Issues Raised

Department of Planning, Industry and Environment

Built Form and Heritage

The majority of the new buildings are located within the SP2 under the Ashfield Local Environmental Plan 2013. While there is no stipulated height limit within the SP2 zone, the five-storey built form at the centre of the site appears to be bulky and would adversely impact on existing views currently enjoyed by the neighbours.

While the impacts of the development on the views enjoyed by the neighbours is assessed as low to moderate, the Department considers that design options should be explored to reduce the overall the height and bulk of the five-storev built form. This may involve reducing or relocating the extent of program accommodated by the new teaching and learning and performing arts buildings and/or further articulation of envelopes and facades.

The design and scale of the proposed development reflects the operational requirements of the school; minimises the building footprint so as to maximise landscaping and open space; maintains a green and vegetated character; minimises the appearance of the bulk and scale through façade articulation, massing, roof modulation, setbacks and landscaping; and equitably treats level changes to create appropriate transitions across the grounds.

Importantly, the design of the school and concentration of the built form in the centre of the Site responds to the existing constraints across the Site and retains amenity to the surrounding residential development.

PMDL has worked closely with the School to develop the renewal project at Trinity Grammar School through an extensive Masterplan process. The proposed built form and design has been developed in response to the following:

Spatial Requirements;

Proponent's Response

- 2. Consideration of the siting of the main building, proposal of appropriate height, bulk, and scale to accommodate high functionality for a leading school facility; and
- 3. Architectural Treatment breaking down the scale.

The new five (5) storey built form will be nestled between the existing School of Music, Sports Centre, Quad Building and Assembly Hall; currently the tallest building across the Site. In order to successfully integrate the built form within the existing fabric, the tallest building elements are confined to the centre of the School's Site, with the building height tapering down, closer to the boundary.

Notwithstanding the above, in response to the matters raised by the Department of Planning, Industry and Environment, there has been a 2.6% reduction in overall building height. The original proposed RL to top of teaching and learning building was RL69.30. The new updated design reduces the level by 500mm to RL68.80. The original proposed Mechanical Plant enclosure was RL68.60. It is now proposed at **RL68.20**, a **400mm** reduction.

To complement the updated Architectural Documentation (Appendix C), an addendum Visual Impact Statement has been prepared by Richard Lamb and accompanies this submission as **Appendix E**. The assessment concludes that while the built form would clearly make a qualitative change to the



ssues Raised	Proponent's Response
	appearance of the Site and setting, among others by unifying the architectural treatments ar materiality of the views from the visual catchment, the proposal does not result in significant visu impacts such as impacts on access to views of scenic or culturally significant items or on view sharing
	The proposed modified design is subtle but detectably different from the existing application, we reduced bulk at the upper level, reduced height and greater articulation. As aforementioned, it is not considered that the height or bulk of the existing application is excessive, not that there would be a significant impacts on views from neighbouring properties. Whilst the reduction in height does not necessarily result in an improved view of any items beyond the Site, the proposed modification does provide a perceivable reduction in the bulk of the upper levels of the development and is considered minor improvement to the apparent articulation of the proposal on either side of the lift core.
 The proposal should demonstrate how Aboriginal culture and heritage has been incorporated in the design proposal including built form and landscaping. 	As identified by PMDL (Appendix D), traditional Darug themes of "Country" have been drawn upon and meshed with the strong community spirit of Trinity Grammar School. These include an overall splanning strategy stemmed from Aboriginal meeting places focusing on:
	 Ceremony - Hearts of School - Agora, Quadrangle and Performing Arts Precinct; Learning - internal and external breakout spaces to support formal teaching spaces; Meeting Places - a range of spaces that vary from intimate and introspective, to active a extroverted settings.
	Across the campus, the built form has been designed with the intention to create awareness of on presence within the campus, and instil a strong sense of belonging and strengthen communal bo for its students and staff.
	The objectives of the Renewal Project are bound by core traditional aboriginal qualities that include collective gather; inclusive spatial planning; and non-hierarchical spatial equity.
	Overall, as demonstrated throughout the detailed documentation, there will be opportunity to integral Aboriginal culture and heritage references in meaningful ways for the Renewal Project through w finding, materiality, placemaking, landscape design and public art.
	It is acknowledged that further consultation will occur during detailed design of the project to ensucultural references and storey telling will be carefully articulated and celebrated.



Table 1. Response	to Government A	gencies and Or	ganisations Submissio	ons

Table 1. Response to Government Agencies and Organisations Submissions			
Issues Raised	Proponent's Response		
 The Inner West Council (Council), in their submission, have raised concerns with respect to impacts of the proposed development on the heritage conservation area. The Department strongly recommends that Council be consulted with regard to the concerns in relation to heritage impacts. Any revised heritage impact assessment / revised plans and supporting documents including a Conservation Management Plan be prepared in consultation with Council. 	During the preparation of the response to submissions, consultation was held with Inner West Council's Heritage Officers on two (2) occasions: E-meeting, 10 August 2020; and Site Visit, 7 September, 2020. A revised Heritage Impact Statement has been prepared by Urbis, accompanying this submissions as Appendix K. Further detail is provided below.		
Traffic and Transport			
 It is unclear whether the intersection performance results in the SIDRA analysis within the Transport and Accessibility (TA) report are for the year of completion / operation of the development or 10 years following completion. In this regard, the SIDRA analysis must clarify the year for which the 'Future' SIDRA model is predicated. 	The SIDRA results for the future year are for the year of completion. They are based on the project being completely constructed and a student population of 2,100 students with 321 staff. Refer to the accompanying Traffic Impact Assessment (Appendix H).		
 The number of students considered in the TA report at the time of the SIDRA analysis is also unclear. Clarification must be provided in this regard and the number of students / timing specified against each analysis or table of results. 	As confirmed in Appendix H , the following numbers were considered for the SIDRA modelling in TTM's Traffic Report (Appendix 10 of the original EIS): All Existing Scenarios: 1,655 students and 277 staff; All Future Scenarios: 2,100 students and 321 staff.		
 The TA report must specify whether the increase in student numbers are to be phased during operation. The associated SIDRA modelling for intersection performances, construction and operational traffic impacts on the surrounding road network must be considered for each phase of increase in student numbers or construction of a new building. 	The proposed development results in an additional 445 students across the Site. As discussed in Appendix H , the increase in student numbers will be phased over a number of years, with each increase generally aligning with the start of the new school year in late January/early February. As previously addressed, construction will also be phased. Stages 1 and 2 will be completed prior to any increase in student population. The proposed staging is a deliberate strategy to ensure that any additional demand for vehicle travel to/from school is captured within the new car park on school grounds to reduce potential for queuing of vehicles on-street.		



Issues Raised Proponent's Response

Figure 1 below is an extract from Appendix I and illustrates the relationship between student numbers increases and construction phasing.

		2023	2024	2025	2026	2027	2028
	Junior School		+20	+20	+20		
Student increases	Senior School	+40	+40	+40	+40	+40	+40
	TOTAL	+40	+60	+60	+60	+40	+40
	Stage 1 & 2 – completed prior to 2023						
0	Stage 3 – General Learning, finish car park						
Construction Staging	Stage 4 – Performing Arts						
	Stage 5 – Junior School, landscaping						
	Stage 6 – Minor works						

Figure 1. Relationship between student number increase and construction phasing

The SIDRA Future Scenario modelling in the original TA report by TTM Consulting was carried out using assumptions that the full student and staff increases had been reached. However, to meet the Department's request, additional modelling has been undertaken to demonstrate the effect of the larger student increases between years 2024-2026. This modelling has been carried out by TTM Consulting in Queensland to maintain consistency. Refer to **Appendix H**.

