Table 1: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
NSW Department of Planning, Industry and Environment (Karen Harragon – Director Social and Infrastructure Assessments)	
1. ***Community Use of School Facilities*** *The application includes the use of school buildings/grounds by the community outside of school hours. A detailed schedule listing the school facilities to be used (i.e. meeting rooms, parking spaces, halls, etc), the types of functions/activities to be carried out and maximum occupancy and hours/days of operations is to be submitted.*	The revised Operational Plan of Management (refer to **Appendix 2**) notes that community use of school facilities and resources will provide a number of benefits to the school and wider community, including: ▪ The development of positive perceptions about the school and learning aspects. ▪ The development of cooperation and goodwill in the school and local community relationships. ▪ Increased community awareness of school activities. ▪ The opportunity for schools to improve their curriculum and learning programs through access to a wider range of resources and talents in the local and wider community. ▪ The potential for increased financial returns to the school. ▪ Access for the community to a wider range of facilities and resources. ▪ Efficient utilisation of the school facilities and resources. Specific examples of community use of the school facilities include: ▪ After school 'homework' club (4-6pm); ▪ High performance cricket coaching (4-6pm); ▪ Specialist activities and tutoring in gymnastics, music, art, Twi Quan DO, basketball; and ▪ Dance instructions (4-6pm). Sym Studio note, that the Village Green utilises 'Synthetic Turf' to cater for general community use after school hours. Should the surface be required to revert to natural lawn, accessibility to the general community will be excluded to preserve the integrity of natural lawn. This would be confirmed at the detailed design stage of the Proposal.
2. ***Arborist Report***	An *Arboricultural Impact Assessment* has been prepared by Bluegum Tree Care and

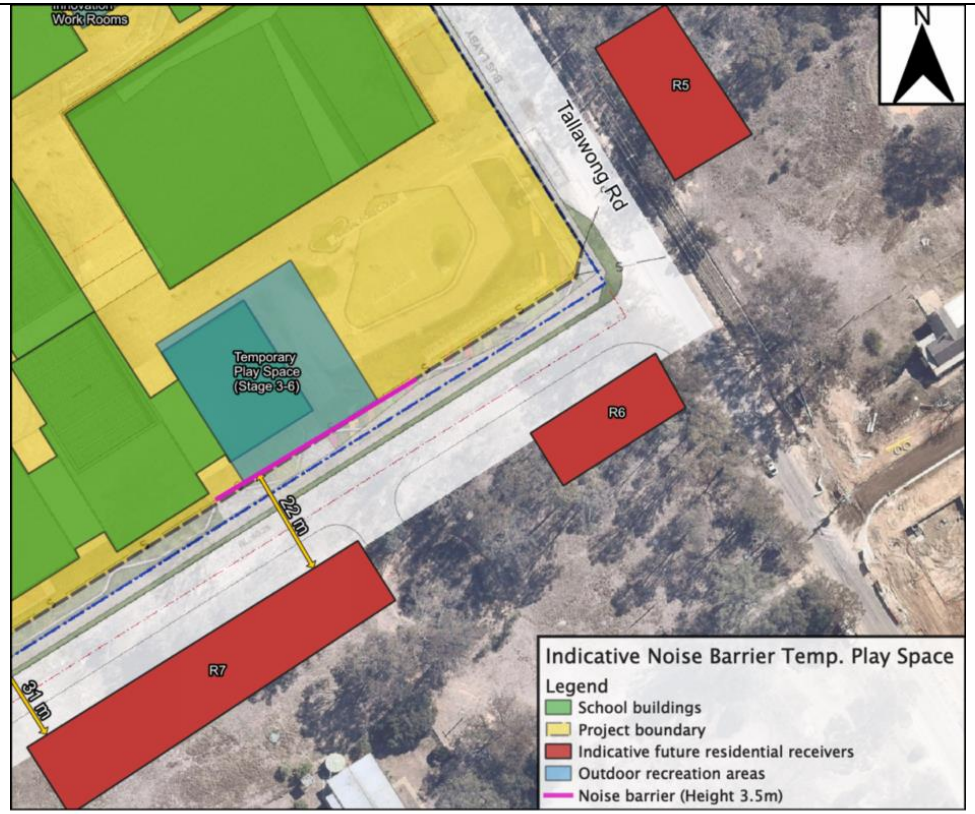
The proposal impacts existing trees on the site. An Aboricultural Impact Assessment report is to be prepared by a suitably qualified person that details of all the existing trees on site, the impact to these trees and provides justification for the removal of trees where required.	Consultancy (Bluegum, 2020), which included an assessment of the likely impacts of the Proposed Development on existing site trees, including recommendations pertaining to both retention and removal of existing site trees (refer to **Appendix 3**). Accordingly, the Arboricultural Impact Assessment (AIA) was undertaken in accordance with the principles set out within Australian Standard 4970-2009, *Protection of Trees on Development Sites.* Bluegum confirm that six (6) trees were assessed on the Subject Site, which included the following species: ▪ Rough-barked Apple, *Angophora floribunda* (Tree 1). ▪ Narrow-leaved Ironbark, *Eucalyptus crebra* (Trees 2, 3 and 6). ▪ Forest Red Gum, *Eucalyptus teriticornis* (Trees 4 and 5). Bluegum note, that none of the trees were assessed as having major significance including heritage significance; and no tree is listed on a register of significant trees. None of the assessed trees are considered likely to remain viable within the context of the Proposed Development, which can be seen from the assessment undertaken by Bluegum. **Tree Number** / **Retention Value** / **Reason for Removal** 1, 2, 3 / Low / Poor structural condition. Trunk or large limb failure is possible. Located within an area of proposed bulk earthworks/building footprint. 4, 5 / High / Bulk earthworks resulting in soil fill around these trees is proposed. They are unlikely to remain viable. 6 / Medium / Within the proposed area of grading for the pedestrian accessway. Bluegum provide recommendations in relation to the trees assessed on-site, including: **<u>Site Establishment – Prior to Construction:</u>**

	▪ **Tree Removal:** The tree removal contractors must be made aware of the high likelihood of encountering wildlife in Trees 1 and 2. The tree removal method must take into consideration the need to avoid harm to animals living within the hollowed trunks of these trees. A wildlife carer must be on-site to coordinate with contractors during tree removal works. Tree removal works should be undertaken in accordance with the WorkSafe Australia *Guide to Managing Risks of Tree Trimming & Removal Work*. **Post Construction:** ▪ **Replacement Tree Planting:** Given the proposed removal of locally native tree species it is recommended that replacement tree planting be undertaken. The following tree species should be incorporated into the proposed planting schedule: o Rough Barked Apple, *Angophora floribunda;* o Forest Red Gum, *Eucalyptus teriticornis*; o Narrow-leaved Ironbark, *Eucalyptus crebra*; and o Grey Box, *Eucalyptus moluccana*. The complete AIA is located within **Appendix 3** of this RTS.
3. ***Landscape Plan*** *The landscape schedule within the submitted landscape plan is to be revised to include the total number of trees proposed to be planted and removed.*	Sym Studio note, that minimal tree removal is proposed, with an estimate of approximately ten (10) existing trees, including five (5) associated with the Tallawong Road Widening. Notwithstanding, the Arborist Report confirmed only six (6) trees as part of their assessment. Furthermore, Sym Studio note a total number of trees proposed is approximately 137, as illustrated within PMD-DA105, Issue A (refer to **Appendix 7**).
The Department is concerned regarding respect to the heat island effect resulting from the proposed artificial lawn on the village green and paved concrete areas in particular at 'civic heart'. The Department recommends reducing the heat island effect through replacing artificial lawn with real lawn, increasing the amount of soft landscaping and planting (including canopy cover) around the civic space, outdoor play areas and car parks, to	Sym Studio affirm the desire to reduce the effects of heat island effect and general comfort of students, teachers and visitors as part of the Proposal, for which reference should be made Micro-climate & Thermal Comfort - PMD_DA-008, Issue A (refer to **Appendix 7**). With respect to the landscaping strategy pertaining to the Proposal, the following parameters are proposed as part of the Landscape Masterplan, including:

provide more external shading. An assessment is to be provided which considers the heat island effect having regard to the proposed treatments and which demonstrates that the proposal would provide a safe and comfortable environment for staff, students and other visitors to the site.	a) Cool paving material, including light colour. b) Permeable Paving = 4000 m^2, approx. 40% of total paving surface. c) Rooftop Gardens = 1500 m^2. d) Vegetation Cover = 6000 m^2. e) Evaporative Cooling to building undercrofts. f) Synthetic Turf employs irrigation system activated 'on demand' when high summer temperatures are forecast. The synthetic lawn has been designed with provisions for irrigation and a moisture retaining layer as sub-grade to retain moisture and mimic the process of evapotranspiration exchange from water to the air, thus reducing surface heat. The intensive use of the village green is likely to cause great stress to lawn likely resulting in 'bare soil patches' and hydrophobic conditions. Management strategies to limit the use of the village green to preserve the natural surface would only serve to limit the positive benefits of active sports. Further limitation on general public (out of school hours) would also be severely compromised. The transition from natural to synthetic lawns in schools is wholly accepted as a preferred approach including Chatswood High School, Narrabeen High School and Manly West PS. Accordingly, the revised Landscape Plan proposes a combination of natural vs. synthetic lawn area. Additionally, the provisions for 137 Trees are proposed to replace the trees identified on-site for removal, providing additional canopy cover and cooling across the Site.
An arborist's report is to be provided which demonstrates the viability and longevity of these proposed tree planting above and adjacent to the basement car parks.	Refer to the abovementioned commentary pertaining to the AIA prepared by Bluegum (refer to **Appendix 3**).
4. ***Acoustic Impact*** *It is unclear if an acoustic assessment of school facilities used by the community outside of school hours (apart for Gurdwara, langar and multi-purpose hall) has been included in the noise and vibration impact assessment report. Clarification (and an updated assessment where required) is to be provided.*	It is noted, that the Noise and Vibration Impact Assessment prepared by Resonate (refer to **Appendix 9**) has been updated to be consistent with the hours of operation proposed within the Environmental Impact Statement (EIS). Accordingly, there are no negligible changes in the assessment undertake due to the extended after school care hours being until 7pm, for which the previous assessment assumed 6pm, which is in accordance with the relevant criteria.
It is unclear if the noise and vibration assessment report provides an assessment of the acoustic impact of the operation of the child care centre. Clarification (and an updated assessment where required) is to be provided.	Section 6.4.5 of the Noise and Vibration Impact Assessment prepared by Resonate (refer to **Appendix 9**) includes an assessment of the proposed Early Learning Centre at the indicative construction stage identified as Stage 3B. The worst-case noise source of children playing outside has been assessed against the relevant

	noise criteria, for which it is considered to be compliant, for which further assessment is not considered to be required.
The noise and vibration impact assessment report states "The K-2 Play area will include approximately 20 children at play which could result in a sound power level of up to 93 dB(A). The nearest residential receiver is located at a distance of 31 m. Without mitigation this would lead to an exceedance of the operational noise criterion of approximately 5 dB(A) on the first floor and 4 dB(A) on the ground floor. With a 3.5 m high noise barrier in close proximity to the play area, compliance would be achieved on ground and first floor. As an in-principle solution, it is recommended to move the K-2 Play area into a better shielded position or erect a 3.5m barrier in close proximity to the play area, or reduce the numbers of children allowed in the play area at any one time." Details are to be provided of what mitigation measures are proposed to address this matter and achieve compliance.	As the paragraph adjacent suggests, the in-principle solution is, "*As an in-principle solution, it is recommended to move the K-2 Play area into a better shielded position or erect a 3.5m barrier in close proximity to the play area, or reduce the numbers of children allowed in the play area at any one time."* Resonate note, that a detailed solution would typically be provided during the detailed design stage of the Proposed Development. Notwithstanding, the in-principle solution demonstrates that practical solutions are possible, to mitigate the K-2 play area noise source. It is noted, that this would generally be sufficient to achieve the aims of a Noise Impact Assessment at the planning phase. For consistency and completeness, the Noise and Vibration Impact Assessment has been updated to include provisions for an acoustic barrier adjoining the K-2 play area, which is located within Figure 7 of the Report (refer to **Appendix 9**).

	 **Figure 7 Indicative noise barrier location for K-2 Play area**
The noise and vibration impact assessment report states that stage 3-6 temporary play space would only meet compliance with the installation of a 3.5m height noise barrier at the boundary of the play space. Details are to be provided of what mitigation measures are proposed to address this matter and achieve compliance.	For the reasons outlined above, the same methodology has been applied with respect to the Stage 3-6 temporary play space (refer to the below).

	 **Figure 8 Indicative noise barrier location for Temporary Play Space** Further consideration is not required in this respect.
*5. **Signage*** *The application seeks consent for signage however no details have been provided in the EIS. Details of the proposed signage is required to be submitted including the number, type and location of signs. Dimensioned plans are also to be provided along with details of illumination/lux levels for digital signs (if any proposed). In addition, the assessment of the proposed signage against State Environmental Planning Policy 64 – Advertising and Signage is to be revised to reflect the details included.*	The Architectural Design Report (pages 38-41) have been amended accordingly to satisfactorily address this Submission item (refer to **Appendix 5**). Additionally, reference should be made to the Landscape Plans – Design Analysis Drawings 'Key Moves & Cultural Identity' PMD-DA-009, Issue A page 9 (refer to **Appendix 7**).
*6. **Construction and Operation Staging***	The Architectural Plans have been revised by PMDL to include indicative timeframes

The construction staging plan is to be amended to include timeframes of the duration of each of the construction stages (i.e. Jan 2021-Jan 2022).	pertaining to each construction stage of the Proposal (refer to **Appendix 4**). It is noted, that construction stage timeframes may vary depending on relevant Construction Certificates being obtained based on the requirement and demand for each component of the School and associated buildings / particulars.
Details are to be provided of the arrangements to be put in place during the staged operation of the site whilst construction is ongoing to ensure the safety of students, staff, other visitors and the public. Details are to include: ▪ *timeframes of staging.* ▪ *safety arrangements, including how operational areas would be separated from areas of ongoing construction.* ▪ *access arrangements, including how school access areas would be safety separated from construction access.* ▪ *how the staging relates to the anticipated provision of local infrastructure, particularly the construction of full road carriageways surrounding the site.*	The Architectural Plans and Operational Plan of Management have been amended to consider and satisfactorily address the adjoining item pertaining to details of arrangements and protocols to be implemented during the staged construction and concurrent operation with respect to the Proposal's varied stages (refer to **Appendix 2, 4** & **5**).
7. ***Student / Staff Accommodation*** *Clarification is to be provided as to why the provisions of State Environmental Planning Policy (Affordable Rental Housing) 2009 apply to the proposed staff/student accommodation.*	*State Environmental Planning Policy (Affordable Rental Housing) 2009* does not apply to the Proposal. It is noted, that the Explanation of Intended Effects (EIE) pertaining to the proposed Housing Diversity State Environmental Planning Policy (Housing Diversity SEPP) considers 'Student Housing'. According to the EIE, the proposed definition for 'student housing' is proposed to read as follows: ▪ *Provides accommodation and communal facilities principally for students enrolled to study at an education establishment during teaching periods; and* ▪ *May incorporate some fully self-contained dwellings.* The Student Accommodation proposed under this Proposal would accord with the EIE exhibited from 29 July 2020 to 9 September 2020.
Clause 4 of the State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development states that where a development involves the erection of a new building with three or more storeys and four or more self-contained dwellings, the Policy applies. The proposal involves erection of a new four storey building with 6 self-contained dwellings. Accordingly, where relevant an assessment is to be provided for the proposed accommodation building against the State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development and design criteria/guidance set out in the Apartment Design Guide. Amended plans are to be provided if compliance with these provisions require amendments to the design of the proposed building.	It is noted, that PMDL have revised the Architectural Design Report (refer to **Appendix 5**) and prepared an Apartment Design Guide Assessment (refer to **Appendix 6**) in relation to the development particular comprising the proposed Student Accommodation. Furthermore, it is noted, whilst the proposed Student Accommodation is generally compliant with the Schedule 1 – Design Quality Principles, there a few minor inconsistencies which have occurred by virtue of facilitating a supportable and conducive design outcome in favour of the Subject Site and overall proposal. The minor non-compliances are in relation to: ▪ **Solar & Daylight Access:** includes the addition of two (2) clerestory pop-ups over Units 5 & 6 for the purposes of providing appropriate solar access.

	All units now receive a minimum of (2) hours sunlight between 9am and 3pm in mid-winter, for which solar diagrams are attached in the revised Architectural Plans (refer to **Appendix 4**). ▪ **Environmental Performance:** the ceiling height of habitable rooms is 2.7 m. Therefore, 2.5 x 2.7 = 6.75. The maximum depth of the units from the window is approximately 6.3 m, which is considered satisfactory and supportable despite the minor non-compliance. ▪ **Apartment Layout:** apartment layouts have been revised accordingly, so that the master bedrooms are a minimum of 10 m^2, and other bedrooms are a minimum of 9 m^2. Accordingly, bedrooms are at least 3 m wide. ▪ **Private Open Space:** apartment layouts have been revised and balconies cantilevered so that Units 1, 2 & 4 have a minimum balcony size of approximately 10 m^2; and Units 3, 5 & 6 have a minimum balcony size of approximately 8 m^2. The minimum depth of all balconies is approximately 2 m. ▪ **Storage:** apartment layouts have been revised to include a minimum of 8 m^3 of storage in Units 1, 2 & 4; and a minimum of 6 m^3 of storage in Units 3, 5 & 6. ▪ **Natural Ventilation:** the location and operability of windows revised to a minimum of 5% of the floor area. ▪ **Apartment Size & Layout:** the apartment layouts have been revised so that Units 1, 2 & 4 are a minimum of 50 m^2; and Units 3, 5 & 6 are a minimum of 70 m^2. The revised Architectural Plans are located in **Appendix 4** and the both the Architectural Design Report and Apartment Design Guide Assessment are located in **Appendix 5** & **6** which satisfactorily address the Submission item confirming compliance can be achieved with the Apartment Design Guide.
8. ***Operational Plan of Management for Student / Staff Accommodation*** *An operational plan of management for the student/staff accommodation is to be submitted which includes, but is not limited to, student/staff capacity, noise management measures, security, room capacities, building services, ongoing review of the plan of management, house rules, and monitoring/complaints management.*	Page 4 of the Operational Plan of Management has been revised to consider the adjoining comment. It is noted, that this can be conditioned accordingly to be updated as part of a revised Operational Plan of Management prior to the issue a the relevant Occupation Certificate (refer to **Appendix 2**).
9. ***Building Height Plane***	Reference should be made to the revised Elevation Plans – DA 201 5 in **Appendix 4**.

