

LAN900096

18 June 2020

Attention: Lenox Tweneboa
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir,

RE: SSD9872 ST MATTHEWS CATHOLIC COLLEGE – SECONDARY CAMPUS

Thank you for providing Mid-Western Regional Council (Council) with the opportunity to provide input into the proposed development of the St Matthews Catholic College – Secondary Campus. Council has reviewed the Environmental Impact Statement (EIS) and would like to provide the following feedback for consideration.

Traffic & Access

The EIS outlines the proposed traffic and access arrangements for the development. It also identifies various upgrades to local transport infrastructure which will be required to facilitate the development.

Council requests that the specific requirements for the proposed intersection, road and access works in the immediate vicinity of the development site are detailed in construction drawings and submitted to Council for approval. This includes the following works:

- Upgrade to the section of Broadhead Road immediately adjacent to the site to provide for pavement widening to form 2 x 3.7 metre wide traffic lanes, kerb and channel and footpath/cycleway along the full frontage of the school boundary;
- Construct a pedestrian refuge near the school boundary and opposite House No. 44 Broadhead Road to accommodate crossing of Broadhead Road by pedestrians;
- Upgrade to Bruce Road between Broadhead Road and Spring Flat Road, with sealing to 7.2 metre wide on a 9 metre pavement width. This section of road will be used primarily for construction traffic, and is also considered to be an additional access and egress route when the school becomes operational. The upgrade to Bruce Road should be undertaken prior to the issue of any Construction Certificate;
- The transition from 9 metre pavement width to 6 metre pavement width on Bruce Road after the bus bay should be increased to 7.2 metres, so that that the width is consistent with the rest of Bruce Road to Spring Flat road upgrade;
- Upgrade to 3 x intersections (Broadhead Road and Lions Drive intersection, Broadhead Road and Bruce Road intersection, Lions Drive and Robertson Road intersection) to

- provide for acceptable bus turning swept paths and pavement treatment, which may include AC surfacing and splitter islands for pedestrian refuges;
- Kerb and gutter is to be extended along the full frontage of Bruce Road to alleviate any gaps in drainage infrastructure.

Parking

The EIS states that there are 75 car parking spaces proposed for use by staff, senior students and visitors. It also indicates 3 bus bays and 12 marked student drop-off/pick-up spaces (kiss and ride zone) will be provided and there is sufficient capacity on site to accommodate overflow parking for events and the like.

The proposed car parking for the development has been calculated based on a maximum of 59 staff members. The EIS states that in addition to the 59 teaching staff, there will be 22 support staff (ie. a total of 81 FTE staff members). Council is concerned that if there is a shortage of car parking onsite, this will encourage parking on the street. Council requests that the required car parking is recalculated based on staff numbers of 81 so that adequate onsite parking is available.

All car parking areas must be constructed with an all-weather sealed surface and dimensioned to comply with the requirements of AS 2890.1 Parking facilities: Off-street car parking. Council requests that the development be conditioned to prohibit on-street car parking.

Drainage and Flooding

Council requests that a detailed Stormwater Drainage Design and Management Plan be prepared for the development. This should include appropriate detention devices and measures to limit runoff from all developed surfaces to existing undeveloped levels.

Alternatively, it may be appropriate and necessary for the creation of a drainage easement along the defined water course.

Water and Sewer Services

The water main servicing the development site will require upgrading to 200mm ID, with the size of the service to be determined based upon modelling for development specific pressure and flow requirements.

It is requested that a ring main be constructed to facilitate suitable water pressure and volume to service the development. This will require installation of a new 200mm ID water main along the frontage of the development on Broadhead Road, to connect with the existing 200mm ID main along Lions Drive to the north and to the existing 250mm ID main on Bruce Road to the South.

Council also requests that backflow prevention be required on the master meter, as well as sub-meters for protection between water supply zones.

Sewer servicing will require connection to the existing 225mm ID sewer main running through the development site. This sewer main has sufficient size and capacity to service the proposed development. Council requires that the connection to the sewer network be made at the furthest access chamber downstream within the envelope of the development.