Overall, the student increases and construction phasing will be staged concurrently. As aforementioned, this strategy was adopted to ensure the new car park arrangement prior to student increases to make sure that pick-up/drop-off functions are wholly contained within the Site, subsequently reducing on-street queuing. Additionally, the additional modelling indicated that the phased student increase will have an incremental impact, and that at a full capacity, there is no detrimental impact on the street network when compared with the existing conditions. This will be further supported through the ongoing implementation of the Green Travel Plan.



Issues Raised

The TA report provides comparative analysis of the existing / future traffic volumes in both peak periods (AM and PM) and concludes that the identified intersections would continue to perform at adequate level of service (LoS) post redevelopment of the school. Notwithstanding, the above conclusion regarding the LoS, the SIDRA analysis and associated tables of results should identify additional delays or queue lengths due to the additional design traffic volume (which is anticipated). The TA report should then address the impacts of the additional queue lengths and delays (if any) and propose suitable mitigation and management measures to minimise the impacts on the surrounding traffic network.

Proponent's Response

Appendix I provides a comparative summary of the differences between the Existing and Future Scenario queue lengths and delays at the surrounding intersections in the vicinity of the Site, including:

- Old Canterbury Road/ Prospect Road;
- Old Canterbury Road/ Hurlstone Avenue;
- Old Canterbury Road/ Henson Street;
- Old Canterbury Road/ James Street;
- Prospect Road/ Seaview Street East;
- Prospect Road/ Seaview Street West;
- Victoria Street/ Seaview Street; and
- Victoria Street/ Harland Street.

The assessment of the delay time between existing and future scenarios demonstrate there is negligible to minimal impact. Even the worst performing intersections of Old Canterbury Road with Prospect Road and Hurlstone Avenue are experiencing an additional delay in Future scenarios that is between 7 and 25 seconds longer than existing delays at full development. These additional seconds are likely to be imperceptible to a person driving a vehicle.

A complete assessment is provided in **Appendix H**. Overall, given the redevelopment of the school does not materially worsen the existing conditions, additional traffic management measures are not proposed.

 It is unclear whether bicycle parking spaces with end of trip facilities are provided on site. Adequate bicycle spaces with endof-trip facilities should be proposed and identified in the architectural plans.

Under the original submission, the bicycle parking facility was identified on **Drawing No. DA111**, located within the basement car park. Access to shower and facilities for the end of trip facility are located in the existing aquatic facility.

However, on further assessment, this location for the bike parking is not ideal given that bike riders will need to mix with the car park traffic to access the bike parking. The alternate is to enter the school at ground level, dismount, and walk the bike to the bike parking. These actions are likely to be a disincentive to bike riding.

It is proposed to relocate the bike parking so that it is accessible from Prospect Road and closer to the end of trip facilities in the aquatic centre. Three potential locations are proposed, with final placement (or potential to consolidate these options into one or two locations) to be decided during detailed design.

The proposed locations are shown in **Figure 2** below:



Table 1. Response to Government Agencies and Organisations Submissions Issues Raised Proponent's Response Option 1: Chapel Drive Option 2: Founders Building; and/or Option 3: New Pavilion Building. VICTORIA STREET Figure 2. Proposed new bike parking location Details of construction traffic arrival and departure routes As identified below, the proponent supports the preparation of a Construction Traffic Management Plan should be included in the TA report. The details of truck turning (CTMP) being conditioned as part of the consent. movements (considering the various sizes and the width of the access roads) and any associated issues / pedestrian safety The proposed construction vehicle routes are identified in **Figure 3** below. matters in relation to the construction traffic routes must also



be identified, noting that the site is located in a residential area.

Table 1. Response to Government Agencies and Organisations Submissions Issues Raised Proponent's Response Vajrayana Institute 😡 To M4/ Hume Highway Outbound Figure 3. Proposed construction vehicle routes The proposed truck routes that will be further development within the CTMP are intended to reduce the number of trucks on residential streets, and any time that the Site is operating, the Site entry will be under traffic control to ensure safety of people in the vicinity of the Site entry. Refer to **Appendix H** for further information. Details of the student drop-off / pick-up zones, the average The student pick-up/drop-off takes place within the car park on Victoria Street. The design of the vehicle turnaround time at the zone, expected demand based proposed car park will increase internal queuing length which will subsequently allow more vehicles to on the number of anticipated drop-off / pick-up for the students queue on-site and reduce potential queuing on-street. are to be provided. Having regard to that data, the adequacy of



Table 1. Response to Government Agencies and Organisations Submissions Proponent's Response Issues Raised the existing / proposed drop-off / pick-zones zones are to be discussed in detail in the TA report. Details on bus drop-off areas / coach parking as well as number The school operates 10 daily bus routes in the morning and 12 daily routes in the afternoon, plus an of buses and frequency are to be provided in the TA report. additional service on a Wednesday, equating to 22 bus services every day, and 23 services on a Wednesday. The bus services, wide catchment of students and strong patronage, assist in minimising private vehicle use. **Figure 4** below indicates the bus stops and locations within the local street network. Trinity Grammar School No Stopping Public Bus Zone School Bus Stop No Stopping 7.30AM – 9.30AM & 2.30PM – 5.30PM School Days **Figure 4. Trinity Grammar School Bus Stops** Refer to **Appendix H** for further details.



	Proponent's R	esponse				
is unclear whether an acoustic assessment of out of school are community use of school facilities has been conducted. Updated acoustic assessment including this component is to provided, in case this has been excluded. The acoustic sessment must include recommendations regarding itations on permitted hours and frequency of such use, in rticular for any outdoor spaces, to mitigate potential noise pacts on the neighbouring residents.	summary of the As there is no p	OOSH activities proposed change endix I, no furt	is provided in A e to numbers in the description in the description is the description in the description in the description in the description is the description in the description	ppendix I . n attendance,	hours of opera	from the existing u tion or located fo equired as they wi
erational noise impact of outdoor play areas and multi- rpose hall is to be provided, given the increase in student mbers proposed. The updated assessment must include						nme hours and loca the current maxi
tails of proposed times and frequency of use of these areas.		demonstrates th	ne projected inci	rease in noise l	evels for those i	identified activities
		demonstrates th	ne projected inco	Current Maximum Attendance	evels for those i	Predicted Increase in Laeq Noise Level
	Figure 5 below			Current Maximum	Proposed Maximum	Predicted Increase in LAeq
	Figure 5 below Activity Summer Sport	Location Ovals 1, 2, 3, CO.1, Sports	Hours 7am - 8:30am &	Current Maximum Attendance	Proposed Maximum Attendance	Predicted Increase in LAeq Noise Level
	Activity Summer Sport Training Track & Field	Ovals 1, 2, 3, CO.1, Sports Centre Ovals, 1, 2, 3 and No. 2 Oval running track,	Hours 7am - 8:30am & 1:50pm - 5pm	Current Maximum Attendance 550	Proposed Maximum Attendance	Predicted Increase in LAeq Noise Level 0.4 dB



