

18 February 2019

Ms Carolyn McNally
The Secretary
Department of Planning and Environment
320 Pitt Street
Sydney NSW 2000

Dear Ms McNally,

**REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS:
DARLINGTON PUBLIC SCHOOL REDEVELOPMENT**

Gardner Wetherill & Associates (GWA) has been engaged by School Infrastructure NSW (SINSW), to assist with the redevelopment of Darlington Public School at Golden Grove Street, Darlington. As the proposal is for the development of an educational establishment that has a Capital Investment Value (CIV) in excess of \$20 million (see Cost estimate Attachment A) it is State Significant Development (SSD) for the purposes of the Environmental Planning & Assessment Act 1979 (EP&A Act).

In accordance with Clause 3 of Schedule 2 of *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP), the purpose of this letter is to request, on behalf of SINSW, the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the proposed development. To support the request for the SEARs this letter provides an overview of the proposed development, sets out the statutory context, and identifies the key likely environmental, cultural and planning issues associated with the proposal. This letter is accompanied by the following:

- Cost estimate prepared by Donald Cant Watts Corke (Attachment A);
- Indicative Concept Scheme prepared by Gardner Wetherill Architects (Attachment B); and
- Arboricultural Development Assessment Report by Moore Trees (Attachment C).

1.0 THE SITE

1.1 Site Location & Description

The school is located on the corner of Golden Grove Street and Abercrombie Street, Darlington, 2008. It falls within the City of Sydney Council and is adjacent to the University of Sydney Darlington Campus, close to Redfern and Macdonaldtown train stations and the Carriageworks Centre located at the old Eveleigh Rail Yards; and is within the emerging Redfern/Waterloo Precinct.

It is surrounded by medium density residential units, terrace housing, St Michael's Melkite Cathedral and the University of Sydney Business School. The northern boundary of the site abuts the University of Sydney Regiment Building and utilities car parking spaces, on the corner of Darlington Lane and Golden Grove Street and along Darlington Lane. Located to the eastern boundary of the site are the

University of Sydney Business School and Abercrombie Student Accommodation. To the north of Darlington Lane is a proposed student housing development of a row of terraces along Darlington Road.

The projected growth of the school is largely as a result of its proximity to Sydney CBD and inner-city suburbs. The local community is currently undergoing significant development, with the release of Medium Density Housing Code and a number of apartments within the School's catchment area recently constructed or currently underway and nearing completion.

The site is irregular in shape and is made up of two (2) lots owned by the NSW Department of Education. It has an overall area of approximately 0.72 hectares.

The site is comprised of two (2) lots as follows:

