identify Non-Indigenous Heritage as a requirement for the current EIS, it would be appropriate to	The Heritage Council has requested that a short report be prepared which identified whether there may be an historical archaeological resource of local or State significance requiring

Recommendation/Issue	Comment
request the Applicant to prepare a short letter report documenting the historical development of the subject site through land title and other historical records to identify whether there may be an historical archaeological resource of local or state significance requiring management at this site as a result of the proposed development. It is recommended this short report is prepared prior to determination of this application and referred to the Heritage Council of NSW for comment by the DPE. This would provide a clearer understanding to DPE and the Applicant whether there is an historical archaeological resource requiring management at this site and what conditions would be appropriate as a result. This short report should be prepared by a suitably qualified and experience historical archaeologist.	<p>management at the site along the alignment of the Old Hume Highway. This report needs to be submitted to the Heritage Council of NSW for review and comment prior to determination of the application. This report is in the process of being completed.</p> <p>The report, in the form of a Baseline Archaeological Assessment under the <i>Heritage Act 1977</i> will supply the following information:</p> <ul style="list-style-type: none"> • Historical research; • Literature review: Previous archaeological studies, heritage studies and listings etc; • Site inspection: Archaeological analysis and photographic record (if required); • Report formulation: Heritage / historical / archaeological significance, archaeological potential, legislative framework, impact evaluation and recommendation for further work; and • Preliminary liaison with the NSW Heritage Division. <p>Once the report has been completed, it will be issued through to the DP&E to assist them with their assessment of the application. This is likely to be issued in August 2018.</p>

NSW Rural Fire Service

Recommendation/Issue	Comment
The RFS provides the following recommended conditions	
<p>1. Asset Protection Zone At the commencement of building works and in perpetuity the entire property shall be managed as an inner protection area (IPA) as outlined within section 4.1.3 and Appendix 5 of 'Planning for Bush Fire Protection 2006' and the NSW Rural Fire Service's document 'Standards for asset protection zones'.</p>	The proponent is willing for this to be required as a condition of consent.
<p>2. Construction New construction shall comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2009 'Construction of buildings in bush fire-prone areas' or NASH Standard (1.7.14 updated) 'National Standard Steel Framed Construction in Bushfire Areas – 2014' as appropriate and section A3.7 Addendum Appendix 3 of 'Planning for Bush Fire Protection 2006'.</p>	Construction has been assessed in the Bushfire Report dated 4 April 2018. Condition 2 does not align with revised recommendation made in the revised report dated 16 May 2018. The condition relates to reducing the impact of BAL-12.5 construction to the eastern end of the build only.
<p>3. Water & Utilities Water, electricity and gas are to comply with sections 4.1.3 and 4.2.7 of 'Planning for Bush Fire Protection 2006'.</p>	The proponent is willing for this to be required as a condition of consent.
<p>4. Landscaping Landscaping to the site is to comply with the principles of Appendix 5 of 'Planning for Bush Fire Protection 2006'.</p>	The proponent is willing for this to be required as a condition of consent.

Recommendation/Issue	Comment
5. Evacuation and Emergency Management Arrangements for emergency and evacuation are to comply with section 4.2.7 of 'Planning for Bush Fire Protection 2006'.	The proponent is willing for this to be required as a condition of consent.

Roads and Maritime Services

Recommendation/Issue	Comment
Lot 1 DP 520158 RMS notes that the submitted Environmental Impact Statement (e.g. Figure 2) and supporting plans (e.g. architectural plans, etc) refer to Lot 1 DP 520158, shown by orange colour on Attachment 2 of this letter, as RMS owned land. As detailed in pre lodgement advice, Lot 1 DP 520158 was dedicated as a public road on the registration date of the same DP (i.e. 16/6/66). This portion of land is council owned and is not RMS owned land.	This figure has been revised in the revised architectural drawings and revised Environmental Impact Statement at Attachment B and Attachment F to the Response to Submissions Letter.
Level of details As outlined in pre lodgement advice that has been provided by RMS, concept plans for the proposed works in Argyle Street that contain a greater level of detail should be provided. These plans should be to scale, and include but not be limited to, legal lot/road reserve boundaries, existing line marking, proposed new line marking, new signage, location of existing infrastructure (i.e. power poles, light poles, etc), road carriageway/lane widths at various locations, measurements for all new proposed infrastructure (e.g. length and width of turn bays, pedestrian thresholds), etc. This level of detail is required so as to demonstrate compliance with relevant standards, to ensure the proposed/required works can fit within the existing road reserve area or if they cannot what changes are required and to enable Council to undertake an assessment of impacts as well compliance with applicable Austroads requirements. At this time, what has been submitted are sketch plans that do not contain adequate information to undertake the required assessment as detailed above. As such, the applicant should be requested to provide the above detail to council for review and comment prior to the determination of SSD 8640.	Additional detail regarding this item is provided in Attachment O to the Response to Submissions Letter.
Swept Path Assessment RMS notes that the submitted Traffic and Accessibility Impact Assessment (prepared by TDG, Ref: 14584 ta 180404 final v2, dated 4 April 2018) contains an evaluation of turning manoeuvres for buses based on a 14.5m long rigid bus accessing and leaving the site. The swept path assessment provided (refer to Attachment E in the TDG report) shows that this size bus is unable to access or leave the bus parking area fronting Argyle Street without encroaching onto the adjoining pedestrian/footpath areas, kerb and gutter, etc. The assessment provided for the Argyle Street frontage shows buses entering into the bus parking/kerb side lane as well as exiting from the bus parking/kerb side lane. Noting that during drop off and pick up times buses will be parked in the kerb side lane, the assessment provided should also detail the manoeuvre of a 14.5m bus into and from the bus parking area travel lane in as well as onto Argyle Street. RMS suggests that the applicant be requested to update their turning path plans and associated	Additional swept path diagrams have been provided at Attachment D to the Response to Submissions Letter. The diagrams include the following: <ul style="list-style-type: none"> An assessment of buses exiting the site whilst a bus is parked in the southernmost bus parking bay. In order for a bus to be able to exit the site in this arrangement it is recommended that the kerb line be amended as shown within the relevant figures. An assessment of buses accessing the site whilst a bus is parked in the northernmost bus parking bay. The assessment shows that a bus accessing the site from the north is able to access the site in this arrangement with some modification to the kerb line. However, a bus accessing the site from the south would be required to wait for the bus to exit the bus bay. In this event, the bus would be able to wait on-site or within the right turn bay. In order to maintain a narrow crossover width at the northern site access to ensure pedestrian safety, and given the infrequent nature of this event

