Issues Raised by Agencies and Organisations	***Proponent's Response***
Department of Planning and Environment (DPE)	
Traffic and Parking Management Plan	
An Operational Traffic and Parking Management Plan (OPTMP) must be provided. The OPTMP must address staff car parking, on-street parking management, pick-up/drop-off, vehicle queuing, bus accessibility, student waiting areas, pedestrian movements, measures implemented to mitigate pedestrian/vehicle conflict and implementation and monitoring of the plan.	An Operational Traffic and Parking Management Plan (OPTMP) is provided at **Appendix C**. Key items relate to: ▪ Management of on-street car parking ▪ Management of off-street car parking (staff and visitors) ▪ Internal kiss and drop operations ▪ Bus operations ▪ Delivery/service vehicle management ▪ Management of feedback and complaints ▪ Review and monitoring of the OPTMP Full details of operational traffic management are provided at **Appendix C**.
Address how conflicts between construction traffic and operation of the adjoining Saints Peter and Paul Assyrian Church will be managed.	During the construction phases of the proposed development, construction traffic will be managed in accordance with the Construction Traffic Management Plan (CTMP) at **Appendix D**. As detailed in the CTMP, construction-related traffic will enter and exit the site in a forward direction via a dedicated access point. As confirmed through swept path analysis, adequate tuning area will be provided internal to the site. All deliveries and loading operations will also occur on-site, with no work zone required. The adjoining Church will be consulted throughout the construction process to ensure that no conflicts occur. As the Church operates almost exclusively outside of weekday business hours (which typically correspond with construction hours), no conflict will occur. Any works proposed on weekends will be

Issues Raised by Agencies and Organisations	*Proponent's Response*
	undertaken in close consultation with the Church to ensure that construction vehicle arrivals do not coincide with the start or finish times of events at the Church.
Shared Use of Car Parking Facilities	
Give consideration to consulting with the adjoining Saints Peter and Paul Assyrian Church to determine whether car parking facilities can be shared through an agreement between the church and proposed school.	It is recognised that in the future, there will be opportunity for the shared use of the proposed school facilities, including on-site car parking between both the School and the Church when required. As the school would operate Monday to Friday and the church would operate on Saturday and Sunday, and certain public holidays, there would be capacity for each facility to provide overflow car parking for the other facility, respectively. In order to mitigate the overflow of on-street parking the school have explored shared use opportunities with the Church, to subsequently include the weekend operating hours, to allow patrons of the Church access to the schools car parking facilities on Saturday and Sunday when required. This will allow the Church, including the Normal Church and Assembly Hall Activities and special occasion i.e. Christmas Eve midnight mass, to continue operation and ensure ongoing accessibility to worship and ministry to its congregation, whilst minimising impacts on the surrounding street network. The shared use of the on-site parking facilities will not increase the approved total congregation. At present the Church provides 56 car parking spaces across the Site. The shared opportunities between the school and Church will ensure in the event attendance exceeds the on-site car parking facilities, vehicles will be directed to the school car parking facilities. In light of the above, consent is sought for the operation of the school car parking facilities on both Saturday and Sunday to alleviate congestion from the Church and minimise on-street impacts.
Consider opportunities for the existing church carpark that could be used by the school as overflow car parking during school hours and the proposed school carpark that could be used by the church as overflow car parking outside of school hours.	
The outcome of any consultation and the particulars of any agreement must be detailed in a report and submitted with the Response to Submissions.	

<table>
<tr><th>Issues Raised by Agencies and Organisations</th><th>Proponent's Response</th></tr>
<tr><td colspan="2">Green Travel Plan</td></tr>
<tr><td>A Green Travel Plan (GTP) is to be provided as part of the RtS and must include detailed site-specific measures that will be implemented to promote and maximise the use of more sustainable travel modes and should include:
Site audit and data collection to establish baseline data;
Objectives and targets (ie. site-specific, measurable, achievable and timeframes for implementation) to define the direction and purpose of the GTP;
Actions to help achieve the objectives, including incentives for using sustainable transport modes;
Measures to promote and support the implementation of the plan, including financial and human resource requirements; and
A process for monitoring and review that allows for the effectiveness of the GTP to be measured.</td><td>A Sustainable Travel Plan was prepared by McLaren Traffic Engineering & Road Safety Consultants, and included at Appendix 14 of the original SSDA. The Sustainable Travel Plan incorporates the details requested by RMS as part of the 'Green' Travel Plan, with no further updates required. In summary, the information requested by RMS is included in the following sections of the original Sustainable Travel Plan:
<table>
<tr><th colspan="2">Table 1. Sustainable Travel Plan References</th></tr>
<tr><th>Information Requested by RMS</th><th>Section of Sustainable Travel Plan (McLarens 2018)</th></tr>
<tr><td>Site audit and data collection to establish baseline data</td><td>Section 4
Section 5.3</td></tr>
<tr><td>Objectives and targets (ie. site-specific, measurable, achievable and timeframes for implementation) to define the direction and purpose of the GTP</td><td>Section 2
Section 5.4</td></tr>
<tr><td>Actions to help achieve the objectives, including incentives for using sustainable transport modes</td><td>Section 5.2
Section 6</td></tr>
<tr><td>Measures to promote and support the implementation of the plan, including financial and human resource requirements</td><td>Section 3
Section 6</td></tr>
<tr><td>A process for monitoring and review that allows for the effectiveness of the GTP to be measured</td><td>Section 5.5</td></tr>
</table></td></tr>
</table>

Issues Raised by Agencies and Organisations	***Proponent's Response***
Tree Planting	
Demonstrate that urban tree canopy targets (as outlined in the Government Architect NSW (GANSW) document *Greener Places: Establishing an Urban Green Infrastructure Policy for New South Wales*) would be met.	The Government Architect NSW (GANSW) draft document *Greener Places: Establishing an Urban Green Infrastructure Policy for New South Wales* will be supported by a manual/toolkit for *Urban Tree Canopy*. However, this manual/toolkit has not yet been published online. Objective 30 of the Greater Sydney Commission's *A Metropolis of Three Cities* establishes a target to increase tree canopy cover to 40%, up from the current 23%. Landscaping will be provided across the site to create a 'green oasis'. As well as providing green spaces generally, the proposed landscape scheme incorporates a significant urban tree canopy. As demonstrated in the Landscape Masterplan included at Appendix 12 of the original SSDA, tree planting is proposed adjacent to the school entry, along the site boundaries, throughout the open space areas and within the riparian corridor. A Condition of Consent requiring 40% tree canopy cover across the site would be accepted.
Endeavour Energy	
There are: ▪ No easements over the site benefitting Endeavour Energy. ▪ Low voltage overhead power lines to the road verge/roadway. ▪ No existing electricity infrastructure/customer connection point to the site.	Noted; the information provided by Endeavour Energy is consistent with the Electrical Infrastructure Assessment prepared by JHA Consulting Engineers and provided at Appendix 31 of the original SSDA.

Issues Raised by Agencies and Organisations	*Proponent's Response*
Network Capacity/Connection	
Endeavour Energy's Network Connections Branch are managing the conditions of supply with the proponent and their Authorised Service Provider (ASP). However the applicant will need to contact Endeavour Energy's Network Connections Branch if this DA results in an electricity load that is outside of the existing Supply/Connection Offer requiring the incorporation of the additional load for consideration. This is due to load being based on a desktop assessment using an After Diversity Maximum Demand (ADMD) where demand is aggregated over a large number of customers providing an ADMD for the site/per lot. Depending on the actual development proposed for the site, the ADMD provided may not be sufficient and the proposed design may need to be amended/upgraded.	It is proposed to provide an onsite substation, therefore sufficient capacity will be available for the school. Ongoing consultation with Endeavour Energy's Network Connections Branch will be carried out to ensure the electricity supply provides suitable load to meet the demand generated by the proposed school.
In regards to the existing pole mounted substation no. 25488, these have comparatively limited capacity of 25 kilovolt amperes (kVA) up to a maximum of 400 kVA where as a newer padmount substation can accommodate loads from 315 kVA up to 1,500 kVA ie. there is a significant variation in the number and type of premises able to be connected to a substation. Pole mounted	Noted; the information provided by Endeavour Energy is consistent with the Electrical Infrastructure Assessment prepared by JHA Consulting Engineers and provided at Appendix 31 of the original SSDA. As described in the Electrical Infrastructure Assessment, a new padmount substation is proposed to provide the electricity supply required for the school.

Issues Raised by Agencies and Organisations	***Proponent's Response***
substation no. 25488 currently has 5 customer connection points servicing 6 premises and is not intended to or capable of supplying a significant urban development of this nature.	
In regards to the easement and restrictions required for the padmount substation, please refer to the attached copy of Endeavour Energy's *Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'*.	The easements and restrictions required for electricity purposes will be registered on Title.
Street Lighting	
With the significant increase in both vehicular and pedestrian traffic, given the existing streetlighting is designed for a non-urban environment, the streetlighting for the proposed development should be reviewed and if necessary upgraded to comply with the series of standards applying to the lighting of roads and public spaces set out in with Australian/New Zealand Standard AS/NZS 1158: 2010 'Lighting for roads and public spaces' as updated from time to time. Whilst the determination of the appropriate lighting rests with the road controlling authority, Endeavour Energy as a Public Lighting Service Provider is responsible for operating and maintaining the streetlights on behalf of local	The existing street lighting will most likely need to be upgraded. If the authorities determine that the lighting does need to be upgraded, ongoing consultation with the relevant authorities will be carried out to ensure the design of lighting meets relevant requirements.

Issues Raised by Agencies and Organisations	*Proponent's Response*
councils, Roads and Maritime Services and other utilities in accordance with the NSW Public Lighting Code, January 2006 (Code). Endeavour Energy recognises that well designed, maintained and managed Public Lighting offers a safe, secure and attractive visual environment for pedestrians and drivers during times of inadequate natural light.	
Earthing	
The construction of any building or structure (including fencing, signage, flag poles, hoardings etc.) whether temporary or permanent that is connected to or in close proximity to Endeavour Energy's electrical network is required to comply with Australian/New Zealand Standard AS/NZS 3000:2018 'Electrical installations' as updated from time to time. This Standard sets out requirements for the design, construction and verification of electrical installations, including ensuring there is adequate connection to the earth. Inadequate connection to the earth to allow a leaking/fault current to flow into the grounding system and be properly dissipated places persons, equipment connected to the network and the electricity network itself at risk from electric shock, fire and physical injury.	All buildings and structures will be constructed in accordance with AS/NZS 3000:2018, including with respect to earthing.

Issues Raised by Agencies and Organisations	***Proponent's Response***
Pursuant to Endeavour Energy's 'Design certification checklist for ASP L3' the design must comply with Endeavour Energy's 'Earthing Design Instruction EDI 001 – Earthing design risk assessment' in which schools are regarded as a 'special location'. The applicant should check with their ASP responsible for the network connection to the site that the padmount substation earthing has been designed to comply with the 'special location' requirements under EDI 100.	The design will comply with Endeavour Energy's *'Earthing Design Instruction EDI 001 – Earthing Design Risk Assessment'* as it relates to 'special locations'.
Endeavour Energy has also noted that the underground onsite stormwater detention basin (OSD) is partially located within the 'Separation of Swimming Pools to an Earth Grid' restriction for a padmount substation. Whilst this restriction is only applicable for bodies of water where swimming is likely to occur, the OSD will require regular maintenance and repair which may entail working in a wet/damp environment with limited access and/or substantial depth. Although this is not likely to be a significant issue/risk, the applicant's ASP may wish to consider this in their earthing design.	The earthing design will consider the OSD and its proximity to the padmount substation.

