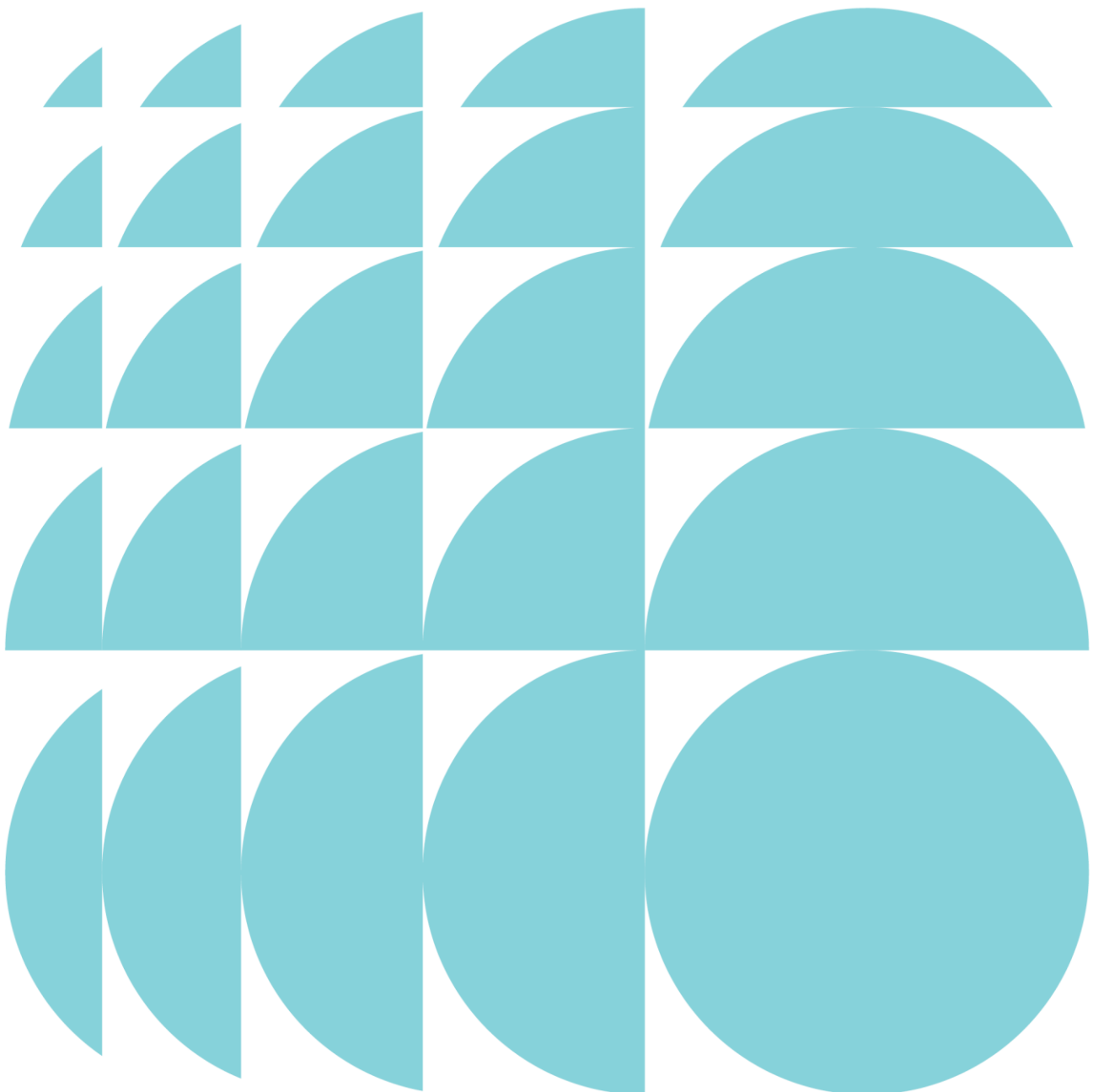


Response to Submissions

Samuel Gilbert Public School Redevelopment
SSD18_9274

Submitted to Department of Planning and
Environment
On behalf of Schools Infrastructure NSW

13 May 2019 | 2190298



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Contents

Executive Summary	3
1.0 Introduction	5
1.1 Amendments to Proposed Development	5
2.0 Key Issues and Proponent's Response	7
Government Agencies and Authorities	7
Members of the Public	7
2.1 Built Form	7
2.2 Traffic and Parking	12
2.3 Vegetation	14
2.4 Bushfire	14
3.0 Proposed Amended Development	17
3.1 Overview of Proposed Changes	17
3.2 Description of Proposed Development (as amended)	17
4.0 Additional Assessment	18
4.1 Consistency with Original SSDA scheme	18
4.2 Consistency with Relevant EPIs, Policies and Guidelines	18
4.3 Built Form	19
4.4 Traffic and Parking	19
4.5 Vegetation	19
4.6 Bushfire	19
4.7 Ecologically Sustainable Development	20
5.0 Final Mitigation Measures	21
6.0 Conclusion	23

Figures

Figure 1 Increased set back of Building N	9
Figure 2 South eastern perspective of Building N and Building P	9
Figure 3 Reduced height of Building N	10
Figure 4 Reduced height of Building N and Building P – previous design (left), revised design (right)	10
Figure 5 Increased planting buffer on Ridgescrop Drive	11
Figure 6 Revised landscaping on Ridgescrop Drive	11
Figure 7 Intersection performance analysis	12
Figure 8 Additional kiss and drop zones (shown in red)	13
Figure 9 Bushfire protection management strategy	16