A building height plane diagram showing the maximum building height development control overlayed above the proposed buildings with Australian Height Datum is to be submitted.	
The elevations are to be amended to include an annotation of the maximum building height (9m) control.	The 9 m height Development Standard has been included on the elevations (refer to **Appendix 4**).
10. ***Green Travel Plan, Bicycle Spaces and End of Trip Facilities*** *A preliminary Green Travel Plan prepared by a suitably qualified person is to be submitted which includes targets and measures to reduce reliance on car travel to the site.*	Traffix have prepared a Green Travel Plan, which is considered to satisfactorily address the adjoining Submission item (refer to **Appendix 10**).
Whilst it is noted that Blacktown Council's Development Control Plan 2015 does not require for bicycle spaces, bicycle parking spaces and end of trip facilities are to be provided for the proposed development in line with the mode share arrangement proposed in the Green Travel Plan.	The revised Architectural Plans include provisions for bicycle parking spaces throughout the Site (refer to **Appendix 4**). Further consideration is not considered warranted in this respect.
11. ***Plans*** *It appears that a western elevation of the proposed development was not included in the EIS. This is to be provided.*	Reference should be made to the revised Elevation Plans – DA 201 5 in **Appendix 4**.
A schedule of materials and finishes is to be submitted.	Reference should be made to pages 32-35 of the revised Architectural Design Report which includes a materials and finishes schedule (refer to **Appendix 5**).
Additional NSW DPIE Comments Received 13/10/2020	
1. ***Community Use (Appendix 1)*** ▪ *Clarify the hours of operation of:* o *the Gurdwara & Langar (eg 5, 6 or 7days? Including public holidays?)* o *the 'other activities', including what facilities the community would have access to* ▪ *Provide a clear list of facilities on the site intended to be available for community use and if not already confirmed, provide likely hours of operation. This needs to be addressed in the acoustic report as well.*	The revised Operational Plan of Management has been revised to satisfactorily address the NSW DPIE concerns and is located within **Appendix 2**.
2. ***Landscaping*** ▪ *Confirm whether consideration has been given to the inclusion of biodiversity/green roofs to inaccessible roof areas, update the drawings to include such roofs where possible.* ▪ *Update the landscaping plan PMD-DA-101 B so that the colours used*	▪ Green roofs were considered; however, this would prohibit the requirements pertaining to solar panels and mechanical plant to be appropriately installed across the Site, as well as instilling future maintenance and access issues which were not considered to be supported by the Proposal. ▪ The Landscape Plans have been revised accordingly (refer to **Appendix 7**). ▪ Sym Studio have completed a Tree Canopy Cover Study with respect to the

to differentiate between synthetic and natural lawn are clearer. ▪ *Confirm the tree canopy cover as a percentage of the total site area both in the original (prior to tree removal) and proposed scenarios.* ▪ *The Department notes the RtS states the Arboricultural Impact Assessment (AIA) includes commentary on the planting of trees above/next to basement areas. However, it appears that no commentary is provided within the AIA on this matter. Please provide a detailed response to this issue.*	Proposal in accordance with the Subject Site (refer to **Appendix 8**). ▪ The Arboricultural Impact Assessment and the Landscape Plans have been amended to remain consistent with one another (refer to **Appendix 3** & **7**).
5. ***Signage*** ▪ *Provide a revised plan showing the location of proposed signage including annotated reference numbering of proposed signs.* ▪ *Provide an updated assessment against the SEPP 64 signage criteria.*	▪ The Architectural Plans and Design Report have been revised to include a revised Signage Plan (refer to **Appendix 4** & **5**). ▪ Section 4.2.1 of the RtS Planning Report satisfactorily addresses the SEPP 64 signage criteria.
6. ***Staging*** ▪ *Update the Design report to confirm the predicted construction completion dates of Stages 3B and 9.* ▪ *The details on the safety information for staged construction is not adequate.*	▪ The Architectural Design Report has been revised to include indicative construction completion dates on Stages 3B and 9 of the Proposal (refer to **Appendix 5**). ▪ The Staged Construction Drawings contain preliminary safety details, for which the Detailed Design will include a comprehensive safety schedule and further details (refer to **Appendix 5**).
7. ***Student / Staff Accommodation*** ▪ *Update Appendix 5 to specify the percentages, sqm, sizes etc of how the proposal meets or exceeds the ADG requirements.*	The Apartment Design Guide Assessment prepared by PMDL has been revised to satisfactorily address the NSW DPIEs requirements regarding inclusion of numeric values throughout the assessment (refer to **Appendix 6**).
9. ***Building Height Plan*** ▪ *A building height plane diagram has not been submitted, only elevation plans. A building height plane diagram needs to be submitted.* ▪ *Elevations should be updated with annotations to include the highest point of buildings (including parapets and roof enclosures). Provide annotated heights on roof plan DA100.*	▪ It is noted, that a Building Height Plane Diagram has been prepared by PMDL (refer to **Appendix 4**), which satisfactorily demonstrates the built form components proposed above the maximum building height plane. This accords with only a minor portion of the Site and has been centred around the Site to ameliorate over shadowing concerns and limit potential visual amenity impacts across the Site with respect to nearby residential receivers. This is articulated within Drawing DA602 of **Appendix 4**. ▪ All elevations proposed have been updated accordingly (refer to **Appendix 4**).
10. ***Plans*** ▪ *Provide a drawing that clearly identifies the location and proposed number of bicycle parking spaces and confirm the location and number of end of trip facilities.*	PMDL have revised the Architectural Plans (refer to **Appendix 4**) to capture the locations and number of proposed bicycle parking spaces across the Site, including end of trip facilities.

Other Matters ▪ *A RtS report is to be prepared and submitted, similar to Trinity Grammar (SSD-10371).* ▪ *The RtS includes a response to traffic concerns raised by Council and TfNSW and quotes their traffic consultant – however, there is no updated traffic report. An updated traffic report is to be submitted with the RtS.* ▪ *Not all public submission has been withdrawn. There is one that has not been withdrawn that needs to be addressed.*	▪ An RtS Planning Report has been prepared by Willowtree Planning and is dated 28 October 2020, which satisfactorily addresses the Submissions received. ▪ A revised Traffic and Parking Impact Assessment has been prepared by Positive Traffic and is located within **Appendix 17**. ▪ All Public Submissions have been satisfactorily addressed throughout this Submissions Matrix.

Table 2: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Blacktown City Council (Alan Middlemiss – Acting Manager Development Assessment)	
Stormwater / Drainage: 1. *Amended drainage plans from Martens and Associates Pty Ltd are to be provided to meet the requirements under Part J of BDCP 2015 and Council's Engineering Guide for Development 2005. The amended plans must address the following:* i. *Lots 42 & 43 are shown as flood affected on mapping provided by the Department of Planning, Industry and Environment. The habitable floor level for the proposed buildings are to be the higher of a minimum of 225 mm above finished ground level or 500 mm above the highest street gutter invert level outside the site.*	With respect to the revised *Concept Stormwater Management Plan and Preliminary Flood Study* prepared by Martens (2020), they indicate that the peak 1% AEP water level is approximately 50.9 m AHD at the north eastern boundary of the Site. As the proposed building floor level is 52.5 m AHD, a freeboard of 1.6 m is achieved. In the 1% AEP with climate change event, the water level reaches up to 51.1 m AHD, which results in a freeboard of approximately 1.4 m (refer to **Appendix 11-13**).
ii. *The flows from the upstream catchment are flowing through the overland flow path runs through the site in current conditions. The proposed fill of the site fully blocks the flow path and the existing low point in Tallawong Road, which results in more than 1 m deep ponding in Tallawong Road before the flows are collected in the proposed pits and the excess flows run through the car park. This approach relies fully on the proposed pit and pipe system to capture and convey the 1% AEP flow. This is not supported by us as the more than 1 m deep ponding at the sag point in Tallawong Road in a 1% AEP storm event will flood the properties north-east of Tallawong Road and lead to high hazard conditions in Tallawong Road.*	Martens (2020) note, that the upstream property identified at 154 Tallawong Road has already been developed and upgraded along the Tallawong Road frontage of the Site should be considered in both the existing and proposed conditions of the flood modelling undertaken. Additional flood modelling has been undertaken to incorporate with the WAE levels, for which the results demonstrate, that flood water on Tallawong Road will reach a maximum depth of approximately 0.185 m in the 1% AEP flood event and up to 0.250 m in the climate change scenario.
iii. *The issues of overland flows in Tallawong Road need to be addressed as to how the 1% AEP flows can be safely conveyed to the discharge point without flooding the properties upstream of Tallawong Road at the sag and how the ponding depth will be*	As above.

maintained to acceptable limits.	
iv. The Stormwater Management Plan shows more than 200 mm ponding in the proposed car park north of the site. The maximum allowable ponding depth is 200 mm.	Martens note, that the proposed car parking area at the northern portion of the Subject Site is noted to be flood free in the 1% AEP, as demonstrated in **Figure 6** of **Appendix 11-13**. Additionally, the car parking area is only inundated by flood water during the PMF Events.
v. The architectural plans show a basement car park north-east of the site. Demonstrate how the overland flows for 1% AEP storm event through the site are diverted from entering the basement.	Martens confirm that the 1% local upstream catchment flows have been fully contained within the proposed trunk drainage pipe. Additionally, the road formation along the north western boundary road will convey the 100-year flows, which is considered to be satisfactory for the Proposal. Furthermore, the driveway ramp to the basement car parking is at (or above) the road reserve levels which ensures that no flows enter the basement.
vi. The 1% AEP flows for the upstream catchment shown in Table 2 of the Stormwater Management Plan are incorrect. The flows are to be calculated for the 6.7 ha upstream catchment.	The Overland Flow Report (refer to **Appendix 11-13**) has been revised to capture an upstream catchment of approximately 6.7 ha.
vii. The design of the 3 half width roads surrounding the lots and the external drainage pits and pipe system are to be shown on plan.	The half-road construction is subject to a concurrent DA with Blacktown City Council under **DA-19-01597**, for which does not form part of the Proposal. The half-road construction would be undertaken ahead of time prior to the subject SSD Application.
viii. Number all the roads and pits.	The Civil Engineering Drawings have been updated accordingly in Drawing Numbers PS05-E100 & E101 and PS05-E500 & E501 (refer to **Appendix 11-13**).
ix. Provide a tailout system at the final discharge point south-west of the site. Details to be provided.	It is noted, that the school drainage will connect to an easement pipe as demonstrated within Drawing PS05-E100 & E101 (refer to **Appendix 11-13**). The easement drainage pipe is subject to a concurrent DA with Blacktown City Council under **DA-19-01597**, which is to be constructed prior to the construction of the school under the subject SSD Application. Notwithstanding, the tailout grading and discharge pipe is demonstrated in Drawing PS05-E100 & E101 (refer to **Appendix 11-13**).
x. The design levels of the half width road south-east of Lot 42 are to be consistent with the levels of the other half width road on the approved plan for the adjoining development at 141 Tallawong Road.	The design levels of the half width road southeast of Lot 42 have been designed to be consistent with all other half road widths on the approved plan for the adjoining development at 141 Tallawong Road.
xi. In the drainage pipe system design for the external roads, provisions are to be made in the drainage plans for the future development at	With respect to the concurrent DA with Blacktown City Council under **DA-19-01597**, stub connections have been included to the design which covers external

163 Tallawong Road and in Lot D/DP407863 with stub pipes across half width of roads north-west and south-west of the site for future connections of drainage from those developments.	roads.
xii. Extend the stub lines of the other half of the road south-east of Lot 42 shown on the approved plans of 141 Tallawong Road and provide kerb inlet pits at the end of the pipe lines at the north-west side of the road.	As above.
xiii. The pipe line on the southern corner of Lot 42 is to be connected to the proposed discharge pipe from 141 Tallawong Road.	The connection is shown on Drawing E100 (despite being subject to **DA-19-01597**, which covers external roads), for which additional notations have been for clarity (refer to **Appendix 11-13**).
xiv. Show invert levels, surface levels, size and type of pits and pipes and grade of pipes of the internal and external drainage system on the overall drainage layout plan.	The half-road construction is subject to a concurrent DA with Blacktown City Council under **DA-19-01597**, for which does not form part of the Proposal. Long sections and a pit schedule have been provided under the concurrent DA which would be constructed prior to the school being constructed. For consistency and completeness the Civil Engineering Drawings have been revised to include long sections and pit schedules for internal pits and pipes along Tallawong Road identified within Drawing PS05-E300, E301 and E500 (refer to **Appendix 11-13**).
xv. Provide long sections of external pip lines indicating pipe and pit system details, hydraulic grade line and the applied design ARI.	As mentioned above, the upstream property identified at 154 Tallawong Road has already been developed and upgraded along the Tallawong Road frontage of the Site should be considered in both the existing and proposed conditions of the flood modelling undertaken. Additional flood modelling has been undertaken to incorporate with the WAE levels, for which the results demonstrate, that flood water on Tallawong Road will reach a maximum depth of approximately 0.185 m in the 1% AEP flood event and up to 0.250 m in the climate change scenario.
xvi. For stormwater quantity, Section 7.11 contributions apply to the area as indicated in the letter from Council's Contributions team.	Noted and agreed. Contributions would be calculated as part of the Development Consent subject to approval.
xvii. Temporary OSD is required until the regional basin is operational, to cater for the 1% AEP flows from the site as well as the surrounding roads excluding Tallawong Road.	The half-road construction is subject to a concurrent DA with Blacktown City Council under **DA-19-01597**, for which does not form part of the Proposal. Notwithstanding, provisions for OSD have been provided as part of the Proposal. Reference should be made to details articulated within Drawing PS05-E600 and E601 in relation to Stage 1 and the Final Stage (refer to **Appendix 11-13**).
xviii. Provide an OSD catchment plan for stage 1 showing total catchment area and which area is directed to the OSD system	Reference should be made to Drawing PS05-E600 for the OSD catchment plan in relation to Stage 1 (refer to **Appendix 11-13**).

and which area is bypassing. It is unclear which area is included in stage 1.	
xix. The internal pipe system is to be sized to carry minimum 5% AEP flows. Flows up to 1% AEP storm from the internal catchment and the surrounding roads are to be directed to the temporary OSD basin. Demonstrate how the 1% AEP flows in excess of the drainage system capacity are directed to the OSD system.	Martens note, that the internal pipe system is to be provided at the Construction Certificate stage of the Proposal to cater for the 5% AEP flow. Notwithstanding, reference should be made to Drawing PS05-E101 pertaining to the flow arrows which articulates where the 1% AEP flows in excess of the drainage system capacity are directed.
xx. The pits shown for the internal drainage system are to be grated.	The proposed internal drainage system is grated, for which the keys on the plans have been amended as per Drawing PS05-E100 and E101 (refer to **Appendix 11-13**).
xxi. The swales shown within the site are to be designed for 1% AEP capacity. Provide calculations and show details of the swales on sections.	Reference should be made to Drawing PS05-E207 for the Stage 1 swale calculations (refer to **Appendix 11-13**).
xxii. For stage 1, temporary detention storage has been provided. However amended plans are required to address how the temporary OSD is operational. The temporary OSD basin is to be designed as per Council's Water Sensitivity Urban Design standard drawings A(BS)175M. The OSD Deemed to Comply spreadsheet is to be used for OSD calculations for stage 1 also.	Reference should be made to PS05-E100, E200 and E600 for further details (refer to **Appendix 11-13**).
xxiii. The discharge pipe from the temporary OSD basin is to be connected to the street drainage system.	The temporary basins will discharge to a permanent easement pipe, which is subject to a concurrent DA with Blacktown City Council under **DA-19-01597**.
xxiv. The temporary OSD basin details that include levels, batter slopes, control pits with orifices, inlet and discharge pipe details are to be provided on plan and section.	Reference should be made to PS05-E100 & E200 for further details and sections (refer to **Appendix 11-13**).
xxv. Provide dimensions to the temporary OSD basin on plan to show that the required storage volumes can be achieved.	Reference should be made to PS05-E200 for further details and sections (refer to **Appendix 11-13**).
xxvi. For stormwater quality, Section 7.11 contributions apply to the area as indicated in the letter from Council's Contributions team.	Noted and agreed. Contributions would be calculated as part of the Development Consent subject to approval.
xxvii. Temporary water quality treatment is to be provided for the site and to the external roads except for Tallawong Road until the	It is noted, that the external roads are subject to a concurrent DA with Blacktown City Council under **DA-19-01597**.

	regional water quality basin is operational. Show how the low flows from the external road and the site are directed to the temporary water quality basin. If the external road flows cannot be directed to the temporary water quality basin, 200 micron Ocean Guards (Stormwater 360) or Stormsack (SPELL) can be used in road pits.	
xxviii.	*Provide a MUSIC catchment plan for stage 1 bioretention basin showing the catchment area, bypass area, and land use and which area.*	Martens note that the deemed to comply tool has been used; therefore, there is no MUSIC model. Reference should be made to Drawing PS05-E600 pertaining to the bioretention catchment (refer to **Appendix 11-13**).
xxix.	*Provide details of the temporary bio-retention basin. Details of the filter media layers with RLs and extended detention depth and size of the basin with dimensions are to be provided on plan and section.*	Reference should be made to Drawing PS05-E100 & E200 pertaining to the grading design (refer to **Appendix 11-13**).
xxx.	*Provide pit and pipe system along the frontages to capture the surface flows between the buildings and the boundaries.*	Reference should be made to Drawing PS05-E101 and E701, where additional pits have been included in some locations and identified as areas bypassing treatment (refer to **Appendix 11-13**).
xxxi.	*Show base and top RLs of the temporary OSD tank on plan.*	Reference should be made to Drawing PS05-E201 for further tank details (refer to **Appendix 11-13**).
xxxii.	*In OSD calculations, the base level of the tank is to be the average level of the base with 2% grade. The base level of the OSD tank is to be amended in the OSD spreadsheet.*	Reference should be made to Drawing PS05-E201 for further tank details and Drawing PS05-E601 for the amended calculation sheet (refer to **Appendix 11-13**).
xxxiii.	*In the OSD spreadsheet, the RL of invert of discharge to the Council drainage pit is to the design level of the external pit to which the discharge pipe is connected.*	Reference should be made to Drawing PS05-E601 for the amended calculation sheet which includes the amended RL (refer to **Appendix 11-13**).
xxxiv.	*Show how the excess flows from the raingarden are directed to the OSD tank with levels.*	Martens note, that the excess flows from the raingarden are directed to the OSD tank which are detailed by flow arrows in Drawing PS05-E101 (refer to **Appendix 11-13**).
xxxv.	*Show roof water pipe connections to the water quality devices on plan for stage 1 and ultimate stage.*	Connection pits for roof water discharge have been included within Drawing PS05-E100 and E101 (refer to **Appendix 11-13**). The final roof connection point will be confirmed at the CC Stage subject to the downpipe designs.

