

## Concerns raised in objections

As a result of the public exhibition of this Development Application (DA), we received 9 individual submissions.

The submissions raised concern with regard to density, height of buildings, number of storeys, crowding, monoculture of higher density dwellings, setbacks, garbage design, building design, changes to the road layout in the Indicative Layout Plan, apartment mix and removal of native vegetation.

Concern was also raised regarding the capacity of local amenities, risk of the Sydney property price bubble impacting on the commercial viability of developments, significant change to the character of the local area, impact with regard to geotechnical, contamination, tree removal and aboriginal heritage matters.

In response, the Applicant submitted amended plans which included reducing the number of storeys from 5 storeys to part 3 / part 4 for Building A; and increasing the building separation and outlook to the adjoining properties to the east of Building A.

The amended plans were re-notified and 6 further individual submissions, 1 petition with 7 signatures and 6 pro forma letter submissions were received in opposition to the proposed development which generally maintained the above concerns.

A summary of these concerns and the Applicant's response is provided below, followed by our consideration of the issues raised.

## Location of objectors and petitioners



Key:

The site the subject of this application is highlighted in purple.

● = Location of the objector/petitioner property.

Notes:

- 7 objectors are not shown as they are confidential and outside the scope of this map.

- In some cases, multiple submissions signed by different individuals were received from the same property.

## Concerns raised in objections, Applicant's response and our consideration of issues

Submission Issues	Applicant's Response	Council Comments
<b>1. Exceeds Height Limit and Number of Storeys</b>		
<p>Building A is zoned for <b>25 dwellings per hectare</b>. This density is described by the standards as 'Generally single and double storey dwellings with <b>some 3 storey buildings</b>.'</p> <p>The proposed design for Building A is <b>5 storeys</b>, which is at least 2 storeys higher than the standard. The planned development also exceeds the 16 metre height limit on 11 out of 16 buildings, by up to 1.5 metres. To exceed this limit without even having a pitched roof makes this proposal inconsistent with the desired future character of this density as defined in the Blacktown City Council Growth Centre Precincts Development Control Plan (DCP).</p>	<p>The dwelling density is a minimum requirement. The proposed density complies with this control.</p> <p>The proposed heights are consistent with the 16 metre height control. A variation to height is a result of the topography of the site and the accompanying plans, Clause 4.6 and Statement of Environmental Effects demonstrate that the variations will not adversely affect adjoining properties or future buildings within the development.</p> <p>88.4 % of the development will comply with the 16 metre height control. Also the proposed Floor Space Ratio of 1.35:1 is significantly lower than the Growth Centres SEPP maximum of 1.75:1.</p> <p>Building A has been redesigned to a reduced height of 3 to 4 storeys plus communal roof space. Although not required by the controls, this will provide an improved transition with the adjoining sites.</p>	<p>Refer to <b>Section 7</b> of the Assessment Report which considers the proposed height of buildings in detail. The proposed storeys and building height is supported in the circumstances of this case.</p>
<b>2. Crowding</b>		
There are also multiple encroachments and deviations which collectively show that the proposed design would overcrowd the site:		
<ul style="list-style-type: none"> <li>• There are some deviations from the minimum boundary setbacks and building separation criteria.</li> </ul>	<p>The architectural plans have been amended to provide 12 metre separation for Levels 1-4 and a 16 metre to 18 metre separation on Level 5, as agreed with Council.</p>	<p>Although the full extent of the street setback is not achieved, the proposal offers an interesting and high quality streetscape presentation which is considered satisfactory on its merits.</p>
<ul style="list-style-type: none"> <li>• The proposed development is predominantly zoned as 40 dwellings per hectare with lot 1 being zoned 25 dwellings per hectare. The overall density for the proposed development is 160.2 dwellings per hectare (calculated as 1,408 dwellings over 8.7878 hectares). At 1,408 dwellings <b>this development alone constitutes more than 25% of the estimated dwellings in all of Schofields by 2036.</b></li> </ul>	<p>The density control is not a maximum. Building A has been redesigned to a part 3 and part 4 storey building.</p>	<p>Although the proposal is inconsistent with the maximum dwelling density exhibited in May 2017 this Development Application was lodged in 2016 and pre-lodgement meetings were held in 2015 and 2016. Also, there is no certainty or imminence to these amendments coming into effect, and therefore this is not a matter that should be given determinative weight in</p>