Tables

Contents

Table 1	Comparison of trip generation	12
Table 2	Final mitigation measures	21

Appendices

A	Response to Agency Submissions <i>Ethos Urban</i>	
B	Response to Public Submissions <i>Ethos Urban</i>	
C	Updated Architectural Drawings <i>Fulton Trotter</i>	
D	Supplementary Design Report <i>Fulton Trotter</i>	
E	Landscape Drawings <i>Ground Ink</i>	
F	Clause 4.6 Variation Request <i>Ethos Urban</i>	
G	Traffic and Transport Impact Assessment (including covering letter) <i>TSA</i>	
H	Arboricultural Impact Assessment <i>Tree Talk</i>	
I	Biodiversity Development Assessment Report <i>Travers Ecology</i>	
J	Bushfire Assessment Report (including covering letter) <i>Peterson Bushfire</i>	
K	Revised Bulk Earthworks Plan and Stormwater Management Strategy <i>Henry & Hymas</i>	
L	Contamination Statement <i>WSP</i>	
M	Services Statement <i>Northrop</i>	
N	Acoustic Statement <i>Day Design</i>	
O	Flooding Statement <i>Henry & Hymas</i>	
P	ESD Statement <i>JHD</i>	

Executive Summary

The proposed redevelopment of Samuel Gilbert High School involves alterations to the existing school buildings, the construction of a new three storey building along Ridgescrop Drive and a new school hall. The redevelopment will result in the removal of 12 demountable classrooms and will enable increased capacity of the school from 780 students to 1,000 students.

The Environmental Impact Statement (EIS) in support of State Significant Development Application (SSDA 18_9274) for the redevelopment of Samuel Gilbert High School was publicly exhibited between 21 November 2018 and 18 December 2018. Public exhibition occurred in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

13 submissions were received in response to the public exhibition of the EIS, including submissions made by government agencies and authorities and the general public, as follows:

- Government agencies and authorities: 9.
- Members of the public: 4.

The Department of Planning and Environment (the Department) has also prepared a letter setting out additional information or clarifications sought prior to the final assessment of the project.

The key issues raised in submissions (agencies and members of the general public) can be grouped into the following categories:

- Urban design and built form.
- Traffic and parking.
- Vegetation.
- Bushfire.

The proponent, Schools Infrastructure NSW (SINSW), and its expert project team have considered all issues raised in the submissions made pursuant to the requirements of the EP&A Act.

In responding to and addressing the range of matters raised by government agencies, authorities and the general public, SINSW has sought to refine the proposal for redevelopment of Samuel Gilbert High School. The key changes made post-public exhibition are:

- Building N has been set back a further 3 metres from Ridgescrop Drive, resulting in a total set back of 11.6 metres.
- Building N and P have been reduced in height by 1.3 metres, from 17 metres to 15.7 metres.
- A revised landscape scheme is proposed, involving additional planting within the increased setback on Ridgescrop Drive, replacement of the proposed retaining wall with a batter and removal of some exotic species.
- Introduction of sign-posted kiss and ride zones on Ridgescrop Drive and Gilbert Road and reinstatement of the existing kiss and ride on Ridgescrop Drive.
- Revised bushfire protection strategy, involving introduction of an Asset Protection Zone (APZ) around the proposed Building N.

Section 2 and **Section 4** and the accompanying documentation provide an analysis and assessment of the proposed changes and the refined project. Final measures to mitigate the impacts associated with the refined proposal are detailed at **Section 5**.

In summary, the nature of the changes are considered to result in a development that retains the key elements of the proposal that was publicly exhibited, whilst providing a refined proposal that responds to community and authority feedback to deliver an enhanced outcome on the site. The amended proposal carefully responds to the

complex environmental constraints that apply to the site, and importantly will provide high quality education facilities to meet projected future student demand in The Hills LGA. The key social infrastructure will enable the delivery of the Department of Education's strategic priorities and will result in significant benefits to the wider community.

1.0 Introduction

The Environmental Impact Statement (EIS) in support of State Significant Development Application (SSDA 18_9274) for the redevelopment of Samuel Gilbert High School was publicly exhibited between 21 November 2018 and 18 December 2018. Public exhibition occurred in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

13 submissions were received in response to the public exhibition of the EIS, including submissions made by government agencies and authorities and the general public, as follows:

- Government agencies and authorities: 9.
- Members of the public: 4.

The Department of Planning and Environment (the Department) has also prepared a letter setting out additional information or clarifications sought prior to the final assessment of the project.

The proponent, Schools Infrastructure NSW (SINSW), and its expert project team have considered all issues raised in the submissions made pursuant to the requirements of the EP&A Act.

This Response to Submissions report, prepared by Ethos Urban on behalf of the proponent, sets out the responses to the issues raised in accordance with Clause 85A of the *Environmental Planning and Assessment Regulation 2000* (the Regulation) and details the final project design and mitigation measures for which approval is now sought. The final project design includes amendments made by SINSW pursuant to Clause 55 of the Regulation, including changes to address matters raised in submissions.

This report provides a detailed response to all of the issues raised by the various government agencies and the general public. Whilst the submissions received from agencies have been addressed individually, the submissions made by the general public have been addressed on an issue by issue basis. This approach has been adopted to reflect that many of the submissions raised similar issues and concerns.

The key issues raised in submissions (government agencies and the general public) can be broadly grouped into the following categories:

- Urban design and built form.
- Traffic and parking.
- Vegetation.
- Bushfire.