Recommendation/Issue	Comment
<p>required works to demonstrate that manoeuvres for these buses can be contained within the formed road area. The plans provided should comply with Austroads requirements (e.g. speeds used, required clearances, etc)</p> <p>Roads Act 1993 RMS notes the Environmental Impact Statement details that an approval is not required under the <i>Roads Act 1993</i> in order to permit the proposed development to occur (i.e. Table 5). RMS advises that as the current proposal is seeking to undertake work on Argyle Street which is a I classified regional road, these works and/or structures will require consent from council and concurrence from RMS under Section 138 of the <i>Roads Act 1993</i>. Generally, should the developer be able to demonstrate to council that a proposed treatment and/ or work on a classified regional road is acceptable and complies with relevant standards, RMS would issue its concurrence to council under Section 138</p>	<p>occurring, and the low impact of buses waiting for a short period of time before accessing the bus bay, this arrangement is considered to be acceptable.</p> <p>Accordingly, it is recommended that the kerb line be amended as per the swept path diagrams.</p> <p>Noted.</p>
<p>School Zones RMS notes that proposed development will require amendments to existing school zones. This including, but not limited to, a new school zone in Wonga Road. Limited details have been provided as part of the SSD application on this school zone or changes that may be required to the existing school zone in Argyle Street. The extent of the school zones must be determined in consultation with RMS's Safer Around Schools Project Officer. It is therefore suggested that the developer or their agent make contact with Kristian Pinochet at RMS on 4221 2580 post any approval being issued and prior to submission of a Section 138 application to Council.</p> <p>SIDRA RMS acknowledges that an assessment of intersection operations has been undertaken using SIDRA modelling. Electronic copies of the modelling have not been provided to review as requested in previous advice issued. Electronic copies of this modelling should be provided to council for its review as well as details on any defaults that have been changed along with supporting justification for these changes,</p> <p>Environmental Impacts The environmental impacts of the proposed roadworks within both the Argyle Street and Wonga Road road reserves need to be adequately considered. These impacts include traffic and road safety impacts as well as other impacts such noise, flora and fauna, heritage and impact to community.</p>	<p>During the preparation of the Traffic Report, TDG contacted Kristian Pinochet (RMS), who provided the following advice:</p> <p><i>'I have followed this up with our Land Use unit who have advised that this is currently pre-DA. In this regard, no formal action by RMS is required with regards to the school zone at this stage.</i></p> <p><i>If the application is approved, I can review the final plans and determine the extent of the school zone extension. From there I can start the internal process.'</i></p> <p>As such, no action was taking in determining the new school zones, and this will be addressed following approval of the application, as requested by RMS.</p> <p>TDG have prepared SIDRA files and have been appended to the Response to Submissions Letter at Attachment G. This attachment is accompanied by a short letter which details assumptions that have been used.</p> <p>In addition to this, TDG will be conducting traffic modelling for a single lane roundabout at the intersection of Wonga Rd & Argyle St.</p> <p>TDG are currently in the process of preparing a Construction Traffic Management Plan, which will address any road safety matters during construction.</p> <p>It is further noted that these impacts have been considered in the existing Biodiversity Development Assessment Report.</p>