xxxvi. Amend OSD and stormfilter tank plan on drawing no.E201 (D) to show the 2 inlets to the tank.	Drawing PS05-E201 has been amended accordingly (refer to **Appendix 11-13**).
xxxvii. The OSD and Stormfilter tank is to be configured as per Council's Water Sensitivity Urban Design standard drawing showing details of energy dissipaters, Stormfilter weir and oil baffle.	Martens note that the MUSIC model and overall treatment strategy have been amended accordingly, as well as the OSD tank, for which reference should be made to Drawing PS05-E201 (refer to **Appendix 11-13**).
xxxviii. The pits containing Ocean Guards and the size are to be clearly marked on the plan.	The Civil Engineering Drawings have been revised to show the pits previously containing Oceanguards to include SPEL StormSacks instead (refer to **Appendix 11-13**).
xxxix. All Ocean Guards within the site are to be identified as '200 micron'.	The Civil Engineering Drawings have been revised to show the pits containing SPEL StormSacks (refer to **Appendix 11-13**).
xl. Ocean Guards treating only surface flows require a minimum clear depth of 500 mm below the grate to any inlet or outlet pipe obvert. Ocean Guards treating surface flows and upstream pipe flows require a minimum clear depth of 500 mm from the invert of the upstream pipes to be treated, to the obvert of the outlet pipe. Where these pits are treating upstream pipe flows, the inverts of all pipes in and out of the pit are to be shown.	Martens note that the pit inserts treat surface flows only, for which reference should be made to the longitudinal sections on Drawing PS05-E311 and E314, as well as further details provided within Drawing PS05-E205 & E206 (refer to **Appendix 11-13**).
xli. Amend the MUSIC catchment plan on drawing no. E701 (C) showing which areas drain to which specific stormwater treatment device and bypass areas. The flows that directly run into the OSD tank are bypassing treatment.	Martens have revised Drawing E701 accordingly (refer to **Appendix 11-13**).
2. Revised MUSIC modelling is required to address the following: *i. In MUSIC, consider the ultimate design of the whole school site as 85% impervious.* *ii. Amend the bypass area in the model.*	Martens have revised Drawing E701 accordingly which includes amendments to both impervious areas and bypassing areas (refer to **Appendix 11-13**).
3. Amend Stormwater Management Report to reflect the required amendments.	Noted and agreed.
4. Water conservation:	Martens note, that this requirement is not mandatory for infrastructure

i. A rainwater tank (RWT) is required for water conservation. A minimum of 80% of non-potable water demand for the development is to be met through the reuse of rainwater. Non potable water demand is to include landscape watering and toilet/urinal flushing.	developments pertaining to new schools. Furthermore, the *Blacktown Development Control Plan 2015* (BDCP2015) requires only industrial and business developments to supply 80% of their non-potable demand via rainwater. Accordingly, further consideration with respect to this item is not considered to be warranted.
ii. Allow for a minimum usage rate of 0.1 kL per day internal use per toilet or urinal (where the school is used only 5 days per week allow for 5/7 less school holidays) and a minimum of 0.4 kL per m^2 per year for landscape watering excluding turf areas.	As above.
iii. If the total demand could not be met through a RWT alone, a stormwater tank (SWT) could also be provided to meet the annual demand for landscape watering.	As above.
iv. Where a SWT is used, the RWT is to collect the roof water only and is to be re-used for all the toilets and urinals.	As above.
v. MUSIC is generally used to assess the performance of the rainwater tank using the node water balance and an electronic copy of the MUSIC model needs to be provided to us for assessment.	As above.
vi. Allow for a 20% loss in rainwater tank size volume in MUSIC to that shown on the design plans to allow for anaerobic zones, mains water top up levels and overflow levels, e.g. where a 50,000 L tank is specified on the drainage plan it is to be modelled in MUSIC as 40,000 L.	As above.
5. Stream Erosion Index: *i. Provide 2 separate and additional MUSIC models (pre and post) to demonstrate that the Stream Erosion Index (SEI) is less than 3.5 based on the technique in our MUSIC Modelling Guide in part 4 of the Developer Handbook for Water Sensitive Urban Design available on our website. The pre development is to consider a vacant pervious block. Provide all calculations.*	Martens confirm that the Stream Erosion Index (SEI) results have been detailed within Drawing PS05-E701 (refer to **Appendix 11-13**).
6. Provide amended drainage plan and Stormwater Management report, Deemed to comply spreadsheet for stage 1, MUSIC model for stage 1	Noted and agreed.

and revised MUSIC model for the ultimate stage to address the issues above.	
Other Engineering Matters: *7. The application is proposing filling a low point and redirecting via piped drainage. We do not support this. A suitable drainage channel should be provided. In the event of blockage of drainage infrastructure of the 1% AEP storm event pond within Tallawong Road to an unacceptable level, flows will be forced into the school site and/or neighbouring properties, which is not an acceptable situation. Site plan and drainage plan is to be amended accordingly.*	Martens note that in the event of blockage (100% blocked), this will not be worse than the Probable Maximum Flood (PMF) Event overland flows, which are accurately demonstrated within the flooding plans in the flood study (refer to **Appendix 11-13**). Furthermore, the ILP envisages a low point along Tallawong Road without further provisions for a drainage corridor. Typical urban piped drainage is therefore considered an appropriate drainage measures to convey these flows.
8. Any pipes within the property proposed to drain water from the road network must have a suitably sized easement over them.	Martens note that the proposed easement pipe has been sized accordingly to accommodate for the 100-year flow.
9. Half road construction of Tallawong Road and half road construction of proposed ILP roads along all 3 property boundary lines must be included within this application. Plans to be amended to include longitudinal sections for proposed ILP roads and proposed drainage infrastructure.	Noted and agreed. A concurrent Subdivision Application (**DA-19-01596**) is currently being assessed and determined by Blacktown City Council, for which includes provisions to undertake the half-road construction surrounding the Site. The aim is for this scope of works to be completed prior to Development Consent being obtained with respect to this SSD Application.
10. Road construction and dedication must be completed prior to any building Construction Certificates being issued.	Noted and agreed.
11. Extent of Tallawong Road half construction is for full frontage of both 151 and 161 Tallawong Road and inclusive of ancillary works to make construction safe and effective (i.e. batters and extension of road to meet existing levels where proposed design levels deviate from existing).	Martens note that the construction of the full width of the carriageway of Tallawong Road has been completed as part of the development identified at 154 Tallawong Road. It is noted, that the proposal included provisions to widen the road from 9 m to 11 m wide (2 m widening along the full frontage of the Site) with the levels designed in accordance with the Works As Executed (WAE) Plan pertaining to 154 Tallawong Road, which was prepared by Mepstead and Associates.
12. Tallawong Road levels to be in accordance with current Council design. Applicant to contact Georg Eberl our Asset Design Engineer to confirm centreline levels.	As above.
13. Proposed 1.5 m verge on Tallawong Road where proposed bus bay is located is not supported. Minimum verge width is to be 3.5 m.	Reference should be made to PS05-E100 & E200 whereby the Tallawong Road design included a 3.55 m road verge (refer to **Appendix 11-13**).
14. Proposed signage, line-marking and any other form of local traffic	Reference should be made on the Traffic Plan which includes provisions for traffic

calming devices inclusive of school zone requirements must be reviewed and approved by our Local Traffic Committee prior to Development Application approval.	related signage (refer to **Appendix 4**).
15. Details of temporary On-site Detention (OSD) and temporary Stormwater Treatment Measures (STM) for all stages must be included within application documentation.	It is noted, that provisions for OSD (including temporary STMs) have been provided for Stage 1 and the Final Stage. The Stages of the Proposal in between are Conceptual only and would be subject to change based on the progression of the relevant construction stage.
16. Plans to include detailed plan of upstream catchment drainage to proposed piped drainage solution and consideration for flood impacts from flows from the upstream catchment.	Martens note that the proposed drainage system and flood mitigation measures have considered the flow rates from the approved upslope development. This is satisfactorily addressed within the revised *Concept Stormwater Management Plan and Preliminary Flood Study* (refer to **Appendix 11-13**).
17. Tailout drainage works to be included within this application.	The school drainage system will connect to an easement pipe as demonstrated within Drawing PS05-E100 & E101. This easement pipe drainage system is subject to approval from a concurrent Subdivision Application (**DA-19-01596**) is currently being assessed and determined by Blacktown City Council, for which includes provisions to undertake the half-road construction surrounding the Site prior to the construction of the school. In any case, the tailout grading and discharge pipe is shown in Drawing PS05-E100 & E101 (refer to **Appendix 11-13**).
Traffic: *18. The traffic report is silent as to whether the proposed parking on the site at each of the stages satisfy the parking requirements of the relevant Development Control Plan.*	The Architectural Plans submitted as part of the Traffic Impact Assessment prepared by Positive Traffic, establishes that parking provision for each stage of the Proposal exceeds the minimum requirements of each use within each stage having regard to the latest information available for the proposed school. Accordingly, the majority of parking in the DCP is for staff, of which the level of staff by each stage is not fully known at the time of preparing the Traffic Impact Assessment. Notwithstanding, the parking provisions were based on a worst-case scenario for which a conservative approach has been applied with respect to car parking across the Site with respect to each stage of the Proposal.
19. The potential trip generation of the proposed school has been estimated based on mode of travel survey undertaken at some schools in Sydney's Inner West. However, surveys undertaken in that part of Sydney may not be appropriate in Western Sydney. Western Sydney has different	Positive Traffic note, that it is not feasible for a new school, in particular a school which is not directly related to the Department of Education (comprising a public school) to undertake mode of travel surveys of other schools staff and students population. Thus, such developments rely on traffic experts to utilise data from

socio-economic demography, where transport choice is mostly depended on car travel rather than public transport. The proposed school site is not located within walking distance of a train station or a transport interchange. Therefore, the estimated traffic generation in the traffic report may not be representative of this location.	previously approved school projects to inform the ensuing traffic assessments. It is noted that the same surveys of the same schools, despite having lower public transport use, were adopted and modified accordingly for the proposed Inner Sydney High School traffic report previously undertaken by Positive Traffic Pty Ltd which was approved / supported by Transport for NSW (TfNSW). The traffic generation estimates prepared in the traffic report have been undertaken on a first principles basis informed by experience in transport planning for such projects as no traffic generation rates are provided for educational facilities in the RTA Guide to Traffic Generating Developments. Accordingly, Positive Traffic confirm, that the traffic generation assessment undertaken is both transparent and robust in its approach and should TfNSW wish to provide alternative traffic generation data based on surveys of other Educational Establishments this could be reviewed further as part of future assessments required as part of the post-approvals requirements, subject to Development Consent.
20. The development is an ethnic community based school, therefore the catchment for the school would be widespread and most likely not from the local catchment, which means more car dependency. The estimated 30% bus travel mode is unrealistic for this location.	The mode share pertaining to the utilisation of buses, was based on both an assessment of the available public transport both now and into the future, having regard to the fact that the proposed school would provide full sized buses given its catchment is expected to be wider than a typically zoned public school. As confirmed below by TFNSW, bus operations in the immediate area (following the opening of the new operational Sydney Metro – Tallawong Station) are continuing to expand with increased development in the immediate area of which this Proposal would form part of that community and increased development demand, particularly within the infrastructure sector, comprising Educational Establishments. Positive Traffic notes, that since the preparation of the SSD Application traffic report, a Green Travel Plan has been prepared, which provides alternative targets following a finer grain assessment of potential public transport use. It is expected that these targets would form the basis of an ongoing assessment of mode of travel demands as recommended in the Green Travel Plan (refer to **Appendix 10**).

21. Raised pedestrian crossings need to be proposed in the roads on the northern and southern boundary of the school site.	The Proponent (including Positive Traffic) does not agree with the statement, that marked footpath crossings should be installed within the northern and southern local streets. The provision of marked footpath crossings is subject to specific TfNSW requirements, which consider it necessary that a minimum level of both pedestrian and vehicle volumes should be achieved to ensure marked footpath crossings are safe. The traffic demand forecasts in the northern and southern boundary roads in the traffic report indicates that traffic volumes in these streets would not meet the warrants for such facilities to be installed. Accordingly, the Proposed Development does not preclude the installation of such devices in the future.
22. The roads abutting the site along the northern and southern boundaries need to have a carriageway width of at least 11 m (18 m road reserve) to allow parking on both sides of the road and to maintain 2 traffic lanes. In this regard, if any future residential subdivision opposite the school is approved to provide only an 8 m wide road reserve (half road), then the school needs to provide the remaining 10 m wide road reserve within the school site to make up the total road reserve of 18 m.	The local roads forming the northern and southern boundaries of the proposed school are not identified as bus routes in the Riverstone East Traffic Study and thus it is unclear why there is need to provide wide local roads which include parking on both sides of the street. The proposed school provides on-site parking over and above the minimum requirements of the DCP and provides the majority of this parking within an all-weather facility which includes Kiss and Drop provisions. Positive Traffic note, that changing the ILP road network to accommodate four lanes in the northern and southern boundaries roads is unjustified. Furthermore, it requires school children to cross much wider roads than would otherwise be the case for a local street in the area in turn exposing children to greater risk of vehicle impact. Accordingly, narrower streets provide a slower speed environment with friction from adjacent parking as recommended in AMCORD and this approach has been adopted for all local streets within the precinct. Further consideration is not considered warranted in this respect.
Natural Area Issues: *23. Any approval is to include conditions of consent that should adequately incorporate all of the safeguards and mitigation measures (Section 6) of*	Noted and agreed.

the Aquatic and Terrestrial Ecology Assessment NGH Environmental June 2019, including the supervision of the habitat tree by a suitably qualified ecologist. It is recommended that for each hollow lost, that 3 nest boxes for microbats are installed.	
24. Additionally, approval is to include a condition of consent to prepare and implement a dam dewatering plan. The plan is to identify that dam dewatering is to occur with an aquatic ecologist on-site to rescue and relocate any native fauna found (including turtles, fish or eels) and to humanely euthanise any exotic species (such as European carp).	Noted and agreed.
Open Space: *25. An arboricultural impact assessment report to confirm tree removal requirements is required. We believe some of the trees on site can be retained.*	As mentioned in **Table 1** above, an *Arboricultural Impact Assessment* has been prepared by Bluegum Tree Care and Consultancy (Bluegum, 2020), which included an assessment of the likely impacts of the Proposed Development on existing site trees, including recommendations pertaining to both retention and removal of existing site trees (refer to **Appendix 3**). Accordingly, the Arboricultural Impact Assessment (AIA) was undertaken in accordance with the principles set out within Australian Standard 4970-2009, *Protection of Trees on Development Sites.* Bluegum confirm that six (6) trees were assessed on the Subject Site, which included the following species: ▪ Rough-barked Apple, *Angophora floribunda* (Tree 1). ▪ Narrow-leaved Ironbark, *Eucalyptus crebra* (Trees 2, 3 and 6). ▪ Forest Red Gum, *Eucalyptus teriticornis* (Trees 4 and 5). Bluegum note, that none of the trees were assessed as having major significance including heritage significance; and no tree is listed on a register of significant trees. None of the assessed trees are considered likely to remain viable within the context of the Proposed Development, which can be seen from the assessment undertaken by Bluegum.

Tree Number	Retention Value	Reason for Removal
1, 2, 3	Low	Poor structural condition. Trunk or large limb failure is possible. Located within an area of proposed bulk earthworks/building footprint.
4, 5	High	Bulk earthworks resulting in soil fill around these trees is proposed. They are unlikely to remain viable.
6	Medium	Within the proposed area of grading for the pedestrian accessway.

Bluegum provide recommendations in relation to the trees assessed on-site, including:

Site Establishment – Prior to Construction:

- **Tree Removal:** The tree removal contractors must be made aware of the high likelihood of encountering wildlife in Trees 1 and 2. The tree removal method must take into consideration the need to avoid harm to animals living within the hollowed trunks of these trees. A wildlife carer must be on-site to coordinate with contractors during tree removal works.

  Tree removal works should be undertaken in accordance with the WorkSafe Australia *Guide to Managing Risks of Tree Trimming & Removal Work*.

Post Construction:

- **Replacement Tree Planting:** Given the proposed removal of locally native tree species it is recommended that replacement tree planting be undertaken. The following tree species should be incorporated into the proposed planting schedule:
  - Rough Barked Apple, *Angophora floribunda;*
  - Forest Red Gum, *Eucalyptus teriticornis*;
  - Narrow-leaved Ironbark, *Eucalyptus crebra*; and
  - Grey Box, *Eucalyptus moluccana*.

	The complete AIA is located within **Appendix 3** of this RTS.
26. An updated landscape plan showing street trees at a spacing of approximately 8 m taking into account street lighting and vehicle sight lines.	Revised Landscape Plans prepared by Sym Studio satisfactorily address the Submission (refer to **Appendix 7**). Further consideration is not considered to be required in this respect.
27. The landscape plan must show street tree planting and maintenance details with the use of root directors installed to manufacturer's directions. Street tree species are listed below: ▪ *Tallawong Road – Syncarpia glomulifera* ▪ *Northern street trees – Pyrus calleryana'Bradford'* ▪ *Southern street trees – Zelkova serrata* ▪ *Western street trees – Brachychiton acerifolius.*	Revised Landscape Plans prepared by Sym Studio satisfactorily address the Submission (refer to **Appendix 7**). Further consideration is not considered to be required in this respect.
Urban Design: *28. Contemporary interpretation of a typical traditional Gurdwara, utilising glazed blocks with sacred script integrated into the façade design is a strong design feature.*	Noted and agreed.
29. Urban heat is a significant issue in Western Sydney which has been acknowledged in the design reports. However, there is still a significant portion of hardstand and built areas compared with soft landscaped zones. The design should incorporate additional soft landscaped or turfed areas in lieu of hard paved areas or increase the number of shade trees to the civic heart area as this is where students are likely to congregate during breaks. This area should be adequately shaded from both direct sunlight and to mitigate radiant heat from the buildings above and adjacent.	Sym Studio affirm the desire to reduce the effects of heat island effect and general comfort of students, teachers and visitors as part of the Proposal, for which reference should be made Micro-climate & Thermal Comfort - PMD_DA-008, Issue A (refer to **Appendix 7**). With respect to the landscaping strategy pertaining to the Proposal, the following parameters are proposed as part of the Landscape Masterplan, including: g) Cool paving material, including light colour. h) Permeable Paving = 4000 m^2, approx. 40% of total paving surface. i) Rooftop Gardens = 1500 m^2. j) Vegetation Cover = 6000 m^2. k) Evaporative Cooling to building undercrofts. l) Synthetic Turf employs irrigation system activated 'on demand' when high summer temperatures are forecast. The synthetic lawn has been designed with provisions for irrigation and a moisture retaining layer as sub-grade to retain moisture and mimic the process of

	evapotranspiration exchange from water to the air, thus reducing surface heat. The intensive use of the village green is likely to cause great stress to lawn likely resulting in 'bare soil patches' and hydrophobic conditions. Management strategies to limit the use of the village green to preserve the natural surface would only serve to limit the positive benefits of active sports. Further limitation on general public (out of school hours) would also be severely compromised. The transition from natural to synthetic lawns in schools is wholly accepted as a preferred approach including Chatswood High School, Narrabeen High School and Manly West PS. Accordingly, the revised Landscape Plan proposes a combination of natural vs. synthetic lawn area. Additionally, the provisions for 137 Trees are proposed to replace the trees identified on-site for removal, providing additional canopy cover and cooling across the Site.
30. Privacy implications of the boarding rooms overlooking the residential lots on the west should be addressed.	PMDL have updated Drawing DA201 5 comprising the Western Elevation, which now demonstrates the horizontal fins for privacy to the residential blocks. It is noted, that the vertical fins respond to the thermal heat on the western façade (refer to **Appendix 4**).
31. Waste collection configuration must be wholly within the site. Trucks must enter and leave in a forward direction. The plans do not demonstrate that this is achievable within the design. Further, it is recommended that the waste and services pavilion is integrated into the design of the buildings to minimise its visual impact. The location of the pavilion is currently in a prominent location on site and will be highly visible. Collection areas should be adequately screened with landscaping and have suitable acoustic treatment to minimise impact on students and neighbouring development. Given that basement parking has been provided for the site, it is preferred that the service areas/waste collection is positioned within the basement. Refer to Blacktown City Council's Waste Section in regard to detailed operational requirements.	Noted and agreed.