Lot 100 DP 623500	2,366 m ²
Lot 592 DP 752049	4,887 m ²
	7,253 m ²



Figure 1 – Site Context Plan

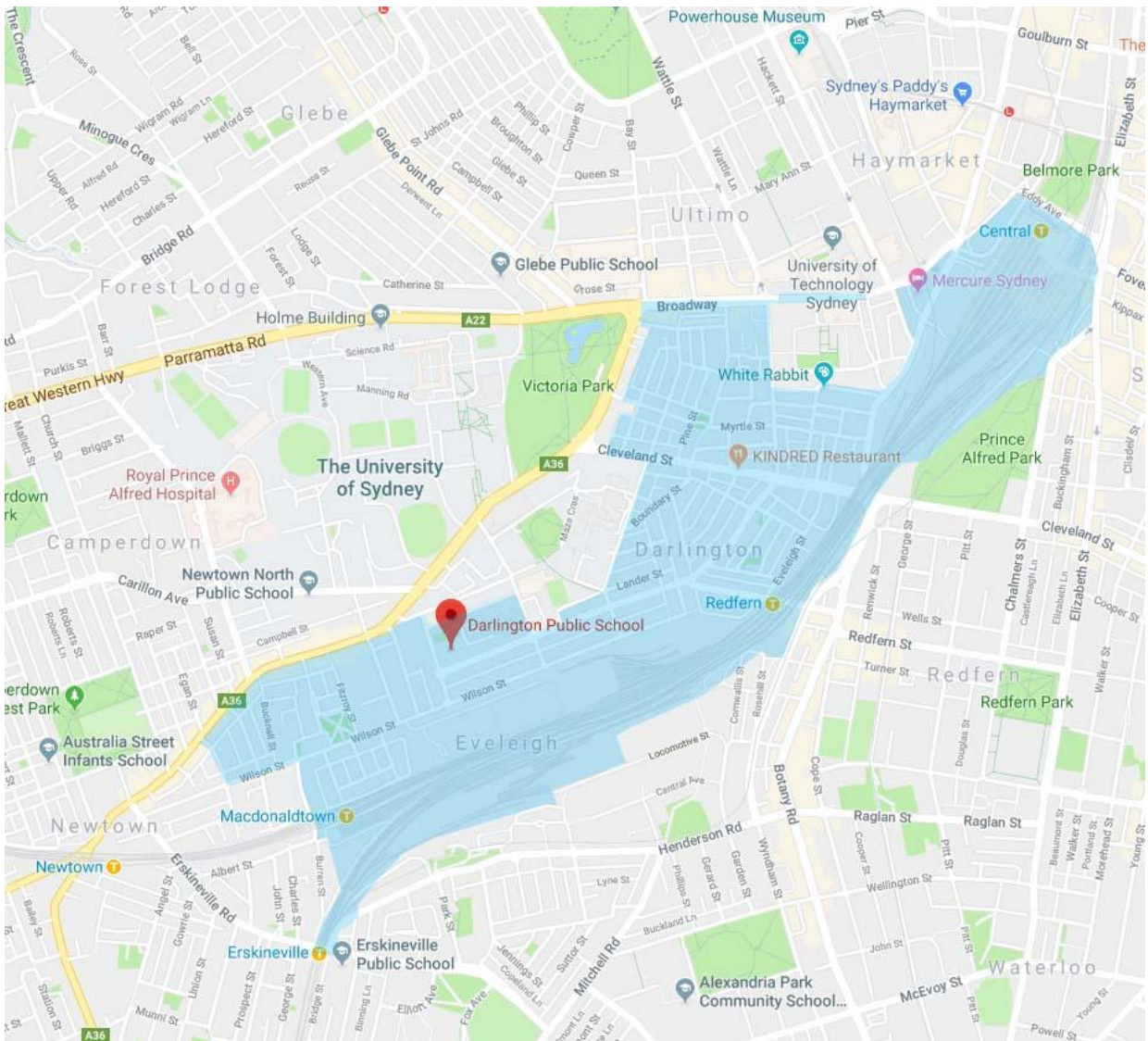


Figure 2 - School Catchment Area

1.2 Existing Development

The school accommodates for 250 students (preschool and K-6) in 10 permanent homebases, 3 preschool classrooms and a room used as an out-of-school-hours-care (OSHC) facility.

The existing school layout consists of three interconnected buildings, Buildings A, B and C with a free standing store located to the central east boundary of the site. Building A, located at the corner of Golden Grove Street and Abercrombie Street, is a two storey concrete and masonry structure with timber roof trusses. This structure consists of one (1) homebase, one (1) music room and accommodates the canteen, administration and staff units with the library situated on the first floor. Building B, located to the southeast of the site, is a one-two storey structure of similar construction to Building A. This building consists of eight (8) homebases and an Out of School Hours Care (OSHC) facility on the ground floor. Building C, located to the west of the site, is a one storey structure of similar construction to Buildings A & B. This building consists of one (1) homebase, a sunken communal hall and three (3) preschool classrooms.

The site drains from the northern play courts towards the central courtyard bounded by Buildings A, B & C. This courtyard has no apparent overland flow path in the event that ponding occurs.

The main pedestrian entry point is located along Golden Grove Street with a secondary access on Abercrombie Street aligned to the pedestrian crossing. Students dropped off both streets by car utilise both entrances whilst those arriving by bicycle or scooter use the Abercrombie Street entrance. The changing levels of the existing school facilities and play areas make accessibility to certain areas difficult and/or non-compliant.