Issues Raised by Agencies and Organisations	***Proponent's Response***
Vegetation Management	
The planting of large trees in the vicinity of electricity infrastructure is not supported by Endeavour Energy. Suitable planting needs to be undertaken in proximity of electricity infrastructure. Larger trees should be planted well away from electricity infrastructure and even with underground cables, be installed with a root barrier around the root ball of the plant. Landscaping that interferes with electricity infrastructure could become a potential safety risk, restrict access, reduce light levels from streetlights or result in the interruption of supply may become subject to Endeavour Energy's Vegetation Management program and/or the provisions of the Electricity Supply Act 1995 (NSW) Section 48 'Interference with electricity works by trees' by which under certain circumstances the cost of carrying out such work may be recovered.	The proposed landscape scheme (refer Landscape Masterplan at Appendix 12 of the original SSDA) has considered the location of existing and proposed electrical infrastructure. Large trees will be suitably separated from electrical infrastructure, and root barriers will be installed where required.
In regards to the future padmount substation required for the site, please find attached for the applicant's reference a copy of Endeavour Energy's 'Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations'.	The design of structures, and ongoing maintenance, around the padmount station will comply with Endeavour Energy's *'Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations'*.

Issues Raised by Agencies and Organisations	*Proponent's Response*
Prudent Avoidance	
The electricity network is operational 24/7/365 ie. all day, every day of the year. The electricity industry has adopted a policy of prudent avoidance by doing what can be done without undue inconvenience and at modest expense to avert the possible risk to health from exposure to emissions form electricity infrastructure such as electric and magnetic fields (EMF) and noise which generally increase the higher the voltage ie. Endeavour Energy's network ranges from low voltage (normally not exceeding 1,000 volts) to high voltage (normally exceeding 1,000 volts but not exceeding 132,000 volts/132 kV). In practical terms this means that when designing new transmission and distribution facilities, consideration is given to locating them where exposure to the more sensitive uses is reduced and increasing separation distances. These emissions are generally not an issue but with Council's permitting or encouraging development with higher density, reduced setbacks and increased building heights, new development can impact on existing electricity infrastructure.	Noted.

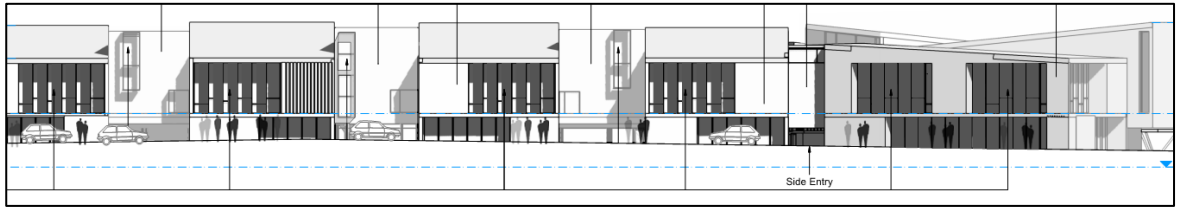
Issues Raised by Agencies and Organisations	*Proponent's Response*
Where development is proposed in the vicinity of electricity infrastructure, Endeavour Energy is not responsible for any amelioration measures for such emissions that may impact on the nearby proposed development. Endeavour Energy believes that likewise Council should also adopt a policy of prudent avoidance by the siting of more sensitive uses away from any electricity infrastructure – including any possible future electricity infrastructure required to facilitate the proposed development. Exposure to electric and magnetic fields (EMF) may be encountered in specific situations such as near substations, underground cables, specialised electrical equipment, or at elevated locations near lines. However, as the strengths of EMFs decrease rapidly with distance from the source, typical exposure associated with Endeavour Energy's activities and assets given the required easement widths, safety clearances etc. and having a maximum voltage of 132,000 volt/132 kV, will with the observance of these separation distances should not exceed the recommended public exposure limits.	

Issues Raised by Agencies and Organisations	***Proponent's Response***
Dial Before You Dig	
Before commencing any underground activity the applicant is required to obtain advice from the Dial Before You Dig 1100 service in accordance with the requirements of the Electricity Supply Act 1995 (NSW) and associated Regulations. This should be obtained by the applicant not only to identify the location of any underground electrical or other utility infrastructure across the site, but also to identify them as a hazard and to properly assess the risk.	Prior to work commencing, *Dial Before You Dig* advice will be obtained.
Public Safety	
As the proposed development will involve work near electricity infrastructure, workers run the risk of receiving an electric shock and causing substantial damage to plant and equipment.	All work will be carried out by suitably-qualified personnel and in accordance with Endeavour Energy's public safety guides.
Environment Protection Authority (EPA)	
The proposal does not constitute a Scheduled Activity under Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act).	Noted.
The EPA does not consider that the proposal will require an Environment Protection Licence under the POEO Act.	Noted.

Issues Raised by Agencies and Organisations	***Proponent's Response***
The EPA understands that the proposal is not being undertaken by or on behalf of a NSW public authority. The EPA is therefore not an appropriate regulatory authority for the proposal.	Noted.
The EPA has no further comment regarding the proposal and has no further interest in this matter.	Noted.
Fairfield City Council	
Council Resolution	
Council staff make a submission to DPE as per the recommendations listed in the report and indicate its willingness to work with the proponent to address the issues raised and identified in the report.	The proponent is willing to work with Council and DPE to address the outstanding issues identified by Council.
Council staff meet with the proponent and DPE if required to assist in addressing the outstanding issues.	The proponent is willing to meet with Council and DPE to address the outstanding issues identified by Council.
Planning	
Concern is raised that the proposed building design being a single mass, located in close proximity to the eastern boundary, is not considered to be in character with the rural locality. It is noted that the eastern elevation of the building is approximately	The consolidation of internal learning areas and other internal facilities within a single, two (2) storey built form enables unbuilt-upon area and landscaping to be maximised over the site. Through the provision of vast open spaces and extensive landscaping, the site responds to its rural surrounds and maintains a 'green' and vegetated character.

Issues Raised by Agencies and Organisations	*Proponent's Response*
74.8m in length which is vastly different from the other built forms within the area. Accordingly, the proposal would be inconsistent with the objectives of the zone, particularly *"To ensure that development is sympathetic to the rural environment and minimises risks from natural and man-made hazards".*	By contrast, the provision of multiple, detached buildings dispersed across the site in an arrangement more typical of older schools which have needed to provide additional facilities over many years to accommodate growth that was not initially planned for, would deplete the available open space and reduce landscaping. Such an approach to the design of the school would contribute to a site characterised by buildings rather than a green landscape, thereby compromising the rural character of the site. Importantly, the design of the school and concentration of built form in the east of the site also responds to site constraints including bushfire, flood, land contamination, the riparian zone and topography. The design and siting of buildings best allows for the continuation of natural processes and maintenance of natural landscapes, whilst also mitigating potential hazards and risks for future school students and staff. This represents an informed approach to planning in a currently rural locality. Additionally, whilst the school incorporates built form that is larger than existing buildings in the immediate area, the overall appearance of the density, bulk and scale of the development has been managed through façade articulation, appropriate massing of different building elements, the equitable treatment of level changes to create appropriate transitions across the grounds, and landscaping to soften the appearance of built form. Façade articulation, which contributes to positive aesthetics and creates a 'human' scale to the development, has been achieved through the application of contrasting render and face brick textures in facades, glazing, appropriate massing of different building elements, clearly defined building entries, modulated canopies and alternating skillion roof forms. With specific reference to the eastern elevation, the appearance of the length and overall scale of the building wall has been mitigated through the articulation of classroom spaces as separate building volumes, varied façade finishes, modulated roof forms, outdoor learning courtyards and boundary landscaping providing 'green screening'. Also of note, the building wall has been setback a minimum of 20m from the eastern side boundary, which significantly exceeds the 5m side setbacks required pursuant

Issues Raised by Agencies and Organisations	*Proponent's Response*
	to FDCP and offers significant building separation from the adjoining property. Extracts showing the eastern elevation are provided at **Figure 1-2** below. Therefore the design of the eastern elevation and eastern boundary setbacks are *not* considered to be in any way 'inappropriate'. Similarly, the proposal would *not* be inconsistent with the objectives of the RU4 zone. Council have specifically queried the proposal's consistency with the following zone objective: *To ensure that development is sympathetic to the rural environment and minimises risks from natural and man-made hazards.* As described in the above paragraphs, the development is *sympathetic to the rural environment* on the following basis: ▪ The design integrates with the rural environment through maximising open space, unbuilt-upon area and landscaping over the site. ▪ The appearance of the bulk and scale of the built form has been managed through façade articulation, massing of different building envelopes, treatment of level changes, modulated roof forms, setbacks and landscaping. ▪ Vegetation planting adjacent to the site boundaries will soften views toward the site, riparian planting will enhance the environmental quality of the corridor in the site's west, and more than half of the site will be retained as open space. ▪ Canopy trees proposed to be planted will extend above the height of the roofline, thereby assisting the scale of the development to integrate with its landscape. ▪ The amenity of surrounding rural properties has been safeguarded through generous boundary setbacks, extensive landscaping and planting of canopy trees.

Issues Raised by Agencies and Organisations	*Proponent's Response*
	Also consistent with the zone objective, the development has been designed to minimise risk from hazards through: ▪ Compliant Asset Protection Zones (APZs); ▪ Siting buildings outside of the flood zone and minimising cut/fill in the flood zone; ▪ Remediation of land contamination on Lot 2321; ▪ Compliant riparian setbacks and planting within the riparian corridor; ▪ Balancing cut and fill and managing level changes. At the same time as minimising risk to students and staff, these measures will protect natural processes, maintain natural landscapes and improve the environmental quality of the site. The proposal therefore achieves the zones objectives and offers an appropriate response to the rural character of the immediately surrounding context.  **Figure 1. Eastern Elevation (PMDL 2018)**

Issues Raised by Agencies and Organisations	*Proponent's Response*
	 **Figure 2. Perspective Looking South-East (Arterra 2018)**
The proposal seeks to breach the maximum building height development standard within the FLEP 2013 by approximately 3.8m or 42.2%. Accordingly, an assessment of the breach indicates that it is not considered that there are sufficient environmental planning grounds to support a variation proposed and therefore it is not considered that the proposal would be in the public interest.	Whilst the proposed building exhibits a maximum height of 12.8m, thereby exceeding the 9m height standard pursuant to FLEP2013, justification for the additional building height has been provided in accordance with Clause 4.6 (refer Appendix 2 of the original SSDA). The following summarises the justification provided in the Clause 4.6 Variation: ▪ The height non-compliance is limited to the roof form over the western elevation on the downslope area of the site. ▪ The additional building height for a portion of the development results from the steeply sloping topography of the site. ▪ The additional building height is required in order to maintain level access to all school facilities and to create uniform rooflines, building lines and floor levels. This in turn contributes to a uniform streetscape.

Issues Raised by Agencies and Organisations	*Proponent's Response*
	▪ The two (2) storeys of the proposed built form complies with the number of storeys set by FDCP. ▪ The proposed development (including those sections comprising additional building height) exhibits a positive visual impact, contributes to a desirable character for the site and streetscape, and maintains neighbouring amenity. ▪ The additional building height is located away from the boundaries of any surrounding residential properties and is buffered by 'compliant' elements of the development, deep soil landscaping, the upper slopes of the site and considerable separation distances. As a result, the non-compliant sections of the building will not protrude above the remainder of the school and therefore will not be visually prominent, will not obstruct any views, will not give rise to overlooking and will not cause overshadowing. The proposed building height is therefore justified on environmental planning grounds, having regard to the matters for consideration under Clause 4.6.
The proposed development results in significant cut and fill particularly within the eastern portion of the site. The architectural plans show approximately 4.4m level difference between the eastern neighbour and the subject site which is significant. This is not considered in character with the rural area. This is a concern that was expressed by the Design Review Panel.	The site exhibits steeply-sloping topography (falling from RL100.90 in the south-eastern corner of the site to RL89.07 in the north-western corner of the site). Cut and fill is therefore required to create a flat building pad appropriate for the school development, noting though that cut and fill in the flood zone has been minimised. Cut and fill has been effectively balanced and level changes across the site have been managed through landscape treatment. In particular, the level difference between the adjoining site to the east has been managed through a retaining wall which incorporates shrub and small tree planting at the base and ivy planting on the face of the wall to create a green wall. This will soften the appearance of the wall, offset the visual impact of level changes and create a green outlook. This treatment and corresponding visual outcome (refer **Figures 3-4**) ensure the development integrates with the rural character.