ssues Raised	Proponent's Response
	The predictions in Figure 5 indicate that in all cases the proposed increase in maximum number would result in a noise level increase of less than 1dB, which would be a negligible increase from the current use.
	In light of the above, irrespective of the proposed increase in attendance and student numbers, given the activity location and hours of operation would remain unchanged, the predicted noise lev is negligible compared to that which currently occurs and is not considered to be acoustically significant.
 Although there are no anticipated changes to the use of public address system or school bell, no assessment has been presented on the likely impacts of these components. Further details should be provided on the design, siting and operation 	The design of the School Bell, PA and EWIS system would be carried out as part of the Detailed Desi phase so there is no specification or acoustic data available at this stage. It is proposed to instal new PA system which would integrate with the existing systems as appropriate.
of these elements to minimise / mitigate noise impacts on the surrounding community.	New loudspeaker locations will be selected to cover both internal and external areas within the Renew Project. With regard to external locations, it is anticipated that the only significant addition to the existing system coverage is likely to be in the vicinity of the new Multi-Purpose Hall. However the coverage area of the additional loudspeaker(s) would be further from the school boundaries than the existing No. 1 Oval and No. 3 Oval.
	With appropriately designed speaker coverage limited to the vicinity of the new Hall only, it is anticipated that the addition of these loudspeakers would result in any increase of PA system noise the residential receivers located to the West or East of the School.
	For operational activities occurring regularly including PA system announcements, a criteria of RBL 5 dB is considered appropriate in accordance with Section 4.3.2 of the acoustic report. For receiv along Victoria Street this corresponds to a criteria of LAeq 49 dB during the daytime period (7.00 to 6.00pm). The PA system will be designed to achieve compliance with this or other relevant agree criteria at the nearest receivers.
Community and Out of Hours Use of the Site	
 Details are to be provide of future shared use of school facilities /outdoor play areas with the community including (but not limited to) a schedule of: list of all school facilities to be used (meeting rooms, parking spaces, halls, etc). types of functions/activities carried out. 	An amended schedule of uses has been prepared and accompanies this application as Appendix 3



ssues Raised	Proponent's Response
 maximum occupancy and hours/days of operations of such uses. likely frequency of community uses within the site. any additional noise and traffic assessment in relation to out of hours community use of school facilities. 	
 Details of any proposed Out of School Hours (OOSH) or intensification of use of the existing OOSH are to be provided including the maximum number of students that are likely to use this facility. 	An amended schedule of uses has been prepared and accompanies this application as Appendix J . Overall, the proposed OOSH will not alter significantly from those that currently occur.
andscaping and Streetscape	
 Details and numbers of the proposed replacement planting (species, pot size and quantity) on site must be included in the landscape plan. 	Updated Landscape Plans has been prepared by Arcadia and accompanies this application a Appendix G . A planting schedule is included in the updated Landscape Plan detailing the propose replacement planting, including species, pot size and quantity.
Details with regards to Seaview Street streetscape is to be provided including elevations and planting in front of the proposed new Maintenance Building to screen its bulk from the street.	Refer to Appendix F and Appendix G . As indicated on the landscape documentation prepared by Arcadia, <i>Acemena smithii 'minor'</i> is proposed to be planted along the Seaview frontage and will provide a level of screening to the new Maintenance Building when viewed from the public domain. A detailed elevation, Drawing No. DA308 , has been prepared by PMDL and accompanies the application as Appendix C .
The Arborist report should be updated to include a plan identifying trees to be removed and retained in two separate colours.	An updated Arborist Report has been prepared by Australis Tree Management (Appendix M). Under the original EIS, a total of 17 trees were identified to be removed to accommodate the proposed development. Further to the above, Australis Tree Management identifies ten (10) of the existing tree located on the Site are proposed for retention. Trees proposed for retention on site and adjoining properties will require implementation of tree protection measures to ensure their ongoing health and survival during construction. The Arborist Report has been updated to include a plan identifying trees to removed and retained in two separate colours.



Table 1. Response to Government Agencies and Organisations Submissions		
Issues Raised	Proponent's Response	
Signage		
 The application seeks consent for a signage on the western façade of the new building. The details of the proposed signage including a clear elevation and dimensions must be submitted in this regard. 	The proposed development seeks consents for the following signage: Drawing No. DA501 Signage Location Plan; Drawing No. DA502 Signage Blade Wall; Drawing No. DA503 Lift Tower Signage; Drawing No. DA504 Scoreboard Signage; Drawing No. DA505 Prospect Road Signage; Drawing No. DA506 Centenary Centre Signage; Drawing No. DA507 Seaview Maintenance Signage. The details of the proposed signage, including clear elevations and dimensions, accompany this submission as Appendix C .	
 The EIS states that 'environmentally-sensitive lighting would be designed into the proposed signage'. Details of this lighting including lux levels is to be provided. 	A Lighting and Lighting Control Strategy has been prepared by Acor and accompanies this submission as Appendix N . The lighting design will comply with the requirements of: AS 4282 - Control of the obtrusive effects of outdoor lighting. The lighting to be designed includes but is not limited to the following:	
	 Obtrusive Lighting Control. All luminaires will utilise LED technology lamps and the luminaire's reflector will be designed specifically for LED lamp sources. External lighting will be controlled via a combination of photo electric cells and time switches with a manual override control. Light fittings shall be provided with a finish to the school and architect's colour scheme requirements. All external lighting will be designed to have less than 1 lux light spill within 2 metres of the boundary, and will be lighting, which is aligned with any sensitive boundary areas, will be shielded to negate any discomfort glare issues with neighbouring properties. 	



Table 1. Response to Government Agencies and Organisations Submissions		
Proponent's Response		
External lighting shall generally be low height, low intensity and discreetly positioned so as to avoid spill lighting and compliance with AS/NZS 1158.3.1 and AS 4282.		
Refer to the following, accompany the submission as Appendix C : Drawing No. DA306, Building Elevations; Drawing No. DA307, Building Elevations; Drawing No. DA308, Seaview Elevations.		
Refer to Drawing No. DA030 of Appendix C .		
Refer to the following, accompany the submission as Appendix C : Drawing No. DA600, Material's Board Western Façade; Drawing No. DA601, Material's Board Southern Façade; Drawing No. DA602, Material's Board Eastern Façade; Drawing No. DA604, Material's Board Seaview Maintenance.		

Inner West Council

Transport & Accessibility Assessment

Council has undertaken a review of the transport and accessibility assessment and notes that it lacks detail on the proposed infrastructure measures required to ameliorate the impacts on road safety and traffic efficiency of the development as required by the SEARS.

The provided transport and accessibility assessment should be updated to include measures proposed to ameliorate impacts. A list of works that should be considered are:

 The upgrading of the existing pedestrian crossing in Prospect Road to a raised pedestrian crossing.

An addendum Traffic Statement has been prepared by Street Level Strategies and accompanies this submission as **Appendix H**.

The following has been considered in the addendum Traffic Statement:

- The existing pedestrian crossing is in a fair to poor condition. The school is supportive of an upgrade to a Raised Crossing/ Continuous Footpath Treatment.
- Consideration has been given to widen the existing traffic island on Prospect Road at the intersection, with Old Canterbury Road, the limited use of this crossing point by the school and lack of existing safety concerns from the school or local community indicates that there is no compelling reason to install a pedestrian refuge at this stage, or as part of SSDA 10371.