A gate access is located along Darlington Lane and the main vehicular access is located on Golden Grove Street. No on-site car parking and formal service/loading bays exist.

The site has a number of outdoor spaces. These consist of an elevated games court to the north, a fenced preschool area and a main central courtyard. The ancillary courtyards to the south, south-west and south-east of the site are used as entrance courtyards but otherwise are underutilised due to lack of sightlines from the main play area.

Waste storage is collected and transferred to the Golden Grove entrance courtyard for recycling and Abercrombie entrance courtyard for general waste. Collection is undertaken through a private operator organised through a DoE contract.

2.0 DESCRIPTION OF PROPOSED DEVELOPMENT

2.1 Objectives of the Proposed Development

The primary objective of the proposed development is to provide new innovative learning spaces to enhance the learning experience for the next generation of students and Indigenous student outcomes whilst increasing the capacity of the school in order to meet the growing demand for public education in Sydney's inner-west suburbs.

The development will seek to demolish and rebuild the existing school to accommodate up to 510 students. It is proposed that the existing building stock which is nearing the end of its economic life and usefulness will be replaced with modern educational building that will meet the learning needs of the students and provide a comfortable working environment for staff.

Supplementary objectives of the proposed development include:

- Create a welcoming atmosphere and pleasant school environment both internally and externally;
- Improve school connection with the local community;
- Retention of Aboriginal artworks and artefacts for display and storage in the new development;
- Design intuitive wayfinding throughout the school grounds;
- Improve pedestrian safety at school pick-up / drop-off points;
- Create purposeful outdoor learning spaces to function as a learning tool for student interaction and exploration;
- Design innovative learning environments; and
- Provide community access to communal hall, play space and other ancillary facilities.

2.2 Proposed Development

An overview of the proposed development is provided below. The works include the following:

- Necessary early works including site remediation
- Construction of a three to four storey building along the northern section of the site
- Demolition of existing structures to enable staged construction and landscape works

Summary of the proposed accommodation schedule is as follows:

- 17 new homebases with shared practical, presentation, withdrawal and outdoor areas
- New administration facilities with a school clinic
- New staff room facilities
- New library
- 2 new special programs rooms
- New communal hall with OSHC and canteen facilities
- 3 new preschool classrooms with dedicated storage, toilets and outdoor play area
- Accessible and ambulant toilet facilities and new general storage areas
- New external play area with a covered outdoor learning area (COLA) and games court
- New substation and services rooms and cupboards

3.0 PLANNING CONTEXT

3.1 Environmental Planning & Assessment Act 1979

The EP&A Act establishes the assessment framework for SSD. Under Section 4.36 of the Act the Minister for Planning is the consent authority for SSD. Section 4.12 requires that a development application for SSD is to be accompanied by an EIS in the form prescribed by the Regulations.

3.2 State Environmental Planning Policy (State and Regional Development) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) identifies development which is declared to be State Significant. Clause 15 of Schedule 1 of the Policy provides that the proposed development as described herein is SSD, as follows:

Development for the purpose of an educational establishment (including associated research facilities) that has a capital investment value of more than \$20 million.

As the proposal is for the purposes of an educational establishment and has an estimated CIV of over \$20 million, it is considered to be a SSD (see Cost estimate prepared by Donald Cant Watts Corke, Attachment A).

3.3 State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017

SEPP (Educational Establishments and Child Care Facilities) 2017 commenced in September 2017 is a relevant matter for consideration for the SSD Application. Key changes in the proposed legislation of relevance to the school redevelopment include the following:

- Seven design quality principles listed in Schedule 4 that apply to schools to ensure that school infrastructure is well designed and responsive to its purpose and location
- Child Care Planning Guide that apply to centre-based childcare facilities including preschools to ensure that new facilities are appropriately designed and built to the Education and Care Services National Law and Regulations

3.4 State Environmental Planning Policy No.55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) provides state-wide planning approach to the remediation of contaminated land. SEPP 55 requires the consent authority to consider whether the subject land of any rezoning or development application is contaminated. If the land requires remediation to ensure that it is made suitable for a proposed use or zoning, the consent authority must be satisfied that the land can and will be remediated before the land is used for that purpose. Accordingly, geotechnical and contamination investigations will be undertaken and discussed as part of the EIS.