This report provides a detailed response to each of the above issues and outlines the proposed amendments to the exhibited EIS. Where individual issues are not discussed in this report, a detailed response can be found in the tables at **Appendix A** (Response to Agency Submissions) and **Appendix B** (Response to Public Submissions).

1.1 Amendments to Proposed Development

To address the issues raised in submissions and reflect the resulting design changes, a range of updated plans and documentation have been prepared. The key changes made post-public exhibition are:

- Building N has been set back a further 3 metres from Ridgescrop Drive, resulting in a total set back of 11.6 metres.
- Building N and P have been reduced in height by 1.3 metres, from 17 metres to 15.7 metres.
- A revised landscape scheme is proposed, involving additional planting within the increased setback on Ridgescrop Drive, replacement of the proposed retaining wall with a batter and removal of some exotic species.
- Introduction of sign-posted kiss and ride zones on Ridgescrop Drive and Gilbert Road and reinstatement of the existing kiss and ride on Ridgescrop Drive.

- Revised bushfire protection strategy, involving introduction of an Asset Protection Zone (APZ) around the proposed Building N.

The revised drawings include updated Architectural Drawings (**Appendix C**), a Supplementary Design Report and Schedule of Architectural Changes (**Appendix D**) and updated Landscape Drawings (**Appendix E**).

The following consultants' reports and supporting information have also been updated, or further supplements the material originally submitted in support of the EIS:

- Clause 4.6 Variation Request.
- Traffic and Transport Impact Assessment.
- Arboricultural Impact Assessment.
- Biodiversity Assessment Report.
- Bushfire Assessment Report.
- Revised Bulk Earthworks Plan and Stormwater Management Plan.

The following responses are provided to address detailed issues raised in agency submissions. **Appendix A** provides a detailed response to all agency submissions.

- Contamination Response.
- Services Response.
- Acoustic Response.
- Flooding Response.
- ESD Response.

The revised supporting documentation enables the Department to undertake an informed assessment of the amended proposal. The findings of the revised supporting consultant documentation are summarised at **Section 4** of this report as relevant.

A final schedule of the mitigation measures proposed is provided at **Section 5**.

This report should be read in conjunction with the EIS prepared by Minto Planning, dated 14 November 2018, as relevant.

2.0 Key Issues and Proponent's Response

This section of the report provides a detailed response to the following key issues raised by the Department, government agencies and authorities and the general public during the public exhibition of the SSDA:

- Urban design and built form.
- Traffic and parking.
- Vegetation.
- Bushfire.

A response to each of the individual issues raised by the Department and submitters is provided in the tables at **Appendix A** and **Appendix B**.

An overview of the parties who made submissions and their key issues for consideration is provided below. Other issues which require further assessment are considered in **Section 4**.

Government Agencies and Authorities

9 submissions were received from government agencies and authorities in response to the exhibition of the EIS. Responses were received from:

- The Hills Shire Council.
- Transport for NSW.
- Government Architect NSW.
- Office of Environment and Heritage.
- OEH – Heritage Division.
- Sydney Water.
- Endeavour Energy.
- Environment Protection Agency (EPA).
- NSW Rural Fire Service.

A number of these submissions comprised the agency or authority confirming they had no comment on the application or providing guidance on recommended conditions. These included submissions from OEH – Heritage Division, Sydney Water, Endeavour Energy, the EPA and NSW Rural Fire Service.

In addition to these submissions, the Department of Planning and Environment has provided an issues letter summarising the key issues to be addressed. A detailed response to all issues raised in agency and authority submissions, in addition to the Department's issues letter, is provided at **Appendix A**.

Members of the Public

A total of four public submissions were received and all public submissions objected to the proposal. Submissions were received from members of the public who live in the vicinity of Samuel Gilbert Public School.

These submissions raised issues relating to traffic, built form, community use of school facilities and construction impacts. A detailed response to the issues raised by the public is provided at **Appendix B**.

2.1 Built Form

2.1.1 Issue

The Department, Council and the Government Architect NSW (GANSW) raised concern about the appropriateness of the scale of the proposed building on Ridgescrop Drive and the existing character of the site. The Department

requested consideration be given to increasing the set back of Building N and to allow for additional screen planting. In addition to this, a Clause 4.6 Variation was requested to be submitted.

2.1.2 Proponent's Response

The revised design has increased the building setback and reduced the height of the building, resulting in an overall improvement to the relationship between the school and the surrounding development. Specifically:

- Building N has been set back a further 3 metres from Ridgecrop Drive, resulting in a total set back of 11.6 metres (refer to **Figure 1** and **2**).
- Building N and P have been reduced in height by 1.3 metres, from 17 metres to 15.7 metres (refer to **Figure 3** and **Figure 4**).
- The increased set back allows for additional trees and screen planting (refer to **Figure 5**).
- The retaining wall has been replaced with a landscaped bank (batter) on Ridgecrop Drive, allowing for increased planting (refer to **Figure 6**).

Overall, these design changes significantly improve the relationship of the development with the surrounding area by reducing the visual impact and providing additional opportunities for landscape screening, as detailed further below.

Notwithstanding the amendments that have been made in response to the concerns raised with the proposed built form, it is important to recognise that a built form that is larger than the character of the surrounding area is appropriate on the subject site because:

- There is a significant need for high quality education facilities to meet projected future student demand in The Hills LGA. The provision of this key social infrastructure will result in significant benefits to the wider community that outweigh the localised impacts that occur as a result of the proposal.
- The site is highly constrained by bushfire and ecology. Acknowledging the recognised need for the facilities, the alternative to the current proposal would be to expand the footprint of the development, having a far greater impact on the vegetation on the site and producing a worse planning outcome.
- Schools are civic buildings, which since the early establishment of Sydney have deliberately been larger than the development that surrounds them in order to act as important markers, that recognise the value of education and their centrality to our communities.