Issues Raised

Widening of the island at the intersection of Old Canterbury Road and Prospect Road to provide a refuge island so as to improve safety of pedestrians at the intersection.

- The relocation of the existing electrical kiosk at the main vehicular access location in Victoria Street as the current location severely impacts sight distance.
- The improvement of the poor sections of asphalt footpaths in Prospect Road, Seaview and Victoria Streets to improve pedestrian and cyclist safety.

Proponent's Response

- Consideration has been given to relocate the electrical kiosk. With no history of crashes, the road alignment shifted to the west, and the kerb blister providing an opportunity for drivers to see in both directions, the kiosk is not proposed to be relocated at this stage.
- Given a lack of safety issues being raised on the quality of the footpaths being raised throughout consultation, and the small impact that the additional students are likely to have on wear and tear, upgrades are not proposed as part of SSDA 10371.

Maintenance and Delivery Area

Victoria Street

The new maintenance and delivery area will be via the southern driveway in Victoria Street. It is proposed that the "left out only" restriction at this driveway be removed so as to allow for heavy vehicles to turn right when leaving the site. No objection is raised to this measure provided the restriction is removed only for heavy vehicles.

The other measure proposed at the southern driveway is to remove the adjacent traffic island to allow delivery vehicles to turn left out of Harland Street into Victoria Street and then a guick right into the southern driveway. The traffic island proposed to be removed is in fact a pedestrian refuge and its removal is not supported. The removal of this refuge will severely impact pedestrian safety as it is adjacent to the main southern driveway whose use is being intensified and which has poor sight lines for and of pedestrians and vehicles due to the existence of an electrical substation adjacent to the driveway.

Delivery vehicles should only access the driveway by turning left in.

As referenced in **Appendix H**, movements to and from the driveway for service vehicles were reviewed to determine the potential for access without any impact on the pedestrian refuge. While the original intent for access to/from this driveway was to limit heavy vehicle movements along Victoria Street, it was not possible to achieve turning movements for Medium Rigid Vehicles (MRV) or Heavy Rigid Vehicles (HRV) to/from Harland St without adjusting or relocating the pedestrian refuge.

Following a review of the service entry/exit and the necessary turning paths for heavy vehicles, the access has been amended to allow movements to/from the north on Victoria Street only. As a result, there is no longer a need to remove or change the existing pedestrian refuge.

Additional swept paths accompanying this submission in **Appendix H**.



Issues Raised	Proponent's Response
Seaview Street	No further comment is required.
No objection is raised to the new delivery/ loading bay accessed from Seaview Street, subject to the concerns raised under subheading Seaview Street Streetscape below being addressed and resolved.	
Delivery Hours	The delivery hours will be conditioned as part of the future consent.
Both delivery bays should have time restrictions placed upon them, with regards to when delivery trucks are permitted to deliver goods and access the site. The approved hours should be outside the proposed hours of drop off and pick up for students to ensure minimal disruption to the traffic for the locality, but also allow for the amenity of the surrounding residential area.	
Seaview Street Streetscape The proposal seeks consent for the demolition of at least four (4) existing dwellings along Seaview Street and the construction of a new Maintenance Building and a loading dock for deliveries. The plans fail to provide sufficient details with regards to the development along Seaview Street. Critical information such as detailed elevations and streetscape analysis have not been provided and therefore a	As previously identified, The proposed development includes the demolition of the school owned residences at 46-52 Seaview Street to create a service, maintenance and delivery area accessed via Seaview Street and provide an improved outdoor recreation area dedicated for Junior School students. The new service, maintenance and delivery area will include the construction of a new two (2) storey maintenance building, under croft workshop space, and reconfiguration of vehicular access for deliveries and maintenance.
comprehensive assessment of the impacts of the proposal on Seaview Street cannot be made. Additional information regarding the proposed maintenance building and streetscape analysis for Seaview Street must be provided to enable a detailed assessment.	The proposed works also include improvements to accessibility and movement across the School through the upgrade of the current path from the underground car park through to the Junior School, resulting in improved access for students and visitors, while allowing immediate access for a small service vehicle.
Notations outlined on the plans outline that the applicant wishes to construct a 2m high acoustic wall along Seaview Street. While construction of such as wall would improve acoustic amenity for neighbours, it is expected to result in a poor urban design/streetscape outcome and will offend CEPTED principles. The installation of a 2m high wall on along the street is also likely to attract vandalism and graffiti and will diminish the character of the area. Council raises	The proposed built form will present itself as a two (2) storey building, set back from Seaview Street boundary. Consideration has been taken into account of the typical Seaview Street character and an appropriate scale and form has been developed so the proposed built form will be complementary streetscape. This has been achieved through proposed an architectural language that is contemporary but sympathetic to the surrounding heritage streetscape, allowing the development to express the growth and progression of the school whilst allowing the heritage significance to be celebrated.
significant concerns with the future passive surveillance to Seaview Street and the resulting streetscape.	The addendum Noise Impact Assessment accompanying this submission as Appendix I has considered the noise impacts of the proposed Junior School. Based on previous experience, noise from



Issues Raised	Proponent's Response
	children playing is generally not considered an offensive source of noise. Additionally, noise from children playing is an existing feature of the area.
	Notwithstanding, where mitigation is considered necessary for the new outdoor play area, a boundary fence of solid construction which blocks line of sight to the nearest receivers would likely be effective. The design and particulars of the proposed boundary fence will be considered during detailed design and will be designed to result in an improved urban design outcome and integrate into the surrounding streetscape.
	Refer to Drawing No. DA308 of Appendix C .
Car Parking	
The revised car park design has included measures to remove car spaces with access along the main circulation road so as to minimise the likelihood of a vehicle on the circulation road being delayed by a vehicle manoeuvring into or out of a parking space. The loss of car parking is not supported. A better approach would be to restrict the use of these car spaces during pick up and drop off times while still making them available during other times including after hours and weekends for out of school hours activities such as sporting events. One option would be to make these spaces "staff only" and managed in such a way that they were not used during pick up and drop off times.	The existing Jubilee and staff carparks have a combined total of 312 car parking spaces . Under the proposed arrangement 324 car parking spaces are to be provided. To support the provided car parking provision, a Green Travel Plan and Workplace Travel Plan have been developed to contribute to the appropriate use of alternative transport modes and the efficient operation of the parking facility and the surrounding road network. The proposed car parking is satisfactory and no further amendments are proposed.
Plan of Management	
The provided Plan of Management should be updated to include details about out of hours activities. This information should cover any concerts or events to be held at night or on weekends. Details such as finishing times, potential patron numbers and material on where to park should be provided.	An amended schedule of uses has been prepared to accompany this submission (Appendix J), update details around out of hours activities.
Heritage Impacts	
The heritage advice prepared to support this SSD does not meet Inner West Council's requirements for Statements of Heritage Impact	An amended Heritage Impact Statement (HIS) has been prepared by Urbis and accompanies this submission as Appendix K .



Issues Raised

and consequently does not meet the LEP aims for conserving the environmental heritage of the LGA.

