

10 December 2019

The Director
Social and Infrastructure Assessments
NSW Planning, Industry & Environment
320 Pitt Street,
Sydney, NSW, 2000

Attention: Karen Harragon

Dear Karen,

Re: New Catherine Field Primary School, O'Keefe Drive, Oran Park (SSD-9477)

I refer to your letter dated 11 November 2019 providing notice of the exhibition of the proposal for a new Primary School on O'Keefe Drive in Oran Park.

Harrington Estates are the development managers for Hixson Pty Ltd and our land adjoins the proposed school on the southern side of the school. We were the precinct proponents for the rezoning of the Catherine Fields Part Precinct where the school is located, and we have been undertaking development in the local area for over 25 years.

We are supportive of a new primary school in the local area and congratulate the Department of Education for accelerating the delivery of this important infrastructure that is required to support the growing community.

However, there are some aspects of the design that are concerning for the incoming residents that will neighbor the school. To date, we have twice met with the Department of Education representatives to discuss the planning and design of the school. Unfortunately, the exhibited documents do not address the concerns that we have previously raised. The documents also provide information that has not previously been shared with us..

Our primary concerns are as follows:

1. Height and Location of Buildings.
2. Verge Widths and Landscaping Along the Southern Boundary

To assist with understanding the context of our comments, attached is a draft layout showing a potential subdivision pattern for the land immediately to the south of the school. Whilst we are currently proposing mostly rear loaded houses to minimize traffic conflicts with the school, the layout demonstrates that there is likely to be in excess of 20 homes directly facing the southern side of the school.

With regard to the height and location of the school buildings, it would seem that in order to maximize the playground areas of the school, the proposed buildings have been pushed as far south and as high as possible. This design has the maximum impact on our future residents. These impacts include overshadowing and visual impacts, which have not been considered anywhere in the impact assessment. Despite our previous meetings with the Department of Education, the EIS was the first time we have seen the shadow diagrams.

We therefore seek for the building design to be amended to be relocated to the north to remove the shadowing impacts and reduce the scale and bulk fronting our property. Alternatively, or in conjunction with the relocation, a reduction in building height should be considered.

We also have concerns about the street and landscaping design along our common road. These issues have been raised previously. We understood that we had agreed certain outcomes with the Department but these have not been reflected in the design. These outcomes included:

- Widening the verge to accommodate a proposed cycleway
- Construction of the diplomat fencing behind the property line
- Articulation of the fence line and inclusion of architectural features
- Placement of a hedge and landscaping in front of the diplomat fencing
- Street landscaping and tree planting to a high standard in keeping with the surrounding areas.

The naming of the school, whilst a matter for the Department of Education, may create some confusion. Currently the school is identified as Catherine Field Primary School, located in the suburb of Oran Park and adjacent to Catherine Park Estate. We suggest that further thought be given to this name. We will be creating a neighborhood village which will likely be identified as Catherine Park neighborhood village very close to the school.

We also note that section 3.11 identifies the potential joint use of the school hall by the community. We encourage this discussion and also suggest that it may be appropriate to open the grounds for community use outside of school hours.

In addition to the draft layout attached, the following items are also attached to this submission for your consideration. These are:

- A memorandum from our planner identifying non-compliances with the planning instruments that are of concern to us
- Comments on the site plan from our engineers
- Marked up pages 30, 41, 53, 66, 67 and 68 from the EIS showing areas of concern. We note that the visual images provided on page 68 or within the visual impact analysis do not consider the views of future residents
- Marked up page 5 from the access report demonstrating that the design does not comply with the existing design

We trust this submission is helpful and look forward to working with the Department of Education to amend the design to best accommodate the needs of future school users and future residents. Should you have any queries, please do not hesitate to contact the undersigned.

Yours sincerely,



Trevor Jensen
Development Director



CONCEPT SUBDIVISION PLAN

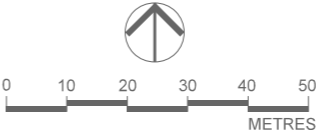
CATHERINE PARK VILLAGE

NOTES

Base data supplied by NSW LPI / Nearmap
Projection MGA50 Zone 56

Areas and dimensions shown are subject to final survey calculations.
All carriageways are shown for illustrative purposes only and are subject to detailed engineering design.