A Liquid Trade Waste application will be required for the development given proposed onsite activities, including teaching laboratories, cooking and commercial kitchen uses.

Contributions

Section 64 Contributions

Pursuant to Council's 2008 Development Servicing Plans for Water and Sewer, the applicable contributions are calculated at 0.040 ET per student (Day School).

Based on 680 students, the developer contributions applicable to the proposed development are:

Water Headworks	$(\$8,548 \times 0.04) \times 680$	= \$232,505.60
Sewer Headworks	$(\$3,903 \times 0.04) \times 680$	= <u>\$106,161.60</u>
Total Headworks		\$338,667.20

Chapter 5.5 of the DSP indicates that Council may waive Developer Contributions ordinarily attributable to development, where the proponent demonstrates to Council's satisfaction that it is a non-profit and charitable organisation, which by virtue of carrying out such development, is considered by Council to be making a significant and positive contribution to the community.

The applicant has requested an exemption from the payment of Section 64 Water and Sewer Contributions given it is registered with the Australian Charities and Not-for-profit Commission as a charity organisation, the social infrastructure nature of the project and the non-monetary and works-in kind contributions that could be made or realised.

The purpose of the DSP is to allow Council to collect an equitable monetary contribution for the provision of water and sewer infrastructure to meet the loads generated by new development and to maintain required levels of service.

The headworks costs associated with delivering water and sewer infrastructure are material, and if Council does not collect the relevant contributions, the costs are then borne by Council and other developers. It is Council's position that this places an unreasonable and unequitable burden on the Mid-Western Regional rate payers, to bear the costs on the developer's behalf especially given the large increase in demand generated by the proposed development. To that end, Council is unable to grant a waiver and requires the applicant to pay the relevant Section 64 Contributions.

Section 7.12 Contributions

Pursuant to Council's Developer Contributions Plan 2019, Section 2.6 *Educational Establishments* are subject to 7.12 Contributions, calculated as 1% of the total capital investment value. This requires a contribution of \$362,740 from the applicant.

There is no mechanism in the Plan to waive 7.12 Contributions. Council may consider the dedication of land, or undertaking works in kind to offset a monetary contribution in part or full. As the applicant has not put forward a proposal for the dedication of land or provisioning of works in kind, the Section 7.12 Contribution is applicable.

The payment of contributions is required prior to the issue of any Construction Certificate.

Construction

The EIS has provided limited details in relation to the management of the construction workforce for the proposed development.

Prior to the issue of a Construction Certificate, Council requests that the applicant submit a Workforce Construction Statement detailing how the construction workforce will be managed to minimise local impacts during the 17 month construction period. These impacts include management of onsite parking, vehicle movements and accommodation arrangements. This statement should address both locally and externally sourced contractors at peak workforce numbers.

To avoid construction traffic congestion and parking issues in the public roadway, Council requests that all construction traffic park onsite. The Construction Management Plan should provide a detailed plan or map showing proposed construction access routes and onsite parking areas.

Signage

The EIS proposes installation of two digital signs to keep the school community updated. Council requests that the proposed digital signage is not turned on outside the hours of 6am and 9pm – 7 days per week, and the output lumen limited so that it complies with *Australian Standard AS 4282:1997 – Control of the Obtrusive Effects of Outdoor Lighting*.

After Hours and Weekend Use

The EIS indicates that the multipurpose hall may be utilised after hours and on weekends for a range of activities including dance lessons and competitions, dinner functions, musical performances, sports activities, small conferences and events. The EIS notes that outdoor spaces would only be used during core school operating hours.

It is important that any after hours and weekend uses do not cause amenity impacts for neighbouring residents. It is recommended that relevant conditions be included to appropriately manage these impacts, in particular noise, traffic and use of outdoor spaces.

Should you have any further enquiries in relation to this matter, please contact Council on (02) 6378 2850.

Yours faithfully

BRAD CAM
GENERAL MANAGER