The supporting heritage and aboriginal heritage assessments have largely been compiled from secondary sources and neither document contains adequate documentary or physical research regarding the original landscape form. The reports do not demonstrate an understanding of the design and character of the sequence of significant buildings and associated landscaping and quadrangles progressively erected to create the school campus. This sequence of development including buildings and landscaping created for four different educational users including the private school, the NSW Department of Public Instruction (later Department of Education) and the Anglican Church is potentially of state significance. The architects of the various phases include the most significant designers of school buildings in the State.

The conclusions of the HIS are not supported by Inner West Council's Heritage Specialists. Today interwar and post war works of architecture and landscape are also considered to be of cultural significance, and should have been assessed in relation to both the Collegiate Gothic and Tudor Revival tradition in School Architecture in Australia and in terms of the introduction of modern architectural trends in School Architecture (based on criticism of using historic motifs for the chapel in the mid 1950s).

Inner West Council had established the heritage significance of three elements within the complex: the Chapel; the Headmaster's Residence and the gates in its Ashfield Heritage Study and the listings also mention the quadrangle. This inventory was undertaken in 199192 for Council by highly respected heritage consultants however the listing information has not been included in the SSD application (despite being provided by Council's heritage specialists).

The Heritage Assessment does not contain sufficient documentary or physical evidence to support a change in the level of significance from

Proponent's Response

In summary amendments to the HIS include the following:

- Minor additions to history to reflect updated research.
- Inclusion of known architects this has been the focus of additional research, and has been assisted by Dr. Noni Boyd from Inner West Council.
- Further identification of the significant elements across the Site.
- Acknowledgements and limitation section acknowledging the contribution of previous reporting and Dr Noni Boyd, as well as the limitations on research including poor record keeping post-war and the Covid-19 pandemic.

As part of the preparation of the amended HIS, further investigations were undertaken to determine the significance of the heritage items across the Site. It is concluded that the significant elements on the Site constitute the Headmasters House and grounds and the War Memorial Chapel. It is also considered that the following elements make a defining contribution to the significance of the Site overall, all with a high grading of significance, and should be retained:

- Headmaster's Residence and Chapel Garden;
- Chapel Gates an Way;
- War Memorial Chapel Court;
- Dining Hall:
- Presentation of the North Quad.

Figure 6 below illustrates the gradings of significance for buildings across the Site.



Issues Raised

that ascribed by the leading Australian Architectural Historian and expert on the architectural character of the Inner West, the late Robert Irving in association with Godden Mackay P/L. The inventory sheets which set the attributes and levels of significance should have formed the basis of any assessment of the site. The designers have not been identified or their context and influence on the development of collegiate and modern school architecture in Australia identified. The assessment of John Horbury Hunt's work is also not supported as it is not based on the published studies of his work by Peter Revnolds et al.

The opportunities for the retention of the residence in Seaview Street listed as being Contributory 1 in the proposed Trinity School Estate should be investigated (No. 48 Seaview Street).

As no detailed research has been undertaken regarding the development of site, the HIS does not contain sufficient information to assess the heritage impact of the current proposal on the buildings and landscape dating from pre 1965 likely to be of aesthetic and historic significance. Buildings identified as being of cultural significance should be adaptively reused and not demolished. This more sustainable approach to the treatment of the built environment is now being promoted by Australian ICOMOS and there is a new quideline to the Burra Charter that has not been considered by the heritage consultants. Buildings with little or no cultural significance that are not suitable of being adapted can be replaced with new facilities.

It is recommended that a staged approval be given so that selected works can continue to the sections of the site where buildings dating from pre 1965 are proposed for demolition and that that more detailed heritage advice be prepared to more adequately assess the cultural significance of the interwar and post war buildings on this campus, including identifying the architect and date of construction of each block or residence to Seaview Street and its associated landscape features or quadrangles. A more detailed CMP should be

Proponent's Response

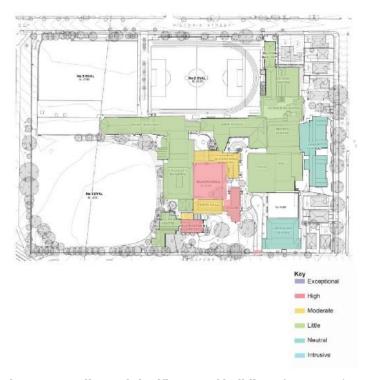


Figure 6. Gradings of significance of buildings (Source: Urbis, 2020)

The proposed development has been designed and orientated to minimise the impact of buildings across the Site with a high to moderate significance.

Additional consultation has been undertaken with Inner West Council to assist in mitigating the concerns raised in their formal submission. Following a Site visit on 7 September 2020, Council acknowledged the existing state of a number of the heritage items across the Site and how they have been modified as the Site has been developed over time. Additionally, it was also noted that the heritage consultant had sought to obtain additional information from Council, however, it was apparent



Issues Raised

prepared that contains historic research and a more detailed physical analysis of the building stock and landscape undertaken. The

proposed works to the existing buildings can then be assessed against the findings of this CMP in a revised HIS.

It is also recommended that the character of the landscape prior to any alteration as part of European settlement be undertaken, to determine that nature of 'country', to form part of the Aboriginal Assessment.

Proponent's Response

that the requested may not be available. Therefore, the amended HIS has been prepared in response to the documentation that is available and appropriately identifies the significance of the heritage items across the Site and their relation to the proposed development.

Further, as acknowledged by Council, it is proposed to remove four (4) dwellings along Seaview Street. The three (3) westernmost properties are not within the heritage listed curtilage of the School. The easternmost property (48 Seaview Street) is located within the heritage listed curtilage however it has been identified as being of no heritage significance. The impact of the replacement development on the opposite conservation areas has been assessed as acceptable. The removed dwellings would be replaced by the Junior School play area and a two (2) storey maintenance building. Additional investigations have provided no further information around the heritage significance of the Site to support the retention of 48 Seaview Street. Overall, the proposed development is considered to be of a sympathetic to the scale of the street and will appropriately respond to the future development of the Site.

Refer to **Appendix K** for further detail.

Heritage Recommendations

Staged Approval

A staged approval should be granted, with works to the post 1965 buildings that are to be replaced approved initially. Works to the pre 1965 buildings and landscaping should be reassessed following the preparation of a more comprehensive Conservation Management Plan that clearly identifies all of the phases of development as the site is potentially of state heritage significance.

Revised Conservation Planning Documents

As the site is potentially of state significance, additional heritage advice is to be prepared including a CMP and a revised HIS and the final design of the alterations to the pre 1965 buildings is to reflect this additional detailed heritage advice. These documents are to be prepared to the satisfaction of Inner West Council's Heritage Specialists.

It is acknowledged that the request for the preparation of a Conservation Management Plan for the entire Site was not requested as part of the SEARS issued by the Department of Planning, Industry and Environment, dated 26 September 2020. Therefore, the proponent does not support the request for a staged approval and/or the preparation of a Conservation Management Plan.

The HIS has been prepared to assess the potential impact of the proposed works on the significant fabric comprised across the Site and within proximity. In summery, the proposed works respect the significance of the place.

It is acknowledged that the request for the preparation of a Conservation Management Plan for the entire Site was not requested as part of the SEARS issued by the Department of Planning, Industry and Environment, dated 26 September 2020.