A revised Bulk Earthworks Plan and Stormwater Management Strategy are submitted at **Appendix K** to reflect these amendments.

Increased setback on Ridgecrop Drive

The increased set back of Building N from Ridgecrop Drive provides greater separation between the proposed development and the surrounding residential area (refer to **Figure 1**) by providing a total setback of 11.6m. This arrangement aligns Building N with Building P, resulting in an overall reduced visual impact to the street (refer to **Figure 2**).

The increased setback also reduces the height of the building by setting the ground level closer to the natural ground level of the site. Additional planting has then been provided to increase screening of the building and blend with the existing streetscape (as outlined in further detail below).



Reduction in height of Building N and Building P

9

Whilst this remains above the maximum height permitted by *The Hills Local Environmental Plan 2012* (THLEP), Clause 42 of the *State Environmental Planning Policy (Educational Establishments and Childcare Facilities) 2017* (ESEPP) permits consent to be granted even though the development would contravene a development standard. A Clause 4.6 Variation Request is submitted at **Appendix F**. It is also noted that the Education SEPP permits complying development for the purpose of a school to a maximum height of 22 metres or 4 storeys. Whilst this application is not made as complying development under the Education SEPP, the proposed height is significantly below this development standard.

The reduction in height has allowed for the reconfiguration of the roof design of Building N and Building P, which reduces the bulk of the roof and improves the overall visual impact (refer to **Figure 4**).

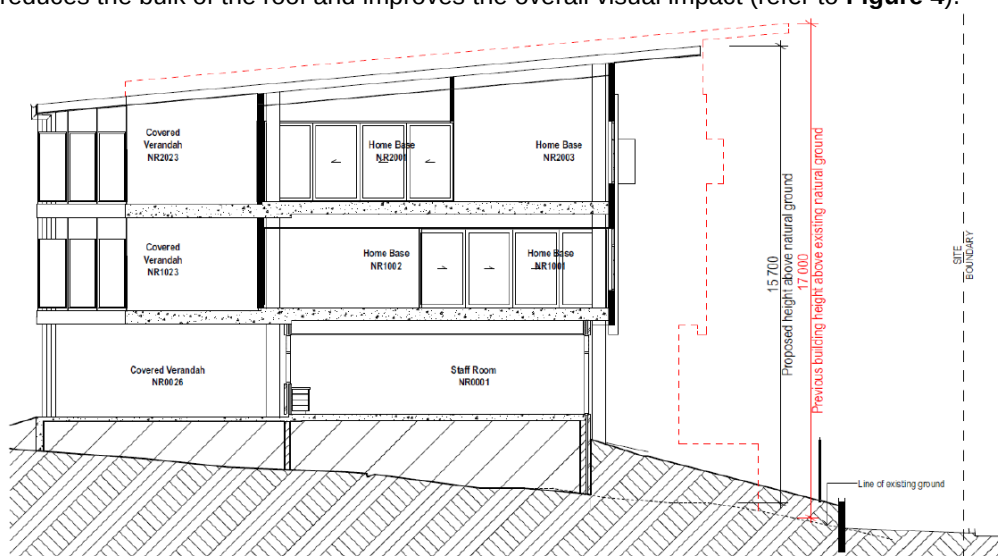


Figure 3 Reduced height of Building N

Source: Fulton Trotter



Figure 4 Reduced height of Building N and Building P – previous design (left), revised design (right)

Source: Fulton Trotter

Increased landscaping on Ridgecrop Drive

Increased tree planting and landscaping is now proposed on Ridgecrop Drive, as a result of the increased set back of Building N (refer to **Figure 5** and **Appendix E**). The increased planting will enhance screening of the built form and blend in with the bushland character of the existing streetscape. In addition to this, the increased setback allows for the removal of the retaining wall and replacement with a landscaped bank that more closely aligns with the natural ground levels. This bank provides additional opportunities for planting, and reduces the overall visual impact of the built form (refer to **Figure 6**).



Figure 5 Increased planting buffer on Ridgescrop Drive

Source: Ground Ink



Previous design



Revised design
Figure 6 Revised landscaping on Ridgescrop Drive

Source: Fulton Trotter

2.2 Traffic and Parking

2.2.1 Issue

Traffic and parking issues were primarily raised by Council and TfNSW and focussed on:

- Trip generation assumptions and intersection performance analysis.
- Drop-off/pick-up arrangements and the potential to introduce a kiss and ride zone.
- Car parking provision is less than the rates set out in The Hills Development Control Plan (THDCP) and relies on public and on-street parking facilities.
- Safety of the school entrance.

2.2.2 Proponent's Response

Trip generation and intersection performance

Trip generation and intersection performance analysis has been revised in the updated Traffic and Transport Impact Assessment in accordance with the recommendations of TfNSW (refer to **Appendix G**). A comparison of the previous and revised trip generation is outlined at **Table 1**.

Table 1 Comparison of trip generation

Trips	AM Peak		PM Peak	
	<i>Previous</i>	<i>Revised</i>	<i>Previous</i>	<i>Revised</i>
Inbound	87	98	74	98
Outbound	74	98	87	98
Total	161	196	161	196

Based on the revised trip generation, updated intersection performance analysis was undertaken. This analysis found that the level of service of the key intersections remains unchanged as a result of the proposed development, despite the increased trip generation (refer to **Figure 7**).