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CLIENT : Hixson Pty Ltd
SCALE : A3@1:1,250
DATE : 2/12/2019
PLAN No : 001.CP.035
REVISION : 02

MEMORANDUM



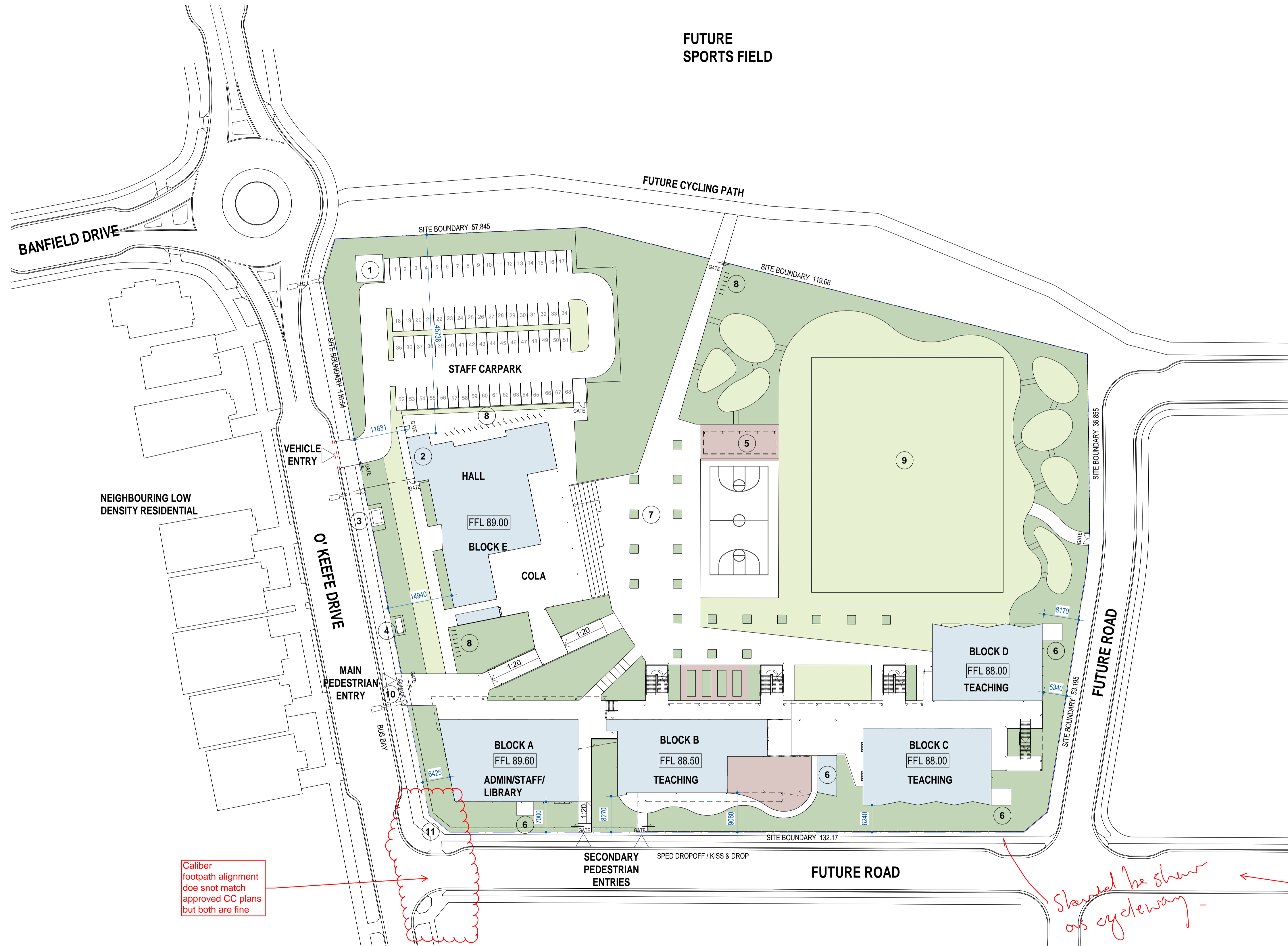
To: Trevor Jensen
From: Guy Evans
Subject: Review of
Date: 9 December 2019