Transport for NSW

Recommendation/Issue	Comment
<p>Green Travel Plan <u>Recommended Condition:</u> As part of the ongoing operation of the school, a detailed Green Travel Plan (GTP), which includes target mode shares for both staff and students with the objective to reduce the reliance on private vehicles, shall be prepared. The GTP must be implemented accordingly and updated annually.</p> <p><u>Reason:</u> To ensure sustainable transport outcomes and achieve the overall strategic planning objectives in the:</p> <ul style="list-style-type: none"> • Future Transport 2056; • Sydney's Bus Future 2013; • Sydney's Cycling Future 2013; and • Sydney's Walking Future 2013. 	<p>Whilst the DP&E have requested that a Green Travel Plan be provided as part of this Response to Submissions, the proponent notes that TfNSW have included the requirement of a Green Travel Plan as a 'recommended condition'. As such, a Green Travel Plan is in the process of being prepared, however, we request that this is required as a condition of consent as per TfNSW's submission. The proponent is willing to provide a Green Travel Plan upon occupation of the site.</p>
<p>Traffic and Parking Management Plan <u>Recommended Condition:</u> The Applicant shall prepare a Traffic and Parking Management Plan, which details the measures to safely manage the daily transport task to/from the school for both the interim and final design. Traffic and parking management measures that need to be addressed include:</p> <ul style="list-style-type: none"> • kerbside vehicle pick-up/drop-off management, staff parking management and orderly vehicle queuing; • maintaining bus accessibility and student waiting areas; • safe parent and student behaviour during pick-up/drop-off; and • safe pedestrian movements to the school entrances, minimising vehicle-pedestrian conflicts. <p>The plan shall also detail the responsibilities of various personnel executing the plan and include measures to monitor, review the performance and make improvements to the plan. This plan should be implemented as part of the ongoing operation of the redeveloped school.</p> <p><u>Reason:</u> To safely manage the high volume of traffic (vehicular and pedestrian) movements, which generally occur within a short timeframe before and after school hours.</p>	<p>It is proposed that the Traffic and Parking Management Plan be required as a condition of consent, in accordance with the recommendation provided by TfNSW.</p>
<p>Signage and Linemarking Plan <u>Recommended Condition:</u> The Applicant shall prepare a detailed signage and linemarking plan of the proposed changes to kerbside parking restrictions to accommodate the various vehicle movements to/from the development within the local road network. The preparation of the plan should be made in consultation with and approved by Woollondilly Shire Council. The approved</p>	<p>Line marking upgrade and the inclusion of the extent of 40Km zone will be implemented and developed based on concept drawing C030 (refer to Attachment B of the Response to Submissions letter). Detail design of Signage and line marking will be carried out accordance with Austroads Design Guidelines to Council and RMS standards.</p>

Recommendation/Issue	Comment
<p>kerbside parking restrictions must be implemented to the satisfaction of Council.</p> <p>Sufficient bus zone lengths are to be provided to accommodate school bus services and for school charter services.</p> <p><u>Reason:</u> To ensure that pick-up/drop-off parking management measures are provided prior to the completion of the school.</p>	
<p>Road Safety Evaluation <u>Recommended Condition:</u> A Road Safety Evaluation (RSE, refer to <i>NSW Centre for Road Safety Guidelines for Road Safety Audit Practices</i> and <i>Austroads Guide to Road Safety Part 6: Road Safety Audit</i>) shall be conducted on all relevant sections of road utilised for bus and private vehicle pick-up and drop-off. This should be undertaken as part of the detailed design stage and upon completion of all relevant road works.</p> <p>Appropriate road safety measures and/or traffic management measures shall be implemented based on the outcomes of the RSE.</p> <p><u>Reason:</u> The traffic and parking demands associated with the proposed land use has the potential to adversely impact road safety and exacerbate any existing road safety issues.</p>	<p>It is proposed that the Road Safety Evaluation be required as a condition of consent, as TfNSW in their submission provided this comment as a 'recommended condition'.</p> <p>The Road Safety Evaluation will be undertaken following completion of the detailed design stage of the project, in accordance with the recommendations made by Transport for NSW. The Road Safety Evaluation will be undertaken in accordance with the 'NSW Centre for Road Safety Guidelines for Road Safety Audit Practices' and 'Austroads Guide to Road Safety Part 6: Road Safety Audit' documents and will be undertaken by a suitably accredited traffic engineer. The Evaluation will include a review of all relevant sections of road utilised for bus and private vehicle pick-up and drop-off. A second Road Safety Evaluation will be undertaken upon completion of the relevant works. Appropriate road safety measures and/or traffic management measures will be implemented based on the outcomes of the Road Safety Evaluations.</p>

Wollondilly Shire Council

Recommendation/Issue	Comment
Comments from Council Meeting, 21 May 2018	
Adequate parking is provided for teachers and students	The adequacy of the parking provision is clearly outlined within Section 11 of the Traffic Report.
Air conditioning is provided in all class rooms and the hall (as per the previous NOM)	In line with the recent announcement by the Minister for Education, all new and refurbished schools will be implemented with air cooling. Picton High School will adhere with this policy.
Solar panelling be considered for the project	Solar panels (100KW system) have been included within the project.
Water reuse tanks be considered for the project	Rainwater collection and reuse is included in the project for irrigation purposes only as it is School Infrastructure NSW policy to not allow the use of rainwater for toilet flushing
The upgrades allow joint use for the community, particularly for the hall, library and playing fields	The shared use facilities are included in the Design Verification Statement provided in the original SSD proposal.