Intersection	Existing Conditions		Projected Conditions	
	AM Peak	PM Peak	AM Peak	PM Peak
Gilbert Road & Ridgeway Drive (southernmost junction)				
Delay	8.9	42.6	10.7	50.1
Degree of Saturation	0.74	1.05	0.81	1.07
Level of Service	A	D	A	D
Gilbert Road & Ridgeway Drive (northernmost junction)				
Delay	8.7	10.2	8.9	10.3
Degree of Saturation	0.50	0.56	0.51	0.56
Level of Service	A	A	A	A

Figure 7 Intersection performance analysis

Source: TSA

Kiss and ride

Additional kiss and ride zones are proposed to be provided along Ridgeway Drive and Gilbert Road (refer to **Figure 8**). These zones will be sign-posted to designate this area as a loading zone during the AM and PM peak periods. Based on trip generation for the proposed development, a kiss and ride zone of approximately 220m – 230m is required to cater for demand. The two additional kiss and ride zones are a total of 272m in length. In addition to this, the existing indented kiss and drop bay on Ridgeway Drive will be reinstated, resulting in more than sufficient capacity for loading.

Management of these kiss and ride zones will be implemented in accordance with the preliminary Operational Traffic and Pedestrian Management Plan at **Appendix G**, which includes measures to ensure that students are supervised by a warden and that parents/carers are informed about the use of the zone.

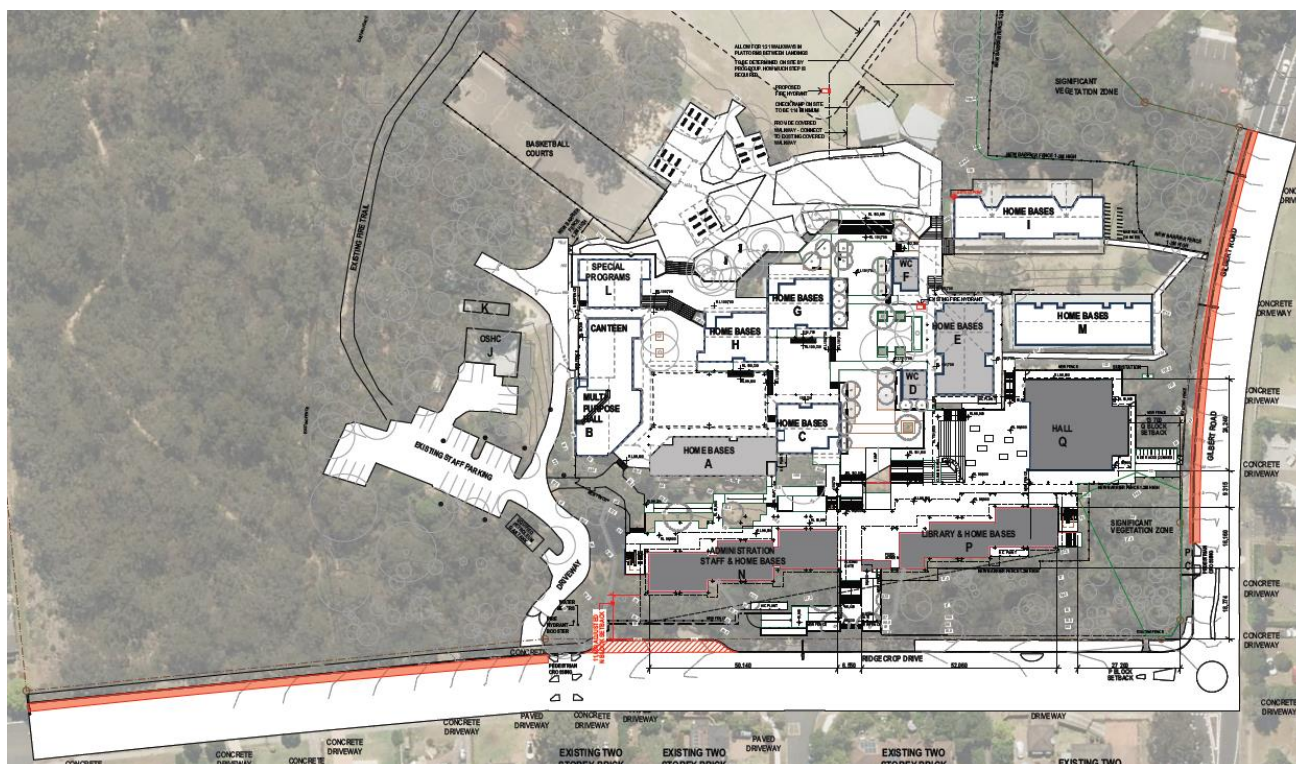


Figure 8 Additional kiss and drop zones (shown in red)

Source: Fulton Trotter

Car parking

The requirement to provide car parking has been balanced against the constraints of the existing vegetation on the site and change in levels. As a result, no additional car parking has been provided within the site to avoid the need to remove additional vegetation or undertake additional earthworks to create a car park, which would likely result in additional visual impacts. This approach is acceptable on the basis that the surrounding street network is able to accommodate the parking demand generated by the school, as detailed at **Appendix G**.

TSA have undertaken a car parking survey of the surrounding street network, which identifies that there are 285 car parking spaces available on the surrounding blocks, either on-street or in publicly accessible car parks. The maximum parking demand is:

- 89 cars during the AM peak.
- 159 cars during the PM peak.

The majority of this parking is temporary in duration, as parents drop or collect students from the school. In addition to this, it is expected that the increased capacity of kiss and drop zones will alleviate parking demand for parents. The Green Travel Plan and preliminary Operational Traffic and Pedestrian Management Plan outlines measures to encourage alternative modes of transport and manage the flow of traffic during peak drop off and collection periods.