No.	Issue	Description	Comments
1	SEPP Principal Development Standards	<ol style="list-style-type: none"> 1. Zoned 'R2 Low Density residential' and "educational establishments" use as permissible with consent. 2. Maximum building height is '9m' and proposed building height is 14.8 metres (3 storeys), and therefore, there is a non-compliance. 3. Non-compliance of building height is justified by: <ul style="list-style-type: none"> • Resultant overshadowing for greater than 3 hours on June 21 which is consistent with the requirements of the Camden Development Control Plan 2019. • The volume of massing is broken down in a series of small volumes to ensure grade access points into to the school. • The proposed development respects the low density residential to the west. • The modern architectural design will provide a high-quality built form outcome. • The proposed development will not result in overshadowing or privacy issues. 	<p>The proposal does not comply with the building height standards in the SEPP.</p> <p>The non-compliance is 64% to the SEPP standard.</p> <p>The justification that the proposal "will not result in overshadowing or privacy issues" (p52 EIS) is not accurate.</p> <p>The justification for the non-compliance appears to be inadequate to support such a significant variation to the height limit, given there is overshadowing impacts on future residential land to the south.</p> <p>There is no justification why the building can not be positioned so no overshadowing occurs on the residential land to the south.</p>
2	Camden Growth Centre Precincts Development Control Plan	<ol style="list-style-type: none"> 1. The proposal does not state any non-compliances with DCP requirements. 2. In assessing a DA proposal for an education establishment, the DCP requires that the following must be considered: <ul style="list-style-type: none"> • the privacy and amenity of adjoining developments; • the need and adequacy for provision of buffer zones to surrounding residential development; • urban design; • location; • the size of the land where the development is proposed; 	<p>It is considered the amenity of the overshadowing impacts to residential land to the south has not been properly, particularly given the significant variation (64%) to the maximum height limit.</p> <p>There has not been proper consideration/assessment of urban design for development to the south.</p> <p>There has been no proper consideration/assessment on impacts on residential character.</p>

No.	Issue	Description	Comments
		<ul style="list-style-type: none"> • traffic generation and the impacts of traffic on the road network and the amenity of nearby residents; • the availability of parking; • the scale of buildings and their capacity; and • hours of operation and noise impacts. 3.	
3	State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017	1. Seven 'Design Quality Principles' in the SEPP have been considered including amenity.	Consideration of amenity has not included consideration of future surrounding residential uses to the south.
4	Urban Design	1. The proposal includes a 3 storey buildings with a height up to 14.8 metres and along the southern boundary. The southern elevation includes windows and opening to the south, with a minimum building setback of 6.24m. The classrooms and other education internal spaces in the buildings along the southern boundary are accessed from the northern side of these buildings.	The visual impact and proposed additional height allowance, which results in overshadowing and visual impacts, are urban design matters not fully considered from the south of the site.
	Overshadowing	1. The proposed buildings located along the southern boundary, opposite the residential development subject site, create overshadowing impacts. 2. No mitigation measures are provided for impacts from building height in EIS.	<p>Given the proposed non-compliance of building height, it is considered achieving 3hrs of sunlight between 9am and 3pm on the 21st of June is not adequate justification and there should be no impact.</p> <p>It has not been demonstrated why the buildings could be sited to avoid any overshadowing on residential land to the south.</p>
2	Traffic	1. Architectural plans and the Traffic Impact Assessment have identified the future road located between the school and the subject site as the location for the school's drop off/pick up zone. This southern road (adjoining Catherine Park) will be heavily trafficked at morning and afternoon peak times. 2. The intersection of O'Keefe Road and the future road will be of concern during	<p>The proposal appears to meet require traffic and intersection performance requirements.</p> <p>Given the pedestrian access to the southern road, it is understood it will be subject to a school speed zones.</p>

No.	Issue	Description	Comments
		morning peak times as it achieves a Level of Service rating of D.	
3	Noise	<ol style="list-style-type: none"> 1. An acoustic assessment for the proposed school utilised loggers on residential development sites to the east and the west of the school site. 2. A temporary sound barrier wall for construction noise is to be erected on the O'Keefe Drive boundary of the construction site only. 	<p>It is expected the position of the buildings along the southern boundary will provide noise attenuation for the residential land to the south.</p> <p>The acoustic report did not utilise the Camden Environmental Noise Policy 2018 in its assessment for impacts to neighbouring developments, but did consider the NSW EPA Noise Policy for Industry 2017.</p> <p>Depending on timing, a noise barrier to residential uses to the south may be necessary.</p>

2/09/2019 6:00:10 PM



SITE SERVICES LEGEND	
Number	Description
1	WASTE PAD
2	MAIN SWITCHBOARD ROOM
3	SUBSTATION
4	PUMPS
5	SHADE STRUCTURE
6	PLANT WITH SCREEN
7	ASSEMBLY
8	BICYCLE PARKING
9	SPORTS FIELD
10	MAIN SCHOOL SIGN
11	FUTURE ELECTRIC SCHOOL SIGN

Caliber
footpath alignment
does not match
approved CC plans
but both are fine

Should be shown
as cycleway -

Calibre
Approved Stage 6
plans only have
1.2m wide
footpath.

