

12 June 2025

Navdeep Singh Shergill
Social and Infrastructure Assessments
NSW Department of Planning, Housing & Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Shergill,

**Cover Letter to Draft Submission - State Significant Development
(SSD-59020210) – Construction and operation of a new Aquatic Centre for Meriden
School**

Thank you for the opportunity to provide comments on the proposed SSDA – Construction and operation of a new Aquatic Centre for Meriden School. Council staff have reviewed the proposal and prepared a submission which is attached below.

Please note that these comments are officer comments only. The submission will be presented to Council for endorsement this may result in additional feedback or comment.

Please contact Bismark Opoku-Ware – Senior Planner on 9748 9999 or bismark.opoku-ware@strathfield.nsw.gov.au for any further correspondence or to discuss Council's input.

Regards,



Dylan Porter
Acting Director, Planning & Environment

Strathfield Council Draft Submission to State Significant Development (SSD-59020210) – Construction and operation of a new Aquatic Centre for Meriden School – June 2025

Strathfield Council appreciates the opportunity to provide comments on the application for SSDA – Construction and operation of a new Aquatic Centre for Meriden School. The proposed works comprises:

- Removal of 57 trees and demolition of the existing apartment building with associated structures at 12-14 Margaret Street, Strathfield;
- Tree Removal of 57 trees
- Site preparation, including remediation and bulk earthworks;
- Construction of a 1,589 square metre aquatic centre with two levels of basement, including:
 - main entrance and foyer area;
 - 25 by 30 metre sized swimming pool;
 - visitor area including seating and staff offices;
 - staff, student and visitor amenities;
 - storage and building services;
- Landscaping works including new and replacement planting;
- Associated services and infrastructure including a new substation and fire hydrant; and
- New loading bay along Margaret Street.

The Environmental Impact Statement (EIS) has been reviewed and the comments below are offered for consideration by the Department of Planning, Housing & Infrastructure.

Heritage

Aboriginal Cultural Heritage Assessment Report (ACHAR)

It is unclear in the ACHAR if any local Aboriginal community members were involved in the consultation exercise, or if local Aboriginal cultural heritage representative groups were involved in advising on local Aboriginal culture and heritage matters.

Accordingly, it is recommended that the Applicant adopts the mitigation measures contained in the Unexpected Finds Procedure and Human Remains Procedure sections of the ACHAR in the event of any unexpected finds.

External Colours and Finishes & Screening

The proposed design of the building reads as an oversized colonnade at the front façade. Coupled with its form, the proposed external colours and finishes show the aquatic centre will stand out in colour, size and materials. This is contrary to discussions in the Heritage Impact Statement (HIS) and Environmental Impact Statement (EIS), and the approach is not deemed heritage best practice for a development site containing a heritage item.

It is recommended that the visual bulk of the building be screened with large sized and a greater number of replacement trees along the development's interface with the heritage dwelling and be outlined appropriately in the HIS and EIS.

Geotechnical and Vibration Impact of proposal on heritage item

The proposed building will be in proximity to the "Lingwood" Victorian house item located at 16 Margaret Street. It is noted that no details on the impact of vibration from ground works and construction works have been provided.

It is recommended that a comprehensive geotechnical and vibration impact assessment be undertaken prior to the carrying out of any works and recommendations to mitigate geotechnical and structural impacts on the heritage item be adopted for the subject works.

Plantings and landscaping.

The proposal involves removal of 57 trees. However, the Heritage Impact Statement (HIS) does not cover any research on the remnant plants and trees on the land that may be associated with the garden curtilage of the local heritage item– "Lingwood" Victorian house and garden at 16 Margaret Street.

In the absence of the research, it is recommended that the trees be replaced like for like, and where there are additional trees proposed, they should be site specific and useful.

Urban Forest

Tree removal

According to the EIS, Landscape Plan, and Landscape Report, the development involves the removal of 57 trees of the 64 trees on the site. The application is supported by an Arboriculture Impact Assessment Report (AIA) prepared by Tree iQ. The report has undertaken an assessment of the impact of the development on the existing trees on site and it identifies the retention value of each of the 64 trees on site, recommending retention or removal for each tree.