Whilst THDCP sets car parking rates for schools, Clause 11 of the State and Regional Development SEPP prescribes that DCPs do not apply to SSD applications. It is also noted that the Education SEPP does not include any development standards for car parking associated with schools. As a result, the variation to THDCP is acceptable as the TTIA has confirmed that car parking demand as a result of the proposed works can be accommodated on the surrounding street network.

Pedestrian safety

The overall development has been designed to ensure the safety of children at all times. The main school entry is protected by an existing fence located against the kerb on Ridgescrop Drive for a distance of approximately 40 metres. In addition to this, the relocation of the main school entry further east along Ridgescrop Drive provides greater separation between the main pedestrian entry and the existing driveway. The preliminary Operational Traffic and Pedestrian Management Plan proposes a range of measures to ensure that safety is maintained through the supervised management of parking and drop-off/pick-up arrangements (refer to **Appendix G**).

2.3 Vegetation

2.3.1 Issue

Clarification about the extent of tree removal was sought by the Department and OEH, as well as a request for a Vegetation Management Plan to be prepared (VMP).

2.3.2 Proponent's Response

Tree Removal

A total of 102 trees are proposed to be removed, as set out in the updated Arboricultural Impact Assessment at **Appendix H**. The revised Arboricultural Impact Assessment has been prepared in accordance with the revised bushfire management strategy (detailed at **Section 2.4** below). In summary:

- A total of 618 trees were surveyed within the development site.
- 516 trees will be retained.
- 102 trees will be removed.

The Arboricultural Impact Assessment notes that trees identified for retention should be assessed upon completion of works to ensure they remain safe.

Vegetation Management Plan

A VMP will be prepared prior to the commencement of works on the site and will be continually updated to ensure that vegetation management responds to environmental conditions. As the VMP will be informed by the detailed landscape plans, asset protection zones (APZs) and construction plans, this approach is considered suitable to ensure that the VMP accurately responds to the detailed development. The VMP will:

- Detail species to be planted on the site.
- Include details about the retention and maintenance of vegetation and any fauna habitat.
- Provide an ongoing weed control and maintenance program.
- Describe monitoring and maintenance measures to manage revegetation and landscaping works.
- Comply with *Planning for Bush Fire Protection 2006*.

2.4 Bushfire

2.4.1 Issue

Further clarification was sought about whether existing vegetation across the site is managed to the standard of an inner protection area (IPA), and what alternative arrangements would need to be implemented if it is not.

2.4.2 Proponent's Response

Further investigation has demonstrated that the entire site is not managed as an IPA, rather that vegetation has been managed as a result of regular maintenance by the school and in accordance with a previous approval relating to the establishment of an APZ around Building M, which captures Building P within the outer protection area (refer to **Appendix J**). As a result, an APZ is required to be established for the proposed Building N. A map illustrating

the existing and proposed APZs is provided at **Figure 9**. The establishment of this APZ results in the need to remove some additional vegetation, which is accounted for in the revised Biodiversity Assessment Report at **Appendix I**. Importantly, the establishment of the APZ does not require the removal of protected species associated with the Sydney Turpentine Ironbark Forest (STIF), but will require the pruning of other, non-protected vegetation. This pruning is considered to result in an improved ecological outcome, as it reduces the pressure of other vegetation roots competing with the STIF (refer to **Appendix I**).

3.0 Proposed Amended Development

Since public exhibition of the proposal, a number of amendments have been made to the proposed development. The changes include those made in response to some of the issues and comments raised by the Department, Council, government agencies and the general public, along with adjustments made to enhance the design of the proposal.

The proposed changes are shown on the revised Architectural Drawings at **Appendix C** and in the Supplementary Design Report at **Appendix D**.

The following section outlines the updated description of the modified development for which approval is now sought. As illustrated in the following section, the overall changes are positive and aim to deliver an improved outcome.

3.1 Overview of Proposed Changes

The following details all changes made to the development following exhibition of the proposal:

- Building N has been set back a further 3 metres from Ridgecrop Drive, resulting in a total set back of 11.6 metres.
- Building N and P have been reduced in height by 1.3 metres, from 17 metres to 15.7 metres.
- Revised landscape scheme, involving additional planting within the increased setback on Ridgecrop Drive, replacement of the proposed retaining wall with a batter and removal of some exotic species.
- Introduction of sign-posted kiss and ride zones on Ridgecrop Drive and Gilbert Road.
- Revised bushfire protection strategy, involving introduction of an Asset Protection Zone (APZ) around the proposed Building N.
- Introduction of light coloured roofs.
- Installation of vegetation fencing around existing Sydney Turpentine Ironbark Forest.

3.2 Description of Proposed Development (as amended)

The proposed amendments outlined above do not result in any changes to the scope of development for which approval is sought. For completeness, the description of the development for which approval is sought is reproduced below.

This application seeks approval for the following development:

- A new three storey facility along Ridgecrop Road which houses:
 - New staff and administration offices (including Staff Toilets)
 - New library
 - 23 new permanent teaching spaces
 - New entry forecourt with lift to address accessible access to a sloping site.
- Alterations to existing administration building to convert it to 3 new home bases.
- Alterations to the existing library building to convert it to 3 new home bases.
- New hall building with separate entrance for out of school hours and community use.
- Removal of 12 demountable teaching spaces.
- Demolition of a number of outdated existing classroom spaces to create a new circulation axis between the new entry and facilities and the existing campus through to the existing school playing fields.
- Ancillary signage.