AMENDMENTS				LEGEND
REV	BY	DATE	DESCRIPTION	
A	VL	13.08.19	PRELIMINARY ISSUE FOR REVIEW	
	VL	02.09.19	ISSUE FOR SSDA TOA	

STRUC. CIVIL
NORTHROP ENGINEERS
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MECH. ELEC.
STEINER VARMING
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HYD.
WOOLACOTTS
(02) 8241 9900
FIRE
MCD FIRE ENGINEERING
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PERUMAL PEDAVOLI ARCHITECTS
T: 02 9291 0000
WEB: www.pp-a.com.au
Nominated Architect
Vince Pedavoli NSW reg No 5045
LANDSCAPING
TAYLOR BRAMMER LANDS. ARCH.
(02) 9387 8855

PERUMAL
PEDAVOLI
ARCHITECTS

CATHERINE FIELD PS
NEW HIGH QUALITY CLASSROOMS
DRAWING NAME
OVERALL SITE PLAN

PROJECT NORTH

0 5000 10000 15000 20000 25000 30000
SCALE 1:500 @ A1

DRAWN	CHECKED	VERIFIED	DATE
Author	Checker	Approver	2 September 2019

DRAWING NUMBER

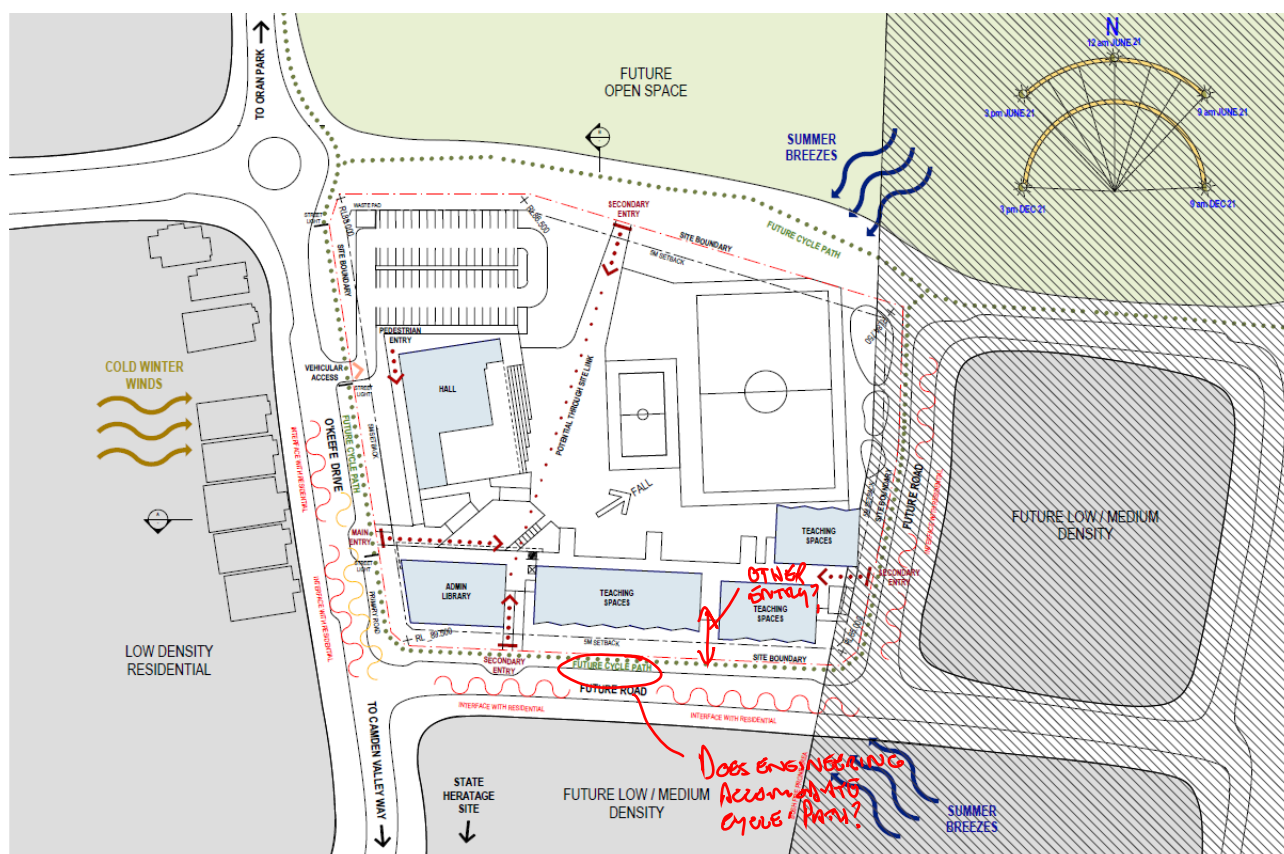
PROJECT CODE SCH. REF. DISC. TYPE SERIES#

NHQ2 - CF - AR - SSDA - 00_002

REVISION

A

DRAFT ISSUE

Figure 7: Site analysis

Source: Perumal Pedavoli Architects

3.2 Building Design Philosophy

A Design Analysis Report has been prepared by Perumal Pedavoli Architects and is attached in Appendix E. This identifies the education and design principles that form the foundation of the design.