Issues Raised by Agencies and Organisations	*Proponent's Response*
	Also of note, whilst the GA NSW Design Review Panel initially expressed some concern over level changes, the later iterations of the design which included attention to the management of levels, were commended by the GA NSW.  **Figure 3. Eastern Boundary Perspective (Arterra 2018)**

Issues Raised by Agencies and Organisations	*Proponent's Response*
	 **Figure 4. Eastern Boundary Perspective (Arterra 2018)**
Within the front setback to Kosovich Place is the open play area for the kindergarten. This is not considered appropriate as the front setback should be used solely for landscaping purposes in order to assist in maintaining the character of the rural area.	It is acknowledged the majority of the kindergarten play area is situated within the 15m front setback to Kosovich Place. The kindergarten play area incorporates lawn, tree planting, a sandpit, small amphitheatre seating and canopy shelters, and is separated from the street by hedge planting and integrated fencing. As such, the kindergarten play area incorporates landscaping that will enable it to integrate with the front setback and achieve the intent of setback and landscape controls, including contributing to 'green' views toward the site and softening the appearance of built form. In any case, the kindergarten play

Issues Raised by Agencies and Organisations	*Proponent's Response*
	area will be largely screened in views from the street by hedges and other planting adjacent to the boundary (refer **Figure 5**). The character of the area and streetscape will thereby in no way be undermined as a result of the kindergarten play area.  **Figure 5. Perspective Taking in Kosovich Place Setback and Kindergarten Play Area (Arterra 2018)**
Given the above points, the proposed built form is considered inconsistent with the character of the	In summary of the above points, the scale and size of the proposed development reflects the operational requirements of the school; minimises the building footprint so as to maximise open space and

Issues Raised by Agencies and Organisations	*Proponent's Response*
rural locality given its size, scale and location on the subject site.	landscaping over the site in direct response to the rural environment; minimises the appearance of bulk and scale through façade articulation, massing, roof modulation, setbacks and landscaping; and is limited to two (2) storeys with the roofline to be below the tree canopy (once proposed trees have matured). The location of the building on the site directly responds to site constraints including bushfire, flooding, land contamination, the riparian zone and topography. Site planning thereby responds the characteristics of the rural environment. The proposal therefore offers an appropriate response to rural character.
The 20 metre eastern setback proposes 30 kiss and drop of point spaces, additional car parking for staff and outdoor learning areas. The location of the spaces, drop off points and outdoor learning areas is likely to result in unacceptable amenity impacts to the eastern neighbouring property. The eastern boundary provides minimal landscaping given the internal car parking and learning spaces and this is not considered in character with the rural area.	As noted, the proposal provides a 20m building setback to the eastern side boundary, with kiss-and-ride spaces, the access driveway and a portion of the outdoor learning courtyards incorporated in the setback zone. The proposed 20m setback significantly exceeds the 5m side setbacks required pursuant to FDCP. The amenity of the adjoining property to the east would be maintained by compliant side setbacks, significant building separation, the retaining wall adjacent to the site boundary and landscaping. Specifically, landscaping adjacent to the eastern boundary includes tree planting on both sides of the driveway, shrub and small tree planting at the base of the retaining wall, and ivy planting on the face of the wall to create a green wall (refer **Figure 6**). The eastern side setbacks and boundary treatment (including landscaping) would contribute to visual screening and noise mitigation, and maintain a suitable level of amenity for the adjoining property. Views toward the site over the eastern boundary will take in landscaping, therefore complementing the rural character.

Issues Raised by Agencies and Organisations	*Proponent's Response*
	 **Figure 6. Eastern Boundary Landscaping (Arterra 2018)**
The proposed 30 kiss and drop off spaces is unlikely to be sufficient in order to accommodate up to 665 school children and staff onsite. This will likely result in unacceptable queuing and parking within Kosovich Place.	It is noted that the 30 kiss-and-drop spaces are intended to accommodate the drop-off and pick-up of the *630 students* proposed for the school. Staff would be separately accommodated by the staff car park proposed in the south-eastern corner of the site. The number of kiss-and-drop spaces and proposed queuing arrangements have been designed in conjunction with a qualified Traffic Engineer (refer Traffic and Parking Impact Assessment at Appendix 13 of the original SSDA). The following provides a summary of the utilisation of kiss-and-drop spaces and maximum queue lengths. The results demonstrate that the parking demands of the development and all queuing can be accommodated within the site.

Issues Raised by Agencies and Organisations	*Proponent's Response*

Table 2. Queuing Analysis (McLarens 2018)

Phase	*Estimated Vehicles in Kiss-and-Drop Spaces*	*Estimated Queue Vehicles*
Stage 1 Development		
Prior to pick up	30	5
During pick up	3	0
Final Development		
Prior to pick up	30	36
During pick up	7	0

To ensure the proposed kiss and drop facilities operate with high levels of efficiency and safety, the following management practices will be implemented:

- Traffic control by school staff at internal pedestrian crossing locations;
- Traffic control by school staff to direct queued vehicles into vacant kiss and drop spaces;
- Organisation of students into general kiss and drop areas by year-group to speed pick-up operations;
- Assistance of school staff to load vehicles with children and bags.

Full details are provided in the Traffic and Parking Impact Assessment at Appendix 13 of the original SSDA. The following figure also provides a visual demonstration of the proposed internal queuing arrangements.

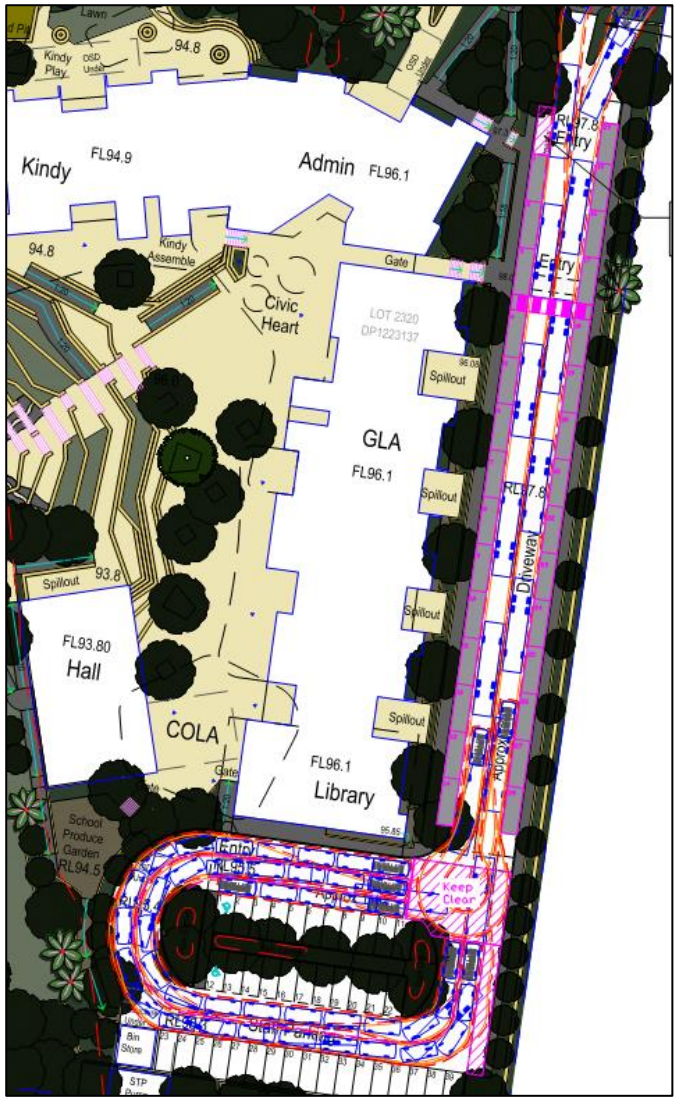


Figure 7. Proposed Queuing (McLarens 2018)

Issues Raised by Agencies and Organisations	***Proponent's Response***
The proposed bus zone is located within the road reserve and potentially will leave insufficient space for cars and or other vehicles to manoeuvre in Kosovich Place. The proposed bus zone will also likely impact on sight distances for vehicles entering and exiting the site as well hinder pedestrian movement.	To accommodate the two-way passing *and* standing of buses in the *indented* bus bay, Kosovich Place is proposed to be widened from 6.5m to 7.0m from the intersection of Wallgrove Road to the site boundary, and to 10.0m from the driveway to the termination of the street. This road widening will enable bus access and provide sufficient width for up to four (4) buses to pick-up or drop-off passengers without interrupting traffic flow along the street. Light vehicles are able to enter and depart the site without conflicting with queued or manoeuvring buses. It has been advised and demonstrated by the bus operator, Transit Systems, that the existing turning bulb is sufficient to facilitate U-turns by buses. As also confirmed in the Traffic and Parking Impact Assessment (refer Appendix 13 of the original SSDA), all vehicular and pedestrian facilities have been designed to meet relevant Australian Standards, including in relation to sight lines for all driveways and pedestrian crossings. Safe pedestrian movement between the bus stop and school entry point will be facilitated via the footpath proposed for construction along the extent of the site frontage. The siting of the bus stop west of the driveway means students will be able to walk between the bus stop and school entry without needing to cross the driveway. The safety of children has been a primary consideration in the design solution proposed.
The subject site is located within a cul-de-sac and the noise and traffic generated from the size and scale of the development is not in keeping with the character and scale of the road and locality.	The Traffic and Parking Impact Assessment (refer Appendix 13 of the original SSDA) demonstrates that with the proposed upgrades to Kosovich Place (including road widening), the volume of traffic generated by the school would be suitably accommodated. It is also noted that the primary volume of traffic would be generated during the twice-daily, pick-up and drop-off times, respectively, with traffic generation to be minimal at other times of the day. This would assist in protecting neighbouring amenity and the rural character of the street during most times of the day and all times of the night.

Issues Raised by Agencies and Organisations	*Proponent's Response*
	Further to the above, the updated Noise Assessment at **Appendix E** confirms that noise levels generated by School-related traffic on Kosovich Place would comply with RNP noise criteria which limits noise increases associated with new development to 2 dB. The RNP notes that *'an increase of up to 2 dB represents a minor impact that is considered barely perceptible to the average person'.* As confirmed in the Noise Assessment provided at Appendix 23 of the original SSDA, noise associated with the car park and pick-up/drop-off zones (including starting a car engine and a car door closing) would generally be of very short duration and therefore low impact when observed over an assessment period. Such emissions would usually be considered in relation to sleep disturbance criteria for the night-time period, however given the school would not operate during the night-time period, sleep disturbance impacts would not be relevant. The Noise Assessment similarly finds that noise emissions associated with the operation of the school would be acceptable, having consideration to the general use of classrooms and administration facilities, activities in the School Hall, the school bell and PA system, children in outdoor play areas and mechanical plant. Therefore the proposed school development is demonstrated, through technical assessments prepared by qualified engineers, to be suitable for the road and locality.
There appears to be no consideration of the cumulative impacts of the proposed school development with the church activities within the locality. The combined activities of both the church and the proposed school will likely have significant amenity impacts to the residential dwellings of Kosovich Place.	It is noted that the proposed school is a separate development from the church, will be contained within its own lot, and will benefit from its own facilities and infrastructure. Whilst opportunity exists for future connections to be developed with the church in terms of car parking arrangement, the school and church will continue to be designed to operate independently of each other. As the church is an existing establishment, its activities would be accounted for by the Traffic and Parking Impact Assessment (Appendix 13 of the original SSDA) and Noise Assessment (Appendix 23 of the original SSDA) in their calculation of existing traffic generation, existing intersection performance