The proponent does not support nor agree with Inner West Council's request for the preparation of a Conservation Management Plan.



able :	. Response to Government Agencies and Organisations	s Submissions
ssues	Raised	Proponent's Response
he CM	P is to include:	
1)	Phases of development plans are to be prepared, including an analysis of the landscape and quadrangles before any building or levelling work took place. Surveys prepared by the Surveyor Generals' Department and the Public Works Department are to be utilised to determine landscape character.	
2)	More research is to be undertaken to determine the date of construction and the architect of each building and these are to be identified on the phases of development plan, including demolished buildings.	
3)	A comparative assessment is to be undertaken that illustrates examples that demonstrate that there are more significant examples of evolution of Collegiate Gothic or Tudor Revival and the transition to modern school architecture than this site. The architects of these buildings are to be identified. The comparative analysis is to include buildings of the same building type: eg chapels and headmaster's residences.	
4)	A second opinion regarding the significance of the interwar and post war buildings should be sought from an expert on the development and design of educational buildings in Australia.	
5)	Buildings identified as being of cultural significance should be adaptively reused not demolished as this is a more sustainable approach to the treatment of the built environment. Buildings with little or no cultural significance can be replaced with new facilities.	
6)	More detailed diagrams are to be prepared showing the levels of significance of the buildings, including contributory buildings in Seaview Street. Buildings identified as being of cultural significance should be retained and adapted, retaining evidence of their layout, significant fabric and spaces.	



Appendix A - Response to Government Agencies and Organisations Submissions

Trinity Grammar School - SSDA 10371 119 Prospect Road, Summer Hill

Table 1. Response to Government Agencies and Organisations Submissions

Issues Raised

A revised assessment of heritage impact is to be prepared that can be supported by documentary and physical research and reflects the levels of significance already established in the Ashfield Heritage Study in particular:

- 1) The levels of significance from the Ashfield Heritage Study listing are to be utilised for the Chapel, Headmaster's Residence and the gates.
- 2) The draft Trinity Grammar School Estate HCA listing is to be considered in the revised HIS.
- 3) Additional research is to be undertaken to determine the provenance of the relocated gates.
- 4) The impact of the proposed development on the surviving twentieth century buildings on the site is to be considered. once their significance has been adequately assessed in the CMP.
- 5) The impact of the development on views towards Summer Hill from a distance and on distance views from the first floors of adjacent Victorian era villas in Victoria Street that are now heritage items is to be identified.

Proponent's Response

An amended Heritage Impact Statement (HIS) has been prepared by Urbis and accompanies this submissions as **Appendix K**.

In summary amendments to the HIS included the following:

- Minor additions to history to reflect updated research.
- Inclusion of known architects this has been the focus of additional research, and has been assisted by Dr. Noni Boyd from Inner West Council.
- Further identification of the significant elements across the Site.
- Acknowledgements and limitation section acknowledging the contribution of previous reporting & Dr Noni Boyd, as well as the limitations on research including poor record keeping post-war and the Covid-19 pandemic.

Roads and Maritime Services Division

Maintenance and Delivery Vehicles Access and Movements on Victoria Street

Comment

The Transport and Accessibility Assessment prepared to support the development application states that Medium Rigid Vehicles (MRV) and Heavy Rigid Vehicles (HRV) entry manoeuvres conflicts with the pedestrian refuge island on Victoria Street.

The Statement of Environmental Effects states the following:

"In order for delivery vehicles to access the new loading facility adjacent to Yeo Park, the traffic island located opposite the southern access will be removed to accommodate access. It is proposed that a painted island is

As referenced in **Appendix H**, movements to and from the driveway for service vehicles were reviewed to determine the potential for access without any impact on the pedestrian refuge. While the original intent for access to/from this driveway was to limit heavy vehicle movements along Victoria Street, it was not possible to achieve turning movements for Medium Rigid Vehicles (MRV) or Heavy Rigid Vehicles (HRV) to/from Harland St without adjusting or relocating the pedestrian refuge.

Following a review of the service entry/exit and the necessary turning paths for heavy vehicles, the access has been amended to allow movements to/from the north on Victoria Street only. As a result, there is no longer a need to remove or change the existing pedestrian refuge.

Additional swept paths accompanying this submission in **Appendix H**.



Table 1. Response to Government Agencies and Organis	

Issues Raised

Proponent's Response

installed in replacement of the traffic island. In light of the above, the left hand turn only will need to be modified to permit delivery and service vehicles to turn right out of the driveway."

Additionally, the proponent accepts a condition to provide a Service Vehicle Management Plan.

The proponent accepts the proposed condition to undertake a Stage 2 (Concept Plan) Road Safety

It is advised that the proposed replacement of pedestrian refuge island with a painted island on Victoria Street would have an impact on the pedestrian safety in particular for school children crossing Victoria Street.

It is noted that the details of the type and frequency of delivery vehicles expected to access/egress the school are not provided and it is not clear whether the delivery vehicle movements would occur outside of peak school activity.

Any changes to traffic facilities on Victoria Street will need to be approved by the local council.

Recommendation

It is requested that:

- The applicant be conditioned to undertake a Stage 2 (Concept Plan) Road Safety Audit in accordance with the relevant Austroads Guidelines by an independent TfNSW accredited road safety auditor for the following:
 - o Proposed painted island in replacement of the pedestrian refuge on Victoria Street; and
 - Proposed delivery vehicle access arrangement for Southern Access Road on Victoria Street.

Based on the results of the road safety audit, the applicant shall review the design drawings and implement safety measures in consultation with the local council as required.

The applicant provides a Service Vehicle Management Plan including the details of the type and frequency of service



Issues Raised	Proponent's Response
vehicle movements to the site and expected timing of these movements as part of the applicant's response to submission.	
Construction Pedestrian and Traffic Management	
Comment Section 7.1 of the Transport and Accessibility Assessment states the following:	The proponent is happy to accept the recommended condition to prepare a Construction Pedestria and Traffic Management Plan (CPTMP).
Each contractor appointed to undertake works for the renewal project will be required to prepare a Construction Traffic Management Plan (CTMP). All CTMPs prepared for works relating to this project shall be prepared in accordance with the Framework outlined in this section of the report.	
It is noted that construction activities for the redevelopment of the school are expected to occur while students are on site. In addition, construction vehicle movements from the development could have the potential to impact on general traffic and bus operations within the vicinity of the School, as well as the safety of pedestrians and cyclists particularly during commuter peak periods.	
Recommendation	
It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP), in consultation with Inner West Council and TfNSW and submit a copy of the final plan to Inner West Council, prior to the commencement of any work on site.	



Table 1. Response to Government A	gencies and	l Organisations	Submissions
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Issues Raised Proponent's Response

Green Travel Plan

Comment

It is noted that a Green Travel Plan has been prepared and included in the Transport and Accessibility Assessment.

Recommendation

TfNSW requests that the applicant be conditioned to update the Green Travel Plan (for staff and students) in consultation with TfNSW to encourage active and public transport modes and reduce the reliance on private vehicles.

The proponent is happy to accept the recommended condition to update the Green Travel Plan (for staff and students) in consultation with TfNSW to encourage active and public transport modes and reduce the reliance on private vehicles.

Department of Transport

Maintenance and Delivery Vehicles Access and Movement on Victoria Street

Comment

The Transport and Accessibility Assessment prepared to support the development application states that Medium Rigid Vehicles (MRV) and Heavy Rigid Vehicles (HRV) entry manoeuvres conflicts with the pedestrian refuge island on Victoria Street.