- The development has clear and well-defined entries, which clearly identify school and community access points. This will maximise separation between vehicles and pedestrians
- A variety of open space has been incorporated into the design to link both school and community use. Aboriginal and non-aboriginal heritage history has been considered throughout the design
- Step massing has been incorporated to respect the natural slop and ensure grade entries, which will support the surrounding residential development.

3.3 Built Form and Urban Design

The proposed school buildings are situated along the corner of O'Keefe Drive and the future road to the south creating a marker for the site and signals the main entry point. The proposed development is for new school buildings, open spaces, and site and parking facilities.

New School Buildings

Five main school building multi-purpose school buildings are proposed as part of the development.

- Block A: two (2) storey building on the site that have been distributed to collect the Administration, Staff and Library in one building located at the main focal corner of the site. This being the corner of O'Keefe Drive and the future road to the south

- The site has no formal drainage on site. All current overland flows travel towards the north eastern side of the site into a stormwater drainage pipe which drains into a bio-retention basin and discharges into South Creek, to the north of the site.
- Learning spaces such as homebases are to be served by a mixed mode ventilation strategy utilising natural ventilation for space cooling when possible. Administration and staff areas are to be naturally ventilated and heated only.
- The extent of fire services provided are wet services only and include fire hydrants, fire hose reels and portable fire extinguishers. Buildings will also be provided with a smoke detection and alarm system. Portable fire extinguishers will be installed in accordance with the requirements of the Building Code of Australia AS 2444. Generally, places of potential hazard will be provided with extinguishers, such as electrical switch room, mechanical and plant rooms.

3.9 Stormwater Management

A stormwater design report was developed by Northrop, see Appendix G. This identifies the site is not situated on flood prone land and therefore is not subject to any flooding.

The proposed school will connect to the legal point of discharge, to the on-site stormwater detention and bio-retention basin downstream of the new subdivision known as the Oran Park South Development Tranche 33. This interim basin will be constructed prior to this proposed school development. In result, additional OSD and water quality measures are not proposed as part of the proposed school. All stormwater works will be designed and installed in accordance with *Managing Urban Stormwater: Soils and Construction* "The Blue Book" 2004 (4th edition).

3.10 Staging and Construction Management

3.10.1 Construction Staging

The proposed development is to be constructed using a combination of offsite and onsite construction techniques to deliver a high-quality state of the art school while minimising construction impacts associated with onsite works as much as possible. As outlined in the Construction Traffic Management Plan (CTMP) prepared by the ASON Group at Appendix L, the construction will be undertaken in the following stages:

Stage 1 - General earthworks and benching and the construction of temporary access roads. This will also form the final access way for the proposed development via O'Keefe Drive.

Stage 2 - The general construction and landscape works.

It is expected that the conditions of consent for the proposed development issued by the Planning Secretary, that allow suitable provisions for the proposed development and update strategies, plans or programs to suit construction requirements, that would be consistent with the Planning Secretary's requirements.

3.10.2 Construction Hours

All works will be in accordance with standard construction working hours and would be as follows:

- Monday to Friday: 7am-6pm
- Saturday: 8am-1pm.

No construction works will be undertaken on Sundays and Public Holidays.

Works outside of the hours above may be required from time to time, including delivery of machinery and materials, which would be minimised as much as possible.

Clibre statement is consistent with stage 6 design, school drains towards GDC basin not Hixson. We (Hixson Caliber team) have not checked the capacity of the basin in as it does not affect Hixson design

Brown?