Recommendation/Issue	Comment
The footpath be expanded on both sides of Argyle St between Wonga Road and Henry St for safety reasons	<p>An existing continuous concrete footpath is established along Argyle Street on the east (school side) of the road. It extends north from the southern school boundary connecting the school with the Picton town centre.</p> <p>The number of walking trips generated by the school is minimal and will remain relatively unchanged following the redevelopment. As such, the existing pedestrian infrastructure is adequate including the existing footpath on the eastern side of Argyle Street.</p> <p>Notwithstanding this, it is proposed to provide a pedestrian footpath along the western side of Argyle Street between the proposed two new pedestrian crossings to facilitate pedestrian movements. It is also proposed to provide footpaths for safe paths of travel from the existing eastern Argyle Street footpath to the school entrance. The extension of the existing footpath has been included in the scope of works.</p>
A footpath be built along Wonga Road on the school side for safety reasons	There is no proposed pedestrian access to the school from Wonga Road for the redeveloped school. All pedestrian access is proposed from the Main Entrance on Argyle Street.
Adequate parking spots be allowed for buses	The adequacy of the bus parking provision is clearly outlined within Section 11 of the Traffic Report.
A pedestrian or School crossing be installed on Argyle Street	The existing pedestrian crossing facility on Argyle Street has been removed as its previous location required pedestrians to cross the internal bus parking area. In order to accommodate pedestrian movements across Argyle Street for the redeveloped school, two new pedestrian crossing facilities are proposed to the north of the site and between the two southern crossovers. Relocated pedestrian refuges along Argyle St are shown on drawing C030 in the revised Architectural Drawings at Attachment B to the Response to Submissions letter.
That due to the fact that Picton High School has the largest amount of students who catch a bus in the State, the Department of Education financially contribute to the building of a cycleway to Tahmoor	Traffic investigations detail that there is a negligible number of students who currently cycle to school. The number of cycling trips generated by the school will remain relatively unchanged following the redevelopment. As such, the existing cycling infrastructure is considered adequate. It is not considered appropriate for School Infrastructure NSW to financially contribute to the building of a cycleway between Picton and Tahmoor (approximately 9km).
Council again stresses the importance of upgrading the intersection of Wonga Road and Remembrance Drive	The Traffic and Accessibility Impact Report (refer to Attachment C of the Response to Submissions Letter) has been revised in accordance with the clarification of student and numbers for which consent is sought under this application. The revised modelling has indicated that in the year 2021, with the school operating at full capacity of 1,580 students, the intersection of Wonga Road and Argyle Street is operating at a Level of Service B for the morning and evening peak periods. In summary, the existing intersection configuration will have ample capacity to accommodate for future traffic growth and the traffic generation from the school.
Traffic and Infrastructure Comments	
Council has from the outset of discussions with MACE, raised concerns as to the potential impacts from the school on the local road network and the level of detail lacking within the early draft Traffic Assessment Report. In Council's opinion this has led to the need for traffic control	As above, the Traffic and Accessibility Impact Report (refer to Attachment C of the Response to Submissions Letter) has been revised in accordance with the clarification of student and numbers for which consent is sought under this application. The revised modelling has indicated

Recommendation/Issue	Comment
<p>measures at the intersection of Argyle Street and Wonga Road. The details submitted with the SEARs clearly shows the intersection performance drops from a LOS B to a LOS F due to the development and this is likely to occur during the temporary school to be accessed from Wonga Road as well as the ultimate development. As such this intersection needs to be addressed as a first stage of the project. Council would consider traffic lights or a round-a-bout installed at no cost to Council at this intersection.</p> <p>Council is extremely concerned with the strategy of reliance on on-street parking and the need for pedestrian movements to access the school including safe connections across Argyle St, for which the proponent's state is to be upgraded to 4 lanes. Council require detail of pedestrian connectivity including safe access across and alongside Argyle St given the applicant's dependency on on-street parking. This would likely include the need to signalise the bus bay exit or a stand-alone 'pelican crossing'.</p>	<p>that in the year 2021, with the school operating at full capacity of 1,580 students, the intersection of Wonga Road and Argyle Street is operating at a Level of Service B for the morning and evening peak periods. In summary, the existing intersection configuration will have ample capacity to accommodate for future traffic growth and the traffic generation from the school.</p> <p>No timeframes have been provided by Council to determine when the road will be upgraded to four lanes. Whilst it remains a two-lane road the proponent believes the proposed arrangement is sufficient to allow safe crossing of the road.</p> <p>As noted previously, a Road Safety Evaluation is required for the project. This will provide an independent review of the safety of the project. The proponent recommends waiting until the result of such an assessment before deciding to make any changes.</p> <p>At this stage, and without any plans to determine what the road network will look like with four lanes, it is difficult for the proponent to provide any comment on what crossing facilities will be required when the road is widened. Whilst the two are linked, the proponent believes this would be a matter to be addressed at a later date when the road upgrade is designed.</p>
<p>The intention of a round-a-bout at the end of the reconstructed Wonga Road is also taken to be constructed at no cost to Council, and Council in-principal provide no objection to this roundabout and associated land being transferred to Council.</p> <p>Council does not support the transfer of the Argyle Street Bus Bay to Council and would also prefer to see the transfer of Road Reserve at the northern section of Argyle Street to the ownership of the Department of Education.</p> <p>That the submission provided by the RMS emailed the Department of Planning dated 12 June 2018 be considered with a view to resolve traffic and mitigation measures for the local road network.</p>	<p>This item is subject to further negotiation between the proponent and Council.</p> <p>Conditional to further negotiation between SINSW and Wollondilly Shire Council.</p> <p>Refer to above comments.</p>
Traffic and Infrastructure Comments in respect of the Environmental Impact Statement	
<p>Volume 1 Section 4.7 Commentary refers to 'pedestrian crossings', although detail commentary and sketches refers to pedestrian refuges.</p> <p>Section 4.9 We note the comments about the boundary adjustment enabling the dedication of the entire bus bay to Council. Throughout the discussions between Council and the Dept, at no time was this agreed to and Council's concerns with this bus bay remains – the bay would need to be built in accordance with Council Specifications and a detailed traffic assessment and road safety audit carried out reviewing the risk to vehicles and pedestrians.</p> <p>Section 6.3 (& Appendix H & L – Vol 2)</p>	<p>This has been amended in the revised Environmental Impact Statement at Attachment F of the Response to Submissions Letter.</p> <p>This has been amended in the revised Environmental Impact Statement at Attachment F of the Response to Submissions Letter. We note that the transfer of the Bus Bay is conditional to further negotiation between SINSW and Wollondilly Shire Council. The update to the EIS acknowledges this. In any event, the bus bay will be built to Council's specifications and road safety will be assessed under the Road Safety Evaluation that is being prepared under separate cover.</p> <p>Noted. This has now been provided.</p>