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		consideration of this application.
<ul style="list-style-type: none"> <li>Most of the proposed blocks exceed the limit of 8 units per circulation core (Design criteria 4F-1.1), with buildings N and Q exceeding 12 units per circulation core. There is no additional amenity provided (e.g. additional natural light, wider corridors, gathering places) in the circulation spaces to justify not complying with these criteria.</li> </ul>	<p>The development provides between 5 units (Buildings G2 and L2) per corridor up to 13 units (Buildings B1, N1 and Q1). Buildings S1 and S2 have 18 units however this is split between 2 cores providing an appropriate design response.</p> <p>In addition, the corridors contain a window in close proximity to lifts to improve internal amenity and have also been strategically placed near ends of corridors where possible.</p> <p>The building layouts see a change in direction of corridors which avoids the 'gun barrel' effect.</p> <p>Buildings D1, D2, E1, E2, G2, J2, L2, P1 and P2 all provide a maximum of 8 units or less per corridor and therefore complying with the design criteria.</p> <p>Overall, the number of units off one corridor is acceptable.</p>	<p>A condition of consent is recommended to be imposed requiring the cores of Buildings S1 and S2 to be split to reduce the number of dwellings per core/corridor to 7 and 11 apartments. This approach avoids providing corridors which are excessive in length and is a satisfactory outcome.</p>
<ul style="list-style-type: none"> <li>Not enough storage in provided within some units.</li> </ul>	<p>Refer to amended unit schedule, sufficient storage is provided. A minimum of 50 % storage space will be provided within each unit with the remainder in the basement.</p>	<p>Sufficient storage is provided for each dwelling.</p>
<ul style="list-style-type: none"> <li>The density of this development means it will produce a huge amount of waste that the council will need to remove.</li> </ul>	<p>Refer to amended Waste Management Plan. The proposed layout complies with Council's requirements.</p>	<p>The proposal has been considered by Council's Waste Officer, and is supported subject to conditions.</p>
<ul style="list-style-type: none"> <li>Lack of open communal spaces with sufficient amenity (see Common Open Space in Appendix B): not compliant with 25% minimum required.</li> </ul>	<p>Refer to amended architectural drawings and communal open space calculations. Each 'street block' of apartment buildings is provided with a minimum communal open space area of 25 % of their site area. This includes the incorporation of rooftop communal open space areas on the rooftop of some buildings.</p>	<p>The proposal demonstrates that the provision of communal open space area, and the solar access afforded to those communal open space areas is satisfactory.</p>
<ul style="list-style-type: none"> <li>The height limit is exceeded on 11 out of 17 buildings, by up to 1.5 metres, including over portions of the main roof area.</li> </ul>	<p>Noted a Clause 4.6 report was submitted with the application.</p>	<p>Refer to <b>Section 7</b> of the Assessment Report which considers the proposed height of buildings in detail. The proposed building height is supported in the circumstances of this case.</p>
<ul style="list-style-type: none"> <li>There are multiple issues with the basement car parks which could be resolved if fewer units were included in the design.</li> </ul>	<p>The amended basement car parks provide adequate storage, waste facilities, car spaces, bicycle parking and motorcycle parking. Refer to the amended drawings.</p>	<p>The amended proposal now demonstrates that the basements appropriately service the development.</p>
<p>Some of these deviations, if taken in isolation, may not appear significant. However, together they</p>	<p>The development is significantly below the maximum FSR of 1.75:1. The development is an appropriate form of</p>	<p>The proposal is in scale with the desired future character of the Precinct,</p>