Table 3: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
NSW Department of Planning, Industry and Environment – Environment, Energy and Science (Susan Harrison – Senior Team Leader Planning)	
Riparian Planting: *The EIS notes planting will enhance the environmental quality of the riparian corridor in the site (section 5.1.3, page 95). Figure 3 in the EIS shows a first order watercourse currently flows through the site but it is unclear where the riparian corridor is proposed to be planted. If a riparian corridor is to be planted on the site, it is recommended the proponent provides a scaled plan which shows:* ▪ *The site boundary;* ▪ *The development footprint;* ▪ *The location of the watercourse and stream order;* ▪ *The top of highest bank along the watercourse; and* ▪ *The riparian corridor width (measured from the top of the highest bank).*	Sym Studio confirm that only riparian 'ground covers' are proposed, including both Dianella and Lomandra species. They note that the current design proposes highly modified 'stream' with limited scope to enhance the environmental quality due to the basement car parking area proposed on the Site. Further consideration is not considered warranted in this respect.
Site Landscaping: *The EIS notes Cumberland Plain Woodland – Plant Community Type (PCT) 849 – Grey Box – Forest Red Gum grassy woodland of flats of the Cumberland Woodland Plain, Sydney Basin Bioregion was considered to occur on the site (page 197). It indicates the site landscaping proposes to use a mix of evergreen and deciduous trees; Cumberland Plain Woodland Plant Community Type (PCT) for tall canopy trees with an open 'midstorey' and expansive low growing understorey; and Corymbia maculate and Angophora costata for street trees. It also notes "proven exotic species" are also proposed (section 3.2.4, page 32 of EIS).* *EES recommends that the plant species list used for tree planting should use species that are characteristic of Cumberland Plain Woodland, and that (according to the ATEAR) were found on site. This would include Narrow-leaved Ironbark (Eucalyptus crebra), Forest Red Gum (E. tereticornis), Rough-barked Apple (Angophora floribunda) and Grey Box (E. moluccana).*	The tree species selected across the Subject Site attempts to strike a balance between 'naturally occurring plant communities'; and its proposed land-use as a three stream school, in Bush Fire Prone Land – Inner Protection Zone, for which appropriate Asset Protection Zones have been applied to the Site, including a strategically proposed landscaping strategy. Species from the Cumberland Plain Woodland community have been integrated into the current plant schedule including *Angophora floribunda* deemed as a possible substitute for *Angophora costata*, with the potential for consideration concerning *Euc. Moluccana Euc. Crebra* and *Euc. tereticornis*. Sym Studio have utilised and considered the Blacktown Growth Centre DCP 'Prescribed Trees & Preferred Species List' (noting a total of 22 species in the current plant schedule). Furthermore, many endemic species of shrubs and ground covers fail to thrive in an

EES supports the inclusion of the Rough-barked Apple as a species to be used in planting, in reference to the Darug word 'dalawong' (as mentioned in section 3.2.4 of the EIS) but it should be noted that the Rough-barked Apple is Angophora floribunda not A. costata (Smooth-barked Apple) EES notes the Landscape Design Report also proposed to use A. costata (Smooth-barked Apple) (pages 2 and 14). The Smooth-barked Apple is found in sandstone environments, and so it is not suitable for the site. It is recommended Angophora costata (Smooth-barked Apple) is removed from the species list. *EES recommends the indicative plant schedule is amended to use a diversity of local provenance species (trees, shrubs and groundcovers) from the native vegetation community that occurred on the site rather than use non-endemic native species and exotic species.*	intensively used, urban school environment. Sym Studio suggest that maintaining the current plant selection reflects a balanced, responsible and dependable selection, appropriate to this 3-stream school of 1200+ children and staff of all ages and abilities. The Site is to be initially managed as an Inner Protection Zone, for which many species would be excluded, particularly dry & woody ground covers & shrubs as associated with Cumberland Plains Woodland.
The Landscape Design Report appears to show that the 'village green' area on the site is proposed to consist of 'integrated permeable synthetic lawn' (see pages 8 and 9). It is recommended the Department considers potential issues associated with using synthetic lawn as opposed to using natural non-invasive lawn including: ▪ *Natural grass provides a cooler surface than artificial turf surfaces which get much hotter and absorb radiant heat (sunlight) and potentially add to the urban heat island effect by radiating the heat back into the air.* ▪ *Natural grass surfaces (as opposed to synthetic grass) provide some habitat value for certain native fauna.*	The synthetic lawn is designed with irrigation and a moisture retaining layer as sub-grade to retain moisture and mimic the process of evapotranspiration exchange from water to the air, thus reducing peak summer temperatures by 1-5 degrees Celsius. The intensive use of the Village Green is likely to cause great stress to natural lawn, likely resulting in 'bare soil patches' and hydrophobic conditions as well as precluding it's out of hours use to the General Community. The transition from natural to synthetic lawns in schools is wholly accepted as a preferred approach to facilitating greater access to open space sports facilities including after hours community use of the Site. Recently converted school sports fields form natural to synthetic include Chatswood High School, Narrabeen High School and Manly West PS.
Urban Tree Canopy Cover: *The EIS notes the site is highly modified and cleared of all native vegetation except for two remnant trees (section 7.8.1, page 197) and the proposed development will result in the removal of two remnant native trees (section 7.8.1, page 198) which are identified as Eucalyptus crebra and Angophora floribunda (see page 58 of ATEAR).* *As the site occurs within an area covered by the Central City District Plan (CCDP) it is recommended the development of the site is consistent with*	The ideal way to achieve urban tree canopy cover at the Site would be to alter the development to avoid the removal of remnant tree and native vegetation regrowth, for which the architectural and landscaping treatments proposed have considered where possible. In cases where the remnant trees or native vegetation cannot be avoided, supplementary plantings of native canopy species can mitigate or improve canopy cover loss and will be integrated into landscape management plans. WSUD strategies are proposed in current scheme through the use of a semi-open stormwater system utilising rain gardens (bioretention facilities) connecting down

Planning Priority N16 – increasing urban tree canopy cover and delivering Green Grid connections. Objective 30 of this planning priority is that urban tree canopy cover is increased. Planning Priority N16 outlines that the NSW Government has set a target to increase tree canopy cover across Greater Sydney to 40 per cent. *The numerous benefits of urban tree canopy cover are noted in the CCDP including green cover assists to:* ▪ *Mitigate the urban heat island effect;* ▪ *Support cleaner air;* ▪ *Provide local habitat; and* ▪ *Slow and store stormwater and improve water quality and filter pollution before it reaches the District's waterways.* *The EIS indicates extensive planting throughout the site would improve biodiversity and tree canopy of the site and refers to riparian planting and green roof spaces (section 3.2.4, page 31). It is recommended the Concept Landscape Masterplan for the site is amended to include additional planting of local native trees (see Landscape Design Report, page 10).* *The ATEAR notes remnant and regrowth vegetation occurs around the edges of the site (section 4.2 and 4.7, pages 1 and 7). One way to achieve urban tree canopy cover at the site is for the development to avoid removing remnant and regrowth native vegetation.*	along the central spine of the school.
Farm Dam: *The EIS notes the development proposes to dewater the existing farm dam on the site by pumping approximately 1 ML of water out onto the ground downslope. While the ATEAR indicates no turtles were observed surfacing in the dam or within the area surrounding the damns and no eels were observed during dipnetting (section 4.6.1, page 7), it is recommended a Fauna Relocation Plan is prepared to address the transfer of any native aquatic fauna and the acclimatisation of aquatic fauna to different water conditions. If it is determined to grant approval, it is recommended the following conditions is included:* *1. A Fauna Relocation Plan must be prepared by a suitably qualified and*	A Fauna Relocation Plan (FRP) will be prepared by a suitably qualified and experienced Ecologist. The FRP will ensure the safe and efficient relocation of any fauna that may be observed during proposed works. It is expected, that the FRP can be conditioned, subject to Development Consent being provided, with the adjoining conditions implemented into the formal Development Consent.

experienced ecologist prior to any dewatering of the dam commencing. The Plan must include details on, but not be limited to, the following: ▪ *The native fauna species know to inhabit and / or use the dam which require transfer from the dam;* ▪ *The methodology proposed to transfer the fauna;* ▪ *The location and suitability of the proposed relocation sites* ▪ *Any potential impacts of relocating the fauna to the relocation sites; and* ▪ *Details of oversight of the Plan's implementation by an ecologist.*	
Suitability and Building Design: *The Landscape Design Report indicates the development proposes to include a green roof, rooftop gardens and green walls (page 8) and the EIS indicates the rooftops on slab will utilise above ground planters and mounding for small tree planting (section 7.2.9, page 133). The EIS also notes the rooftops will contribute to a cooler microclimate using light coloured roof materials to reduce the 'heat island effect' (page 231 of EIS). EES supports the development incorporating green roofs, green walls and light-coloured roof materials into the design.*	Noted and agreed.
Flood: ▪ *The concept stormwater management plan and preliminary flood study (martens consulting engineers, July 2019) provides a brief summary of flood modelling results for the 1% AEP existing condition and the 1% AEP, 1% AEP plus climate change and the Probable Maximum Flood (PMF) proposed condition.* ▪ *Figures 3 to 5 of the reports shows the site is significantly impacted by the 1% AEP in existing conditions. Figures 6 to 11 shows no impact by the 1% AEP in the proposed condition due to the proposed drainage system.* ▪ *The report does not provide information whether the project results in any adverse impacts on adjacent and neighbouring properties. These impacts should be addressed and documented.* ▪ *The project is impacted by the PMF as shown in Figure 12. The northern proposed road and footpath access to the school will be cut off by flood water.* ▪ *EES recommends that, an emergency response plan is prepared,*	Updated flood modelling results prepared by Martens (refer to **Appendix 11-13**) indicates that the peak 1% AEP water level is 50.9 mAHD at the north-eastern boundary of the Site. As the proposed building floor level is 52.5 mAHD, a freeboard of 1.6 m is achieved which is considered satisfactory and adequate with respect to the Proposed Development. In the 1% AEP with a climate change event, the water level reaches up to 51.1 mAHD, which results in a freeboard of 1.4 m, which is considered satisfactory and adequate in adverse weather circumstances. It is noted that the upstream property at 154 Tallawong Road has already been developed and upgraded along Tallawong Road. The Site should be considered in both the existing and proposed conditions of flood modelling undertaken with respect to the pre and post-development scenarios. Additional flood modelling has been undertaken to incorporate with the WAE levels. The results demonstrate that flood waters on Tallawong Road will reach a maximum depth of 0.185 m in the 1% AEP flood event, and up to 0.250 m in the climate change scenario. Discharge will be contained within the designed tailout swale on the DPIE owned

including safety signs, along the proposed road and footpath, at the access to underground parking to the north and at the carpark at the north east corner of the site. The preparation and implementation of an emergency response plan will help ensure the safety of students, teachers, parents, carers and other members of the school community.	land downstream of the Site with no adverse impacts on adjacent and neighbouring properties. Furthermore, the Emergency Response Plan has been added into Section 5 of the Preliminary Flood Emergency Report to address SES comments (refer to **Appendix 11-13**).
Recommended conditions of consent: *EES recommends that if the SSD is approved the following conditions are included:* *1. Trees removed by the development shall be replaced by a diversity of local native species at a ratio greater than 1:1.*	Agree. Replacing removed trees with local native species is ideal. In order to facilitate the loss of canopy cover and to ensure plant establishment, plantings at a ratio of greater than 1:1 is recommended. It is noted, that 137 trees are proposed to be planted as part of the Proposal.
2. Enough area / space is provided on site to allow the trees to grow to maturity.	Agree. It is vital to plant trees with sufficient area / space to allow them to grow to their full size and reach maturity. Each species would have individual requirements, ensure to consult the species description for information. Appropriate spacing is necessary to maximise the canopy cover benefit as well as mitigating planted trees competing against each other for resources such as water and sunlight.
3. The Landscape Plan for the site shall use a diversity of local native provenance trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the native vegetation community which once occurred in this locality.	Agree. It is essential to use a diversity of local native provenance trees, shrubs and ground cover species. Refer to the diagnostic species for Cumberland Plain Woodland for information.
4. The Landscape Plan shall include details on: *a) The native vegetation community (or communities) that once occurred in the locality.* *b) A list of local provenance tree, shrub and groundcovers to be used in the landscaping.* *c) The quantity and location of plantings.* *d) The pot size of the local native trees to be planted.* *e) The area / space required to allow the planted trees to grow to maturity.*	Agree. A Landscape Plan will be prepared prior to the commencement of proposed works. All these points will be considered accordingly as a post-approval requirement.
5. Native trees to be removed are salvaged and used on the site (including the riparian corridor) to enhance habitat including tree hollows and tree trunks (greater than approximately 25-30 cm in diameter and 3 m in length).	Agree. Habitat features will be retained where possible. They may continue to provide habitat for other species. Detail will be provided in the FRP.
6. Tree planting at the site shall use advanced and established local native	Agree. In some instances, it is beneficial to utilise advanced/established trees for

trees (from the relevant vegetation community that once occurred in the locality), preferably with a minimum plant container pot size of 100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed.	revegetation. This may increase the chance of plant survival and even require less resources to establish. Furthermore, it will take less time to gain the canopy cover benefit and before it is a habitable resource to fauna. It is suggest to implement a dichotomous mix pertaining to 50% endemic, 40% native and 10% exotic.

Table 4: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Endeavour Energy	
Endeavour Energy's Asset Strategy & Planning Branch whilst not having undertaken a detailed analysis of the Development Application have not indicated any concerns regarding the electricity supply to the proposed development and advised that ' Asset Strategy & Planning Branch have not seen an application for connection of load for the Sikh Grammar School come through yet. Asset Strategy & Planning Branch will evaluate this through the normal connections process when an application for connection of load is received via Network Connections Branch'.	Noted and agreed. An application for connection has not yet been submitted as the Proposal is presently in early design stages. Supply offers which result from connection applications have limited validity and as such, connection applications shall be submitted when the development design has progressed to a point commensurate with this SSD Application.
Fact that provision is being made for the padmount substation is from Endeavour Energy's perspective positive. Endeavour Energy's general requirements is for a padmount substation easement to have a minimum size of 2.75 x 5.5 metres and also have the additional restrictions for fire rating (which usually extends 3 metres horizontally from the base of the substation footing, and 6 metres vertically from the same point and also has regard to any structures etc. attached to the building that may spread a fire) and possibly swimming pools and spas (which in this instance may not be applicable). The easement and restriction/s should not affect any adjoining property (unless supported by an appropriate easement / restriction). The substation should be at ground level and have direct access from a public street (unless provided with a suitable easement for right of access). Generally it is the Level 3 ASP's responsibility (engaged by the developer) to make sure that the substation location and design complies with Endeavour Energy's standards the suitability of access, safety clearances, fire ratings, flooding etc. As a condition of the Development Application the applicant should be required to submit documentary evidence from Endeavour Energy confirming that satisfactory arrangements have been made for the connection of electricity and the design requirements for the substation, prior to the release of the Construction Certificate / commencement of works.	Noted and agreed. The substation design shall be cognisant of the items noted and shall be carried out by the nominated L3 ASP to be in accordance with Australian Standards, Endeavour Energy design standards and Blacktown City Council requirements. The location of the substation shall be co-ordinated with the project design team.
In due course the applicant for the future proposed development of the site will need to submit an application for connection of load via Endeavour Energy's Network Connections Branch to carry out the final load assessment and the method of supply will be determined (also taking into consideration the potential further development / electricity load of the residue allotments). Depending on	Noted and agreed. The connection application shall be submitted in due course. The L3 ASP designer shall carry out the substation design in accordance with the resultant Design Information Pack issued by Endeavour Energy, Australian Standards, Endeavour Energy design standards and Blacktown City Council requirements. The location of the substation shall be co-ordinated with the