Recommendation/Issue	Comment
<p>Appendix H We note that despite consistent requests from Council and RMS, a traffic impact assessment was not forthcoming and has only been seen with the formal SEARs package.</p> <p>Section 1 TDG refers to Council's Development Contributions Plan and Argyle St being upgraded to a 4 lane road, which mitigates any increase in school traffic. We note that the contributions plan is from 2011 and is currently under review – the traffic assessment done, by TDG for Council, for the review indicates no need to upgrade the road to 4 lanes. No comments seen of how pedestrians are to be safely catered for crossing the road across four lanes and further to concerns raised from Section 4.9 of Vol 1 (see above)</p>	<p>TDG can confirm that the strategic model indicates Argyle Street does not need to be upgraded to a four-lane road. A change in where future development is expected to occur in the surrounding area has resulted in the expected increase in traffic along Argyle Street to be minimal. As such, the proposed pedestrian crossing facilities are expected to allow safe crossing of Argyle Street.</p>
<p>Section 4 Council and RMS have previously expressed concern at the background traffic surveys given the date taken was at the very end of the school term and likely not indicative of normal traffic movements. The further survey was carried out during the Christmas school holidays further raising concerns at the appropriateness of the survey.</p> <p>Commentary confirming that the existing car parking of 113 spaces is well utilised at 92%, which raises concerns that ultimately only 135 spots are to be provided (yet the school is doubling). This places extra pressure on the on-street parking which is Council's infrastructure, for which TDG are suggesting 4 lanes of live traffic – which will remove on-street parking.</p>	<p>The traffic surveys were undertaken on the Thursday prior to the school holidays. Based on TDG's experience, the traffic environment on a Thursday prior to the school holidays is not significantly different to a typical Thursday during the school term. As such, it is considered that the traffic surveys are suitable for the purposes of the traffic assessment.</p> <p>The further survey was undertaken to establish the traffic volumes along Wonga Road. The school does not currently have access via Wonga Road and as such the traffic volumes are not expected to significantly change during the school holiday period.</p> <p>The application proposes to increase the school capacity to 1,500 students. At the time the traffic assessment was undertaken the school had a roll of 1,158 students. Therefore, the application will result in an increase of approximately 350 students.</p> <p>The proposed on-site car parking provision is expected to cater for the teacher and visitor car parking demand. Therefore, the increase in on-street car parking demand will be generated by parents picking up and dropping off their students, and students parking on-street.</p> <p>The increase in car parking demand is expected to be 22 car parking spaces, which has been calculated based on the existing school parking demand. This demand can be accommodated within Argyle Street as outlined within the traffic report, which is not proposed to be upgraded to a four-lane road.</p> <p>The surveyed parking area used for the traffic assessment only included Argyle Street within close proximity of the school. The proposed school will provide a new access via Wonga Road at the rear of the site. Therefore, it is expected that some parents and students may choose to park in Wonga Road. Wonga Road currently experiences a low parking demand and is expected to be able to readily accommodate an increase in car parking.</p> <p>Based on the above, it is concluded that the minor increase in the student and parent car parking demand can be accommodated within the nearby on-street parking.</p>
<p>Section 8 The SIDRA results are assumed to be for the post construction development and not during the construction – modelling of the 'temporary school' access from Wonga Rd should be assessed</p>	<p>The operation of the intersection will be assessed as part of the preparation of the Construction Traffic Management Plan which TDG are currently preparing.</p>