3.5 Current Zoning & Development Controls

Sydney Local Environmental Plan 2012

The *Sydney Local Environmental Plan 2012* (SLEP) is the applicable local planning instrument for the proposed development and establishes the relevant land uses and other development standards for the site. The key relevant controls of the SLEP are as follows:

Consideration	Control & Comment
Land Zoning	<p>SP2 – Infrastructure (Educational Establishment)</p> <p>Educational Establishments are permitted with consent.</p> <p>The proposed school may also include an ancillary preschool service and OSHC service for its students. Since the preschool and OSHC service are ancillary to the total operation of the proposed educational establishment, the preschool and OSHC are deemed permissible with consent at the site.</p> <p>The proposed preschool and OSHC service is consistent with the SP2 zone land use objective “to provide for infrastructure and related uses.”</p>
Height of Buildings	9m
Floor Space Ratio (FSR)	1.25 : 1
Heritage	Site not identified as a heritage item or within a heritage conservation area. The site abuts University of Sydney Regiment which is a heritage item (I2244). It is also adjacent to a conservation area to the south of the site along the Abercrombie Street frontage.

Sydney Development Control Plan 2012

The *Sydney Development Control Plan 2012* (SDCP) provides detailed controls for specific development types and locations. Most controls in the SDCP relate to character, streetscape and public domain works. The EIS will assess the proposal against all relevant controls within the DCP.

3.6 Other Planning Policies

In addition to the above, the following policies apply to the site and will need to be considered as part of the SSD Application:

- NSW State Priorities;
- A Plan for Growing Sydney;
- Central City District Plan;
- NSW Long Term Transport Master Plan 2012;
- Sydney's Cycling Future 2013;
- Sydney's Walking Future 2013;
- Healthy Urban Development Checklist, NSW Health; and
- State Environmental Planning Policy (Infrastructure) 2007;

4.0 OVERVIEW OF LIKELY ENVIRONMENTAL AND PLANNING ISSUES

The anticipated impacts and risks associated with the proposal are summarised below and will be addressed in detail in the EIS.

4.1 Traffic & Parking

As there will be an increase in student and staff numbers on the site, there will be an increase in traffic volumes and parking demand in the locality in addition to changes to the pick-up / drop-off arrangement and vehicular access / egress to the site. The proposed development will generate traffic that requires referral to the RMS.

A Traffic & Parking Assessment Report will be provided as part of the EIS. The report will analyse parking requirements, existing and expected traffic impacts and the design of proposed vehicular access points.

The report will also outline a Sustainable Travel Plan to encourage staff, students and parents to access the site by walking, cycling or public transport.

4.2 Ecology – Flora & Fauna

The overall site is scattered with 55 trees as identified in the Arboricultural Development Assessment Report by Moore Trees (see Attachment C). The report shows 78% of the 55 trees have a life expectancy of 15-40 years and 22% have a short life expectancy or could be readily replaced. In general, the school has a healthy tree population in terms of quantity of trees and tree health. There were no trees assessed as being at risk of imminent failure however some minor scattered dead wood was noted.

The existing tree schedule was assessed against the SINSW Educational Facilities Standards & Guidelines (EFSG) on DG92.08 Landscape Soft Works – Hazardous Trees / Plants. The preliminary assessment identified that 11 of the 55 trees may impact on the proposed development. These trees were noted as species that drop leaves, blocking gutters and drains as well as shed large branches. These species ideally should not be planted or located adjacent to buildings, school play and assembly areas. Therefore, the recommendation is for these trees to be removed.