the outcome of the assessment, any required padmount substation will need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling) by an easement and associated restrictions benefiting and gifted to Endeavour Energy. Please refer to Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'. Further details are available by contacting Endeavour Energy's Network Connections Branch via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm or on Endeavour Energy's website under 'Home > Residential and business > Connecting to our network' via the following link: *http://www.endeavourenergy.com.au/ .*	project design team. The development representatives shall process the required easements and property tenure rights as required by Endeavour Energy.
Advice on the electricity infrastructure required to facilitate the proposed development can be obtained by submitting a Technical Review Request to Endeavour Energy's Network Connections Branch, the form for which FPJ6007 is attached and further details (including the applicable charges) are available from Endeavour Energy's website under 'Our connection services'. The response to these enquiries is based upon a desktop review of corporate information systems, and as such does not involve the engagement of various internal stakeholders in order to develop a 'Connection Offer'. It does provide details of preliminary connection requirements which can be considered by the applicant prior to lodging a formal application for connection of load. *Alternatively the applicant should engage a Level 3 Accredited Service Provider (ASP) approved to design distribution network assets, including underground or overhead. The ASP scheme is administered by Energy NSW and details are available on their website via the following link or telephone 13 77 88:* *https://energy.nsw.gov.au/government-and-regulation/legislative-and-regulatory-requirements/asp-scheme-and-contestable-works .*	Noted and agreed. A connection application shall be submitted in due course. The L3 ASP designer shall carry out the substation design in accordance with the resultant Design Information Pack issued by Endeavour Energy, Australian Standards, Endeavour Energy design standards and Blacktown City Council requirements.
The following site plan from Endeavour Energy's G/Net master facility model shows there are various 'Work Polygons' (indicated by the coloured highlighting and/or hatching of the lot) and 'Developer Areas' (indicated by the proposed subdivision layouts) in the vicinity of the site indicating enquiries and applications for contestable works projects with Endeavour Energy's Network Connections Branch for electricity supply. In keeping with Endeavour Energy's reticulation policy, as the new urban residential subdivision occurs the existing overhead distribution power lines are progressively being undergrounded. The site plan from Endeavour Energy's G/Net master facility model does not reflect	Noted and agreed. The contents of the Service Infrastructure Assessment are informed by the assessment of the existing overhead high voltage infrastructure present in Tallawong Road adjoining the Site at the time of the report. The electrical connections between the substations proposed for the Site and the Endeavour Energy network shall be designed to suit the nature of the network at the time of design by a certified L3 ASP, e.g. connections to in-ground high

the current progress of the new electricity infrastructure being provided as part of the subdivision works and is updated once all the works are completed and the plans of subdivision are registered. Depending on the timing of the respective developments, it is likely that the remaining existing overhead power lines to the opposite side of Tallawong Road will no longer be in existence and, regardless, underground cables will need to be utilised to supply the required padmount substations eg. as part of the current works being undertaken in the locality, whilst not shown on Endeavour Energy's G/Net master facility model, the following photograph shows a new low voltage underground pillar installed near the site's front south eastern boundary with Lot 41 DP 30186.  	voltage services.
Distribution substations should not be subject to flood inundation or stormwater runoff ie. the padmount substation cubicles are weather proof not flood proof and the cable pits whilst designed to be self draining should not be subject to	Noted and agreed. L3 ASP designs shall be carried out to ensure that substations are positioned cognisant of required flood zone protection via location, elevation, etc. and shall be in accordance with Australian Standards,

excessive ingress of water. Section 7 'Substation and switching stations' of Endeavour Energy's Mains Construction Instruction MCI 0006 'Underground distribution construction standards manual' provides the following details of the requirements for flooding and drainage in new padmount substation locations.	Endeavour Energy design standards and Blacktown City Council requirements.
Street Lighting: *With redevelopment of urban areas resulting in the significant increase in both vehicular and pedestrian traffic, 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 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.* *For any Code implementation and administration / technical matters please contact Endeavour Energy's Substation Mains Assets Section via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm or email mainsenquiry@endeavourenergy.com.au .*	Noted and agreed. External lighting outside the boundary of the Subject Site was not included in the scope of the Service Infrastructure Assessment. External lighting for the Proposed Development shall be designed to relevant codes and standards including: ▪ AS/NZS 1158 - Lighting for Roads and Public Spaces; ▪ AS/NZS 4282 - Control of the Obtrusive Effects of Outdoor Lighting; and ▪ BCA 2019 - Building Code of Australia.
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*	Noted and agreed. L3 ASP design works shall be carried out in accordance with relevant Australian Standards, Endeavour Energy design standards and Blacktown City Council requirements. The location of the substation shall be co-ordinated with the project design team to ensure co-ordination of elements in the vicinity of the substation, e.g. fences, structure, clearances to other services, etc.

dissipated places persons, equipment connected to the network and the electricity network itself at risk from electric shock, fire and physical injury. *Endeavour Energy's Substation Primary Design Section have provided the following comments:* *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, pre-schools, day care centres are regarded as a 'special location' – please see the following extract of EDI 001.* *The applicant should check with their ASP responsible for the network connection to the site that any padmount substations earthing has been designed to comply with the 'special location' requirements under EDI 100.*	
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.* *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 applicants and determining authorities 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*	Noted and agreed. The design of the electrical services infrastructure including substation siting shall be informed by Australian Standards, Endeavour Energy design standards and Blacktown City Council requirements. Due consideration shall be given to noise and electromagnetic emissions when considering items in the proximity of the substation.

infrastructure required to facilitate the proposed development. *Please find attached a copy of Energy Networks Association's 'Electric & Magnetic Fields – What We Know' which provides the following advice and can also be accessed via their website at https://www.energynetworks.com.au/electric-and-magnetic-fields .* *Electric fields are strongest closest to their source, and their strength diminishes rapidly as we move away from the source.* *The level of a magnetic field depends on the amount of the current (measured in amps), and decreases rapidly once we move away from the source.* *Typical magnetic field measurements 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 not exceed the recommended magnetic field public exposure limits.* *Endeavour Energy's Network Environment Assessment Section has provided the following general advice in regard to schools, pre-schools, day care centres which are regarded as a 'sensitive use' being located in proximity of electricity infrastructure:* *As far as I know there are no restrictions in legislation that stop schools, pre-schools, day care centres being placed next to electricity infrastructure.* *Prudent avoidance measures must however be implemented. Prudent avoidance was a policy recommended by former Chief Justice of the High Court of Australia, Sir Harry Gibbs, as a result of an inquiry he conducted into community needs and high voltage transmission lines including issues in relation to EMF back in 1991. The findings in the Gibbs report are consistent with subsequent inquiries and are still relevant today.* *Prudent avoidance is defined as doing what can be done without undue inconvenience and at modest expense to avert the possible risk to health from exposure to new high voltage transmission facilities. In practical terms, this means designing new transmission and distribution facilities having regard to*	

their capacity to produce EMFs, and siting them having regard to the proximity of houses, schools and the like. *Although the Gibbs report was particularly aimed at electricity distributers to consider when placing their infrastructure, and bearing in mind that there are schools, pre-schools, day care centres adjacent to our infrastructure in various locations right across our franchise area, it is nonetheless Endeavour Energy's recommendation it that such 'sensitive uses' not be built adjacent to major electricity infrastructure.* *Should such a development proceed, the design of the schools, pre-schools, day care centres should also consider prudent avoidance measures such as any rooms which the children will occupy (class rooms, play areas, sleeping rooms, eating areas) be arranged such that they are on the side of the site/building which is furthest away from the electricity infrastructure.* *There is scientific consensus that health effects have not been established but that the possibility cannot be ruled out. Accordingly, if there are any concerns regarding the location of the schools, pre-schools, day care centres in proximity to the electricity infrastructure, in order to make an informed conclusion, the applicant may need to commission an independent review to provide an overall assessment including electric and magnetic field measurement and advice. Applying a precautionary approach early on in the design process will hopefully result in the adoption of prudent avoidance principles benefitting the eventual development of the site.* *As shown in the above extract of the Architectural Plans, Site Plan-Level 0 (Ground), the proposed location of the padmount substations to north eastern corner of the site within the car parking area is in keeping with the principles of prudent avoidance by increasing the separation to the buildings on the site which will be regularly occupied. In addition, this will also assist in meeting the fire restriction for the padmount substation which usually extends 3 metres horizontally from the base of the substation footing, and 6 metres vertically from the same point (for further details please refer to Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights').*	
Vegetation Management: *The planting of large trees in the vicinity of electricity infrastructure is not*	Noted and agreed. The design of the electrical services infrastructure shall be cognisant of the proposed landscaping design for the Proposed Development.

supported by Endeavour Energy. Suitable planting needs to be undertaken in proximity of electricity infrastructure (including any new electricity infrastructure required to facilitate the proposed development). 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. *In regard to the future padmount substation site required to facilitate the proposed development, please find attached for the applicant's reference a copy Endeavour Energy's 'Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations'.*	
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 and other utility infrastructure across the site, but also to identify them as a hazard and to properly assess the risk.*	Noted and agreed. DBYD information shall be obtained to inform the design of services related works in the area of the Subject Site.
Removal of Electricity Supply: *Approval for the permanent disconnection and removal of supply must be obtained from Endeavour Energy's Network Connections Branch (contact via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 8am - 5:30pm) by Accredited Service Providers (ASP) with the relevant class of Authorisation for the type of work being carried out. The work could involve:* ▪ *The disconnection and removal of an underground service cable or overhead service line,* ▪ *Removal of metering equipment.* *The written request must be submitted to Endeavour Energy using Form FPJ4603 ' Permission to Remove Service / Metering by Authorised Level 2*	Noted and agreed. Applications for modification / removal of existing services shall be made at an appropriate point in the construction stage of the Proposal.

Accredited Service Provider' which must be accompanied by Notification of Service Works (NOSW) forms provided as a result of service work activity performed by a Level 2 ASP. The retailer must also provide written agreement for the permanent removal of supply. *For details of the ASP scheme please refer to the above point 'Network Capacity / Connection'.*	
Demolition: *Demolition work is to be carried out in accordance with Australian Standard AS 2601—2001: 'The demolition of structures' as updated from time to time. All electric cables or apparatus which are liable to be a source of danger, other than a cable or apparatus used for the demolition works shall be disconnected ie. the existing customer service lines will need to be isolated and/or removed during demolition. Appropriate care must be taken to not otherwise interfere with any electrical infrastructure on or in the vicinity of the site eg. streetlight columns, power poles, overhead power lines and underground cables etc.*	Noted and agreed. Modification / removal / demolition of existing services shall be performed at an appropriate point in the project's development and shall be performed in accordance with the relevant Australian Standards, supply authority requirements and NSW Service Rules.
Public Safety: *Workers involved in work near electricity infrastructure run the risk of receiving an electric shock and causing substantial damage to plant and equipment. I have attached Endeavour Energy's public safety training resources, which were developed to help general public / workers to understand why you may be at risk and what you can do to work safely. The public safety training resources are also available via Endeavour Energy's website via the following link:* *http://www.endeavourenergy.com.au/wps/wcm/connect/ee/nsw/nsw+homepage/communitynav/safety/safety+brochures .* *If the applicant has any concerns over the proposed works in proximity of the Endeavour Energy's electricity infrastructure to the road verge / roadway, as part of a public safety initiative Endeavour Energy has set up an email account that is accessible by a range of stakeholders across the company in order to provide more effective lines of communication with the general public who may be undertaking construction activities in proximity of electricity infrastructure such as builders, construction industry workers etc. The address is Construction.Works@endeavourenergy.com.au .*	Noted and agreed. The construction works contractor shall be responsible for implementing and maintaining suitable protocols for safe working in accordance with all relevant WHS requirements, including but not limited to physical barriers, signage, education, traffic management plans, works programming, etc.

Emergency Contact: *In case of an emergency relating to Endeavour Energy's electrical network, the applicant should note the Emergencies Telephone is 131 003 which can be contacted 24 hours/7 days. Endeavour Energy's contact details should be included in the any risk or safety management plan. Endeavour Energy's contact details should be included in any relevant risk and safety management plan.*	Noted and agreed. The construction works contractor shall incorporate emergency contact details into their site safety and works management plan.

Table 5: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
NSW Environment Protection Authority (Jacqueline Ingham – Unit Head – Sydney Industry)	
The EPA advised that the Environmental Assessment (EA) should assess, quantify and report on groundwater contamination, however the EIS does not appear to have considered groundwater in its assessment process.	In the *Detailed Site Investigation* prepared by Martens they note that a review of WaterNSW 'Real-time Water Databases' indicated that there were no groundwater wells within 500 m of the Site. No springs were listed within 500 m of the Site in the NSW Government Hydrography Spatial Data (SEED, 2019). Furthermore, Martens confirm that in consideration of the conceptual site model and the Proposed Development, the following lines of evidence indicate that there will be no impacts on current or the future groundwater quality; and no readily identifiable risk from potential existing groundwater contamination (if present) would occur on future site receptors: ▪ Shallow groundwater (less than 4.0 m) was not encountered during the borehole excavation during the site geotechnical investigations (Martens, 2019). ▪ The Proposed Development does not require any activities such as significant excavation that is expected to cause direct disturbance to groundwater. ▪ The Proposed Development will significantly increase impermeable area across the Site and drainage systems proposed as part of the Proposed Development will limit surface water infiltration. Accordingly, based on the information provided by Martens (2020) above, assessment of site groundwater is not considered warranted (refer to **Appendix 14**).
Based on the information provided, the proposal does not constitute a Scheduled Activity under Schedule 1 of the Protection of the Environment Operations Act 1997 (POEO Act). The EPA does not consider that the proposal will require an Environment Protection Licence (EPL) under the POEO Act. The EPA therefore has no further comment to make in relation to this matter.	Noted and agreed.

Table 6: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Government Architect NSW	
The proposal needs to better address concerns around amenity and sustainability, commentary below is made in the context of: ▪ *The proposal's ambition for a Green Star Rating (level 4) as a framework approach across all project stages. Noting:* o *the framework can be 'skewed; around higher rating for individual buildings. at the expense of over-arching consideration for the site. Site-wide considerations (exclusive of building envelopes) will enable/ensure sustainability measures are more impactful in the longer term.* o *the variables for building envelopes to shift over time in multi-stage delivery.*	Green Star has been selected; however, the intension is not to apply one rating to the entire project, this would not be possible under the Green Star requirements (i.e. maximum allowable time to complete rating after PC). The intention would be to apply individual ratings as the stages dictate. This would ensure that each stage (or groups of stages as the program dictates) would achieve the rating independently and safeguard against the framework being skewed. The adoption of Green Star also ensures that as each stage is delivered it will demonstrate best practice in the context of the time at which it is constructed. Green Star regularly updates to ensure past initiatives which are now BAU do not contribute to the rating. In the same way that the applicable building code will apply to the stages as they are delivered, so too will be the current Green Star definition of 4-star best practice. Clear project boundaries will be applied to each rating to ensure both building and site initiatives are captured within the defined boundary. This will all be undertaken with a view for the overall site-wide benefits.
▪ *Several over-arching site considerations (as per the above) are not well or fully represented by the project's Green Star framework. These include incorporating and implementing a commitment to:* o *Tree canopy cover (as outlined in the landscape documentation)– as a key measure for mitigation of the heat island effect and key to open space amenity.* o *opportunities for water capture and re-use (grey water & reuse for irrigation). Noting this is in the landscape approach but not evident in the ESD report (as clear & readily recognisable).* o *opportunities for permeable/semi permeable treatments to complement the large extent of hardstand paving and artificial turf.*	It should be noted that the Green Star framework provided is indicative to a degree but does not address all the items mentioned i.e. heat island mitigation, water capture and re-use and storm water management. However, it is noted further details could have been provided. The Ecologically Sustainable Development Report has been amended accordingly and is located within **Appendix 15** of this Submission. The key to the approach undertaken by Umow Lai was to establish a commitment to a framework which was capable of delivering meaningful sustainable outcomes when considering the complex nature of the proposed staging of the proposed Masterplan. As noted above Green Star accounts for this by way of updating regularly. Given different versions of the Green Star tool may be applicable e.g. D&AB v1.3 for first stage(s) and New Buildings for some later stage(s); the accreditation pathway will vary for rating to rating (dictated by the credit structure). A fully coordinated

	pathway to achieve a 4-star rating will be established for each rating during the Detailed Design of the Proposed Development. Each pathway will include measures to address heat island mitigation, water capture and re-use (for irrigation) and storm water management as shown in the indicative pathway and supported by the Landscape Plans prepared by Sym Studio (refer to **Appendix 7**). An additional 137 Trees are proposed as part of the Proposal, for which the current Proposal includes provisions to provide approximately 40% permeable paving across the Site, which is approximately 4,000 m^2.
A short review of the layout and staged implementation of the canopy cover raises the concern that the canopy cover will not be achievable (as drawn) due to the variables of integration with future street landscaping under the DCP, project staging and the delivery/construction process generally: This includes: ▪ *Spatial compatibility between future street trees and School perimeter planting.* ▪ *Insufficient space between the Secondary School & the north-west boundary for mature planting* ▪ *Deep soil (min 1500 mm) depth for mature planting at locations with basement carparking under.*	Sym Studio have provided the following responses to the adjoining items: ▪ Blacktown City Council have provided new information nominating street tree species at 8.0 m spacing intervals, taking into account street lighting and vehicle sight lines. ▪ Mid-story trees are proposed in restricted locations e.g. *Eleocarpus sp*. If deemed 'insufficient space' alternate locations for trees can be investigated at the detailed design stage as required. As a replacement, large shrubs including *Banksia sp*. are to be utilised. ▪ Agreed. 1.5 m above the basement for mature trees.
GANSW recommend a commitment to the (as proposed) canopy target – allowing for flexibility of location / distribution of trees relative to 1) shading quality/ maximum positive impact & 2) each stage of the project.	Noted and agreed.
It is noted that areas such as the carpark to ELC interface are reliant on the street trees and could potentially cater for additional planting. This demonstrates the risk of reliance on factors yet to be determined (e.g. finalise street tree layouts aligned with the DCP).	Noted and agreed. Both the Architectural and Landscape Plans have been updated to reflect trees along the parking areas. This can form a Condition of Consent to include one (1) tree every ten (10) car stalls.

Table 7: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
NSW Roads and Maritime Services (Laura Van Putten – A/Senior Land Use Planner – North West Precinct)	
1. Roads and Maritime is responsible for speed limits along all roads within the state of New South Wales. That is, Roads and Maritime is the only authorised organisation that can approve speed zoning changes and authorise installation of speed limit/ school zone signs. Roads and Maritime will arrange for site inspection close to the completion of all construction works to determine the appropriate location of the new school zones. The applicant is to notify Roads and Maritime close of the competition of all construction works to allow enough time (4-6 weeks) for Roads and Maritime to gain approval for the speed limit changes.	Noted and agreed.
2. The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1- 2004 and AS2890.6-2009. Parking Restrictions may be required to maintain the required sight distances at the driveway.	Noted and agreed.
3. Sight distances from the proposed vehicular crossings to vehicles on the proposed local roads are to be in accordance with the Austroads Guide to Road Design: Part 4A: Unsignalised and Signalised Intersections (Section 3 – Sight Distance) and AS 2890. Vegetation and proposed landscaping/fencing must not hinder sight lines to and from the vehicular crossings to motorists, pedestrians and cyclists.	Noted and agreed.
4. All vehicles are to enter and leave the site in a forward direction.	Noted and agreed.
5. The proposed development will generate additional pedestrian movements in the area. Pedestrian safety is to be considered in the vicinity.	Noted and agreed.