Submission Issues	Applicant's Response	Council Comments
clearly demonstrate that the proposed development is out of scale for the site and intended character of the zone. This should preclude the development from being approved in its current form.	development consistent with the zoning of the land.	and is supported.
<b>3. Monoculture of Higher Density Dwellings</b>		
<p>Landcom's Density Guide Book recommends a mix of densities to create areas of different character. The NSW Department of Planning and Environment recommends providing more diverse housing options by increasing the supply and quality of low rise medium density housing (referred to as The Missing Middle), so as to not saturate the market with high density apartments. This block is an ideal opportunity to address 'the missing middle', but instead 17 blocks of units have been proposed which do not comply with the DCP standards.</p> <p>This is a pattern across many of the dwelling developments currently proposed in this area (such as SPP-16-04465, JRPP-16-04460, JRPP-16-03330, JRPP-16-04466): apartment blocks that do not fit with Blacktown Council's intended zone/density characteristics. Should this application be approved despite the clear breach of several of Blacktown Council's development standards (as listed above), it should be a rare exception. Instead it is likely to set a precedent for all of these apartment blocks to be approved, resulting in monoculture and additional strain on amenities that was not planned for.</p> <p>The DCP has an objective 'to encourage a diversity of housing types,' yet this development proposes 1,408 of the same housing type: apartments. To comply with the DCP, part of this development should be altered to low rise medium density options such as townhouses, terraces and dual occupancy home. This will provide better amenity to the future residents and neighbourhood.</p>	<p>The Growth Centre Precincts DCP has set a minimum density rate of 25 dwelling per hectare for Lot 1 and 40 dwellings per hectare for remaining lots.</p> <p>This control is a minimum not <b>maximum</b> control. Building A has been redesigned to reduce the scale of the building and the remaining lots are consistent with the desired future character given the overall development will be significantly below the maximum Floor Space Ratio for the site.</p> <p>With regard to the 'Missing Middle' document, this is a <b>draft</b> document intended to provide more affordable housing that requires less land area. This '<b>draft</b>' document is for strategic consideration for Council and the State Government when preparing/amending SEPPs and LEPs to guide future development.</p> <p>The current controls allow for the development of residential flat buildings and the proposed density is acceptable as discussed above.</p> <p>Building A has been significantly redesigned to provide a varied building form.</p> <p>The new roads, public domain, proposed materials and finishes and landscaping will ensure 'monoculture' is minimised and variety in design, built form and siting are achieved.</p>	<p>Although the proposal is inconsistent with the maximum dwelling density exhibited in May 2017, there is no certainty or imminence to these amendments coming into effect, and therefore this is not a matter that should be given determinative weight in consideration of this application.</p>
<b>4. Boundary Setbacks and Build Separations</b>		
The DCP states that these apartment buildings require a 6	The proposed setbacks from the proposed streets will generally be 6m.	Although the full extent of the street setback is not

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<p>metre setback on all boundaries, with balcony protrusions allowable up to 4.5 metres along the front facade for the first 3 storeys. However, the development proposes protrusions up to 4.5 metres on multiple sides of several buildings, including above the third storey.</p> <p>The proposal generally complies with building separation for the first 4 storeys, but on the fifth storey, most buildings violate the required 18 metre between balconies as required by the Apartment Design Guide. This could be easily resolved by reducing the buildings to 4 storeys or fewer.</p>	<p>Balcony elements will protrude in parts but in most cases will be far less than 50% of the facade length. In this case, the protrusion above the third storey is acceptable as the majority of the facade will be setback 6m.</p> <p>The upper levels (level 5) have increased separation as agreed with Council.</p>	<p>achieved, the proposal offers an interesting and high quality streetscape presentation which is considered satisfactory on its merits.</p>
<b>5. Garbage Removal Design</b>		
<p>There are total of 478 recycling bins (240 litre 'wheelie' bins) across the proposed site that must be manually retrieved from and returned to garbage rooms by council contractors. This design requires excessive manual labour and time each week. Additionally, in the largest garbage room these bins are stored 6 rows deep, requiring them to be staged in another location while being taken out, emptied and replaced. It would be safer and more efficient to use 1,100 litre garbage bins if possible, although there are already 118 of these garbage bins proposed to use for general waste, which will need to be emptied three times per week.</p>	<p>This has been addressed in an amended Waste Management Plan. The proposed layout complies with Council's requirements.</p>	<p>The proposal has been considered by Council's Waste Officer, and is supported subject to conditions.</p>
<b>6. Specific Design Issues</b>		
<p>a) <b>Corridor length</b> (Buildings A, B, C, F, G, H, L, K, M, N, P, Q, R, and S) Corridor lengths in these buildings exceed 40 metres which provides a poor level of amenity due to limited access to natural light.</p>	<p>Where possible 2 to 3 windows are provided to increase daylight into these spaces and when combined with the floor layout the corridors change direction to minimise length of each corridor.</p>	<p>A condition of consent is recommended to be imposed requiring the cores of Buildings S1 and S2 to be split to reduce the number of dwellings per core to 7 and 11 apartments. Subject to this condition, the corridor lengths and their treatment are satisfactory.</p>
<p>b) <b>Building depth</b> (All buildings) Building depth exceeds the 10-18 metre limit with all buildings being proposed between 23-24 metres deep.</p>	<p>This has been justified in the original Statement of Environmental Effects, this extract is provided below:          'The modulation of the building ensures that the design of each building will achieve adequate light and ventilation reducing in width to provide a higher level of amenity for</p>	<p>The amended building depths demonstrate adequate daylight and natural ventilation, good orientation, articulation, layouts, room and apartment depths. Overall, the proposal provides good</p>