Recommendation/Issue	Comment
<p>and likely result in similar performance to the Wonga/Argyle St intersection, post development, which is shown to go to LOS F. As such the roundabout (or other upgrade such as signals) will need to be constructed prior to access requirements from Wonga Rd commencing.</p> <p>Section 8.5 Further to comments above, there are no confirmed or immediate proposals to upgrade Argyle St to 4 lanes by 2028 and this appears to be at odds with Council's most recent modelling performed by TDG (which will be pursued by Council as a separate exercise)</p>	<p>Noted.</p>
<p>Section 11.5 Council notes the Dept Policy for on-site parking but it notes 'parking should be kept to a minimum', which would take into context the availability of on-street parking. Given the surveys done at dates unlikely to be normal (refer above), and in spite of the high utilisation of existing parking, an unknown loss of on-street parking from the modifications proposed in front of the school for access and egress, yet a doubling of school numbers plus a potential need for additional lanes on Argyle St, it is unclear how the applicant proposes to cater for increased parking or safe pedestrian movements.</p> <p>Section 11.8 Reference made to a travel management plan which seems to be replicated in the Conclusions as a 'Green Travel Plan' – seems very noble yet no detail – and the impact assessment clearly states numerous times that existing active transport use is low and unexpected to change.</p>	<p>TDG provide the following comments in relation to the matters raised:</p> <ul style="list-style-type: none"> • The survey results are considered to be reflective of typical school term conditions as outlined above; • The surveyed parking area used for the traffic assessment only included Argyle Street within close proximity of the school. The proposed school will provide a new access via Wonga Road at the rear of the site. Therefore, it is expected that some parents and students may choose to park in Wonga Road; • The proposal will result in a maximum increase of approximately 350 students; • The strategic model indicates that Argyle Street does not need to be upgraded to four lanes and will remain as a two-lane road. <p>Based on the above, it is concluded that there is ample on-street parking to accommodate the increased on-street demand of 22 spaces. Therefore, the proposed parking provision is considered appropriate and in line with the Department of Education's Policies.</p> <p>Further, the proposed pedestrian crossing facilities are expected to allow safe crossing of Argyle Street.</p> <p>A Green Travel Plan is in the process of being prepared which will address these comments, as outlined with Item 5 above. The proponent is therefore willing for this to be provided as a condition of consent.</p>
<p>Appendix L References are made for the need for a Construction Traffic Management Plan – yet the Plan supplied has no detail to review. There is no investigations or findings detailed in the report or how it arrived at the recommendations made. Council's previous comments still stand on how the works will impact on the broader transport network and how this is to be managed which details traffic movement and control planning.</p>	<p>A Construction Traffic Management Plan for the works associated with the redevelopment of the school is currently being prepared. The CTMP will assess the impact on the broader transport network and how this is to be managed which details traffic movement and control planning.</p>
Council Environment Comments	
<p>Council recommend that the following listed trees NOT be removed:</p> <ul style="list-style-type: none"> • Tree 14 Himalayan Cedar at the front of the site. Council disagrees with the "Low" rating in relation to Landscape/Visual Significance. The tree is prominent in the location for persons living near and passing the site. It appears to be one of the oldest trees on the site and has cultural significance as part of the memorial garden. 	<p>Tree 14 be removed due the following reasons:</p> <ul style="list-style-type: none"> • Tree 14 blocks supervision and site lines of into main entry of school, for security reasons it is important all vegetation in this area is at a low height. • Main entry zone is to be used as a community gathering place incorporating native trees and flora, this will also be the location of the bush tucker garden.

Recommendation/Issue	Comment
<ul style="list-style-type: none"> Council does not support the removal of trees 46 to 53 which are outside the new building zone. 	<ul style="list-style-type: none"> New cultural/memorial zone has been allocated within the northern courtyard where cultural/memorial ceremonies will take place next to the flag poles and relocated lone pine tree. <p>Tree No 46, 47 & 48 to be removed, due to the addition of covered outdoor learning area off the support unit. This is a SINSW requirement for support unit facilities.</p> <p>Tree No 49 to be retained</p> <p>Tree No 50, 51 ,52 & 53 to be removed due to access requirements during construction phase as well as for operation of new school.</p>
<ul style="list-style-type: none"> If the apparently enlarged sports field greyed out on page 67 is not part of the DA we query the need to remove trees 68 to 73 	<p>Trees 68 to 73 are required to be removed due to location of temporary School.</p>
<ul style="list-style-type: none"> Council also queries the need to remove tree 65 	<p>Tree 65 is to be removed due to location within the new main works zone. The location of tree 65 is in middle of the Industrial Arts Workshops which internally are required by SINSW to be linked therefore no allowances can be made for separation of workshops and retention of Tree 65</p>
<p>Council recommends the removal of weed trees in the agricultural zone area, namely the camphor laurel, willow and privet</p>	<p>All camphor laurel and privet species are to be identified and removed as part of the proposed works.</p>
<p>The loss of native trees on Council land at the proposed Wonga Street turning area should be minimal</p> <p>We would appreciate the opportunity to comment on the draft Landscape Management Plan. Council notes that 45 trees are listed to be <i>'replaced in the landscape upon completion'</i>. Council assumes this means within the landscape of the school site and would fully support this replacement of native trees with similar native trees, preferably with some mature stock</p>	<p>Trees are required to be removed due to access on site for large trucks and public safety. Trees will be replaced with remnant species upon completion of the scope of works.</p> <p>The landscape design will be developed as part of the Detailed Design Phase which will incorporate detail on planting species, quantities and locations. As this level of information is not available at this stage, the proponent is willing for this to be accepted as a condition of consent.</p>
<p>We believe there should be no net reduction on the overall school tree canopy i.e. replacement of all removed trees. We note that the report on page 2 refers to some out-of-date legislation.</p> <p>The land area immediately beyond the back school boundary fence is unremediated landfill. This proposal in respect of access during and after contraction would place more people in the area than is currently the situation.</p>	<p>Recommend replacement of 2 for 1 of tree on the landscape plan. Revised report to be reissued.</p> <p>The area east of the eastern boundary is outside the school boundary and thus is not utilised by the school. Notwithstanding this, the construction of the new entry will adhere to requirements in regard to remediation.</p>
<p>The Acoustic Assessment noise mitigation measures need to consider the impact of the development on the Animal Shelter.</p>	<p>An amended acoustic report has been prepared by GHD and is provided at Attachment E to the Response to Submissions Letter. This revised version includes the amended design perimeter requested by the DP&E on noise emissions to external receivers.</p> <p>The additional assessment has found that the intensity on school use of the play area to the south east portion of Picton High School may be marginally reduced. In the current condition, the school's active play area is located in the south eastern open area. However, several courtyards and outdoor play areas are being created within the school ground and surrounded by new buildings upon completion of the redevelopment. Outdoor activities will be dispersed</p>