Table 8: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
NSW Rural Fire Service (Kalpana Varghese – Team Leader, Development Assessment and Planning)	
The intent of measures is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting fire fighting activities. To achieve this, the following conditions shall apply: ***Condition 1:*** *From the start of building works, the entire property must be managed as an Inner Protection Area (IPA). The IPA must comprise:* ▪ *Minimal fine fuel at ground level;* ▪ *Grass mowed or grazed;* ▪ *Trees and shrubs retained as clumps or islands and do not take up more than 20% of the area;* ▪ *Trees and shrubs located far enough from buildings so that they will not ignite the building;* ▪ *Garden beds with flammable shrubs not located under trees or within 10 metres of any windows or doors;* ▪ *Minimal plant species that keep dead material or drop large quantities of ground fuel;* ▪ *Tree canopy cover not more than 15%;* ▪ *Tree canopies not located within two (2) metres of the building;* ▪ *Trees separated by 2-5 metres and do not provide a continuous canopy from the hazard to the building; and* ▪ *Lower limbs of trees removed up to a height of two (2) metres above the ground.*	Agreed in principle; however, it should be noted that this is an extremely restrictive condition, undermining the ability to satisfy the majority of conditions outlined in 'Condition 1'. It is suggested that the Condition 1 be amended to suit the following: ▪ "to be managed as an Inner Protection Zone" as a short term requirement only, noting the long-term vision for the Rouse Hill 'Growth Precinct' promotes built form, physical barriers as protection to the threat of bush fire, thus reducing the requirement to be managed as an Inner Protection Zone.
The intent of measures is that buildings are designed and constructed to withstand the potential impacts of bush fire attack. To achieve this, the following conditions shall apply: ***Condition 2:*** *Construction of the Boarding House and Early Learning Centre shall comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2009*	Noted and agreed. Noting the PBP has been amended in 2019 following the issuance of the formal Response to Submissions.

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.	
The intent of measures is to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building. To achieve this, the following conditions shall apply: ***Condition 3:*** *Water, electricity and gas are to comply with Section 4.1.3 and 4.2.7 of 'Planning for Bush Fire Protection 2006'.*	Noted and agreed. Noting the PBP has been amended in 2019 following the issuance of the formal Response to Submissions.
The intent of measures is for landscaping. To achieve this, the following conditions shall apply: ***Condition 4:*** *Landscaping of the Site should comply with the following principles of Appendix 5 of Planning for Bush Fire Protection 2006.*	Noted and agreed. Noting the PBP has been amended in 2019 following the issuance of the formal Response to Submissions.
The intent of the measures is to provide suitable emergency and evacuation (and relocation) arrangements for occupants of special fire protection purpose developments. ***Condition 5:*** *That a bushfire emergency / evacuation plan be prepared consistent with the NSW Rural Fire Service Guidelines for the Preparation of Emergency / Evacuation Plan.*	Noted and agreed. Noting the PBP has been amended in 2019 following the issuance of the formal Response to Submissions.

Table 9: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
NSW Department of Planning, Industry and Environment – Crown Lands (Kirstyn Goulding – Lands Stakeholder Relations)	
DPIE Crown Lands has no comments for this proposal.	Noted and agreed.

Table 10: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
WaterNSW	
Thank you for allowing WaterNSW the opportunity to comment on SSD-9472. The proposal is not located near any WaterNSW land, assets or infrastructure, therefore we have no particular comments or requirements regarding the proposal. WaterNSW requests the Department continues to consult with WaterNSW for any development that may impact on our assets, infrastructure or land, using the email address Environmental.Assessments@waternsw.com.au.	Noted and agreed.

Table 11: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Department of Primary Industries	
The Department of Primary Industries (DPI) has reviewed the proposal and advises that: ▪ *Any fish must be removed from the dam before it is completely emptied of water.*	Agree. All fish and other aquatic fauna will be removed from the dam before it is completely emptied of water.
▪ *Any exotic or pest fish species must be euthanised using iced water or clove oil. Refer to the Guide to Acceptable Procedures and Practices for Aquaculture and Fisheries Research (available on the DPI website).*	Agree. Any exotic or pest fish species encountered will be euthanised only by accepted procedures outlined in the guide.
▪ *Native endemic fish must be relocated to a suitable nearby waterway.*	Agree. Native fish species must be relocated to a suitable waterway which would be outlined in the FRP.

Table 12: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Transport for NSW (Mark Ozinga – Principal Manager, Land Use Planning and Development)	
Mode Share Assumptions: *Comment:* *Section 5.2.2 of the TPIA notes that information gathered from the mode travel surveys for an Inner West High School in Cleveland Street, Sydney has been used to estimate the mode of travel to and from the proposed development. However, for the proposed development, travel distances will be longer and the bus route network will be less dense and developed than in Inner City areas. Accordingly, it is unclear whether this comparison is an adequate indication of future travel mode shares expected to be generated at the Site.* *Recommendation:* *The proponent should explore whether there is other information available that would more accurately reflect the mode share expected to be generated by the proposed development.*	Positive Traffic note, that it is not feasible for a new school, in particular a school which is not directly related to the Department of Education (comprising a public school) to undertake mode of travel surveys of other schools staff and students population. Thus, such developments rely on traffic experts to utilise data from previously approved school projects to inform the ensuing traffic assessments. It is noted that the same surveys of the same schools, despite having lower public transport use, were adopted and modified accordingly for the proposed Inner Sydney High School traffic report previously undertaken by Positive Traffic Pty Ltd which was approved / supported by Transport for NSW (TfNSW). The traffic generation estimates prepared in the traffic report have been undertaken on a first principles basis informed by experience in transport planning for such projects as no traffic generation rates are provided for educational facilities in the RTA Guide to Traffic Generating Developments. Accordingly, Positive Traffic confirm, that the traffic generation assessment undertaken is both transparent and robust in its approach and should TfNSW wish to provide alternative traffic generation data based on surveys of other Educational Establishments this could be reviewed further as part of future assessments required as part of the post-approvals requirements, subject to Development Consent.
Bus Services: *Comment:* *Section 2.6 of the Traffic and Parking Impact Assessment (TPIA) notes no bus services*	Noted and agreed. The additional bus services which have been enacted since the preparation of the traffic report are noted and would provide further mode choice to future students / staff of the school.

operate along Tallawong Road and existing bus stops near the Schofields Road / Tallawong Road intersection are serviced by 2 bus routes (the T72 – Blacktown to Rouse Hill Town Centre & Return and the T75 – Blacktown to Rouse Hill Town Centre & Return). It is noted these bus routes were renumbered on 26 May 2019 and are now referred to as routes 732 and 735 respectively. *Additionally, since the opening of the Sydney Metro, a regular bus route (Route 742) now operates on Tallawong Road past the Site and a number of bus routes also operate via Tallawong Station. Bus services are expected to increase on Tallawong Road and in the vicinity in response to new development.* *Recommendation:* *Section 2.6 of the TPIA should be updated to reflect the above.*	
Indented Bus Bays: *Comment:* *The future carriageway width/ lane configuration and pedestrian crossing arrangements of Tallawong Road is not known. Subject to these factors, buses may be accommodated in the kerbside lane and an indented bus bay may not be required.* *It is noted that the proposed indented bus facility is expected to accommodate school and regional/ local buses. Accordingly, if an indented bus bay is necessary to address traffic issues on Tallawong Road, the bays' design and location should maximise the kerb length available for buses stopped or parked at the front of the school. This would allow public bus routes to draw-in at the front of any school buses that may be parked in the bay and draw-out again.* *Additionally, TfNSW have released Guidelines for Public Transport Capable Infrastructure in Greenfield Sites. This document details requirements so public transport services can be provided to development in Greenfield sites. This document is available at: https://www.transport.nsw.gov.au/industry/transport-planning-resources#Guidelines for Public Transport Capable Infrastructure in Greenfield Sites .*	The revised Architectural Plans prepared by PMDL (refer to **Appendix 4**) have been undertaken in accordance with TfNSW Bus Stop Design Guide and provides a compliant indented bus bay which can accommodate three (3) full sized buses at any one time. The proposed bus bays have not been provided to 'address traffic issues on Tallawong Road' but to provide a convenient safe facility for the school which connects to the bus services identified in Tallawong Road as the main spine bus corridor through the Riverstone East Precinct. The design of the indented bus bay is considered compliant with all current Policies and Standards.

Recommendation: *It is recommended that the Proponent consults with Transport for NSW, the local bus operators and BCC in determining the location and detailed design of the bus stops. In addition, the design and construction of the proposed bus stops should be consistent with the Guidelines for Public Transport Capable Infrastructure in Greenfield Sites.*	
DDA Compliance: *Comment:* *The footpath at the Tallawong Road school frontage is proposed to be narrowed to accommodate the abovementioned bus bay. The footpath does not appear to be wide enough for local public walking access past the school, as well as for school students. In particular, it appears to be too narrow to accommodate a Disability Discrimination Act (DDA) compliant public bus stop in the bus bay.* *Recommendation:* *The Proponent should confirm in the Response to Submissions (RtS) that the proposed design of the bus bays allows sufficient walking space along the footpath for students and the general public. The RtS should also confirm that any proposed bus stops will be compliant with DDA Standards and Guidelines.*	The proposed nature street along the frontage of the indented bus bay would provide full width concrete and is considered adequate to accommodate ultimate demands of the bus bay. Furthermore, the design of the school allows students to congregate within the school prior to accessing the bus bay; therefore, staggered access to buses can be achieved during peak periods. The arrangements proposed are considered satisfactory.
Public Bus Stop: *Comment:* *The TPIA mentions that a three (3) bay indented bus facility will be provided along the Tallawong Road site frontage to accommodate school, regional and local buses. Public bus services currently run two-way on Tallawong Road. Subject to demand and funding, bus routes may be altered to include an additional stop along Tallawong Road. Accordingly, a public bus stop opposite the school could be utilised by students and staff arriving or departing on buses travelling in a southbound direction towards the Tallawong Metro Station.* *Recommendation:*	The provision and location of bus stops are entirely dependent on TfNSW planning and approval for such facilities. The provision of a southbound bus stop in Tallawong Road (the identified bus corridor through the area) would be supported and subject to planning / approval of TfNSW. This is a matter for both TfNSW and the Local Traffic Committee of Blacktown City Council to enact upon.

A public bus stop should be provided opposite the school for the southbound direction for public buses running towards Tallawong Metro Station.	
Active Transport: *<u>Comment:</u>* *If a public bus stop is provided opposite the school, students and staff would need to cross Tallawong Road to access this bus stop. As there is no proposed or current pedestrian crossing, pedestrian safety issues may arise, particularly during peak drop-off and pick-up times.* *<u>Recommendation:</u>* *Suitable pedestrian crossing facilities should be considered in consultation with Blacktown City Council to facilitate safe student access to and from the future bus stop opposite the school. The design of any such facility would need to be such that conflicts for bus and general traffic movements at the front of the school are minimised. It is also recommended that future design iterations demonstrate additional ways to encourage and cater for increased rates of walking, cycling and use of public transport, for example by providing/increasing bike parking supply, providing safe, comfortable and connected footpaths and bicycle routes and restricting provision of car parking.*	As stated above, the planning and provision of bus stops / bus routes is entirely a matter for TfNSW to consider and enact upon in the future. With regard to the provision of pedestrian facilities along Tallawong Road, it is noted, that ultimately the road has the capacity to become four (4) travel lanes in the future. In accordance with the Austroads Design Guide and RTA Provision for Pedestrian Facilities, marked footpath crossings on four (4) lane roads are not permitted. It is unclear at this stage of planning the location of such a southbound bus stop and it could be located south of the southern local boundary road, central to the school or in another location altogether. It is important to note, upon completion of the local road network surrounding the school, buses accessing the bus bay would have the opportunity to travel south along other roads should local routes be developed over time as planned by TfNSW. Due to the presence of the indented bus bay combined with the four (4) lane width of Tallawong Road, provision of a southbound bus stop directly opposite the school is not recommended, as it could lead to students risking their safety trying to access such a stop through the bus bay. Until such a time when TfNSW plans / confirms the location of any southbound bus stops, the width of Tallawong Road south of the southern boundary road would allow provision of a pedestrian refuge (through the local traffic committee) with the removal of on-street parking adjacent to such a facility. An impact of such a facility would be the blocking of right turn movements into and out of adjacent residential driveways but this would typically be limited to 1-3 properties on either side of Tallawong

	Road. On the basis the above approach to the provision of a southbound bus stop south of the southern boundary road was agreed in principle by TfNSW / Blacktown City Council, a Condition of Consent for the installation of a pedestrian refuge to serve this bus stop could be imposed on the proposed school.
Future Bus Network: *<u>Comment:</u>* *Section 3.1.3 refers to a Bus Servicing Plan which was prepared in 2012 showing an indicative future bus network. While the plan is becoming increasingly out of date with current bus route developments, the ideas continue to be considered as part of current planning work. Route 742 currently operates along Tallawong Road past the subject site linking Riverstone Station with Rouse Hill Station via Tallawong Station.* *Notwithstanding this, the TfNSW Growth Services Program will monitor regular bus routes and make changes to service levels where necessary, subject to demand and funding.* *<u>Recommendation:</u>* *Prior to the commencement of school operations, the proponent should provide additional data and the proposed student catchment area to determine the likely demands on the transport network (all modes). With particular regard to bus usage, data should also be provided on existing and expected patronage by route. This data could be obtained by travel surveys of staff and students.* *The student catchment area and travel data provided to TfNSW will assist with future service planning.*	The potential future bus patronage of students of the school, noting the school also provides on-site accommodation, has been included in the preparation of the Green Travel Plan (refer to **Appendix 10**). TfNSW can provide Opal Data of existing bus routes in the area to the school for future assessments. It is recommended as a Condition of Consent, similar to that which was imposed on the Inner Sydney High School, that annual mode of travel surveys be undertaken of students / staff to gauge mode share to non-private modes and to inform ongoing management of travel choices of students and staff as recommended in the Green Travel Plan (refer to **Appendix 10**).

Table 13: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
NSW Department of Planning, Industry and Environment (Ryan Klingberg – Central (Western) Team, Greater Sydney, Place and Infrastructure)	
The Central (Western) team have no objection to the proposal for the Sikh Grammar School. Under the Growth Centres SEPP the school site is identified as R2 Low Density Residential zone of the Riverstone East Precinct. The indicative layout plan (ILP) for the precinct has the land earmarked for housing. The zone is listed as a "prescribed" zone under the Education SEPP.	Noted and agreed.
Regarding your enquiry relating to the road network capacity/traffic generation, while it was not specifically mentioned in the published Finalisation Report or Traffic Study, I have been advised that the school site was considered in the design of the ILP. Given that Tallawong Road is proposed to be upgraded to a collector road and the proposed new road parallel to Tallawong does not dissect the site; it is considered that the road network can support the traffic while providing safe access to and from the proposed school. This is subject to Transport RMS advice.	Noted and agreed.

Table 14: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Sydney Metro	
Transport for NSW (TfNSW) has delegated its rail authority functions in relation to the Sydney Metro Northwest rail corridor to Sydney Metro. Therefore, Sydney Metro is the relevant rail authority for the Sydney Metro Northwest rail corridor for the purpose of the ISEPP. *Concurrence of Sydney Metro is not required Sydney Metro understands that the development is State Significant Development (SSD), being the staged construction of a new Kindergarten to Year 12 school for up to 1260 students and 120 staff cornprising:* ▪ *Demolition works;* ▪ *Construction of a primary school, high school, and boarding school buildings;* ▪ *Construction of an early learning centre to accommodate up to 89 children;* ▪ *Construction of a Gurdwara and Langar (place of worship/assembly and community kitchen);* ▪ *Bulk earthworks including dam dewatering;* ▪ *Vehicular access and up to 357 car parking spaces;* ▪ *Associated services, including potable water, electricity, gas, wastewater and communications from Tallawong Road; and* ▪ *Associated landscaping works including tree removal.* *As this is a SSD development application, the provisions of clause 86 of the State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) do not apply.* *Section 4.13(2A) of the Environmental Planning and Assessment Act 1979 excludes concurrence or consultation requirements from applying to development applications for SSD, unless an environmental planning instrument requires concurrence or consultation to SSD. As clause 86 of the ISEPP does not require concurrence to be provided in the context of a development application for SSD, concurrence is not required for the DA.*	Noted and agreed. There are no further actions required.

Notwithstanding this, in order to ensure the appropriate management and mitigation of the proposed development's impacts on the Sydney Metro Northwest rail corridor, Sydney Metro has reviewed the DA documents in the link attached to the Department of Planning Industry and Environment's letter and email of 15 October 2019. *Based on this review, Sydney Metro is of the view that the proposed development would not have an adverse impact on the operation or safety of the Sydney Metro Northwest rail corridor as the development is not within or adjacent to the corridor, nor within 400m of the Tallawong Station Precinct.* *Sydney Metro also has no comments on the DA for the purpose of clauses 45 or 85 of the ISEPP.*	

Table 15: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
DPIE – Water and Natural Resources Access Regulator (NRAR)	
The project must obtain a Water Access Licence should surface/and or groundwater be used or intercept during the construction or through the operations period.	Noted and agreed. This can be conditioned accordingly.
The stormwater outlet should be designed in accordance with the Guidelines for Working on Waterfront Land (WaterNSW, 2012) https://www.industry.nsw.gov.au/water/licensing-trade/approvals/controlled-activities	Noted and agreed. This can be conditioned accordingly.

Table 16: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Sydney Water	
Water Servicing	
Water servicing should be available via a DN200 watermain (laid in 2019) on Tallawong Road. The developer may be required to amplify the existing reticulation system to meet the Sydney Water guideline based on development type and building height.	Noted and agreed.
Wastewater Servicing	
Wastewater servicing should be available via a DN150 sewer main (laid in 2019) within the property boundary. The developer may be required to amplify the existing reticulation system.	Noted and agreed.
Recycled Water Servicing	
This development is outside of Sydney Water's existing recycle water schemes. However, Sydney Water is open to collaboration to explore opportunities for recycled water.	Noted and agreed.
Stormwater	
Requirements for Sydney Water's stormwater assets (for certain types of development) may apply to this site. The proponent should ensure that satisfactory steps/measures have been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets.	Noted and agreed.
The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.	Noted and agreed.
This advice is not a formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.	Noted and agreed.