Issues Raised by Agencies and Organisations	***Proponent's Response***
	and the existing acoustic environment, respectively. Therefore the combined activities of the existing church and proposed school *have* been accounted for in the traffic and acoustic impact assessment. In addition, the hours of operation of the two independent entities generally complement each other, reducing the risk or likelihood of cumulative impacts.
In conclusion, it is considered that the proposed built form, constraints relevant to the site, traffic generated as a result of the use (including associated noise impacts) would not render the site to be a suitable location for the purpose of a school catering for up to 665 children and staff.	As demonstrated above, the proposed school has been designed having regard to the existing rural character of the surrounding context as well as site constraints, and provides a highly appropriate design response. Details traffic modelling and acoustic assessment similarly demonstrate the appropriateness of the proposed school, including with respect to neighbouring amenity. Subject to the recommended road and intersection upgrades being carried out (refer details in Traffic and Parking Impact Assessment at Appendix 13 of the original SSDA), traffic generated by the school would be suitably accommodated.
Traffic and Transport	
The traffic generated by the school will have significant impacts on the residents of Kosovich Place.	As described in the following sections of this table and demonstrated in the Traffic and Parking Impact Assessment (Appendix 13 of the original SSDA), the proposed school will be suitably accommodated by Kosovich Place (subject to the proposed upgrade works) and will not unreasonably compromise neighbouring amenity.
As per the traffic report submitted for the application, estimated traffic generation for Stage 1 during morning and afternoon peak will be 239 trips. The final development will generate 579 trips during morning and afternoon peak. This traffic generation has been estimated based on car occupancy rate of 1.85 children. The proposed development will be in a cul-de-sac and	It is acknowledged that, as detailed in the Traffic and Parking Impact Assessment (Appendix 13 of the original SSDA), the proposed school would generate 239 trips during the morning and afternoon peaks for Stage 1 and 579 trips for the ultimate development. As Kosovich Place is a cul-de-sac, all traffic will access the school via the intersection of Wallgrove Road and Kosovich Place. SIDRA Modelling demonstrates that this intersection currently operates at LOS B during the morning and afternoon peak hours. As a result of the Stage 1 development, the intersection would operate at LOS A (accounting for the proposed right-turn restriction from Kosovich Place onto Wallgrove Road). The ten (10) year growth projection for the intersection demonstrates it would still

Issues Raised by Agencies and Organisations	*Proponent's Response*
have to rely on Wallgrove Road for entry and exit. Based on the traffic generation levels, the development is not supported.	operate at LOS B in 2028, and as a result of the ultimate school development would operate at LOS B in the morning peak hour and LOS A in the afternoon peak hour. The development is therefore demonstrated to be supportable on the basis of the impact of traffic generation on the operation of the Wallgrove Road / Kosovich Place intersection.
The impact by the proposed school and the church must be considered concurrently. There are issues associated with the operation of the current Church impacting the amenity of the residents.	It is noted that the proposed school is a separate development from the church, will be contained within its own lot, and will benefit from its own facilities and infrastructure. Whilst opportunity exists for future connections to be developed with the church in terms of car parking arrangement, the school and church will continue to be designed to operate independently of each other. As the church is an existing establishment, its activities would be accounted for by the Traffic and Parking Impact Assessment (Appendix 13 of the original SSDA) and Noise Assessment (Appendix 23 of the original SSDA) in their calculation of existing traffic generation, existing intersection performance and the existing acoustic environment, respectively. Therefore the combined activities of the existing church and proposed school *have* been accounted for in the traffic and acoustic impact assessment. No unacceptable impacts have been shown to result. In addition, the hours of operation of the two independent entities generally complement each other, reducing the risk or likelihood of cumulative impacts.
The car occupancy rate of 1.85 children is adopted for the development based on car occupancy for St Hurmizd Primary School in Greenfield Park. This needs to be justified as St Hurmizd Primary School is located in an urban area where the	The car occupancy rate of 1.85 children has been based off surveys of the associated St Hurmizd Assyrian Primary School. This car occupancy rate is considered relevant to the proposed school as it is a reasonable assumption that the average number of children per family attending the school would be consistent with the

Issues Raised by Agencies and Organisations	*Proponent's Response*
options for student travel to school (i.e. cycle, walk, additional bus services) is far broader and less restricted than the subject site.	children/family rates of St Hurmizd. Likewise, it is a reasonable assumption that when driving one (1) child to school, other children in that family would be driven in the same car. It is important to note that the car occupancy rate is *not* taken to be the same as the private vehicle use rate or mode share. As detailed in the Traffic Report, mode share assumptions have *not* been based off St Hurmizd, and instead adopt 100% private vehicle use for Stage 1 and 80% for the ultimate school. The adoption of alternative modes of travel and correspondingly reduced private car use, rely on the measures detailed in the Sustainable Travel Plan (Appendix 14 of the original SSDA). Such measures relate to the establishment of the school bus service and promotion of car pooling.
With the traffic generation associated with the proposal there will be adverse impact on safety at the intersection of Wallgrove Road/Kosovich Place.	The traffic impact of the development has been assessed using SIDRA modelling based on the traffic generation and assignment detailed in the Traffic Report. With respect to the Wallgrove Road/Kosovich Place intersection, SIDRA modelling demonstrates that this intersection currently operates at LOS B during the morning and afternoon peak hours. As a result of the Stage 1 development, the intersection would operate at LOS A (accounting for the proposed right-turn restriction from Kosovich Place onto Wallgrove Road). The ten (10) year growth projection for the intersection demonstrates it would still operate at LOS B in 2028, and as a result of the ultimate school development would operate at LOS B in the morning peak hour and LOS A in the afternoon peak hour. The development is therefore demonstrated to be supportable on the basis of the impact of traffic generation on the operation of the Wallgrove Road/Kosovich Place intersection, with no safety concerns. Additionally, it is proposed to widen Kosovich Place from the intersection of Wallgrove Road to the termination of the street, in order to accommodate school buses. This will allow the two-way passing of *all* vehicles (including school buses) in Kosovich Place. As such, no safety issues would arise.

Issues Raised by Agencies and Organisations	***Proponent's Response***
The applicant is proposing to restrict right turn movement from Kosovich Place into Wallgrove Road. This will restrict current right turn movements undertaken by the residents in Kosovich Place. The proposed "Right Turn" restriction at the intersection of Wallgrove Road and Kosovich Place would require motorists exiting Kosovich Place and wanting to travel southbound in Wallgrove Road, to undertake U-turn movements at the roundabout at Wallgrove Road/Villers Road. Considering the volume of traffic using Wallgrove Road and the lane arrangement in Wallgrove Road (one lane in each direction), there is a significant detrimental impact on traffic safety at the intersection of Wallgrove Road/Villers Road with the proposed development.	Whilst the traffic modelling completed does not indicate that the intersection of Kosovich Place/Wallgrove Road will be pushed to capacity by the traffic associated with the site, the *Austroads Guide to Road Design* suggests that a CHR treatment is appropriate for an intersection with the traffic volumes that are proposed. Consequently, it is proposed that the intersection be adjusted to include a CHR treatment. The traffic modelling outlined in the Traffic Report demonstrates that the intersection will perform satisfactorily with the proposed layout. It is acknowledged that, as a result of the proposed right-turn restriction from Kosovich Place, traffic wanting to travel south-bound will need to turnaround using the roundabout at the intersection of Wallgrove Road/Villiers Road. The existing and resulting performance of the Wallgrove Road/Villiers Road intersection has been assessed using SIDRA modelling, as detailed in the Traffic Report. In summary of the traffic assessment, this intersection currently operates at LOS A during the morning and afternoon peak hours. As a result of the Stage 1 development, the intersection would continue to operate at LOS A (accounting for the proposed right-turn restriction from Kosovich Place onto Wallgrove Road). The ten (10) year growth projection for the intersection demonstrates it would still operate at LOS A in 2028, and as a result of the ultimate school development would continue to operate at LOS A in the morning and afternoon peak hours. The development is therefore demonstrated to be supportable on the basis of the impact of traffic generation on the operation of the Wallgrove Road/Villiers Road intersection, with no safety concerns.
The applicant is proposing buses to service the development. The proposed bus services will not benefit other stakeholders. Therefore, the bus parking on Kosovich Place is not justified. It is unclear whether the proposed bus services will be public or private.	Consistent with the operational arrangements for many schools in the area and throughout Greater Sydney, a school bus service is proposed to transport students to and from school. The proposal is for a State government-funded, contract school bus service. The bus service would 'piggy-back' off the existing service for St Narsai (being the link high school).

Issues Raised by Agencies and Organisations	*Proponent's Response*
	As well as directly benefitting students and parents of the school, the proposed bus service would promote benefits for other stakeholders associated with reduced car use and therefore reduced volumes of traffic in Kosovich Place and on the surrounding road network. Together with the proposed widening of Kosovich Place, the proposed 'indented' bus bay will allow for up to four (4) buses to pick-up and drop-off passengers without interrupting traffic flow in the street.

The applicant has not provided SIDRA modelling for existing and proposed conditions for the intersections of:
 	
▪ Elizabeth Drive/ Wallgrove Road;
▪ Wallgrove Road/ The Horsley Drive;
▪ Wallgrove Road/ Kosovich Place; and
▪ Wallgrove Road/ Villiers Road.
	SIDRA modelling for the existing and proposed performance of the following intersections has been included in the Traffic and Parking Impact Assessment (Appendix 13 of the original SSDA):
	
	▪ Elizabeth Drive/ Wallgrove Road (M7 exit);
	▪ Wallgrove Road/ The Horsley Drive;
	▪ Wallgrove Road/ Kosovich Place; and
	▪ Wallgrove Road/ Villiers Road.
	
	Based on the estimated traffic generation and trip assignment applied to existing traffic volumes, SIDRA modelling has provided the following results:
	
	▪ Stage 1 Development:
	  ▪ There is a minor increase to approach delays at each of the intersections modelled, but no change in LOS is predicted.
	  ▪ This modelling has been completed with the assumption of a "No Right Turn" restriction at the intersection of Kosovich Place/Wallgrove Road (from Kosovich Place onto Wallgrove Road).
	
	▪ Final Development:
	  ▪ Traffic associated with the proposed school will not substantially change the operation of the intersections surrounding the site and all intersections will remain at their present

Issues Raised by Agencies and Organisations	*Proponent's Response*
	LOS other than the intersection of Elizabeth Drive/Wallgrove Road in the PM peak hour, which is predicted to operate with a LOS of E. ▪ This assessment has adopted the 10-year (2028) projected traffic volumes based on the growth volumes provided by RMS. The planned upgrades to the intersection of The Horsley Drive/Wallgrove Road have also been accounted for. Additionally, the modification of the Elizabeth Drive/Wallgrove Road intersection to include a high angle left turn slip lane would provide additional capacity at the intersection. As shown through further SIDRA analysis, with the addition of a left turn slip lane on the northern approach to the intersection, the LOS of the intersection will be D in both peak hours, a decrease in average delays when compared to the predicted operation of the intersection in 2028 (without the proposed school). Based on the data received to date from the RMS, it is therefore suggested that such an upgrade should be performed to the intersection prior to the opening of the completed school. However, analysis should be undertaken with the latest traffic volumes and projections nearer to the time of construction of the final stage of the school to confirm that such an upgrade is necessary, as there may be significant reductions in the traffic using the Elizabeth Drive/Wallgrove Road intersection after the construction of the M12 Motorway.
Catchment Management	
The rear boundary of the subject property borders Ropes Creek, with all of No.19 Kosovich Place (predominantly where the playing fields for the school area proposed) comprising flood liable land.	The adjoining un-named *tributary* of Ropes Creek together with the 1 in 100 year flood line and the PMF line, have been accounted for in the Site Analysis (Appendix 10 of the original SSDA) and in the overall planning, design and layout of the school.
Council's Catchment Branch advises that the technical reports submitted by the proponent in relation to the proposal are deficient and do not	Flooding has been addressed in the Flood Management Assessment prepared by Martens (Appendix 35 of original SSDA) and an independent review of the Masterplan and Flood Management Assessment has also been carried out by Molino Stewart (Appendix 36 of original SSDA).