4.0 Additional Assessment

The exhibited EIS addressed the potential impacts of the overall development against a range of matters relevant to the development. Except where addressed in this report, the conclusions of the original assessment remain unchanged. Therefore, the assessment of the following matters remain unchanged:

- Staging.
- Social impacts.
- Heritage.
- Aboriginal heritage.
- Sediment, erosion and dust controls.
- Contamination.
- Utilities.
- Contributions.
- Drainage.
- Flooding.
- Waste.
- Construction hours.

4.1 Consistency with Original SSDA scheme

All key elements of the proposed development remain unchanged from what was proposed as part of the exhibited SSDA. The scheme remains generally consistent with the key development parameters of the original proposal and design refinements made in response to submissions have resulted in an increased street setback, reduced building height, additional landscape screening, provision of two additional kiss and ride zones, and other refinements for bushfire protection and vegetation management. Importantly, the development retains the commitment to deliver increased capacity of the school to cater for future educational needs within The Hills LGA.

4.2 Consistency with Relevant EPIs, Policies and Guidelines

The development, as proposed to be amended, remains consistent with the majority of environmental planning instruments, policies and guidelines assessed as part of the exhibited SSDA. The design refinements made do not result in any change to the assessment against strategic policies or statutory policies contained in the EIS, except as noted below.

4.2.1 Biodiversity Conservation Act

A revised Biodiversity Assessment Report is provided at **Appendix J**, which reflects the amendments to APZs and vegetation management across the site. The proposed amended development remains consistent with the relevant provisions of the *Biodiversity Conservation Act*.

4.2.2 SEPP (Educational Establishments and Child Care Centres) 2017

The proposed amended development remains consistent with the relevant provisions of the Education SEPP. Specifically:

- The design of the proposal achieves the design quality principles, as assessed in the Supplementary Design Report at **Appendix D**.
- The amended development will continue to allow the use of school facilities to be shared with the community.

Whilst the development has been amended to reduce the height, it remains above the maximum height limit set by THLEP, however may be approved pursuant to Clause 42 of the Education SEPP.

4.2.3 The Hills Local Environmental Plan 2012

In accordance with the Department's request, a Clause 4.6 Variation Request is submitted for the variation to the maximum height limit prescribed by THLEP (refer to **Appendix F**).

4.3 Built Form

The design of the school has been amended to reduce the overall visual impact on the surrounding locality by increasing the set back to Ridgeway Drive and reducing the height of the buildings. These changes allow for increase landscape screening, which will integrate with the existing bushland character of the area. Whilst the building height remains in excess of the maximum height permitted by THLEP, the SSD DA may be approved pursuant to Clause 42 of the Education SEPP and a Clause 4.6 Variation Request is submitted at **Appendix F**. Further information is provided at **Section 2.1** above.

Notwithstanding the amendments that have been made in response to the concerns raised with the proposed built form, it is important to recognise that a built form that is larger than the character of the surrounding area is appropriate on the subject site because:

- There is a significant need for high quality education facilities to meet projected future student demand in The Hills LGA. The provision of this key social infrastructure will result in significant benefits to the wider community that outweigh the localised impacts that occur as a result of the proposal.
- The site is highly constrained by bushfire and ecology. Acknowledging the recognised need for the facilities, the alternative to the current proposal would be to expand the footprint of the development, having a far greater impact on the vegetation on the site and producing a worse planning outcome.
- Schools are civic buildings, which since the early establishment of Sydney have deliberately been larger than the development that surrounds them in order to act as important markers, that recognise the value of education and their centrality to our communities.

4.4 Traffic and Parking

The increased traffic as a result of the proposed development, and in accordance with the revised trip generation undertaken to respond to TfNSW, can be accommodated on the local street network and does not result in a change to the Level of Service to key intersections in the surrounding area. The provision of two additional kiss and drop zones and the reinstatement of the existing kiss and ride zone will assist with queuing issues during peak periods, as well as provide an alternative to on-street parking for parents. These zones will be managed in accordance with preliminary Operational Traffic and Pedestrian Management Plan.

On-street and public car parking available on the surrounding road network is able to accommodate the forecast parking demand and retain a surplus of spaces. Further information is provided at **Appendix G** and **Section 2.2** above.

4.5 Vegetation

102 trees are proposed to be removed in accordance with the recommendations of the Arboricultural Impact Assessment at **Appendix H**. The Biodiversity Assessment Report has been updated to reflect all trees required to be removed as well as vegetation removal required for the implementation of APZs (refer to **Appendix I, Section 2.3** and **Section 2.4**). Overall, the development will result in acceptable biodiversity impacts and biodiversity offset credits will be purchased in accordance with the requirements of the *Biodiversity Conservation Act 2016*. A Vegetation Management Plan will be prepared prior to the commencement of works to ensure that vegetation on the site is appropriately managed.

4.6 Bushfire

The revised bushfire management strategy involves the establishment of an APZ around Building N. An APZ has been established on the site around the existing Building M, which also captures the proposed Building P. The revised bushfire management strategy has been reviewed and accepted by the NSW RFS (refer to **Appendix J**). As a result, bushfire impacts will be appropriately managed in accordance with the Bushfire Assessment Report (refer to **Appendix J**).

4.7 Ecologically Sustainable Development

The introduction of a light coloured roof to the top of Buildings N and P will assist in reducing the urban heat island effect. The light coloured roof has been selected as it has the lowest solar absorbance for a standard Colorbond colour. The colour palette throughout the development has deliberately avoided dark colours for the exterior of the buildings to further reduce the urban heat island effect. These changes remain consistent with the submitted ESD Strategy.