The Statement of Environmental Effects states the following:

"In order for delivery vehicles to access the new loading facility adjacent to Yeo Park, the traffic island located opposite the southern access will be removed to accommodate access. It is proposed that a painted island is installed in replacement of the traffic island. In light of the above, the left hand turn only will need to be modified to permit delivery and service vehicles to turn right out of the driveway."

It is advised that the proposed replacement of pedestrian refuge island with a painted island on Victoria Street would have an impact

As referenced in **Appendix I**, movements to and from the driveway for service vehicles were reviewed to determine the potential for access without any impact on the pedestrian refuge. While the original intent for access to/from this driveway was to limit heavy vehicle movements along Victoria Street, it was not possible to achieve turning movements for Medium Rigid Vehicles (MRV) or Heavy Rigid Vehicles (HRV) to/from Harland St without adjusting or relocating the pedestrian refuge.

Following a review of the service entry/exit and the necessary turning paths for heavy vehicles, the access has been amended to allow movements to/from the north on Victoria Street only. As a result, there is no longer a need to remove or change the existing pedestrian refuge.

Additional swept paths accompanying this submission in **Appendix H**.

The proponent accepts the proposed condition to undertake a Stage 2 (Concept Plan) Road Safety Audit.

Additionally, the proponent accepts a condition to provide a Service Vehicle Management Plan.



Issues Raised	Proponent's Response
on the pedestrian safety in particular for school children crossing Victoria Street.	
t is noted that the details of the type and frequency of delivery rehicles expected to access/egress the school are not provided and it is not clear whether the delivery vehicle movements would occur outside of peak school activity.	
Any changes to traffic facilities on Victoria Street will need to be approved by the local council.	
Recommendation	
It is requested that:	
 The applicant be conditioned to undertake a Stage 2 (Concept Plan) Road Safety Audit in accordance with the relevant Austroads Guidelines by an independent TfNSW accredited road safety auditor for the following: Proposed painted island in replacement of the pedestrian refuge on Victoria Street; and Proposed delivery vehicle access arrangement for Southern Access Road on Victoria Street. 	
Based on the results of the road safety audit, the applicant shall review the design drawings and implement safety measures in consultation with the local council as required.	
 The applicant provides a Service Vehicle Management Plan including the details of the type and frequency of service vehicle movements to the site and expected timing of these movements as part of the applicant's response to submission. 	



Issues Raised	Proponent's Response
Construction Pedestrian and Traffic Management	
Comment	The proponent accepts the proposed condition to prepare a Construction Pedestrian and Traffi Management Plan (CPTMP).
Section 7.1 of the Transport and Accessibility Assessment states the following:	
Each contractor appointed to undertake works for the renewal project will be required to prepare a Construction Traffic Management Plan (CTMP). All CTMPs prepared for works relating to this project shall be prepared in accordance with the Framework outlined in this section of the report.	
It is noted that construction activities for the redevelopment of the school are expected to occur while students are on site. In addition, construction vehicle movements from the development could have the potential to impact on general traffic and bus operations within the vicinity of the School, as well as the safety of pedestrians and cyclists particularly during commuter peak periods.	
Recommendation	
It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP), in consultation with Inner West Council and TfNSW and submit a copy of the final plan to Inner West Council, prior to the commencement of any work on site.	
Green Travel Plan	
Comment It is noted that a Green Travel Plan has been prepared and included in the Transport and Accessibility Assessment.	The proponent accepts the proposed condition that will require an update to the Green Travel Plan in consultation with TfNSW to encourage active and public transport modes and reduce the reliance on private vehicles.
Recommendation	



Table 1. Response to Government Agencies and Organisations Submissions		
Issues Raised	Proponent's Response	
TfNSW requests that the applicant be conditioned to update the Green Travel Plan (for staff and students) in consultation with TfNSW to encourage active and public transport modes and reduce the reliance on private vehicles.		
Suggested Conditions of Consent		
Maintenance and Delivery Vehicles Access and Movements on Victoria Street Prior to the issue of the Construction Certificate, the applicant shall undertake a Stage 2 (Concept Plan) Road Safety Audit in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits by an independent TfNSW accredited road safety auditor for the following: Proposed painted island in replacement of the pedestrian refuge on Victoria Street; and Proposed delivery vehicle access arrangement via Southern Access Road. Based on the results of the road safety audit, the applicant shall review the design drawings and implement safety measures in consultation with Inner West Council as required.	As aforementioned, movements to and from the driveway for service vehicles were reviewed to determine the potential for access without any impact on the pedestrian refuge. While the original intent for access to/from this driveway was to limit heavy vehicle movements along Victoria Street, it was not possible to achieve turning movements for Medium Rigid Vehicles (MRV) or Heavy Rigid Vehicles (HRV) to/from Harland St without adjusting or relocating the pedestrian refuge. Following a review of the service entry/exit and the necessary turning paths for heavy vehicles, the access has been amended to allow movements to/from the north on Victoria Street only. As a result, there is no longer a need to remove or change the existing pedestrian refuge. Additional swept paths accompanying this submission in Appendix H . Notwithstanding the above, the proponent is happy to accept the recommended condition, if required.	
Construction Pedestrian and Traffic Management Prior to the commencement of any work on site, the applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP), in consultation with Inner West Council and TfNSW with specific reference to but not limited to: Location of the proposed work zone; Haulage routes; Construction vehicle access arrangements; Proposed construction hours;	The proponent is happy to accept the recommended condition for the preparation of a Construction Pedestrian and Traffic Management Plan (CPTMP).	



Table 1. Response to Government Agencies and Organisations Submissions		
Issues Raised	Proponent's Response	
 Proposed measures to prevent students accessing the construction area; Estimated number of construction vehicle movements; Construction program; Any potential impacts to general traffic, cyclists, pedestrians, students and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works; Cumulative construction impacts of projects within the vicinity of the proposed development; and Proposed mitigation measures. Should any impacts be identified, the duration of the impacts and measures proposed to mitigate any associated general traffic, public transport, pedestrian, students and cyclist impacts should be clearly identified and included in the CPTMP. The applicant shall submit a copy of the final plan to Inner West Council, prior to the commencement of any work on site. 		
Green Travel Plan Prior to the issue of the Occupation Certificate, the applicant shall update the Green Travel Plan (for staff and students) in consultation with TfNSW to encourage active and public transport modes and reduce the reliance on private vehicles.	The proponent accepts the recommended condition to update the Green Travel Plan (for staff and students) in consultation with TfNSW to encourage active and public transport modes and reduce the reliance on private vehicles.	
Heritage Council of NSW		
Previous comments from the Heritage Council of NSW stated that although subject site was not listed on the State Heritage Register, the site could yield archaeological potential. It was noted the scoping report was silent on historical archaeology considerations. Recommendations were made that the proponent should undertake an assessment of the archaeological potential of the site and any impacts the project may have. The SEARs subsequently issued by DPIE required the proponent to:	A Historical Archaeological Assessment (HAA) has been prepared by Urbis and accompanies this submission as Appendix L . The subject area has various potential for the presence of archaeological resources. The section of the subject area that will be impacted by the proposed development has low to nil archaeological potentia due to the following: There is no evidence of built structures from earlier use of the proposed development footprint within the subject area.	