Recommendation/Issue	Comment
	onto new courtyards which may result in the reduction on intensive use of the south east corner of the site.

Office of Environment and Heritage (Environment Submission)

Recommendation/Issue	Comment
Biodiversity	
An inconsistency has been noted between the Environmental Impact Statement and the Biodiversity Assessment Report in relation to the impacts on native vegetation. The EIS indicates the proposal will result in the removal of approximately 0.07ha of Grey Box- Forest Red Gum Grassy woodland on flats of the Cumberland Plain vegetation along the southern and south-eastern boundary (page 50), while the BAR notes 0.16ha will be removed (pages 2 and 31). The proponent needs to clarify whether 0.07 ha or 0.16 ha of native vegetation is to be removed.	The proponent clarifies that the extent of native vegetation to be removed to accommodate the temporary school is 0.16ha, as per the BAR. The EIS has been updated to clarify this.
The EIS notes the development will modify/partially clear native vegetation in the northeast of the site for the use of an educational trail, playing fields and Agricultural Plot and that approximately 0.46 ha of native vegetation would be modified through the loss of native groundcover (page 50-51). To assist avoid disturbing remnant native groundcover, it is recommended the proposed education trail is in existing cleared areas or non-native vegetation and the area surrounding the trail is rehabilitated with local native plants. Locating the trail in cleared/non-native areas would have educational benefits in terms of teaching the students about the importance of protecting remnant vegetation and rehabilitating native vegetation.	The educational trail and agricultural plot will avoid disturbance to native vegetation. This is currently grazed / mown and amendments to the civil proposal during design development have ensured trees in the NW corner will not be impacted by the works.
The EIS also indicates future management of the remaining native vegetation within the subject site is likely to be consistent with current management activities of grazing and/or mowing (page 51). Where possible it is recommended mowing is discontinued and the remnant areas to be retained are rehabilitated with a diversity of local provenance native trees, shrubs and groundcover species.	This conditional recommendation is noted for action to be carried out as suggested
OEH recommends the landscaping replaces the loss of the existing trees from the site with local native trees. The AATM recommends using advanced plants in the landscaping and planting species indigenous to the area (page 64). OEH supports these recommendations as the removal of the existing trees and the benefits they provide, can take decades for a juvenile tree to replace.	The redevelopment makes provision to set aside areas for native vegetation rehabilitation and educational purposes.
Landscaping	
It is recommended the landscaping at the site includes the following	
<ul style="list-style-type: none"> native vegetation that is to be retained on the site is clearly identified on the ground to ensure these areas are protected during construction 	The redevelopment makes provision to set aside areas for native vegetation rehabilitation and educational purposes.

Recommendation/Issue	Comment
<ul style="list-style-type: none"> trees removed from the site are replaced by advanced, local provenance species from the relevant native vegetation community 	<p>The project will introduce a significant number of new indigenous trees to meet our design principles of a green edge to the school, enhancing biodiversity and habitat.</p>
<ul style="list-style-type: none"> native trees to be removed from the site are replaced by advanced, local provenance species from the relevant native vegetation community 	<p>The proponent consents for the salvaging of native trees to be used to enhance habitat in remnant areas to be required as a condition of consent.</p>
<ul style="list-style-type: none"> native trees to be removed from the site are salvaged including tree hollows and tree trunks (greater than approximately 25-30cm in diameter and 3m in length) and used to enhance habitat in remnant areas 	
<ul style="list-style-type: none"> the proposed landscaped areas are planted with a diversity of local provenance species (trees, shrubs and groundcovers) from the relevant native vegetation community 	<p>As per the Landscape Schematic Design Report, a diversity of local provenance species is provided as part of the proposal.</p>
<ul style="list-style-type: none"> an ongoing weed control and maintenance program is implemented to maintain the remnant native vegetation and the planted native vegetation areas and 	<p>The proponent is willing for weed control and maintenance to be required as a condition of consent.</p>
<ul style="list-style-type: none"> the site's habitat is enhanced by installing artificial nest boxes which are suitable to native fauna like to use the site. 	<p>The proponent is willing for the installation of artificial nest boxes to be provided as a condition of consent.</p>
Flood	
<p>OEH highlights the need for the flood assessment to provide a sound understanding of flood behaviour for the full range of flood events including up to the probable maximum flood, so that any potential flood risk on the project, which is considered a vulnerable land use, can be understood and managed.</p>	<p>As stated on the Civil Engineering report dated 04 April 2018, the civil work design adopts the following objectives</p> <p>The objectives of this State Significant Development Application (SSDA) report is to demonstrate compliance with all the requirements of <i>Wollondilly Shire Council DCP 2016, Design Specifications and Standard Drawings</i>, and <i>Water Sensitive Urban design Technical Guidelines</i> as follows:</p> <ul style="list-style-type: none"> To design a stormwater trunk drainage system for the site to accommodate the stormwater runoff up to and including 100 year ARI storm events without having adverse impact to adjoining properties, To maintain the post development site discharge levels to pre development (both piped and overland) for all storm events up to and including 100 year ARI storm events, To maintain maximum post development discharge to the available capacity of the downstream stormwater network, and To provide a functional Water Sensitive Urban Design (WSUD) measures for the site to improve the water quality system overall and achieves the pollutant removal targets set by Council's <i>Water Sensitive Urban design Technical Guidelines</i>. <p>Further to the above, consultation has occurred with Wollondilly Council regarding the flood risk of the subject site. Council has subsequently confirmed in writing (dated 11 October 2018, provided to the DP&E under separate cover) that Council's mapping for the site does not have</p>