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	<p>each building.</p> <p>In addition, some buildings will bend around a corner which in fact allows for improved ventilation and solar access to units.</p> <p>Ceiling heights of 2.7 metres will be achieved and a large percentage of the units are double fronted or corner units and this will provide for increased daylight access.</p> <p>On the basis of the above, a variation is justified and the building depth is considered suitable.'</p> <p>Furthermore, the length of Buildings R1 and R2 has been reduced.</p>	<p>amenity to the apartments and satisfies the Apartment Design Control for control building depth.</p>
<p>c) <b>Living space</b> Depth of open living space exceeds 8 metres in many units throughout the proposed development (as per site plans).</p>	<p>The livings are appropriately planned to achieve good residential amenity.</p>	<p>The living spaces are designed in accordance with the Apartment Design Guide and are satisfactory.</p>
<p>d) <b>No outdoor clotheslines</b> (All buildings). There are no outdoor clotheslines shown on plans, as required by Blacktown City Council for BASIX compliance.</p>	<p>Dryers will be provided within each laundry.</p> <p>The accompanying BASIX certificate achieves compliance.</p>	<p>Suitable mechanical drying facilities are provided for each apartment.</p>
<p>e) <b>Access to natural light</b> Although the overall development complies with the minimum numbers for access to natural light, some individual buildings do not comply with solar access requirements and the criteria apply on a per-building basis. For example, Building D has 30 % of units with no access to sunlight in mid-winter (maximum 15 %) and Building B has only 56 % of units receiving at least 2 hours of sunlight in mid-winter (minimum 70 %).</p>	<p>As noted in the submission the overall development meets the requirements of the Apartment Design Guide.</p>	<p>At least 71 % of the apartments receive direct sunlight for at least 2 hours between 9 am and 3 pm at mid-winter which is satisfactory.</p>
<p>f) <b>Issues specific to Building A</b></p> <ul style="list-style-type: none"> <li>Basement storage is accessible only from the pathway of traffic, which is a safety concern.</li> <li>There is no lift or pedestrian ramp access to basement 3.</li> </ul>	<p>Building A has been significantly redesigned, refer to amended architectural drawings.</p>	<p>Building A is now satisfactory with regard to storage and access.</p>
<p>g) <b>Noise Level Exceedance</b> For units facing onto Schofields Road, the internal noise amenity goals will be exceeded in habitable rooms, unless the windows are closed. This would provide a lower level of amenity to residents in the affected units, and could be</p>	<p>The application is accompanied by an Acoustic Report that provides recommendations to ensure compliance with the noise criteria.</p>	<p>Our Environmental Health Officer has reviewed the proposal and accompanying Acoustic Report and advises that the proposal is acceptable, subject to conditions of consent requiring the implementation of these</p>

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mitigated if the proposed changes to the Indicative Layout Plan are not approved.		recommended noise mitigation measures.
<b>7. Changes to the ILP</b>		
<p>The development proposes several changes to the ILP road layout.</p> <p>In Lot 6, this includes the deletion of the north-south road along the SP2 zone, and the deletion of the east-west road running parallel to Schofields Road. The removal of these two roads creates two cul-de-sacs, which the Blacktown DCP states should be avoided. It also limits access and street parking to the adjacent SP2 public green space, which will be developed by Blacktown City Council as a \$909,000 open space. It also removes a buffer between noise and pollution generated on Schofields Road, and residential units, which will not meet noise amenity goals in habitable rooms.</p> <p>In Lot 5, the east-west road along Schofields Road has also been deleted, as well as the north-south road along the substation. Again, this removes the noise and pollution buffer.</p> <p>In lot 2, the north-south road along the substation has also been deleted. As the road in lot 5 above was also removed and there is a large retaining wall at the rear, this change means road access could only be directly onto Schofields Road – a state arterial road.</p>	<p>All changes to road patterns from the approved subdivision plan have been justified in the submitted Statement of Effects.</p> <p>Notwithstanding, the accompanying Electromagnetic Fields Survey Report and Acoustic Report demonstrate that the residential units are capable of achieving compliant and safe levels.</p>	<p>The proposal is inconsistent with the Alex Avenue Precinct Indicative Layout Plan. However, the departure from this control has been considered in a separate Development Application for subdivision, and has been approved.</p> <p>The Applicant has demonstrated that the apartments proposed in this application are suitably protected from noise and pollution sources.</p>
<b>8. Not Enough Storage Inside Some Units</b>		
The overall minimum storage requirements have been met, however it is also required that at least 50 % of that storage is located inside the units. In many units (e.g. B1_302, G1_305, K_407), less than 50 % of required storage is provided within the units.	Refer to the amended unit schedule, at least 50 % of storage is provided within each unit and the remaining within the basement.	Sufficient storage will be provided for each dwelling.
<b>9. Missing Documents</b>		
The following required documents do not appear to have been provided/published, preventing the community from making a full assessment and potentially making the proposal non-compliant:	<p>A Bushfire Assessment Report has been submitted to Council.</p> <p>A CPTED Report has been submitted to Council.</p> <p>A salinity report/management report is not required.</p>	The relevant reports and justification have been submitted with the application and considered in our assessment. We recommended conditions are imposed to ensure that