Issues Raised by Agencies and Organisations	*Proponent's Response*
address the assessment requirements (in relation to flooding issues) specified by the NSW DPE to determine whether the development is suitable for the site. The deficient information comprises (refer following rows of this table):	The flood assessment responds to the SEARs issued by DPE and confirms the suitability of the proposed development for the site with respect to flooding.
▪ The impact of the proposal (including earthworks) on existing flood behaviour for a full range of flood events as specified under part 18 of the Secretary's Environmental Assessment Requirements (SEARs) issued by the Department of Planning and Environment;	As documented in the Flood Management Assessment, the proposed earthworks will result in a very minor *increase* in flood storage volume. Therefore no adverse impact on flood conditions on adjacent sites would result. The extents of the 1 in 100 year ARI and PMF events resulting from the proposed earthworks are shown on the site plans in Attachment A of the Flood Management Assessment. Given all school buildings, pedestrian and vehicle accessways and car park, shall be outside of any mapped Flood Risk Precinct (once the proposed earthworks are accounted for), no impact on flooding would be incurred as a result of this aspect of the proposal. Some site areas mapped within the Low and Medium Risk Flood Precincts are proposed to be used as recreational areas, with no impact on flood behaviour. The very small area of High Risk Flood Precinct has no development proposed and therefore no impact on flood behaviour would arise.
▪ The impact of the proposal on flood behaviour resulting in detrimental changes in potential flood affection of other properties, assets or infrastructure. This	As documented in the Flood Management Assessment, the proposed earthworks will result in a very minor *increase* in flood storage volume. Therefore no adverse impact on flood conditions on adjacent sites would result.

Issues Raised by Agencies and Organisations	*Proponent's Response*
may include redirection of flow, flow velocities, flood levels, and hazards;	
▪ Whether appropriate mitigation measures are required to offset potential flood impacts.	Although not expressed as a 'mitigation' measure in the Flood Management Assessment, the relevant sections (being Schedule 6 of Chapter 11) of FDCP should be considered and complied with. It is noted though that, as all school buildings, carpark and access are located outside of flood risk precincts, they are not subject to flood planning controls. In any case, the controls for school development in Low Flood Risk Precincts are outlined in Table 3 of the Flood Management Assessment and should be *considered*. Controls for site recreation areas in Low and Medium Flood Risk Precincts are outlined in Table 4 of the Flood Management Assessment and compliance with these controls is confirmed in Table 5 of the Flood Management Assessment. In summary, these controls/measures relate to: ▪ Floor levels ▪ Building components ▪ Structural soundness ▪ Flood affects ▪ Car parking and driveway access ▪ Evacuation ▪ Management and design ▪ General requirements At the detailed design phase (post-DA approval), further flood assessment works may be required, including a detailed flood emergency and evacuation plan for the school. All flood mitigation measures will need to be integrated with the final stormwater management design for the school, as well as any riparian management and rehabilitation works that may be included in development consent conditions.

Issues Raised by Agencies and Organisations	*Proponent's Response*
▪ Council's established TUFLOW model established as part of the Rural Area Flood Study (2013) has not been relied on to model existing and proposed scenarios.	As documented in the Flood Management Assessment, review of Fairfield City Council's *Rural Area Flood Study: Ropes, Reedy & Eastern Creeks Final Report* (BMT WBM, November 2013) was completed to confirm the mapped flood extents of the 1 in 20 year ARI, 1 in 100 year ARI and PMF events. Based on Council's maps, the site is impacted by the 1 in 20 year ARI, 1 in 100 year ARI and PMF events and has areas within the Low, Medium and High Risk Flood Precincts. The extent of High Risk Precinct is minimal limited to a very small section of watercourse channel on the western boundary. Accounting for the proposed earthworks, the school buildings, pedestrian and vehicle accessways and car park, shall be outside of any mapped Flood Risk Precinct, all being above the PMF level. Some site areas mapped within the Low and Medium Risk Flood Precincts are proposed to be used as recreational areas. The very small area of High Risk Flood Precinct has no development proposed. The extents of the 1 in 100 year ARI and PMF events for both existing site conditions and for proposed conditions (i.e. after proposed earthworks) shown on the site plans in Attachment A of the Flood Management Assessment, are based on the survey information and flood levels reported by Council.
▪ Information has not been provided to determine whether or not there are increases in flood effects outside of the proposed site, with a tolerance of 10mm in depth to the existing flood scenario.	As documented in the Flood Management Assessment, the proposed earthworks will result in a very minor *increase* in flood storage volume. Therefore no adverse impact on flood conditions on adjacent sites would result.
▪ The application does not address the following matters specified in the DPE SEARS: ▪ The 1 in 200 and 1 in 500 year flood events as proxies for	As summarised above, flooding has been addressed in the Flood Management Assessment prepared by Martens (Appendix 35 of original SSDA) and in the independent review of the Masterplan and Flood Management Assessment carried out by Molino Stewart (Appendix 36 of original SSDA).

Issues Raised by Agencies and Organisations	*Proponent's Response*
assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change. ▪ compatibility with the flood hazard of the land; ▪ compatibility with the hydraulic functions of flow conveyance in floodway and storage in flood storage areas of the land; ▪ whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site; ▪ any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the SES and Council.	The assessments respond to the SEARs in a manner appropriate to the specific flood characteristics of the site and particulars of the proposed development, in light of the development resulting in *no* loss of flood storage and *no* school buildings, pedestrian or vehicle accessways or car parks, being within any mapped Flood Risk Precinct. With respect to emergency management arrangements for flooding, the Flood Management Assessment describes compliance with the 'Evacuation' requirements under FDCP. In summary, site areas within Low and Medium Flood Risk Precincts are proposed to be used for recreational purposes only. Site management shall be strictly implemented such that no students or staff are permitted in these areas during prolonged or intense rainfall. Evacuation from site recreational areas shall be achieved on foot along site paths or other open spaces. Distances to flood free site areas are not more than 250m from furthest area proposed to be used for recreational purposes. Adequate warning time is expected to be available to evacuate Low and Medium Risk Precinct areas on site with evacuation initiated by the onset of rain (at which stage normal school process would be for students to move indoors – given all buildings are above the PMF this would achieve the safe evacuation of potentially flood effected lands long before any inundation).
Development Engineering	
The applicant has indicated there will be a need to upgrade Kosovich Place and the intersections of Kosovich Place & Wallgrove Road and Wallgrove Road & Elizabeth Drive (RMS approval required).	The proposed upgrades to Kosovich Place and intersections are detailed in the Traffic and Parking Impact Assessment (Appendix 15 of the original SSDA). Early consultation with RMS was initiated prior to preparation of the SSDA and consultation is ongoing.

Issues Raised by Agencies and Organisations	***Proponent's Response***
Council's Development Engineer has raised the following concerns in relation to the above as well as other additional issues associated with the proposal as discussed below (refer following rows of this table):	
▪ The site is subject to a restriction on title that prohibits further development of the site until unauthorised fill, potential contamination and flooding issues have been determined and resolved to Council's satisfaction.	It is acknowledged that the site is subject to a Restriction on the Use of Land relating to Lot 2321 to the following effect: *No development within the meaning of the Environmental Planning Assessment Act 1979, as amended, shall be effected upon the lot hereby burdened unless the unauthorised fill, potential contamination and flooding issues have been determined and resolved and satisfactory arrangements have been made with the relevant service authorities for the provision of water supply, electricity and telephone.* *The Council of the City of Fairfield is empowered to release, vary or modify the above restriction covenant without consent provided that any such action be made and done in all respects at the cost and expense of the person(s) requesting such release, variation or modification.* It should be noted that Restriction on the Use of Land does *not* affect Lot 2320. As detailed in the EIS supporting the original SSDA, no development, other than remediation works, will be carried out on Lot 2321 and it will not form part of the school until remediation has been completed and the site verification certificate has been obtained. Accordingly, Lot 2321 will be securely fenced and provided with separate access until such time as remediation is completed. Full details of remediation are provided in the Remedial Action Plan (Appendix 29 of the original SSDA).

Issues Raised by Agencies and Organisations	*Proponent's Response*
	It is noted that, given land contamination and remediation will be completely contained within Lot 2321 and do not affect Lot 2320, the development of the school on Lot 2320 may proceed concurrently with the remediation of the adjoining site. It is acknowledged that a Condition of Consent will be required to the effect that Lot 2321 must be remediated in accordance with all current legislation prior to any future development on Lot 2321 being carried out in conjunction with this approval. With respect to flooding, the restriction may potentially impact on flood management works, should they be required on Lot 2321. The site earthworks are designed to mitigate any potential flood impacts on the development, whilst also preventing any adverse flooding effects (notably increased levels, velocity, etc) on adjoining property from the loss of floodplain storage, as further detailed in the Flood Management Assessment (Appendix 35 of the original SSDA).
▪ The proposal to upgrade Kosovich Place would need to include kerb and gutter and associated drainage system, however inadequate information is provided on where the drainage system would be connected.	It is acknowledged that as part of the proposed upgrade to Kosovich Place, new kerb, guttering and associated drainage, would be required. The proposed upgrade works would be subject to further detailed design, post-approval of the SSDA, based on ongoing consultation with RMS and Council.
▪ The Road would need to be upgraded to asphaltic concrete, however no plans have been provided for the proposed upgrade road works	Concept plans showing the proposed upgrades to Kosovich Place are included at Annexure G of the Traffic and Parking Impact Assessment (Appendix 13 of the original SSDA). The proposed upgrade works would be subject to further detailed design, post-approval of the SSDA, based on ongoing consultation with RMS and Council.
▪ The Flood Management Assessment regards the playing fields as recreational however due to the intended use for the site as a School (sensitive use) the category 'recreation' chosen under	As detailed in the Flood Management Assessment, as all school buildings, carpark and access are located outside of *any* flood risk precincts, they are not strictly subject to flood planning controls pursuant to FDCP. In any case, the controls for Educational Establishments in Low Flood Risk Precincts are outlined in Table 3 of the Flood Management Assessment and should be *considered*.

Issues Raised by Agencies and Organisations	*Proponent's Response*
Chapter 11 of Council's City Wide DCP is in error. In this regard the proposal cannot meet the prescriptive controls of the City wide DCP.	Controls for site recreation areas in Low and Medium Flood Risk Precincts are outlined in Table 4 of the Flood Management Assessment and compliance with these controls is confirmed in Table 5 of the Flood Management Assessment. It is acknowledged that the playing fields and other site recreation areas relate to a school (being a type of Educational Establishment), however given these areas will not include any school buildings, access or car parking, and will be used for recreation purposes only, it is considered appropriate for the site recreation areas to be considered under the flooding requirements for Recreation Areas. Importantly, the suitability of the site recreation areas having regard to flood characteristics, is ensured through the proximity of the recreation areas to non-flood-affected areas of the site. Distances to flood-free site areas are not more than 250m from furthest area proposed to be used for recreational purposes. In a flood emergency, adequate warning time is expected to be available to evacuate Low and Medium Risk Precinct areas on site with evacuation initiated by the onset of rain (at which stage normal school process would be for students to move indoors – given all buildings are above the PMF this would achieve the safe evacuation of potentially flood effected lands long before any inundation). Therefore the proposed site recreation areas are shown to be suitable for use by students in association with the school.
Environmental Management	
According to both Detailed Site Investigations (DSI), soil sampling of the site indicates that fill on the western portion of 19 Kosovich Place includes fragments of asbestos containing fibre cement sheet. The later DSI gives an indicative area for the suspected filling. On viewing Councils 1999 aerial	The area of fill identified over the site together with the identification of potential contamination, has been based on intrusive soil investigation, soil sampling and laboratory analysis. Full details are provided in the Detailed Site Investigation at Appendix 27 of the original SSDA.