In undertaking this assessment, including the provision of compensatory plantings it is deemed that insufficient consideration has been given to Part O-Tree Management of the Strathfield Consolidated Development Control Plan (SCDCP) 2005. The AIA report indicates that of the 64 trees on the site, 20 have been assessed as "Consider for Retention". However, the development proposes retention of only 7 trees which is not deemed as adopting an integrated approach to protecting high retention value trees.

Notably, the proposed removal of the 2x Camphor laurel trees (T4 & T5) is considered unacceptable as the trees are in good health, located significantly outside the building envelope and provide visual and ecological contribution to the streetscape. The trees also contribute to the context and setting of the local heritage item located at 16 Margaret Street.

Furthermore, the development should also consider the retention of Tree No. 25 as the tree is located outside the building footprint and positively contributes to streetscape quality.

It is noted that the sizes of the replacement trees along the eastern and southern boundaries are inadequate to achieve appropriate level of screening between properties. It is deemed that a sufficient replacement is not provided for the removal of Tree 41 in the proposal due to its size and significance. Significant replenishment planting via offsets and tree planting contributions to the public domain should be integrated into the proposal.

In the interest of minimising the impact of the development on the existing canopy cover on the site and the streetscape quality, it is recommended that the Applicant give further design consideration to retaining more trees of moderate or high retention value.

Social Impact Assessment

The inclusion of a comprehensive set of state and local government policy and planning documents as part of the literature review of the Social Impact Assessment (SIA) is welcome. The SIA includes literature review of the following:

- Greater Sydney Region Plan: A Metropolis of Three Cities (2018)
- Our Greater Sydney 2056 Eastern City District Plan 2018
- Strathfield 2040: Local Strategic Planning Statement (LSPS)
- Strathfield 2035 Community Strategic Plan 2022,
- NSW Healthy Eating and Active Living Strategy 2022-2032, (2022),
- Staying Ahead: State Infrastructure Strategy (SIS) 2022- 2042 (2022)
- Better Placed: Environmental Design in Schools (2018)

It is noted that the SSDA proposes use of the aquatic centre for the school only and would not extend its use for the broader community.

The development should consider best practice trends regarding social infrastructure by allowing public use of the facility through shared and joint use arrangements and agreements with Council

or other community stakeholders as highlighted under the 'Liveability' section of the Strathfield Local Strategic Planning Statement (LSPS) as follows:

- *"The provision of open space, recreation and social infrastructure must align with growth over the next 20 years. The capacity of existing infrastructure must be considered when planning decisions are made. Working towards improving and sharing facilities will also increase opportunities for people to participate in and contribute to community life."*

Accordingly, the applicant is encouraged to incorporate a multipurpose use of the facility and adopt a shared and flexible design. It is noted that other private schools have provided access for the community via a learn to swim program operated by an external provider. Further consideration of this point is requested by the applicant.

Traffic Assessment

The impact of sporting events is not fully dealt with by the traffic assessment. Given the regional nature of the school it is expected that competitors would be traveling to the site via a coach from multiple schools or driven to site by parents. There is also the prospect that multiple school teams will be on site at the same time during a competition event and would remain on site for the duration of the event. Additionally that pool based events will take place on the same day as other sporting events associated with the school, for example tennis or other indoor sports.

The Traffic Impact Assessment also suggests that teams would only attend site for the duration of the particular game and would not remain on site. Whilst this can be accepted in part, the assessment does not contemplate overlapping attendance between departing and arriving, which is considered likely to occur. As such further peak attendance scenario testing is requested.

The EIS and Traffic Impact Statement should be updated to reflect a competition and multi event scenario and provide advice on how coaching parking and multiple event management will be addressed.

Development Engineering

The Stormwater Management Report is generally satisfactory in terms of provision of On-site detention (OSD) of stormwater, proper discharge of stormwater, the provision of rainwater tank and the treatment of stormwater to remove pollutants prior to discharging.

However, as the depth of the above-ground OSD basin is likely to be approximately 680mm, it is required that standard warning signs be placed around the basin indicating danger, and a pool fence must be included and shown around the detention basin on the construction plans.

Conclusion

Thank you again for the opportunity to provide feedback on the SSDA. As addressed above, Council has raised concerns over the development as it pertains to heritage, tree management, social impact & development engineering.