Table 17: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Public Submission	
Hi, *I just got this project notice letter yesterday. I am not objecting this project, as I am one of the owners will live there and I need to make sure any future developments are suitable for local residents first. Therefore, there are some items need to be more details.* *1)Size of the school* *Traffic - It mentioned it will be a school for 1260 students and 120 staff, this area is a mainly new developing residential area with middle and high density residential building. Looking at local roads and traffic condition, such a big school will get more people on the road and more traffic time for the local residents, especially the morning peak time.* *Building Size - We have been advised that we only could have two stories building for us, why they are able to build three stories buildings.* *For a school with 1260 students and 160 staff, and a early learning centre for 89 children, dam, 357 car parking space, is there enough land for all facilities and room for each person using the land. Is it too crowed for everyone?*	The suitability of the Site for the Proposal has been previously considered within the EIS and the supporting SSD Application package, which reaffirms the Site's suitability in its size, location and context to facilitate a modernised and State-of-the-Art development such as the Sikh Grammar School. Further consideration is not considered to be required in this respect.
2) Size of Worship, Time of Worship, concern about noise and traffic affection. *a). what is the size for this worship, will it be extended or changed to bigger size in the future.* *b). what is the total allowance amount of people this worship will build for.* *c). when will it be using as a as worship? Monday to Friday or including Weekends?* *d). When it will be a worship, from 7am to 6pm? any other time?* *e). As it will build 357 car parking spaces, so I guess it will be for the weekend worship parking, is it correct?*	Both the Noise and Vibration Impact Assessment and Traffic and Parking Impact Assessment (refer to **Appendix 9** & **17**) provide their affirmation of the Proposal, which includes thorough investigations with respect to the development particular concerning the Place of Public Worship (Gurdwara & Langar) being proposed on the Site. Further consideration is not considered to be required in this respect.

f). Noise control, no any detailed information about the level of noise/music/speech and how to manage it, which I concern most. g). All local residents sharing with this school to use Tallawong road, which is only four lines road. If this worship is designed for more people, how to manage car parking and roadside parking when people coming to this worship. I did see a lot of cars parking illegally and arbitrarily outside the worships at some other suburbs, even parking on some private properties.	

Table 18: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Public Submission	
I strongly object to this project because there are many schools in the Rouse Hill, Schofields, Riverstone area already. Adding an extra school would increase the traffic making it difficult to get home and increase accidents on the road specifically with kiss and ride and drop offs. The entire process of building a new school would see only specific teachers being allocated jobs therefore not allowing jobs for other groups to attain positions. There are already a number of schools for these students to attend- therefore this Sikh Grammar School is not needed in the area.	The Public Submission is quite subjective and does not draw from the conclusions provided by Positive Traffic within the Traffic and Parking Impact Assessment which concludes the Proposal is suitable and supportable on traffic and parking planning grounds. Further consideration is not considered to be required in this respect.

Table 19: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Public Submission	
This is one of its kind school which the Sikh community planned for in Australia. I fully support this community school as it develops a diversified school which I believe helps the community in getting more balanced multi-cultural society.	Noted and agreed.

Table 20: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Public Submission	
Hi, i am supporting the school development but not the boarding school, hostel and Gurudwara. The boarding school and Gurudwara will create parking and traffic congestion of all time also will add nuisance in community. I would be living near this development shortly and oppose Gurudwara, Boarding school and hostel. Thank you.	The conclusions provided by Positive Traffic within the Traffic and Parking Impact Assessment that the Proposal is suitable and supportable on traffic and parking planning grounds. Further consideration is not considered to be required in this respect.

Table 21: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Public Submission	
We would be living near this project area soon, i oppose the development for Gurudwara, hostel and boarding school as this will add traffic and parking problems and nuisance in community. i have no objection in grammar school development.	As above.

Table 22: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Public Submission – David Tunnicliffe	
We would like further information regarding the proposed road at the south east of the site. There is little to no information about the plans for this thoroughfare, it would significantly impact a residential area making the suburb congested and difficult to navigate during peak hours.	The proposed road to the south is being assessed under the concurrent subdivision DA with Council for which all traffic impacts have been assessed under the subdivision DA, as well as within the subject SSD Application.

Table 23: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Public Submission	
I will become a resident of the area very soon, I do not wish to have people who does not belong to the community to be constantly visiting my neighbourhood and create disruptions. Due to the nature of a private school, anyone, including those who does not live around the area can enrol into the school. Thus anyone from anywhere will be coming to my home and places near my home constantly. I believe this will create inconvenience to me as a resident.	This submission is purely subjective and should not be considered a 'unique' submission. Further consideration is not considered to be required in this respect.

Table 24: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Public Submission	
I am a resident of the area, by having a private school built around my neighbourhood will mean that the people living outside of my neighbourhood will be attending the school. I do not wish to have many people visiting my neighbourhood especially if they are not from the area. I believe this will create a major inconvenience for me and my family and possibly affecting the safety of my children.	This submission is purely subjective and should not be considered a 'unique' submission. Further consideration is not considered to be required in this respect.

Table 25: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Castle Group (Rashed Panabig – Development Director)	
Owner's Consent: *The engineering drawings indicate that there is battering to the adjoining properties to the north, south and west. We have not granted consent for any works to our property (141 Tallawong Road) and therefore the application cannot be approved in its current form.*	This item has been ameliorated following ongoing consultation undertaken with the adjoining landowners.
Height of Buildings: *The site is zoned R2 Low Density Residential. The height limit for the site is 9 m which is intended to result in development of the site presenting a reduction in scale from the 12 m height limit in the planned local centre on Guntawong Road.* *The proposal seeks a maximum building height of more than double the existing height limit at 18.19 m. The justification for this significant breach relies on the commercial viability, operational requirements of the school and demand for infrastructure.* *The applications fails to provide adequate justification as to why the departure from the development standard is unreasonable or unnecessary or that the development presents better outcome for the site as a result of the non-compliance. The commercial viability of a project is not a valid planning consideration and the operational requirements of the school can be equally served by a development of lesser scale that occupies a greater land area.*	This Submission item is purely subjective. The person writing the submission has not referenced the Clause 4.6 Variation Request prepared by Willowtree Planning which comprehensively and satisfactorily justifies the proposed height departures. Additionally, in the height plane diagram produced by PMDL as part of the formal Response to Submissions, the bulk and scale has been focused at the centre of the Site in an attempt to significantly mitigated any potential visual amenity impacts occurring on adjoining residential land portions.
Suitability of the Site: *The demand for educational infrastructure within the Precinct was examined during precinct-planning and appropriate sites were identified for schools. These sites have largely not been taken up for the development of schools despite the Department of Education identifying some of them as surplus to public education needs. This site was not identified for a school with the*	*A Metropolis of Three Cities* and the *Central City District Plan* both acknowledge that the Sydney Metropolitan Region is a growing population, for which with population growth incurs the requirement for significant infrastructure investment. The Proposal is permissible with consent within the R2 Low Density Residential zone, and is closely located to key infrastructure assets including bus links along Tallawong Road and the newly constructed Sydney Metro rail network providing connectivity to wider Sydney Metropolitan Region. It is considered that the Subject Site is very suitable for a Proposal of this calibre, particularly with so much investment for housing being prominent throughout Tallawong Road and the surrounding area, with a majority of

result being that the proposed development is inconsistent with the planning controls and expected future character. There exist more appropriate alternate locations for the provision of educational infrastructure within the Precinct.	new residents being members of the Sikh community.
Building Massing: *There are no established FSR controls for the site as the site was never expected to be developed for non-residential development. Whilst the building massing is centred on the site to limit the impacts of overshadowing there remains a considerable disconnect between the proposed density and building massing to that which would be expected in a low-density residential environment.*	This Submission item is purely subjective. The person writing the submission has not referenced the Clause 4.6 Variation Request prepared by Willowtree Planning which comprehensively and satisfactorily justifies the proposed height departures. Additionally, in the height plane diagram produced by PMDL as part of the formal Response to Submissions, the bulk and scale has been focused at the centre of the Site in an attempt to significantly mitigated any potential visual amenity impacts occurring on adjoining residential land portions. Additionally, the built form components proposed are typical of Educational Establishments and have utilised the Site where practical to gain the highest and best use outcomes where achievable whilst being able to provide compliant open space ratios for staff and students alike.
Floodprone Land: *The site is identified as flood prone land. It is understood that flood mitigation works will create a flood free site for development by diverting water to the proposed northern half road. Confirmation is sought that this water will not enter our property (141 Tallawong Road) as a result of the road construction not being completed as a component of this development.*	The Proposal has been strategically developed to take into account the flooding affectations identified across the Site, ensuring that both the pre and post-development scenarios have been considered with respect to the Subject Site and the adjoining sites. All flooding requirements are considered to have been satisfactorily addressed as part of this SSD Application.
Access Arrangements: *The application proposes the construction of half roads to the northern, western and southern boundaries of the site which is consistent with the Indicative Layout Plan.* *Vehicle access to the proposed basement is proposed to be via the northern and southern roads. Further, access to the above ground parking is proposed to be provided via the northern half road.* *In the interim and until such time as the neighbouring sites have been developed this access arrangement is problematic as these half roads are unlikely to be able to safely accommodate the vehicles movements expected to service the development during peak times.*	This is incorrect. The access arrangements have been confirmed as acceptable throughout the Traffic Impact Assessment prepared by Positive Traffic, for which all access requirements can be accommodated throughout the relevant stages of the Proposed Development.

Additionally, the turning manoeuvres indicates on the architectural plans cannot be accommodated within driving into our property, and no consent has been given to temporary or permanent works within our site.	
Inadequacies of Documentation on Exhibition: *There are a number of inadequacies with the documentation that has been included in the exhibition package that make an informed assessment of the proposal difficult:* ▪ *The survey plan is illegible as only Sheet 1 has been included whereas Sheets 2-7 which have not been included presumably provide a greater scale and legible text.* ▪ *The architectural plans do not provide any measurements from natural ground level making precise measurement of the building height and impact on the adjoining properties difficult.* ▪ *There are significant inconsistencies between the masterplan and the architectural plans. Building locations are substantially changed, land uses have been relocated and parking areas, bus layby and access arrangements are different.*	All inconsistencies were amended as part of the Response to Submissions.
An Undesirable Precedent: *The development of an intensive non-residential land use within a low-density residential area proposes amenity, traffic and visual impacts that undermine the precinct planning and desired future character of the Precinct which presents an undesirable precedent for the development of the area.*	As mentioned above, *A Metropolis of Three Cities* and the *Central City District Plan* both acknowledge that the Sydney Metropolitan Region is a growing population, for which with population growth incurs the requirement for significant infrastructure investment. The Proposal is permissible with consent within the R2 Low Density Residential zone, and is closely located to key infrastructure assets including bus links along Tallawong Road and the newly constructed Sydney Metro rail network providing connectivity to wider Sydney Metropolitan Region. It is considered that the Subject Site is very suitable for a Proposal of this calibre, particularly with so much investment for housing being prominent throughout Tallawong Road and the surrounding area, with a majority of new residents being members of the Sikh community.
Devaluation of Adjacent Residential Lands: *The significant overdevelopment of the site is inconsistent with the planning controls and the vision for the Riverstone Precinct. Current and future purchasers of residential land within the Precinct should expect that the low-density character of the area envisaged in the precinct planning and the*	Despite the height non-compliance (which has been significantly justified as noted above) the Proposal represents a design that is generally compliant with the relevant Development Controls applying to the Site as previously assessed at the time of lodgement of this SSD Application. Additionally, the built form proposed would not devalue properties. The investment of key critical infrastructure in residential areas

planning controls should be protected and enhanced by any development proposal. Any deviation presents a devaluation of the vision and be expected to impact property values.	is known to increase property values as it improves access for residents to key infrastructure such as transport and educational establishments.
Conclusion: *There are significant deficiencies with the development as proposed and the documentation exhibited not least of which is that owner's consent has not been obtained for the whole of the development.*	Noted. All items have been appropriately addressed.

Table 26: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
REK Development No3 Pty Ltd ATF REK Developments No3 Unit Trust (Rashed Panabig – Development Director)	
Height of Buildings: *The site is zoned R2 Low Density Residential. The height limit for the site is 9 m which is intended to result in development of the site presenting a reduction in scale from the 12 m height limit in the planned local centre on Guntawong Road.* *The proposal seeks a maximum building height of more than double the existing height limit at 18.19 m. The justification for this significant breach relies on the commercial viability, operational requirements of the school and demand for infrastructure.* *The applications fails to provide adequate justification as to why the departure from the development standard is unreasonable or unnecessary or that the development presents better outcome for the site as a result of the non-compliance. The commercial viability of a project is not a valid planning consideration and the operational requirements of the school can be equally served by a development of lesser scale that occupies a greater land area.*	In an email dated 3 April 2020 issued to the NSW DPIE, all public submissions received are considered to have been addressed and ameliorated. Further consideration is not considered to be required in this respect.
Suitability of the Site: *The demand for educational infrastructure within the Precinct was examined during precinct-planning and appropriate sites were identified for schools. These sites have largely not been taken up for the development of schools despite the Department of Education identifying some of them as surplus to public education needs. This site was not identified for a school with the result being that the proposed development is inconsistent with the planning controls and expected future character. There exist more appropriate alternate locations for the provision of educational infrastructure within the Precinct.*	As above.
Building Massing: *There are no established FSR controls for the site as the site was never*	As above.

expected to be developed for non-residential development. Whilst the building massing is centred on the site to limit the impacts of overshadowing there remains a considerable disconnect between the proposed density and building massing to that which would be expected in a low-density residential environment.	
Floodprone Land: *The site is identified as flood prone land. It is understood that flood mitigation works will create a flood free site for development by diverting water to the proposed northern half road. Confirmation is sought that this water will not enter our property (141 Tallawong Road) as a result of the road construction not being completed as a component of this development.*	As above.
Access Arrangements: *The application proposes the construction of half roads to the northern, western and southern boundaries of the site which is consistent with the Indicative Layout Plan.* *Vehicle access to the proposed basement is proposed to be via the northern and southern roads. Further, access to the above ground parking is proposed to be provided via the northern half road.* *In the interim and until such time as the neighbouring sites have been developed this access arrangement is problematic as these half roads are unlikely to be able to safely accommodate the vehicles movements expected to service the development during peak times.* *Additionally, the turning manoeuvres indicates on the architectural plans cannot be accommodated within driving into our property, and no consent has been given to temporary or permanent works within our site.*	As above.
Inadequacies of Documentation on Exhibition: *There are a number of inadequacies with the documentation that has been included in the exhibition package that make an informed assessment of the proposal difficult:* ▪ *The survey plan is illegible as only Sheet 1 has been included whereas*	As above.

Sheets 2-7 which have not been included presumably provide a greater scale and legible text. ▪ *The architectural plans do not provide any measurements from natural ground level making precise measurement of the building height and impact on the adjoining properties difficult.* *There are significant inconsistencies between the masterplan and the architectural plans. Building locations are substantially changed, land uses have been relocated and parking areas, bus layby and access arrangements are different.*	
An Undesirable Precedent: *The development of an intensive non-residential land use within a low-density residential area proposes amenity, traffic and visual impacts that undermine the precinct planning and desired future character of the Precinct which presents an undesirable precedent for the development of the area.*	As above.
Devaluation of Adjacent Residential Lands: *The significant overdevelopment of the site is inconsistent with the planning controls and the vision for the Riverstone Precinct. Current and future purchasers of residential land within the Precinct should expect that the low-density character of the area envisaged in the precinct planning and the planning controls should be protected and enhanced by any development proposal. Any deviation presents a devaluation of the vision and be expected to impact property values.*	As above.
Conclusion: *There are significant deficiencies with the development as proposed and the documentation exhibited not least of which is that owner's consent has not been obtained for the whole of the development.*	As above.

Table 27: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Castle Group c/- KMA Developments No 6 Pty Ltd ATF KMA Developments No 6 Unit Trust (Rashed Panabig – Development Director)	
Height of Buildings: *The site is zoned R2 Low Density Residential. The height limit for the site is 9 m which is intended to result in development of the site presenting a reduction in scale from the 12 m height limit in the planned local centre on Guntawong Road.* *The proposal seeks a maximum building height of more than double the existing height limit at 18.19 m. The justification for this significant breach relies on the commercial viability, operational requirements of the school and demand for infrastructure.* *The applications fails to provide adequate justification as to why the departure from the development standard is unreasonable or unnecessary or that the development presents better outcome for the site as a result of the non-compliance. The commercial viability of a project is not a valid planning consideration and the operational requirements of the school can be equally served by a development of lesser scale that occupies a greater land area.*	In an email dated 3 April 2020 issued to the NSW DPIE, all public submissions received are considered to have been addressed and ameliorated. Further consideration is not considered to be required in this respect.
Suitability of the Site: *The demand for educational infrastructure within the Precinct was examined during precinct-planning and appropriate sites were identified for schools. These sites have largely not been taken up for the development of schools despite the Department of Education identifying some of them as surplus to public education needs. This site was not identified for a school with the result being that the proposed development is inconsistent with the planning controls and expected future character. There exist more appropriate alternate locations for the provision of educational infrastructure within the Precinct.*	As above.
Building Massing: *There are no established FSR controls for the site as the site was never*	As above.

expected to be developed for non-residential development. Whilst the building massing is centred on the site to limit the impacts of overshadowing there remains a considerable disconnect between the proposed density and building massing to that which would be expected in a low-density residential environment.	
Access Arrangements: *The application proposes the construction of half roads to the northern, western and southern boundaries of the site which is consistent with the Indicative Layout Plan.* *Vehicle access to the proposed basement is proposed to be via the northern and southern roads. Further, access to the above ground parking is proposed to be provided via the northern half road.* *In the interim and until such time as the neighbouring sites have been developed this access arrangement is problematic as these half roads are unlikely to be able to safely accommodate the vehicles movements expected to service the development during peak times.* *Additionally, the turning manoeuvres indicates on the architectural plans cannot be accommodated within driving into our property, and no consent has been given to temporary or permanent works within our site.*	As above.
Inadequacies of Documentation on Exhibition: *There are a number of inadequacies with the documentation that has been included in the exhibition package that make an informed assessment of the proposal difficult:* ▪ *The survey plan is illegible as only Sheet 1 has been included whereas Sheets 2-7 which have not been included presumably provide a greater scale and legible text.* ▪ *The architectural plans do not provide any measurements from natural ground level making precise measurement of the building height and impact on the adjoining properties difficult.* *There are significant inconsistencies between the masterplan and the architectural plans. Building locations are substantially changed, land uses*	As above.

have been relocated and parking areas, bus layby and access arrangements are different.	
An Undesirable Precedent: *The development of an intensive non-residential land use within a low-density residential area proposes amenity, traffic and visual impacts that undermine the precinct planning and desired future character of the Precinct which presents an undesirable precedent for the development of the area.*	As above.
Devaluation of Adjacent Residential Lands: *The significant overdevelopment of the site is inconsistent with the planning controls and the vision for the Riverstone Precinct. Current and future purchasers of residential land within the Precinct should expect that the low-density character of the area envisaged in the precinct planning and the planning controls should be protected and enhanced by any development proposal. Any deviation presents a devaluation of the vision and be expected to impact property values.*	As above.
Conclusion: *There are significant deficiencies with the development as proposed and the documentation exhibited not least of which is that owner's consent has not been obtained for the whole of the development.*	As above.