Issues Raised by Agencies and Organisations	*Proponent's Response*
photograph of the premises, a wider area of filling is indicated.	
According to the Remedial Action Plan (RAP), further sampling is required to determine the extent and depth of the fill area. It states that 'adequate' shallow test pits will be dug to determine the extent of the required remediation works. The RAP does not state the number or location of these test pits. Given that a RAP is meant to outline the extent of any required remediation works, the extent of the remediation area would need to be established prior to the RAP.	As detailed in the Remedial Action Plan (Appendix 29 of the original SSDA), a data gap closure investigation is proposed as the first stage of remediation, inclusive of: ▪ Test pitting across the potential fill area as identified on PS02-AZ09 (Attachment B of the RAP) to confirm the lateral and vertical extent of fill material; and ▪ Where further intrusive investigations clearly identify inclusion impacted fill areas, or PACM fragments are observed within surface soils, testing of impacted soils to determine if soils exceed the NEPM weight for weight (w/w) criteria for asbestos. The sampling program is outlined in Table 5 of the RAP. As stated in Section 4.2 of the RAP, the results of the data closure investigation shall be added as an addendum to the Detailed Site Investigation and any additional remediation requirements shall be addressed in an updated version of the RAP. Accordingly, the required remediation works will be adequately addressed by the RAP, prior to development on the contaminated land (Lot 2321).
The Noise Assessment Report adequately addresses most noise issues with the exception of noise from playgrounds and traffic noise generated by the development.	As detailed in the Noise Assessment (Appendix 23 of original SSDA), the NPI is not intended to be applicable to schools. Further, SLR is not aware of any studies that quantify noise levels generated by outdoor play areas of schools. The Noise Assessment does make reference to the *Association of Australasian Acoustical Consultants (AAAC) Guideline for Child Care Centre Acoustic Assessment*, which addresses noise emissions from *pre-school* children and recommends noise limits based on the existing ambient (background) noise and the

Issues Raised by Agencies and Organisations	*Proponent's Response*
The report gives a range of building requirements to meet internal noise levels and to prevent noise emissions. The report argues that the impacts of playground noise cannot be assessed against the NSW EPA Noise Policy for Industry (NPI). While playground noise cannot be assessed in the same manner as industrial noise, the NPI provides guidance in assessing amenity and intrusiveness impacts. Such guidance has been incorporated into the Association of Australian Acoustical Consultants 'Guideline for Child Care Centre Acoustic Assessment' (GCCCAA). In this regard the proposal does not provide adequate analysis of noise impact.	daily duration of the outdoor play. It is noted that the AAAC Child Care noise limits would be comparable to those determined in accordance with the NPI. The NPI documents the "principles underpinning the noise criteria" as follows: *The industrial noise source criteria set down in Section 2 are best regarded as a planning tool. They are not mandatory, and an application for a noise/producing development is not determined purely on the basis of compliance or otherwise of the noise criteria. Numerous other factors need to be taken into account in the determination. These factors include economic consequences, other environmental effects and the social worth of the development.* In addition, the INP states that: *In those cases when the project/specific noise levels are not, or cannot be achieved, then it does not automatically follow that those people affected by the noise would find the noise unacceptable.* Further to the NPI principles, it is reasonable to conclude that noise associated with children involved in outdoor play would not be considered "offensive" in the context of the *NSW Protection of the Environment Operations Act* (POEO Act), nor would it be expected to interfere with regular domestic activities. These assumptions reflect previous Land and Environment Court (LEC) judgements including *Meriden School v Pedavoli* and *Christian Brothers v Waverly Council*. Notwithstanding the above, the inherent difficulty in accurately predicting noise from outdoor play areas also needs to be considered. It is inherently difficult to meaningfully quantify the level of noise received at nearby residences due to the inevitable variability of the sources (the children) and their locations. The noise level generated during recess and lunch periods may vary according to the following factors:

<table>
<tr><th>Issues Raised by Agencies and Organisations</th><th>Proponent's Response</th></tr>
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the number of children with in the play area;
the level of noise made by each student – this differs from individual to individual, and factors such as age, personality, mood, activity and countless other factors also play a part;
the louder events are not capable of being sustained over an extended period, and
the location of the students relevant to the residences.

Specific to the proposed school development, the following factors will further reduce the likelihood that outdoor play area noise would be considered unacceptable or offensive when observed at the residences:

the outdoor areas tend to be screened from the nearest receptors by intervening buildings;
the outdoor area would generally be used for only short periods throughout the day;
the outdoor area would be used only within school hours; and
the ambient noise at the nearby residences is relatively high due to the M7 Motorway which would provide a degree of 'masking' of playground noise.

Therefore, on the basis of the above, no further investigation of noise from outdoor play areas is considered relevant.
</td></tr>
<tr><td>As a traffic generating development, the assessment of noise impacts from traffic servicing the site has also not been submitted.</td><td>
Noise associated with traffic accessing the School has been assessed in the updated Noise Assessment at Appendix E.

Based on the NSW Road Noise Policy (RNP) the applicable noise criteria are summarised below:
<table>
<tr><th colspan="3">Table 3. Road Traffic Noise Criteria (SLR 2019)</th></tr>
<tr><th>Road Category</th><th>Type of Project / Land Use</th><th>Day (7am- 10pm)</th></tr>
<tr><td>Local Road</td><td>Existing residences affected by additional traffic on existing local roads generated by land use developments</td><td>LAeq(1 hour) 55 dBA</td></tr>
</table>
</td></tr>
</table>

Issues Raised by Agencies and Organisations	*Proponent's Response*
	In addition, pursuant to the RNP, any increase in the total traffic noise level should be limited to 2 dB above the corresponding 'no build option'. The RNP notes that *'an increase of up to 2 dB represents a minor impact that is considered barely perceptible to the average person'.* Therefore, based on the existing level of traffic noise at the site (being 56.2 dBA LAeq(1 hour)), noise from the School-related traffic should not exceed 58.2 dBA LAeq(1 hour). The following parameters have been used to predict noise from vehicles on Kosovich Place at existing residences: ▪ maximum hourly traffic volume of 400 vehicles per hour (200 vehicles each way) during morning drop-off or afternoon pick-up; ▪ traffic speed of 50km/h; ▪ nearest residence is 20m from Kosovich Place; and ▪ 2.5 dBA facade reflection adjustment is included. Based on the above, the predicted noise level was 57.8 dBA LAeq(1 hour), which will be marginally less than the RNP noise criteria based on the existing environment (58.2 dBA LAeq(1 hour)). The predicted noise level at residences greater than 20m from Kosovich Place would be lower and therefore also comply with the RNP criteria. It should be noted that the predicted noise level would occur only twice per day during the morning drop-off and afternoon pick-up. School traffic-related noise at other times would be significantly lower. Noise generated in association with construction traffic (together with on-site construction activities) has also been assessed in the updated Noise Assessment at **Appendix E**. The *Interim Construction Noise Guideline* (ICNG) provides non-mandatory construction noise management levels (NMLs) for residential and other noise sensitive receptors. The construction NMLs

<table>
<tr><th>Issues Raised by Agencies and Organisations</th><th>Proponent's Response</th></tr>
<tr><td></td><td>
for the School are detailed in the following table. The NMLs apply at the property boundary that is most exposed to construction noise.

When trucks and other vehicles are operating within the boundaries of construction sites, their noise contributions are included in the predicted construction activity noise emissions and assessed in relation to the NMLs described in the table below.

Table 4. Construction Noise Management Levels at Residences (SLR 2019)
<table>
<tr><th>Construction Period</th><th>NML, dBA LAeq(15min)</th><th>Application</th></tr>
<tr><td rowspan="2">Standard day time construction hours:

Monday to Friday 7am-6pm

Saturday 8am-1pm</td><td>Noise affected RBL dBA LA90 + 10 dBA

54 dBA
(i.e. 44 dBA LA90 + 10 dBA)</td><td>The noise affected level represents the point above which there may be some community reaction to noise.

Where the predicted or measured LAeq(15min) is greater than the noise affected level, the proponent should apply all feasible and reasonable work practices to meet the noise affected level.

The proponent should also inform all potentially impacted residents of the nature of works to be carried out, the expected noise levels, duration and contact details.</td></tr>
<tr><td>Highly noise affected
75 dBA LAeq</td><td>The highly noise affected level represents the point above which there
may be strong community reaction to noise.

Where noise is above this level, the relevant authority may require respite periods by restricting the hours that the very noisy activities can occur, taking into account:
▪ Time identified by the community when they are less sensitive to noise (such as before or after school for works near schools, or mid-morning or mid-afternoon for works near residences)
▪ If the community is prepared to accept longer construction period in exchange for restrictions on construction times.</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>Issues Raised by Agencies and Organisations</th><th>Proponent's Response</th></tr>
<tr><td></td><td>
<table>
<tr><td>Outside of standard day time construction hours (if required)</td><td>Noise affected RBL dBA LA90 + 5 dBA

Evening: 51 dBA
(i.e. 46 dBA LA90 + 5 dBA)

Night: 48 dBA
(i.e. 43 dBA LA90 + 5 dBA)</td><td>A strong justification would typically be required for works outside the recommended standard hours.

The proponent should apply all feasible and reasonable work practices to meet the noise affected level.

Where all feasible, reasonable practices have been applied and noise is more than 5 dBA above the noise affected level the proponent should negotiate with the community.</td></tr>
</table>

Predictions indicate that the cumulative noise levels from construction activities may exceed the project NMLs at times but would not exceed the 'highly noise affected' criterion. Accordingly, appropriate noise mitigation and management recommendations have been detailed in the report.

Construction-related traffic on the public road network is regarded as 'additional road traffic' rather than as part of the construction works and are assessed in accordance with the RNP, as per the table below.

<table>
<tr><th colspan="6">Table 5. Construction Traffic Noise Predictions (SLR 2019)</th></tr>
<tr><th colspan="4">Vehicles During Day Period 7am-10pm</th><th colspan="2">Predicted Traffic Noise Level, dBA</th></tr>
<tr><th colspan="2">Existing Traffic</th><th colspan="2">Construction Traffic</th><th>Existing</th><th>Construction</th></tr>
<tr><th>Light</th><th>Heavy</th><th>Light</th><th>Heavy</th><th></th><th></th></tr>
<tr><td>40</td><td>0</td><td>50</td><td>10</td><td>47.5</td><td>57.1</td></tr>
</table>

Construction traffic is likely to increase the traffic noise from Kosovich Place, which is common on lightly-trafficked roads, but is not expected to increase overall traffic noise beyond the RNP criterion value of 58.2 dBA.</td></tr>
<tr><td>A Sediment and Erosion Control Plan for the proposal is included as an appendix. Image</td><td>Sediment and Erosion Control Plans are included within the Civil Works Masterplan and Stage 1 Civil Works Plans at Appendices 24 and 25, respectively, of the original SSDA. These plans are of a high resolution.</td></tr>
</table>

Issues Raised by Agencies and Organisations	*Proponent's Response*
resolution of this plan is poor and no details can be discerned.	
Community Health	
A Wastewater Assessment, prepared by Martens Consulting Engineers, dated September 2018, Ref: P1705798JR05V03 was submitted as part of the supporting information accompanying the development application. Given the complexity of the sewage management system and the constraints that exist where the sewer disposal system is located (i.e. flood liable land, proximity to Ropes Creek, salinity and water table issues), an independent wastewater treatment consultant should be required to conduct a peer review of the abovementioned wastewater assessment report. It is noted that a peer review of the Wastewater Assessment Report was previously required for the following similar Development Applications within a close proximity to the subject site: ▪ St Narsai Assyrian Christian College College 217 Horsley Road Horsley park;	The proposed wastewater system for the site has been informed by detailed analysis of site conditions and the school's requirements, as detailed in the Wastewater Assessment at Appendix 34 of the original SSDA. It is noted that the Wastewater Assessment for this SSDA was prepared by the same specialist Engineering consultants as St Narsai Assyrian Christian College. Therefore, the previous peer review findings have been learnt and incorporated into the more recent proposal. However the proponent has no objection to a peer review of this proposal as the safety of the wastewater treatment and management system is critically important for the environment and therefore to this project.

Issues Raised by Agencies and Organisations	***Proponent's Response***
▪ Holy Apostolic Catholic Assyrian Church - 32-40 Kosovich Place Cecil Park. Given the range of other concerns regarding the suitability of the site for the proposed degree of site development referred to previously in this report, this review is not warranted at this stage.	
Government Architect NSW (GANSW)	
Streetscape	
We support the design of the entry to the eastern side of the site, but ask that photographic renders be provided to show the school from Kosovich Place to the north.	The appearance of the school, as seen from Kosovich Place to the north, is shown in the Eyelevel Perspective included in Drawing L-SD-04 A (refer Landscape Plans at Appendix 4 of original SSDA). An extract from the Perspective is shown in the following figure.