Recommendation/Issue	Comment
	the site affected by flood. Therefore, no additional flood assessment has been provided as part of this RfS.

Sydney Water

Recommendation/Issue	Comment
<p>There is insufficient capacity available at the Picton Water Recycling Plant for the proposed development and Sydney Water is presently investigating options to manage surplus recycled wastewater due to increased flows to the plant. The development and implementation of a long-term effluent management strategy for Picton will take time depending on the complexity, approvals and infrastructure requirements, a preferred strategy will take another 5 years. In the interim, Sydney Water is consulting with the Environmental Protection Authority on the best approach to manage excess recycled wastewater.</p> <p>The proposed development is not located within Sydney Water's Growth Servicing Plan and there is no option for Sydney Water to fund additional infrastructure in the area. Additionally, Sydney Water is already committed to servicing land rezoned within the Picton Tahmoor Thirlmere urban land precincts, the proposed development site is outside this area.</p> <p>A meeting with the applicant, local Council and Sydney Water is recommended to discuss alternative wastewater solutions.</p>	<p>Consultation has occurred with Sydney Water regarding the capacity of Picton Water Recycling Plant to accommodate the proposed redevelopment of Picton High School. Sydney Water has advised (in an email dated 11 October 2018, provided to the DP&E under separate cover) that they are consulting with the Environmental Protection Authority on a long-term effluent management strategy for Picton, which may take five years to confirm.</p> <p>They have suggested that further information can be provided in a feasibility application or a response to a Section 73 application. The advice regarding alternate wastewater solutions would be provided in the Notice of Requirements.</p> <p>A Section 73 Application would take approximately 3-6 weeks to process. Timing is a critical component for this project to ensure construction work is coordinated and the school population is decanted with as minimal disruption as possible. Given the timing associated with ongoing negotiations with Sydney Water regarding alternative wastewater solutions, it is requested that further consultation and solutions are provided as a condition of consent.</p>

3.0 Public Submissions

Jan Visser of Picton 2571, NSW

Recommendation/Issue	Comment
Recommend that a separate site at the corner of Argyle Street and Stilton Lane, Picton would be more appropriate for the development of a new high school to avoid disruption for students and staff from redevelopment of the current site in addition to potential mine subsidence issues.	The applicant welcomes the suggestion by Ms Visser and the considered proposal for the alternate location of a high school in the area. As applicant, the Department of Education has authority over the land in which they own. State Significant Development applications need to be submitted with owner's consent and it is therefore appropriate that the Department of Education do so with regard to their land. An analysis of alternatives has been undertaken in Section 2.4 of the Environmental Impact Statement, which concluded that redevelopment of the existing school is the most feasible option to provide increased secondary public school capacity in the region. The impacts of temporary school have been considered separate to the SSD package, however, ongoing mitigation of these impacts is being made to ensure safety and appropriate transition for staff and students. .

Glenda Wilson of Tahmoor, NSW

Recommendation/Issue	Comment
Concern for the crossing of students along Argyle Street. Recommends a pedestrian crossing and lollypop person for safe crossing of students.	The existing pedestrian crossing facility on Argyle Street has been removed as its previous location required pedestrians to cross the internal bus parking area. In order to accommodate pedestrian movements across Argyle Street for the redeveloped school, two new pedestrian crossing facilities are proposed to the north of the site and between the two southern crossovers. Relocated pedestrian refuges along Argyle St are shown on drawing C030 in the revised Architectural Drawings at Attachment B to the Response to Submissions letter.

(Name withheld) of Keiraville, NSW

Recommendation/Issue	Comment
Concern for the decanting of students and operation of the temporary school during demolition and construction of the school, particularly with regards to airborne dust and noise.	The impacts of the temporary school have not been considered in the State Significant Development package, as the temporary school is permissible under the <i>State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017</i> . Notwithstanding this, construction impacts of the proposed development have been considered separately and appropriately mitigated to the fullest extent possible.