Submission Issues	Applicant's Response	Council Comments
<ul style="list-style-type: none"> <li>• Bushfire assessment report</li> <li>• Full Crime Prevention through Environmental Design (CPTED) report</li> <li>• Salinity report / management plan</li> <li>• Corrupted PDF (SP2 areas diagram)</li> <li>• Trees to be removed not shown on site plan (as required), so unclear how tree protection zones are respected or impacted.</li> </ul>	<p>No issue has been identified by Council with the SP2 area diagrams. With regard to tree removal, refer to Point 15 below.</p>	<p>the recommendations of these reports are implemented.</p>
<b>10. Not in Close Proximity Station</b>		
<p>The application claims several times that it is proximity to the station. The development is not within the 400 metre 'walking distance' threshold defined in the Alex Avenue DCP, so it is unclear what is meant by 'in proximity to'.</p>	<p>The development is consistent with the State Government's vision which seeks to increase residential densities on land within 800 metre of a railway station and within close proximity to centres (i.e. Alex Avenue Local Centre). The development is in close proximity to the Schofields railway station.</p>	<p>The site is appropriately serviced by amenities and public transport as directed by the Growth Centre Precinct requirements and is satisfactory.</p>
<b>11. Dominance of 2 Bedroom Units</b>		
<p>More than 70 % of the proposed units are 2 bedrooms and is not an appropriate apartment mix. This configuration caters to a limited demographic and perpetuates the housing affordability crisis for families who require more space, or people who cannot afford two bedrooms. In an area that is predominantly large detached houses, this apartment mix is not consistent with the current market demands and future demographic trends.</p>	<p>As amended, the development provides:</p> <ul style="list-style-type: none"> <li>• 264 x 1 bed apartments (19%)</li> <li>• 967 x 2 bed apartments (70%)</li> <li>• 150 x 3 bed apartments (11%)</li> </ul> <p>The Apartment Design Guide requires a variety and diversity of apartment types which is achieved by this development. The mix of unit types provides a good range of housing options to cater for the broader market. The area is seeing a shift towards apartment living and this development will facilitate this is varying sized units.</p>	<p>The proposal consists of a mix of dwellings which are responsive to anticipated market and demographic demands.</p>
<b>12. Sydney Property Price Bubble</b>		
<p>Consensus is building that the Sydney property market is experiencing a bubble, and that there is substantial risk of a downward correction. Apartment prices have already started to fall in Sydney (and have fallen considerably in Melbourne), with oversupply a major concern. Once this occurs, these large crowded blocks of units over an hour from the CBD will no longer be commercially viable. Despite uncertainty, this is a serious risk to consider when regulating the saturation of remote north-west</p>	<p>This is not a planning consideration.</p>	<p>This is not a matter for our planning consideration.</p>