Issues Raised by Agencies and Organisations	***Proponent's Response***
	 **Figure 8. Eyelevel Perspective of School from Kosovich Place (Arterra 2018)**
We support the integration of services within the landscaping, in particular the fire hydrant pump station adjacent the kindergarten.	Noted.
Form and Mass	
While the design report states that solar and glare controls have been integrated into the façade design, we request larger scale drawings which show what these controls are and where they're used on the façade.	Larger scale drawings providing details of the proposed solar control screens are provided at **Appendix F** (refer Drawing DA400).

Issues Raised by Agencies and Organisations	*Proponent's Response*
We recommend larger scale drawings showing the detailed resolution of the skillion roof form, and heights and relationship to buildings of the canopy roof form.	Larger scale drawings providing details of the proposed roof form are provided at **Appendix F** (refer Drawing A351, A352 and DA401).
Architecture	
We still recommend reviewing the angle of rotation of the entry wing to ensure it doesn't create any undesirable congestion as the school population spills out into the civic heart.	PMDL have reviewed the design of the entry sequence, the angle of rotation of this pivotal building element in relation to the rotation of the adjacent Kindergarten wing and the funnelling that occurs through the Administration building from the Entry to the Civic Heart. This arrival, at the apex of the Civic Heart, coincides with the arrival of students from the Drop-off area along the driveway via a 2.5m wide stair and path. This is intentional so that all students arrive at the same point before they proceed to play before school and then make their way to their GLAs as school commences. This nodal point is reinforced with a large circular skylight over in the canopy roof, which illuminates this 'place'. Any sense of constriction that exists in this 'elbow' of the building is followed by the release into the open of the Civic Heart and the views out to the surrounding landscape from this outward-looking, 'viewing platform'. This aspect of the design came about in response to the Government Architect NSW Design Review Panel's recommendation, which opened up the opportunity for the Kindergarten Play area to increase in size on the due north side of their dedicated indoor learning spaces. In addition, the aim the school is to 'manage' the arrival and departure process by staggering the arrival of the school buses dropping-off and picking-up the students from the Bus Zone lay-by in Kosovich

Issues Raised by Agencies and Organisations	***Proponent's Response***
	Place, immediately outside the Entry, and the Drop-off and Pick-up times for the children arriving and departing by car. For clarity, the Entry double doors have a clear opening width of 1.85m (as drawn) and the threshold between the Administration and the Civic Heart has a set of fully openable, glazed bifold doors with a clear opening width of 3.44m. Children arriving and departing in an orderly fashion will be highly encouraged by the school staff.
We supported the natural ventilation framework but still require further details about user operability to ensure success.	Details of the ventilation system are provided in the Architectural Design Statement at **Appendix J**. in summary, the system has been designed to maximise natural ventilation and minimise the energy consumption of the School. Glass louvres at ground level and on the underside of the roof level on opposing facades will encourage a natural crossflow of fresh air utilising the warm-air-rises, 'buoyancy' principle. On hot days, this can be used as a night-purge system if motorised on a timer control and if the client so chooses. Alternating, mono-pitched roofs along with large voids in the first floor slabs allows this natural ventilation system to work without any mechanical assistance, as and whenever desirable to the occupants. Each space can be managed independently as well as the whole building as one, if the client chooses to incorporate a Building Management System for this purpose.
Aboriginal Cultural Heritage	
We note the suggestions for the inclusion of Aboriginal culture and heritage through interactive displays inside the school and within the school grounds, and encourage the project team to	Subject to ongoing consultation with the local Aboriginal community, additional Aboriginal cultural displays may be incorporated in the landscape scheme for the school such as interpretative displays along the perimeter path displaying Darug dreamtime stories, cultural motifs, bush tucker and medicine plants.

Issues Raised by Agencies and Organisations	***Proponent's Response***
pursue these as well as explore further options such as within the landscape.	The proponent is keen to pursue this opportunity through their Design Team following DA approval. PMDL have already expressed this interest to the local Aboriginal communities through the Aboriginal Cultural Heritage Assessment process.
Landscape and Communal Open Space	
We support the response to level changes by incorporating terraced landscaping and earth banks to transition from the school's bench level to the active play areas, and the civic heart which links all elements of the school on a single level.	Noted.
We support the inclusion of outdoor learning areas on the eastern boundary to enhance GLAs.	Noted.
We note soil type testing has been undertaken and a remediation action plan will be put in place to ensure the site is suitable for the proposed use. We request confirmation that this includes the proposed planting.	As detailed in the Landscape Statement at **Appendix K**, soils are capable of being remediated such that the top layer of soil is capable of supporting normal vegetation growth. The species selected for the site are hardy and adaptable to a wide range of soil conditions, and are also suitable for the local climatic conditions. During the remediation process and the preparations for final landscaping, it is the expectation of the Landscape Architect that the soils can be sufficiently prepared, capped or otherwise ameliorated to allow for proper planting and landscaping to occur at the surface. Accordingly, the proposed planting is suitable for the post-remediation soil conditions.
We note a Flood Management Assessment has been undertaken which concludes that the site is suitable for the proposed use, subject to flood	It is confirmed that the school grounds will be subject to ongoing management and maintenance.

Issues Raised by Agencies and Organisations	*Proponent's Response*
management proposals being adopted. We request confirmation these will include ongoing management and maintenance of the school grounds.	
Sustainability and Environmental Aspects	
We supported the minimal provision of car parking and the EIS now demonstrates that the provision will be adequate for the expected school population.	Noted.
The landscape drawings indicate a proposed tree planting schedule but we request numbers be provided to determine if the proposal meets the NSW Urban Tree Canopy Targets (40%).	Landscaping will be provided across the site to create a 'green oasis'. As well as providing green spaces generally, the proposed landscape scheme incorporates a significant urban tree canopy. As demonstrated in the Landscape Masterplan included at Appendix 12 of the original SSDA, tree planting is proposed adjacent to the school entry, along the site boundaries, throughout the open space areas and within the riparian corridor. A Condition of Consent requiring 40% tree canopy cover across the site would be accepted.
Rural Fire Service (RFS)	
Asset Protection Zones	
At the commencement of building works and in perpetuity the entire property except for the area covered by the Vegetation Management Plan 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	Noted; the management of the entire site (excepting the riparian corridor) as an Inner Protection Area reflects the Bushfire Protection Assessment provided at Appendix 39 of the original SSDA.

Issues Raised by Agencies and Organisations	***Proponent's Response***
NSW REF document *Standards for Asset Protection Zones*.	
Water and Utilities	
Water, electricity and gas are to comply with Sections 4.1.3 and 4.2.7 of *Planning for Bush Fire Protection 2006.*	The design of the school, including buildings, access, landscaping, water and electricity, will comply with relevant sections of *Planning for Bush Fire Protection 2006* (including Sections 4.1.3 and 4.2.7), the BCA and Australian Standards. It is noted that no mains gas is available at the site and none is required.
Access	
The two-way access driveway shall have a minimum trafficable width of 6.5m.	As detailed in the Traffic and Parking Impact Assessment (Appendix 15 of the original SSDA), the two-way driveway exhibits a minimum width of 6.5m and incorporates a turning radius designed in accordance with the requirements of *Planning for Bush Fire Protection 2006.*
The one-way loop to the carpark shall have a minimum trafficable width of 4m.	The one-way carpark loop incorporates a turning radius designed in accordance with the requirements of *Planning for Bush Fire Protection 2006.*
Curves have a minimum inner radius of 6m and are minimum in number to allow for rapid access and egress.	Curves in the driveway have been minimised and maintain compliant widths/radii.
A minimum vertical clearance of 4m to any overhanging obstructions, including tree branches.	Vertical clearance of 4m will be maintained for all access driveways.
Evacuation and Emergency Management	
A Bush Fire Emergency Management and Evacuation Plan shall be prepared consistent with	Noted; the preparation of a Bush Fire Emergency Management Evacuation Plan reflects the recommendations of the Bushfire Protection Assessment provided at Appendix 39 of the original SSDA.

Issues Raised by Agencies and Organisations	***Proponent's Response***
Development Planning – A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan December 2014.	
Design and 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.*	Noted; the construction of the school buildings to comply with Sections 3 and 5 (BAL 12.5) of Australian Standard AS3959-2009 *Construction of Buildings in Bush Fire Prone Areas* and Appendix 3 of *Planning for Bush Fire Protection 2006* reflects the recommendations of the Bushfire Protection Assessment provided at Appendix 39 of the original SSDA.
Roads and Maritime Services (RMS)	
In terms of trip generation proposed school would generate approximately 240 trips during morning and afternoon peak hours in Stage-1 development (as per 1.85 students per car). For the ultimate development the school would generate approximately 580 trips during morning and afternoon peak hours based on 80% of the students will use private vehicle. Given the remote site location and poor public transport facility and considering it is a primary school it is unlikely that 20% of 665 students will	Noted; the trip generation estimated by RMS is consistent with the Traffic and Parking Impact Assessment prepared by McLarens and provided at Appendix 13 of the original SSDA. Whilst RMS have suggested it unlikely that 20% of students would use other modes of transport, this targeted mode split is considered reasonable on the basis of: ▪ Establishment of a school bus service in conjunction with the existing St Narsai link high school; ▪ Encouragement of car pooling; ▪ Implementation of Sustainable Travel Plan (included as Appendix 14 of the original SSDA).

<table>
<tr><th>Issues Raised by Agencies and Organisations</th><th>Proponent's Response</th></tr>
<tr><td>use other mode of transport (such as, bus, cycling, walking).</td><td></td></tr>
<tr><td>From the submitted SIDRA modelling report it was noted that 47 vehicles will turn right into Kosovich Place from Wallgrove Road during morning peak hour against 1021 opposite direction traffic (including 107 turning left into Kosovich Place from Wallgrove Road), in Stage-1 development. And in ultimate development 83 vehicles will turn right into Kosovich Place from Wallgrove Road during morning peak hour against 1120 opposite directional traffic.

Considering Wallgrove Road is an 80km/hr speed zone road and right turning traffic has to negotiate with heavy volume of through traffic, RMS does not support proposed right turn bay (CHR) treatment on Wallgrove Road at Kosovich Place intersection. This would be a potential safety hazard for right turn traffic as motorists have to wait for a safe gap which could frustrate the drivers due to the high through traffic volume.

In addition, RMS does not support proposed banning of right turn from Kosovich Place into Wallgrove Road as this would increase</td><td>The introduction of a roundabout at the intersection of Kosovich Place and Wallgrove Road is not supported.

The assessment and modelling detailed in the Traffic and Parking Impact Assessment at Appendix 13 of the original SSDA demonstrates the suitability of the alternative solution proposed. Further justification for the proposed intersection treatment is summarised in the Traffic Statement at Appendix G.

In summary, SIDRA modelling confirms that in the AM and PM peak hours the right-turn into Kosovich Place from Wallgrove Road will operate with a LoS A or B, which is indicative of low delays and queue lengths. This analysis takes into consideration 10 years of background traffic growth in addition to the traffic generation of the site. The detailed results of the analysis are presented in Table 6 below.

Table 6. SIDRA Analysis- Right-Turn from Wallgrove Rd into Kosovich Place (McLarens 2019)
<table><tr><th>Scenario</th><th>Level of Service</th><th>Average Delay</th><th>95th Percentile Queue Length</th></tr><tr><td>AM Peak Hour + 10Y Growth + Stage 2 School</td><td>B</td><td>17.5 seconds</td><td>6.3m</td></tr><tr><td>PM Peak Hour + 10Y Growth + Stage 2 School</td><td>A</td><td>7.9 seconds</td><td>3.2m</td></tr></table>
The proposed CHR treatment includes a queue storage length of 26.6m, which is more than sufficient to cater for the 6.3m of queues expected in the AM peak hour.