Figure 19: Shadow at 21 June 9 AM

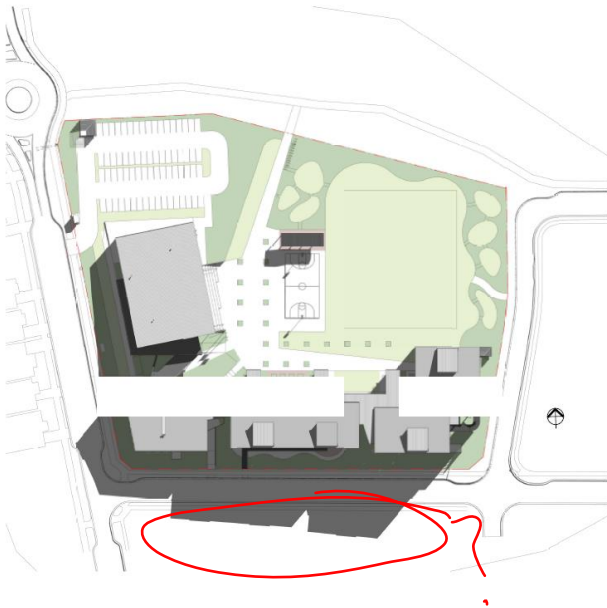


Figure 20: Shadow at 21 June 12 PM

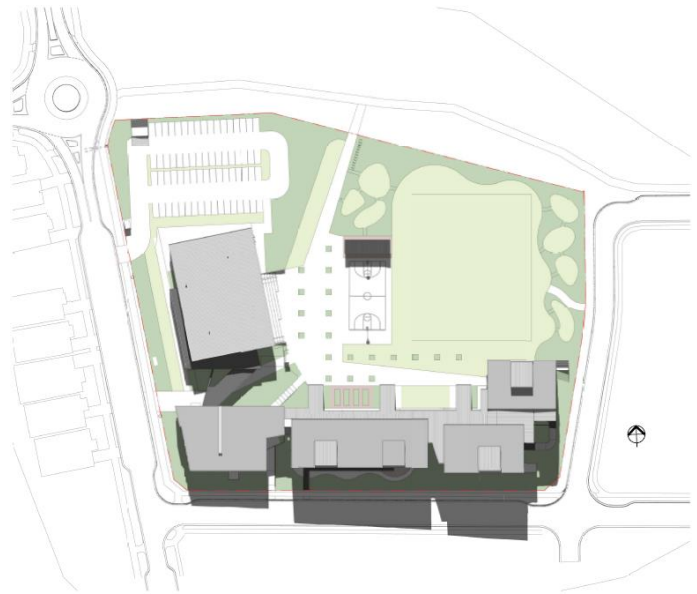
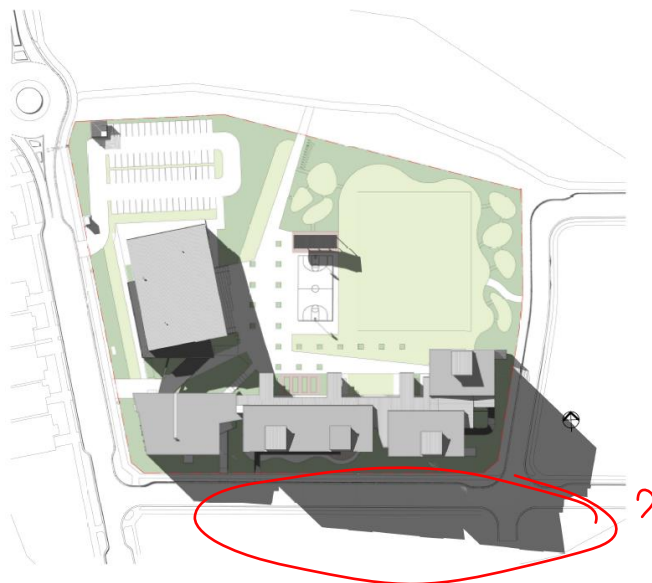


Figure 21: Shadow at 21 June 3 PM

NOTE THAT
BUILDING HEIGHTS
DON'T COMPLY.



Source: Perumal Pedavoli Architects

The proposed development provides the necessary education infrastructure identified under the indicative layout plan for the Catherine Fields (Part) Precinct to service the existing and future community. The proposed development will support the growth and liveability of the precinct as it makes its significant transition into a new neighbourhood that integrates low (to some medium density) housing, open space, conservation areas and urban infrastructure. The proposed development will form a significant part of essential community/education infrastructure for public benefit, providing high quality facilities for primary school aged children, their families and carers.

5.3 State Environmental Planning Policy (State and Regional Development) 2011

State Environmental Planning Policy (State and Regional Development) 2011 identifies development types that are of state significance, or infrastructure types that are of state or critical significance. The proposed

6 KEY ASSESSMENT ISSUES

The following key issues pursuant to SEARs have been assessed, with impacts recognised and mitigation measures proposed where necessary.