Issues Raised

- Provide a statement of significance and an assessment of the impact of the proposal on the heritage significance of the site:
- Address any archaeological potential and significance on the site and based on the outcomes of those investigations, undertake a series of measures to properly manage any relics that may be present

The Heritage Impact Statement (Heritage Impact Statement, Trinity Grammar School, Urbis, 10 February 2020) supplied as an appendix to the EIS (Environmental Impact Statement, The Renewal Project – Trinity Grammar School, SSD - 10371, Willow Tree Planning, 26 March 2020) includes an assessment of the impacts of the proposal on the heritage significance of the site, however it does not address archeological potential of the site, or address any impacts the proposal may have on potential historical archaeology as required by the SEARs. The HIS notes that it is "...beyond the scope of this report to assess archaeological potential".

Therefore, it is recommend that DPIE considers requiring the proponent to undertake an assessment of the archaeological potential and significance on the site in accordance with the SEARs.

Proponent's Response

- Physical evidence of early agricultural use (Phase 2) would have been completely removed by consequent development of the subject area.
- Early structures associated with the Hurlstone College (Phase 3) have been removed and replaced by new structures of Trinity Grammar School and by associated infrastructure.

The level of disturbance caused by the historical land use, particularly the gradual development of the structures and infrastructure of Trinity Grammar School would have removed any physical remains of previously accumulated archaeological resources. The area of proposed impact footprint within the subject area has low to nil potential for any archaeological resource. The eastern part of the subject area, around the Headmaster's Residence has been the subject of lower level of disturbance. The original building from the late 19th century is still intact, and its surroundings were largely spared from the concurrent impacts of the school development and consequently have low to moderate potential for associated archaeological resources.

The HAA concludes that there is only low to nil potential for archaeological resources within the proposed impact footprint of the development and low to moderate archaeological potential for the surrounding of the Headmaster's Residence. This area is excluded from the proposed development and consequently will not be impacted.

In light of the above, the proposed development will not have any detrimental impact on archaeological resources including relics and can proceed with the following recommendations:

- Should any suspected archaeological resources including relics be uncovered during the development, works must stop, and Heritage NSW should be notified in line with Section 146 of the Heritage Act 1977;
- An induction material for all contractors on site should be developed to inform personnel of the nature and type of archaeological resource that might be encountered during construction.

Biodiversity and Conservation Division

EES has reviewed the relevant documentation and make the following comments:

Aboriginal Cultural Heritage Assessment Report

EES notes that an ACHAR has been submitted and prepared by Urbis undated. EES recommends that should an approval be granted that The proponent is happy to accept the recommendations within the ACHAR prepared by Urbis.



Table 1. Response to Government Agencies and Organisations Submissions		
Issues Raised	Proponent's Response	
any recommendations within the ACHAR form part of conditions of consent.	No further consideration is required.	
Biodiversity		
A Biodiversity Development Assessment Report waiver was approved by EES 14 April 2020.	No further consideration is required.	
Flooding		
EES has no further flooding comments.	No further consideration is required.	
Ausgrid		
Ausgrid notes the requirement for additional load to the development and recommends the proponent make the necessary connection application to Ausgrid as soon as practicable.	As previously addressed in the Infrastructure Management Plan (Appendix 30 of the original EIS submission), the existing infrastructure and utility services within the campus will be extended and modified to service the proposed development.	
Ausgrid has 33,000V cables buried along Prospect Road and suitable precautions should be adopted by the development regarding the construction and ongoing operation of the facility in the vicinity of these cables.	The proponent will make the necessary connection application to Ausgrid when required.	
Environmental Protection Policy		
The EPA does not have any interest in the EIS exhibition or the proposal as the EPA is not the appropriate regulatory authority.	It is acknowledged that the EPA has no further interest in the proposal and no further consultation is required.	
Based on the information provided, the proposal does not require an environment protection licence under the Protection of the Environment Operations Act 1997 (the POEO Act). Furthermore, the proposal is not being undertaken by or on behalf of a NSW Public Authority nor are the activities other activities for which the EPA is the appropriate regulatory authority.	A Geotechnical Report prepared by Douglas Partners accompanied the original EIS submission as Appendix 25. The matters around groundwater seepage were previously considered by Douglas Partners. No further consideration is required for the purpose of this RTS Submission.	
In view of these factors, the EPA has no further interest in the proposal and no further consultation is required. While the EPA does not wish to be consulted we recommend that, in addition to the requirements of the Draft SEARS, the EIS should address the following:		



Table 1. Response to Government Agencies and Organisations Submissions		
Issues Raised	Proponent's Response	
Basement Excavations - the EIS should detail measures to collect and manage any seepage waters from the basement/underground car parking areas to prevent pollution of waters. Consideration should be given to waterproofing or "Tanking" and basement levels likely to interfere with an aquifer to prevent the need for treatment and discharge of groundwater.		
Sydney Water		
Water Servicing		
 Potable water servicing should be available via a 150mm DICL watermain (laid in 1985) on Seaview Street. Amplifications to the watermain may be required. 	As previously addressed in the Infrastructure Management Plan (Appendix 29 of the original EIS submission), there are existing Sydney Water Authority serves present around the Trinity Grammar School. Authority potable water is available in Prospect road, Seaview Street and Victoria Street: Prospect Road has a DN100mm diameter Cast Iron Cement Lined (CICL) main; Seaview Street has a DN150mm Ductile Iron Cement Lined (DICL) main, and two DN500mm diameter CICL mains; Victoria Street has a DN375mm diameter CICL main and a DN150mm diameter CICL main. The Site has two authority connection points, one DN100mm connection on Victoria Street, and one DN50mm connection point, located on Prospect Road. These two (2) connections will be retained. The existing DN100mm connection point located on Victoria St shall remain. The reticulated pipeline will remain in-situ during the construction of the new building. During the various stages of the build, branch lines shall be constructed and capped off, to allow connection to at later stages of the school's lifecycle. It is proposed that the entire school's potable supply shall be supplied off a ring main type arrangement, utilising the capped off branches that were installed during earlier stages of the project. No further consideration is required at this stage.	
Wastewater Servicing		
Wastewater servicing should be available via a 225mm VC wastewater main (laid in 1987) on Seaview Street.	Existing Sydney Water authority sewer drainage services are present around the Trinity Grammal School site. The site has two DN150mm, Vitrified Clay Pipe (VCP) authority connection points, located on Prospect Rd and Seaview St.	



Appendix A - Response to Government Agencies and Organisations Submissions Trinity Grammar School - SSDA 10371 119 Prospect Road, Summer Hill

Table 1. Response to Government Agencies and Organisations Submissions	
Issues Raised	Proponent's Response
	The pipelines then continue within the site, to serve the existing building's drainage requirements, by way of gravity drainage.
	The existing sewer drainage connections points and site infrastructure reticulated pipelines are of adequate size to accommodate the increase of load, and do not require augmentation. It is envisaged the existing VCP is reaching the end of its service life, and as such, the sewer drainage pipeline shall be upgraded to new, unplasticised Polyvinyl Chloride (uPVC) pipework. Alternatively, the existing pipework could be relined, should the integrity of the pipework withstand this approach.
	No further consideration is required at this stage.