Considering the SIDRA results, it is unclear on what basis the RMS speculates that a safety hazard could be caused by right turning motorists waiting for a safe gap in traffic.</td></tr>
</table>

Issues Raised by Agencies and Organisations	*Proponent's Response*
unnecessary pressure at the roundabout of Wallgrove Road and Villiers Road. RMS suggest a roundabout at the intersection of Kosovich Place and Wallgrove Road. It would improve the safety for turning traffic and also would reduce the approach speed at the subject intersection.	Additionally, traffic counts undertaken during August 2018 have been analysed to provide platooning and gap characteristics. AUSTROADS Guide to Road Design Part 4A Table 3.5 suggests that right turns from major roads across one-lane require a critical gap of 4-seconds, with a 2-second follow-up headway. Using this criteria, analysis of the data indicates that on an average weekday between 8-9am, a total of 123 gaps occur of at least 4 seconds length in the northbound traffic flow. When a follow-up headway of 2-seconds is considered, the ultimate capacity of a right turn across the northbound traffic flows is 281 vehicles. As noted in the original Traffic Report, a total of 83 vehicles will be required to turn right into the site from the north during the AM peak hour. This represents approximately 29.5% of the capacity of the right turn movement and is therefore acceptable, consistent with the results of the SIDRA intersection modelling. With respect to Villiers Road/Wallgrove Road, SIDRA modelling (accounting for 10 years of background traffic growth in addition to the traffic generation of the site) indicates that in the AM and PM peak hours the intersection will operate with a LoS A. As such, the SIDRA modelling demonstrates that the roundabout will continue to meet the RMS criteria for 'Good Operation'. Further, prior to lodgement of the SSDA, two (2) consultation meetings were attended with RMS (refer attached Meeting Minutes at **Appendices H** and **I**), as required by the SEARs. Prior to the meetings, intersection modelling prepared in accordance with RMS' preferred modelling requirements was issued to RMS and then discussed at the meetings. Whilst the option of a roundabout was discussed at the meetings, the overriding advice provided was that: ▪ A new roundabout would be too close to the roundabout of Wallgrove Road/Villiers Road;

Issues Raised by Agencies and Organisations	*Proponent's Response*
	▪ The impacts of an additional roundabout on the operation of Wallgrove Road would be unreasonably great for the purposes of providing access to a single school; ▪ A roundabout may not be able to be constructed within the RMS land, as the motorway road reserve opposite is privately owned by Transurban. On the basis of the above and the outcomes of the SIDRA modelling, a roundabout option is not needed and has not been investigated further.
Sydney Water	
Water	
The development site is part of the Cecil Park Water Supply Zone. Our servicing investigation shows that the trunk drinking water system has adequate capacity to service the proposed development.	Noted.
Wastewater	
There is no existing wastewater infrastructure or capacity to service the site. The development site is outside Sydney Water's growth servicing plan (GSP).	Noted; the information provided by Sydney Water is consistent with the Wastewater Assessment prepared by Martens and provided at Appendix 34 of the original SSDA. The proposed wastewater infrastructure includes: ▪ Sewage Treatment Plant (STP). ▪ Treatment capacity of 8.8 kL/day.

Issues Raised by Agencies and Organisations	*Proponent's Response*
	▪ A flow balancing storage of 12.5 kL capacity and effluent storage of 87.5 kL capacity, to provide wet weather storage. ▪ These may be housed in separate storages within the same tank (minimum 100 kL capacity). ▪ The pumpout tank built in Stage 1 may be used to house the STP or be cleaned and converted to become part of the flow balancing / effluent wet weather storage systems. ▪ Sub-surface irrigation field (minimum area of 3,660 m²) for re-use of secondary treated effluent Further details are provided in the Wastewater Assessment (Appendix 34 of the original SSDA).
Sydney Water Servicing	
A Section 73 Compliance Certificate under the *Sydney Water Act 1994* must be obtained from Sydney Water. The proponent is advised to make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways or landscape designs. Applications must be made through an authorised Water Servicing Coordinator.	An application for a Section 73 Compliance Certificate will be made to Sydney Water.
Building Plan Approval	
The approved plans must be submitted to the Sydney Water Tap in™ online service to determine	Once approved, the plans will be submitted to the Sydney Water *Tap In* service.

Issues Raised by Agencies and Organisations	*Proponent's Response*
whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.	
Trade Wastewater Requirements	
If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. You must obtain Sydney Water approval for this permit before any business activities can commence. It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission. A Boundary Trap is required for all developments that discharge trade wastewater where arrestors and special units are installed for trade wastewater pre-treatment. If the property development is for Industrial operations, the wastewater may discharge into a sewerage area that is subject to wastewater reuse.	Any trade wastewater will be treated in accordance with Sydney Water requirements.

Issues Raised by Agencies and Organisations	*Proponent's Response*
Backflow Prevention Requirements	
Backflow is when there is unintentional flow of water in the wrong direction from a potentially polluted source into the drinking water supply. All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum. Separate hydrant and sprinkler fire services on non-residential properties, require the installation of a testable double check detector assembly. The device is to be located at the boundary of the property. Before you install a backflow prevention device: ▪ Get your hydraulic consultant or plumber to check the available water pressure versus the property's required pressure and flow requirements.	Noted; backflow prevention devices will be installed as required. Specifically, the Hydraulic consultant has checked the available water pressure and advised that a fire hydrant booster pump will be required for the project. As a separate hydrant fire service is required, a testable double check detector assembly will be located at the boundary of the property.

Issues Raised by Agencies and Organisations	***Proponent's Response***
▪ Conduct a site assessment to confirm the hazard rating of the property and its services. For installation you will need to engage a licensed plumber with backflow accreditation.	
Water Efficiency Recommendations	
Some water efficiency measures that can be easily implemented in your business are: ▪ Install water efficiency fixtures to help increase your water efficiency. ▪ Consider installing rainwater tanks to capture rainwater runoff, and reusing it, where cost-effective. ▪ Install water-monitoring devices on your meter to identify water usage patterns and leaks. ▪ Develop a water efficiency plan.	The proposed development has been designed in accordance with principles of ESD, incorporating both active and passive design features to maximise energy and water efficiency. Measures recommended within the ESD Strategy (Appendix 16 of original SSDA) for water include: ▪ Water efficient fixtures and fittings; ▪ 139kL rainwater tank; ▪ Roof water for landscape irrigation; ▪ Sewerage treated and used to irrigate sports field; ▪ Tree planting to intercept and slow stormwater runoff; ▪ OSD tanks and bio basins (rain gardens); and ▪ Large areas of the site retained as pervious surfaces, supporting natural infiltration.
Transport for NSW (TfNSW)	
Extension of School Bus Service	
As the St Narsai Christian College is some distance from the subject site, there is a need to consider the impacts on school bell times, to account for bus	Prior to any modifications to the existing St Narsai bus service being implemented, consultation with St Narsai would be carried out to ensure the coordination of school bells with bus services.

Issues Raised by Agencies and Organisations	***Proponent's Response***
travel time, should the route be modified as suggested.	
The Applicant should continue liaising with the local bus operator regarding school bus services. Notwithstanding, the provision of any extension of school bus services would be subject to demand and funding.	Consultation with the local bus operator, being Transit Systems, is ongoing. As documented in the EIS submitted as part of the original SSDA (refer Section 7.4 of the EIS), based on consultation to-date, Transit Systems has confirmed the suitability of Kosovich Place for accommodating bus turning, subject to an extended 'no stopping' zone being provided in the vicinity of the cul-de-sac head. No widening of the turning bulb is required to accommodate buses.
Green Travel Plan	
Recommended Condition: 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 to reduce the reliance on private vehicles, shall be prepared in consultation with Fairfield City Council. The GTP must be implemented accordingly and updated annually. Reason: To ensure sustainable transport outcomes and achieve the overall strategic planning objectives in the: ▪ *Future Transport 2056 Strategy;* ▪ *Sydney's Bus Future 2013;* ▪ *Sydney's Cycling Future 2013;* and ▪ *Sydney's Walking Future 2013.*	A Sustainable Travel Plan was prepared by McLaren Traffic Engineering & Road Safety Consultants, and included at Appendix 14 of the original SSDA. The Sustainable Travel Plan incorporates the details requested by TfnSW as part of the 'Green' Travel Plan, with no further updates required. It is accepted that the Sustainable Travel Plan (being the document submitted as Appendix 14 of the original SSDA) should be implemented as a Condition of Consent.

Issues Raised by Agencies and Organisations	*Proponent's Response*
Traffic and Parking Management Plan	
Recommended Condition: 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. Traffic management measures that need to be addressed include: ▪ kerbside vehicle pick-up/drop-off management (if any) 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. 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. Reason:	An Operational Traffic and Parking Management Plan (OPTMP) is provided at **Appendix C**. Key items relate to: ▪ Management of on-street car parking ▪ Management of off-street car parking (staff and visitors) ▪ Internal kiss and drop operations ▪ Bus operations ▪ Delivery/service vehicle management ▪ Management of feedback and complaints ▪ Review and monitoring of the OPTMP Full details of operational traffic management are provided at **Appendix C**. To ensure the proposed kiss and drop facilities operate with high levels of efficiency and safety, the following management practices will be implemented: ▪ Traffic control by school staff at internal pedestrian crossing locations; ▪ Traffic control by school staff to direct queued vehicles into vacant kiss and drop spaces; ▪ Organisation of students into general kiss and drop areas by year-group to speed pick-up operations; ▪ Assistance of school staff to load vehicles with children and bags. With respect to the capacity of the pick-up/drop-off facilities, it is noted that the number of kiss-and-drop spaces (30 spaces) and proposed queuing arrangements have been designed in conjunction with a qualified Traffic Engineer. The following provides a summary of the utilisation of kiss-and-drop spaces and maximum queue lengths. The results demonstrate that the parking demands of the development and all queuing can be accommodated within the site.

<table>
<tr><th>Issues Raised by Agencies and Organisations</th><th>Proponent's Response</th></tr>
<tr><td>To minimise the risk that the capacity of the proposed short-term parking and pick-up/drop-off zones would be insufficient and manage the high volume of traffic (vehicular and pedestrian) movements, which generally occur within a short timeframe before and after school hours.</td><td>
<table>
<tr><th colspan="3">Table 7. Queuing Analysis (McLarens 2018)</th></tr>
<tr><th>Phase</th><th>Estimated Vehicles in Kiss-and-Drop Spaces</th><th>Estimated Queue Vehicles</th></tr>
<tr><td colspan="3">Stage 1 Development</td></tr>
<tr><td>Prior to pick up</td><td>30</td><td>5</td></tr>
<tr><td>During pick up</td><td>3</td><td>0</td></tr>
<tr><td colspan="3">Final Development</td></tr>
<tr><td>Prior to pick up</td><td>30</td><td>36</td></tr>
<tr><td>During pick up</td><td>7</td><td>0</td></tr>
</table>

Having further regard to traffic safety, the proposed widening of Kosovich Place has been designed to accommodate the two-way passing and standing of buses in the indented bus bay. Road widening will provide sufficient width for up to four (4) buses to pick-up or drop-off passengers without interrupting traffic flow along the street. Light vehicles are able to enter and depart the site without conflicting with queued or manoeuvring buses. It has been advised and demonstrated by the bus operator, Transit Systems, that the existing turning bulb is sufficient to facilitate U-turns by buses.

As also confirmed in the Traffic and Parking Impact Assessment, all vehicular and pedestrian facilities have been designed to meet relevant Australian Standards, including in relation to sight lines for all driveways and pedestrian crossings.

Safe pedestrian movement between the bus stop and school entry point will be facilitated via the footpath proposed for construction along the extent of the site frontage. The siting of the bus stop west of the driveway means students will be able to walk between the bus stop and school entry without</td></tr>
</table>

Issues Raised by Agencies and Organisations	*Proponent's Response*
	needing to cross the driveway. The safety of children has been a primary consideration in the design solution proposed. Full details are provided in the Traffic and Parking Impact Assessment at Appendix 13 of the original SSDA and in the Operational Traffic and Parking Management Plan (OPTMP) at **Appendix C**.
Signage and Linemarking Plan	
Recommended Condition: 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 the Fairfield City Council. The approved kerbside parking restrictions must be implemented to the satisfaction of Council, prior to issue of occupation certificate for Stage 1. Reason: Approval would be required from the relevant roads authority for any proposed changes to traffic and parking operations.	In accordance with this recommended condition of consent, a Signage and Linemarking Plan would be prepared prior to the issue of the Occupation Certificate for Stage 1.