- Built Form and Urban Design
- Environmental Amenity
- Noise and Vibration
- Transport and Accessibility
- Social Impacts
- Heritage
- Contamination
- Flooding
- Bushfire
- Biodiversity
- Sediment, Erosion and Dust Control
- Geotechnical and Salinity
- Waste
- Cumulative Impacts.

There is huge bulk & scale directly opposite our proposed homes. Roger/Guy carefully consider setbacks, visual impact, overshadowing, and landscape interference.

6.1 Built Form and Urban Design

The proposed development's layout includes breaks between volumes to provide visual articulation as well as increased external wall area allowing for an increase in daylight and ventilation opportunities. The proposed development utilises the building form and landscape to provide a positive streetscape setting. The massing of the form is broken down into a series of smaller volumes that assist the fall of the land with the objective of providing on grade access points into the school.

The material and finishes complement the landscape and are based on a neutral palette with selected highlight accent materials and colours, reflecting a modern school design.

The landscape design acknowledges the history and the local site context as an integral part of the site planning. It provides spaces that encourage interaction between learning areas, equal access to all areas of the site, and a strong sense as a communal hub. The design provides a modern free play area, balance logs, adventure play, nature play and play spaces for younger or special needs children. It also incorporates shade through trees and sails, and alongside the built form, provides a positive streetscape setting.

6.2 Environmental Amenity

6.2.1 Solar Access and Overshadowing

Built form has the potential for overshadowing on neighbouring properties and future neighbouring development. The proposed development has carefully considered the massing of the built form to mitigate this potential impact. The proposed development has considered solar access.

Shadow diagrams for 9am, 12pm and 3pm during winter solstice have been prepared by Perumal Pedavoli, see Appendix B.

- Any future development south east of the proposed development will not be affected by overshadowing and will have minor overshadowing impacts during 3pm. However, there is no residential development in this area
- Any future development to the south will have minor overshadowing impacts during 12pm. Some overshadowing impacts may occur during 9am and 3pm, however there is no residential development in this area - clearly identified for residential to be built.
- Residential development west of the site will not be affected by the proposed development, therefore will receive continual access to sunlight.

Overall, there are no significant overshadowing impacts caused to adjoining residential sites.

Don't agree.

6.2.2 Privacy

Built form has the potential for impacting privacy on neighbouring properties and future neighbouring development. The proposal has carefully considered this through the orientation, appropriate setbacks and landscape designed.

The proposed development will provide no unreasonable privacy impacts because:

- The school is bounded by roads on three boundaries (west, south and east) and a future sporting field to the north. The proposed school buildings are to be well setback from the site boundaries. The buildings will be setback a minimum of 5.34 metres from the boundary. This will ensure that privacy levels are maintained between school buildings and residential properties on the opposite sides of O'Keefe Drive and the two future roads at the site's southern and eastern boundaries
- Planting will be provided between the school buildings and the site boundary, enhancing privacy between the school and neighbouring residential properties
- The school's communal hall is oriented toward the centre of the school ensuring visual privacy to neighbouring residential properties on the opposite side of O'Keefe Drive
- Outdoor recreational areas are positioned facing towards the future sports field to the north of the site. The school's buildings provide a buffer between the outdoor recreation and neighbouring properties opposite O'Keefe Drive and the future road to the south of the school. A wide buffer of tree planting will provide visual privacy to properties to the east of the school.

Need substantial landscaping.

6.2.3 Visual Amenity

A Visual Impact Assessment has been undertaken by RPS detailing the potential impacts on the surrounding built environment and adjoining heritage item, see Appendix BB. The proposed development includes a combination of two to three storey buildings. The highest point of the proposed school is on Block B and C which are oriented southwards. The maximum height is worked into the natural ground line and the proposed new ground line, working with existing topography to maximise learning facilities while minimising visual impacts.

The setbacks proposed along all boundary lines, which then are fronted by local roads, ensure that separation from nearby residential receivers is maximised. New plantings along the site boundary and material selection for building construction will ensure that the proposed school provides positive visual amenity to the existing context, which is dominated by low density dwellings, greenfield development and infrastructure construction.

Building articulation, colour selection and modern architectural design is considered well-integrated with the existing landscape. The proposed development's design has been developed and refined in consultation

with GANSW and Council, who provided valuable feedback to ensure that the proposed school delivers positive visual amenity and design qualities.