Table 28: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Castle Group c/- 129 Cudgegong Road, Rouse Hill (Rashed Panabig – Development Director)	
Height of Buildings: *The site is zoned R2 Low Density Residential. The height limit for the site is 9 m which is intended to result in development of the site presenting a reduction in scale from the 12 m height limit in the planned local centre on Guntawong Road.* *The proposal seeks a maximum building height of more than double the existing height limit at 18.19 m. The justification for this significant breach relies on the commercial viability, operational requirements of the school and demand for infrastructure.* *The applications fails to provide adequate justification as to why the departure from the development standard is unreasonable or unnecessary or that the development presents better outcome for the site as a result of the non-compliance. The commercial viability of a project is not a valid planning consideration and the operational requirements of the school can be equally served by a development of lesser scale that occupies a greater land area.*	In an email dated 3 April 2020 issued to the NSW DPIE, all public submissions received are considered to have been addressed and ameliorated. Further consideration is not considered to be required in this respect.
Suitability of the Site: *The demand for educational infrastructure within the Precinct was examined during precinct-planning and appropriate sites were identified for schools. These sites have largely not been taken up for the development of schools despite the Department of Education identifying some of them as surplus to public education needs. This site was not identified for a school with the result being that the proposed development is inconsistent with the planning controls and expected future character. There exist more appropriate alternate locations for the provision of educational infrastructure within the Precinct.*	As above.
Building Massing: *There are no established FSR controls for the site as the site was never*	As above.

expected to be developed for non-residential development. Whilst the building massing is centred on the site to limit the impacts of overshadowing there remains a considerable disconnect between the proposed density and building massing to that which would be expected in a low-density residential environment.	
Access Arrangements: *The application proposes the construction of half roads to the northern, western and southern boundaries of the site which is consistent with the Indicative Layout Plan.* *Vehicle access to the proposed basement is proposed to be via the northern and southern roads. Further, access to the above ground parking is proposed to be provided via the northern half road.* *In the interim and until such time as the neighbouring sites have been developed this access arrangement is problematic as these half roads are unlikely to be able to safely accommodate the vehicles movements expected to service the development during peak times.* *Additionally, the turning manoeuvres indicates on the architectural plans cannot be accommodated within driving into our property, and no consent has been given to temporary or permanent works within our site.*	As above.
Inadequacies of Documentation on Exhibition: *There are a number of inadequacies with the documentation that has been included in the exhibition package that make an informed assessment of the proposal difficult:* ▪ *The survey plan is illegible as only Sheet 1 has been included whereas Sheets 2-7 which have not been included presumably provide a greater scale and legible text.* ▪ *The architectural plans do not provide any measurements from natural ground level making precise measurement of the building height and impact on the adjoining properties difficult.* *There are significant inconsistencies between the masterplan and the architectural plans. Building locations are substantially changed, land uses*	As above.

have been relocated and parking areas, bus layby and access arrangements are different.	
An Undesirable Precedent: *The development of an intensive non-residential land use within a low-density residential area proposes amenity, traffic and visual impacts that undermine the precinct planning and desired future character of the Precinct which presents an undesirable precedent for the development of the area.*	As above.
Devaluation of Adjacent Residential Lands: *The significant overdevelopment of the site is inconsistent with the planning controls and the vision for the Riverstone Precinct. Current and future purchasers of residential land within the Precinct should expect that the low-density character of the area envisaged in the precinct planning and the planning controls should be protected and enhanced by any development proposal. Any deviation presents a devaluation of the vision and be expected to impact property values.*	As above.
Conclusion: *There are significant deficiencies with the development as proposed and the documentation exhibited not least of which is that owner's consent has not been obtained for the whole of the development.*	As above.

Table 29: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Castle Group c/- CDG No4 Pty Ltd ATF CDG No4 Unit Trust) (Rashed Panabig – Development Director)	
Height of Buildings: *The site is zoned R2 Low Density Residential. The height limit for the site is 9 m which is intended to result in development of the site presenting a reduction in scale from the 12 m height limit in the planned local centre on Guntawong Road.* *The proposal seeks a maximum building height of more than double the existing height limit at 18.19 m. The justification for this significant breach relies on the commercial viability, operational requirements of the school and demand for infrastructure.* *The applications fails to provide adequate justification as to why the departure from the development standard is unreasonable or unnecessary or that the development presents better outcome for the site as a result of the non-compliance. The commercial viability of a project is not a valid planning consideration and the operational requirements of the school can be equally served by a development of lesser scale that occupies a greater land area.*	In an email dated 3 April 2020 issued to the NSW DPIE, all public submissions received are considered to have been addressed and ameliorated. Further consideration is not considered to be required in this respect.
Suitability of the Site: *The demand for educational infrastructure within the Precinct was examined during precinct-planning and appropriate sites were identified for schools. These sites have largely not been taken up for the development of schools despite the Department of Education identifying some of them as surplus to public education needs. This site was not identified for a school with the result being that the proposed development is inconsistent with the planning controls and expected future character. There exist more appropriate alternate locations for the provision of educational infrastructure within the Precinct.*	As above.
Building Massing: *There are no established FSR controls for the site as the site was never*	As above.

expected to be developed for non-residential development. Whilst the building massing is centred on the site to limit the impacts of overshadowing there remains a considerable disconnect between the proposed density and building massing to that which would be expected in a low-density residential environment.	
Access Arrangements: *The application proposes the construction of half roads to the northern, western and southern boundaries of the site which is consistent with the Indicative Layout Plan.* *Vehicle access to the proposed basement is proposed to be via the northern and southern roads. Further, access to the above ground parking is proposed to be provided via the northern half road.* *In the interim and until such time as the neighbouring sites have been developed this access arrangement is problematic as these half roads are unlikely to be able to safely accommodate the vehicles movements expected to service the development during peak times.* *Additionally, the turning manoeuvres indicates on the architectural plans cannot be accommodated within driving into our property, and no consent has been given to temporary or permanent works within our site.*	As above.
Inadequacies of Documentation on Exhibition: *There are a number of inadequacies with the documentation that has been included in the exhibition package that make an informed assessment of the proposal difficult:* ▪ *The survey plan is illegible as only Sheet 1 has been included whereas Sheets 2-7 which have not been included presumably provide a greater scale and legible text.* ▪ *The architectural plans do not provide any measurements from natural ground level making precise measurement of the building height and impact on the adjoining properties difficult.* *There are significant inconsistencies between the masterplan and the architectural plans. Building locations are substantially changed, land uses*	As above.

have been relocated and parking areas, bus layby and access arrangements are different.	
An Undesirable Precedent: *The development of an intensive non-residential land use within a low-density residential area proposes amenity, traffic and visual impacts that undermine the precinct planning and desired future character of the Precinct which presents an undesirable precedent for the development of the area.*	As above.
Devaluation of Adjacent Residential Lands: *The significant overdevelopment of the site is inconsistent with the planning controls and the vision for the Riverstone Precinct. Current and future purchasers of residential land within the Precinct should expect that the low-density character of the area envisaged in the precinct planning and the planning controls should be protected and enhanced by any development proposal. Any deviation presents a devaluation of the vision and be expected to impact property values.*	As above.
Conclusion: *There are significant deficiencies with the development as proposed and the documentation exhibited not least of which is that owner's consent has not been obtained for the whole of the development.*	As above.

Table 30: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Castle Group c/- GG Dev Pty Ltd ATF GG Dev Unit Trust (Rashed Panabig – Development Director)	
Height of Buildings: *The site is zoned R2 Low Density Residential. The height limit for the site is 9 m which is intended to result in development of the site presenting a reduction in scale from the 12 m height limit in the planned local centre on Guntawong Road.* *The proposal seeks a maximum building height of more than double the existing height limit at 18.19 m. The justification for this significant breach relies on the commercial viability, operational requirements of the school and demand for infrastructure.* *The applications fails to provide adequate justification as to why the departure from the development standard is unreasonable or unnecessary or that the development presents better outcome for the site as a result of the non-compliance. The commercial viability of a project is not a valid planning consideration and the operational requirements of the school can be equally served by a development of lesser scale that occupies a greater land area.*	In an email dated 3 April 2020 issued to the NSW DPIE, all public submissions received are considered to have been addressed and ameliorated. Further consideration is not considered to be required in this respect.
Suitability of the Site: *The demand for educational infrastructure within the Precinct was examined during precinct-planning and appropriate sites were identified for schools. These sites have largely not been taken up for the development of schools despite the Department of Education identifying some of them as surplus to public education needs. This site was not identified for a school with the result being that the proposed development is inconsistent with the planning controls and expected future character. There exist more appropriate alternate locations for the provision of educational infrastructure within the Precinct.*	As above.
Building Massing: *There are no established FSR controls for the site as the site was never*	As above.

expected to be developed for non-residential development. Whilst the building massing is centred on the site to limit the impacts of overshadowing there remains a considerable disconnect between the proposed density and building massing to that which would be expected in a low-density residential environment.	
Access Arrangements: *The application proposes the construction of half roads to the northern, western and southern boundaries of the site which is consistent with the Indicative Layout Plan.* *Vehicle access to the proposed basement is proposed to be via the northern and southern roads. Further, access to the above ground parking is proposed to be provided via the northern half road.* *In the interim and until such time as the neighbouring sites have been developed this access arrangement is problematic as these half roads are unlikely to be able to safely accommodate the vehicles movements expected to service the development during peak times.* *Additionally, the turning manoeuvres indicates on the architectural plans cannot be accommodated within driving into our property, and no consent has been given to temporary or permanent works within our site.*	As above.
Inadequacies of Documentation on Exhibition: *There are a number of inadequacies with the documentation that has been included in the exhibition package that make an informed assessment of the proposal difficult:* ▪ *The survey plan is illegible as only Sheet 1 has been included whereas Sheets 2-7 which have not been included presumably provide a greater scale and legible text.* ▪ *The architectural plans do not provide any measurements from natural ground level making precise measurement of the building height and impact on the adjoining properties difficult.* *There are significant inconsistencies between the masterplan and the architectural plans. Building locations are substantially changed, land uses*	As above.

have been relocated and parking areas, bus layby and access arrangements are different.	
An Undesirable Precedent: *The development of an intensive non-residential land use within a low-density residential area proposes amenity, traffic and visual impacts that undermine the precinct planning and desired future character of the Precinct which presents an undesirable precedent for the development of the area.*	As above.
Devaluation of Adjacent Residential Lands: *The significant overdevelopment of the site is inconsistent with the planning controls and the vision for the Riverstone Precinct. Current and future purchasers of residential land within the Precinct should expect that the low-density character of the area envisaged in the precinct planning and the planning controls should be protected and enhanced by any development proposal. Any deviation presents a devaluation of the vision and be expected to impact property values.*	As above.
Conclusion: *There are significant deficiencies with the development as proposed and the documentation exhibited not least of which is that owner's consent has not been obtained for the whole of the development.*	As above.

Table 31: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Castle Group c/- 141 Tallawong Road, Rouse Hill – Riverstone Dev Pty Ltd (Rashed Panabig – Development Director)	
Owner's Consent: *The engineering drawings indicate that there is battering to the adjoining properties to the north, south and west. We have not granted consent for any works to our property (141 Tallawong Road) and therefore the application cannot be approved in its current form.*	In an email dated 3 April 2020 issued to the NSW DPIE, all public submissions received are considered to have been addressed and ameliorated. Further consideration is not considered to be required in this respect.
Height of Buildings: *The site is zoned R2 Low Density Residential. The height limit for the site is 9 m which is intended to result in development of the site presenting a reduction in scale from the 12 m height limit in the planned local centre on Guntawong Road.* *The proposal seeks a maximum building height of more than double the existing height limit at 18.19 m. The justification for this significant breach relies on the commercial viability, operational requirements of the school and demand for infrastructure.* *The applications fails to provide adequate justification as to why the departure from the development standard is unreasonable or unnecessary or that the development presents better outcome for the site as a result of the non-compliance. The commercial viability of a project is not a valid planning consideration and the operational requirements of the school can be equally served by a development of lesser scale that occupies a greater land area.*	As above.
Suitability of the Site: *The demand for educational infrastructure within the Precinct was examined during precinct-planning and appropriate sites were identified for schools. These sites have largely not been taken up for the development of schools despite the Department of Education identifying some of them as surplus to public education needs. This site was not identified for a school with the*	As above.

result being that the proposed development is inconsistent with the planning controls and expected future character. There exist more appropriate alternate locations for the provision of educational infrastructure within the Precinct.	
Building Massing: *There are no established FSR controls for the site as the site was never expected to be developed for non-residential development. Whilst the building massing is centred on the site to limit the impacts of overshadowing there remains a considerable disconnect between the proposed density and building massing to that which would be expected in a low-density residential environment.*	As above.
Floodprone Land: *The site is identified as flood prone land. It is understood that flood mitigation works will create a flood free site for development by diverting water to the proposed northern half road. Confirmation is sought that this water will not enter our property (141 Tallawong Road) as a result of the road construction not being completed as a component of this development.*	As above.
Access Arrangements: *The application proposes the construction of half roads to the northern, western and southern boundaries of the site which is consistent with the Indicative Layout Plan.* *Vehicle access to the proposed basement is proposed to be via the northern and southern roads. Further, access to the above ground parking is proposed to be provided via the northern half road.* *In the interim and until such time as the neighbouring sites have been developed this access arrangement is problematic as these half roads are unlikely to be able to safely accommodate the vehicles movements expected to service the development during peak times.* *Additionally, the turning manoeuvres indicates on the architectural plans cannot be accommodated within driving into our property, and no consent has been given to temporary or permanent works within our site.*	As above.

Inadequacies of Documentation on Exhibition: *There are a number of inadequacies with the documentation that has been included in the exhibition package that make an informed assessment of the proposal difficult:* ▪ *The survey plan is illegible as only Sheet 1 has been included whereas Sheets 2-7 which have not been included presumably provide a greater scale and legible text.* ▪ *The architectural plans do not provide any measurements from natural ground level making precise measurement of the building height and impact on the adjoining properties difficult.* *There are significant inconsistencies between the masterplan and the architectural plans. Building locations are substantially changed, land uses have been relocated and parking areas, bus layby and access arrangements are different.*	As above.
An Undesirable Precedent: *The development of an intensive non-residential land use within a low-density residential area proposes amenity, traffic and visual impacts that undermine the precinct planning and desired future character of the Precinct which presents an undesirable precedent for the development of the area.*	As above.
Devaluation of Adjacent Residential Lands: *The significant overdevelopment of the site is inconsistent with the planning controls and the vision for the Riverstone Precinct. Current and future purchasers of residential land within the Precinct should expect that the low-density character of the area envisaged in the precinct planning and the planning controls should be protected and enhanced by any development proposal. Any deviation presents a devaluation of the vision and be expected to impact property values.*	As above.
Conclusion: *There are significant deficiencies with the development as proposed and the documentation exhibited not least of which is that owner's consent has not been obtained for the whole of the development.*	As above.

Table 32: Response Matrix	
Relevant Entities Response to Submissions	**Formalised Response**
Rouse Hill Residents Action Group Incorporated (INC 1700899) (Tony Mackman – President)	
Height of Buildings: *The site is zoned R2 Low Density Residential. The height limit for the site is 9 m which is intended to result in development of the site presenting a reduction in scale from the 12 m height limit in the planned local centre on Guntawong Road.* *The proposal seeks a maximum building height of more than double the existing height limit at 18.19 m. The justification for this significant breach relies on the commercial viability, operational requirements of the school and demand for infrastructure.* *The applications fails to provide adequate justification as to why the departure from the development standard is unreasonable or unnecessary or that the development presents better outcome for the site as a result of the non-compliance. The commercial viability of a project is not a valid planning consideration and the operational requirements of the school can be equally served by a development of lesser scale that occupies a greater land area.*	In an email dated 3 April 2020 issued to the NSW DPIE, all public submissions received are considered to have been addressed and ameliorated. Further consideration is not considered to be required in this respect.
Suitability of the Site: *The demand for educational infrastructure within the Precinct was examined during precinct-planning and appropriate sites were identified for schools. These sites have largely not been taken up for the development of schools despite the Department of Education identifying some of them as surplus to public education needs. This site was not identified for a school with the result being that the proposed development is inconsistent with the planning controls and expected future character. There exist more appropriate alternate locations for the provision of educational infrastructure within the Precinct.*	As above.
Building Massing:	As above.

There are no established FSR controls for the site as the site was never expected to be developed for non-residential development. Whilst the building massing is centred on the site to limit the impacts of overshadowing there remains a considerable disconnect between the proposed density and building massing to that which would be expected in a low-density residential environment.	
Floodprone Land: *The site is identified as flood prone land. It is understood that flood mitigation works will create a flood free site for development by diverting water to the proposed northern half road. Confirmation is sought that this water will not enter our property (141 Tallawong Road) as a result of the road construction not being completed as a component of this development.*	As above.
Access Arrangements: *The application proposes the construction of half roads to the northern, western and southern boundaries of the site which is consistent with the Indicative Layout Plan.* *Vehicle access to the proposed basement is proposed to be via the northern and southern roads. Further, access to the above ground parking is proposed to be provided via the northern half road.* *In the interim and until such time as the neighbouring sites have been developed this access arrangement is problematic as these half roads are unlikely to be able to safely accommodate the vehicles movements expected to service the development during peak times.* *Additionally, the turning manoeuvres indicates on the architectural plans cannot be accommodated within driving into our property, and no consent has been given to temporary or permanent works within our site.*	As above.
Inadequacies of Documentation on Exhibition: *There are a number of inadequacies with the documentation that has been included in the exhibition package that make an informed assessment of the proposal difficult:* ▪ *The survey plan is illegible as only Sheet 1 has been included whereas*	As above.

Sheets 2-7 which have not been included presumably provide a greater scale and legible text. ▪ *The architectural plans do not provide any measurements from natural ground level making precise measurement of the building height and impact on the adjoining properties difficult.* *There are significant inconsistencies between the masterplan and the architectural plans. Building locations are substantially changed, land uses have been relocated and parking areas, bus layby and access arrangements are different.*	
An Undesirable Precedent: *The development of an intensive non-residential land use within a low-density residential area proposes amenity, traffic and visual impacts that undermine the precinct planning and desired future character of the Precinct which presents an undesirable precedent for the development of the area.*	As above.
Devaluation of Adjacent Residential Lands: *The significant overdevelopment of the site is inconsistent with the planning controls and the vision for the Riverstone Precinct. Current and future purchasers of residential land within the Precinct should expect that the low-density character of the area envisaged in the precinct planning and the planning controls should be protected and enhanced by any development proposal. Any deviation presents a devaluation of the vision and be expected to impact property values.*	As above.
Conclusion: *There are significant deficiencies with the development as proposed and the documentation exhibited not least of which is that owner's consent has not been obtained for the whole of the development.*	As above.