5.0 Final Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed works are detailed in **Table 2** below. These measures are unchanged from those outlined in the original EIS.

Table 2 Final mitigation measures

Item	Potential Impact	Mitigation Measure
Privacy	Adverse visual privacy impacts on surrounding residences.	Provide setbacks from the proposed building form and the property boundaries. Retention of existing plantings and proposed plantings depicted in Landscape Plan submitted with the application.
	Adverse acoustic privacy impacts on surrounding residences.	Demolition/Construction Phase: Limit hours of construction to - Monday to Friday - 7.00am to 6.00pm - Saturdays - 8.00am to 1.00pm - Sundays & Public Holidays - No works Implement the Noise Control Recommendations in Section 6.0 of the Construction Noise & Vibration Management Plan Operational Phase: Comply with the Noise Control Recommendations in Section 5.0 of the Environmental Noise Assessment.
Traffic	Increase demand on parking and traffic	Demolition/Construction Phase: Finalise the Construction Traffic Management Plan (CTMP) prior to issue of Construction Certificate in accordance with Section 9.0 of the Traffic & Transport Impact Statement. Operational Phase: Implement the Green Travel Plan (GTP) as discussed in Section 7.0 of the Traffic & Transport Impact Statement. Implement an Operational Traffic & Pedestrian Management Plan as discussed in Section 8.0 of the Traffic & Transport Impact Statement.
Bushfire	Bushfire Attack	Comply with all recommendations listed in Section 5 of the Bushfire Protection Assessment.
Heritage	Potential Impact on Surrounding Heritage Items	No mitigation measures required.
Waste	Demolition and Construction Waste	Prepare and implement a Waste Management Plan in accordance with the Construction and Demolition Waste Management Plan.
	Operational Waste	Comply with the recommendations of Section 4 of the Operational Waste Management Plan.
Built Form	Impact on Existing Streetscape	Implement the proposed landscape strategy
Ecological Sustainable Development	Impact on Environment	Incorporate the Sustainable Design Initiatives recommended in Section 5 of the ESD Sears Report.
Social Impacts	Social Consequences	No mitigation measures required.
Aboriginal Heritage	Impact on Cultural Heritage Values	Comply with the recommendations contained at Section 7.5 of the Aboriginal Cultural Heritage Assessment Report.
Vibration	Impact on amenity to surrounding properties as a result of vibration	Implement the recommendations in Section 6.3 of the Construction & Noise Management Plan.
Sediment, Erosion and Dust	Generation and off-site transmission of sediment, dust and fine particles.	Implement the measures depicted in the Sediment and Erosion Control Plan.

Item	Potential Impact	Mitigation Measure
Contamination	Soil and ground water contamination	Comply with the recommendations in Section 5.0 of the Non-Destructive Hazardous Building Materials Survey. Comply with the recommendations in Section 10.0 of the PSI and DSI.
Utilities	Existing infrastructure	Comply with the recommendations of the Infrastructure Management Report.
Drainage	Stormwater runoff Water quality	Comply with the Civil Engineering Works Plan and the Civil Stormwater Design Report.
Flooding	The site is not identified as a flood control lot.	No mitigation measures required.
Biodiversity	Impact on Sydney Turpentine-Ironbark Forest EEC Impact on Sandstone Ridggetop Woodlands Impact on habitat	Implement and comply with the Mitigation and Amelioration of Impacts in Section 5.4 of the Biodiversity Assessment Report. Purchase offset credits in accordance with Section 6.4 of the Biodiversity Assessment Report.

6.0 Conclusion

The proponent, SINSW, and its expert project team have considered all submissions made during public exhibition of the proposal. A considered and detailed response to all submissions made has been provided in this report and in the accompanying documentation.

In responding to and addressing the range of matters raised by the government agencies, authorities and the general public, SINSW has refined the design of the school to improve the relationship of the built form with the surrounding area.

As outlined in this report, the assessment of the amendments to the proposed development confirms that the key elements of the original proposed development that was exhibited remain unchanged and that the refinements made post-exhibition result in overall improvements to the proposed development.

To the benefit of the overall project, the environmental impacts of the amended development remain consistent with those originally assessed. The proposal has significant planning merit on the basis that:

- The proposed school redevelopment is consistent with the relevant strategic policies and will provide new school infrastructure to cater for increased demand in The Hills LGA.
- The proposed school redevelopment is generally consistent with the relevant environmental planning instruments. Specifically:
 - The variation to the building height may be approved pursuant to Clause 42 of the Education SEPP and is accompanied by a Clause 4.6 request.
 - The variation to the car parking controls of THDCP can be offset through the combination of increased kiss and ride zones and by utilising publicly available car park on the surrounding street network.
- The proposed school facilities will deliver on the Department of Education's strategic priorities and will facilitate shared use with the surrounding community.
- The proposed school redevelopment will provide a high quality landscaping scheme that includes a significant amount of native species and will blend with the existing character of the area.
- The proposed school redevelopment will incorporate a range of ESD measures relating to energy efficient and water re-use.
- There are no adverse environmental impacts that cannot be appropriately managed by the proposed mitigation measures.

In conclusion, the Samuel Gilbert Public School redevelopment will deliver an upgraded local public school with increased capacity for projected future demand. The new education facilities have been designed in accordance with the strategic priorities of the Department of Education and will allow for the removal of temporary classrooms across the site. In addition to this, the new facilities will allow for co-use with the local community. The delivery of this critical social infrastructure will ensure that future education needs can be met in a high quality school facility.