Figure 22: View from O'Keefe Drive



Figure 23: View of Entrance from O'Keefe Drive



6.3 Noise and Vibration

It is anticipated the construction and operation of the proposed development has the potential to generate noise and vibration. The proposed development has carefully considered this through an Acoustic Report

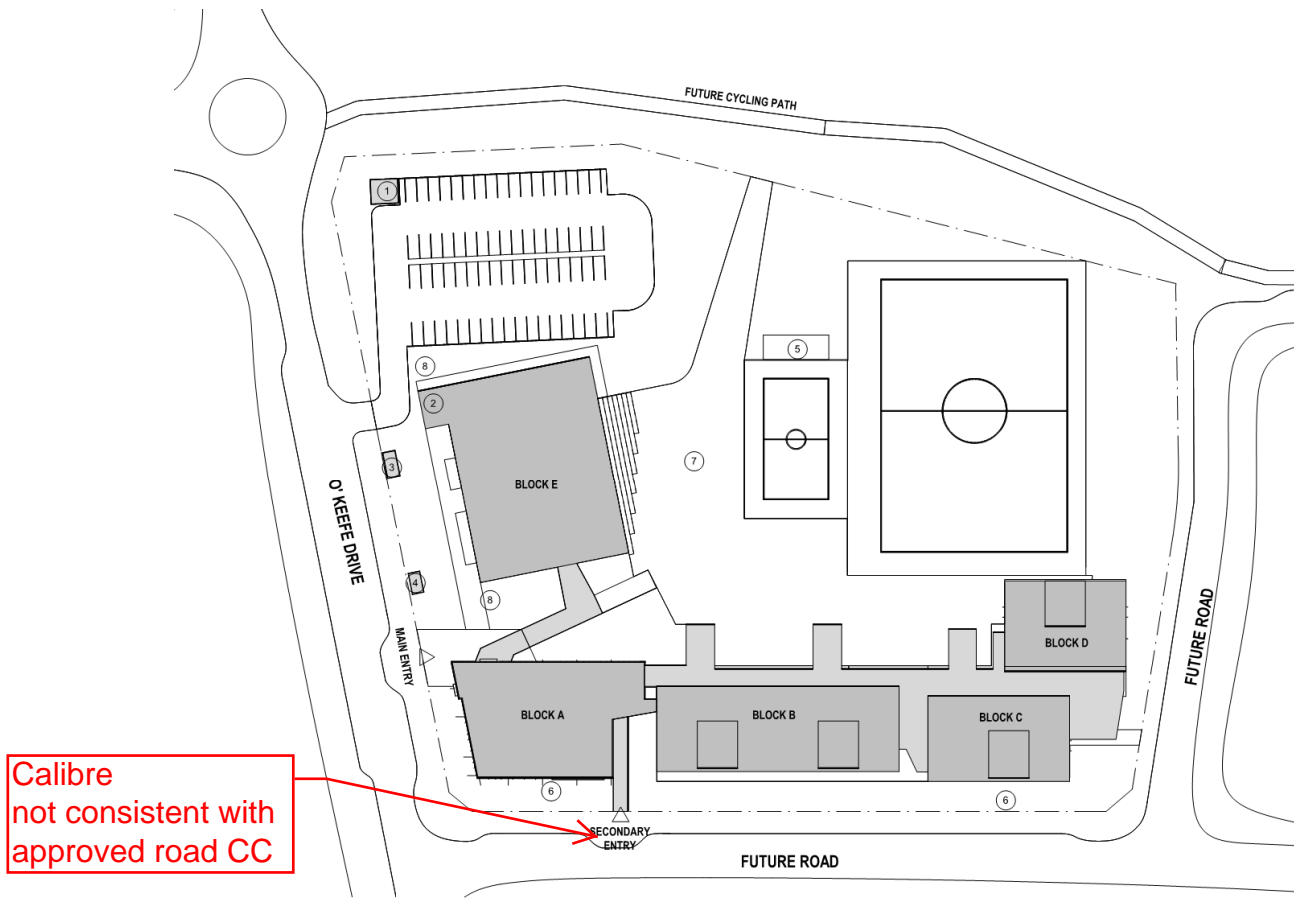


Figure 1 | Site Plan

2.3 Use and Class of Building

Pursuant to the BCA, the primary classification* for the proposed buildings pursuant to the BCA is a Class 5 and 9b.

Level	Proposed Use	Building Classification
Level 00	Office, Assembly Building	5, 9b
Level 01	Office, Assembly Building	5, 9b
Level 02	Office, Assembly Building	5, 9b

*to be confirmed by the Building Certifier

3. General building access requirements

Access for people with disabilities is required through the principal pedestrian entrance of all buildings and throughout the buildings in accordance with Table D3.1. The following table outlines the general building access requirements for this project:

Class of building	Access requirements
Class 5	To and within all areas normally used by the occupants
Class 9b	
<i>Schools</i>	To and within all areas normally used by the occupants