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Sydney with high density developments.		
<b>13. Capacity of Local Amenities</b>		
This development will place additional strain on the local train station, especially the parking lot, which is already over capacity. It is unrealistic to assume all or most residents will walk to the station when the distance exceeds the DCP definition of 'walking distance' as under 400 metres, and considering factors like weather conditions and the age, fitness and potential disability of residents. This development will also place additional strain on local schools.	The State Government has increased the distance from a railway station to 800 metres; the site is within 800 metres and is likely to see people walk.  A new school will be constructed adjacent to the development and is a strategic consideration of both the State Government and Local Council.	The site is in suitable proximity to public transport and is serviced by infrastructure, current schools, and has the opportunity to benefit from future schools, which includes the adjoining site to the east which is earmarked for future school development.
<b>14. Significant Change to the Character of the Local Area</b>		
While the area is being developed and density must increase, this development represents an excessive deviation from the intended character of local area, which is currently a quiet residential area consisting mainly of low-density residential and semi-rural housing.	As discussed above, the development is highly consistent with the future character of the area and is significantly lower than the 1.75:1 floor space ratio maximum.	The density, height and scale of the proposal reflects the objectives and building form anticipated by the relevant planning controls that are in place at the moment, including the Alex Avenue Plan and the Apartment Design Guide. The scale of the proposal is that of a medium density development which is responsive to the existing characteristics of the site and its surrounds.
<b>15. Environmental Impact: Destruction of Native Trees and Habitat</b>		
It is clear from the site plan that a number of mature trees would need to be destroyed to allow for this development, however no Tree Removal Report has been provided/published. This means the community cannot effectively assess the impact of the development on the local environment and gives the community no confidence that the impact has been mitigated appropriately. The development would also displace local wildlife. There is already a significant population of displaced wildlife in the area due to recent land clearing for other developments.	The SEPP (Sydney Region Growth Centres) 2006 contains a 'Native Vegetation Protection Map'. This includes the existing native vegetation area and the native vegetation retention area.  There are no restrictions associated with this site that require further consideration.	The south-eastern portion of the site is identified as existing native vegetation and native vegetation retention area. No works are proposed in these affected areas, therefore, clearing of native vegetation will not occur as a result of this proposal.
<b>16. Summary of Concerns</b>		
Permitting this development without addressing these key concerns would set a precedent with a significant cumulative	As outlined above, the development is consistent with the State Government's strategy for this area and the also consistent with the Plan	The proposed residential development and its design reflects the objectives and building form anticipated by

Submission Issues	Applicant's Response	Council Comments
<p>impact on the character and capacity of the area, as well as the quality of the dwellings our residents live in.</p> <p>The many deviations from limits together represent a proposal that is excessive for the North West Growth Centre (NWGC) zone and density characteristics for this location, which are already more generously defined than the Blacktown City Council equivalent zones. This development does not align with the intentions of the planning controls for this area, and should be rejected.</p> <p>There is a <b>powerful profit incentive</b> for these higher density developments, so it is crucial that these limits are strictly enforced to ensure the intentions of council and state planning are not undermined.</p> <p>We trust that the council will prioritise the interests of the broader community in this matter.</p>	<p>for Growing Sydney.</p>	<p>the relevant planning controls that are in place at the moment, including the Alex Avenue Plan and the Apartment Design Guide. The scale of the proposal is that of a medium density development which is responsive to the existing characteristics of the site and its surrounds.</p>
<b>17. Submission from Schools Infrastructure NSW</b>		
<p>While we raise no objection to the amendments proposed we note that the development plans currently include only a 16 metre wide local road adjoining the proposed school site to the south of 'Building A.'</p> <p>Based on observation of the existing section of the same road, a 16 metre wide road corridor will most likely provide a 9 metre wide kerb to kerb width, which may not be sufficient to efficiently accommodate school buses and other traffic generated by a potential future school and other land uses. Whilst potential future school designs may provide an option for onsite bus bay slip in, we remain concerned that there may not be adequate road width to allow for bus turn movements without conflict with other road users, particularly at AM and PM peak times.</p> <p>The proposed school site also has frontage to the 20 metre wide road on its western boundary, however this road will function as a collector road, which may not be appropriate to be the main access point for a potential future school.</p>	<p>The Applicant seeks to provide a reduced road width of 16 metres to the new local road on the southern side of Building A to complete the extension of Farmland Drive.</p>	<p>The DCP requires a road verge width of 18 metres where development for residential flat buildings is proposed on land zoned R3 Medium Density Residential.</p> <p>Given the adjoining site to the east has recently been development for Torrens title subdivision and dwelling houses, the new local roads to the east have a width of 16 metres only.</p> <p>Given the 16 metre road width of Farmland Drive is established, our Access and Transport Management officer supports the 16 metre road width for this part of the proposal as it provides continuity and a safe outcome in terms of the road layout.</p>

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<p>For the reasons outlined, we request that council examine these issues prior to determination and that a more suitable road width for the section adjoining the northern boundary of the proposed school site be considered.</p> <p>This will ensure that adequate provision is made for efficient and safer access to any future school that may be built on the site for the community, including for pedestrians, public transport authorities, motorists as well other surrounding land uses.</p>		

## Conclusion

We do not consider the concerns raised in the public submissions to be sufficient to warrant the refusal of this application. Several of the concerns are considered capable of being resolved through the Applicant's amendments to the proposal and by conditions.