The EIS will consider the impact of the proposal on any vegetation species and provide an Arborist Report with a site specific tree protection plan to assess impact on trees. If required, the EIS will assess any potential impact on native vegetation communities, the habitat of any threatened species, population or ecological community, and any regionally significant species of plant, animal or habitat.

4.3 Environmental Amenity

The impact of the proposal on surrounding development is anticipated to be minimal. Given the proximity to existing neighbouring residential developments, the following impacts will be assessed:

- Solar access and overshadowing;
- Acoustic;
- Visual privacy; and
- Visual impact.

Shadow diagrams, an Acoustic Assessment and Visual Impact Assessment will be provided with the EIS.

4.4 Aboriginal Heritage & Culture

Darlington Public School has a reputation for Aboriginal education excellence with approximately 30% of the current school population identifying as Aboriginal. Currently, the school contains significant collections of Aboriginal objects and art that have been accumulated over the years. The school also implements daily recognition of Aboriginal heritage and culture among all the children attending the school. These aspects are ingrained in the ethos of the methodological teachings of Darlington Public School and play an important role in the history of the school. Indigenous education is highly regarded and feedback received from consultation with the school community identified that this is a significant factor which will be implemented in the new school.

The EIS will consider the impact of the proposal on Aboriginal heritage and culture and will provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which assesses and proposes recommended actions to manage and protect Aboriginal objects and places of significance.

4.6 Contamination & Geotechnical

As discussed in Section 3.4, geotechnical and contamination investigations will be undertaken as part of the preparation of the EIS.

4.7 Stormwater Management & Flooding

According to the Planning Certificate Section 10.7 (2) (formerly Section 149), development on this site or part of this land is subject to flood related development controls.

A Flood Risk Assessment Report, if required, will be submitted as part of the EIS.

A Stormwater Management Plan will also be prepared, if required, detailing proposed flood risk management strategies and water sensitive urban design measures incorporated into the development.

4.9 Construction & Operational Impacts

The EIS will address and consider the construction and operational impacts of, or on:

- Noise and vibration;
- Construction and operational traffic; and
- Water and air quality impacts.

A Construction and Operational Noise Report will be provided as part of the EIS. The report will provide a detailed assessment of potential noise and vibration impacts caused by the construction on the operation of the school, and recommendations to mitigate these impacts.

4.10 Other Key Environmental Assessment Issues

In addition to the above, the following key environmental assessment issues will need to be considered:

- Design of the landscaping and public domain elements;
- Pedestrian traffic and access;
- Crime Prevention through Environmental Design;
- Building on salinity prone environment;
- Waste; and
- Safety and security.

5.0 CONSULTATION

A Project Reference Group (PRG) was formed in November 2017 and has been meeting regularly with the project team. The PRG comprises of representatives from the school, including the Schools Director, the School Principal and Deputy Principal, Staff Representative, Parent Representative as well as a Community and Local Aboriginal Representative. The project team comprises of representatives from SINSW, project management consultancy (MACE) and the architecture firm (GWA).

Community engagement activities undertaken to date include information booths, information drop-in sessions, project updates, website updates and school newsletters. Consultation with the school and local community where feedback was encouraged by the project team were distributed both as print and online surveys. SINSW have also commenced engagement with the University of Sydney in order to provide the best precinct solution for Darlington.

Information booths are set up and attended by the project manager and SINSW representatives. These booths are located at the school and in various locations in the local community. Their purpose is to provide information about the proposed school redevelopment. A print and online survey was distributed to the school community encouraging input on aspirations for the school redevelopment. Two drop-in information sessions were organised by the project team at Darlington Public School in 2018. These sessions introduced the project team, provided information on project progress to date and encouraged feedback from the community.

The City of Sydney Council will be formally consulted upon receiving SEARs.

6.0 CONCLUSION

The purpose of this letter is to request the SEARs for the preparation of an EIS for the Darlington Public School Redevelopment at Golden Grove Street, Chippendale. The CIV of the project is over \$20 million and in excess of the requisite threshold for educational establishment projects. On the basis that the project falls within the requirements of Clause 15 of Schedule 1 of SRD SEPP, Schools Infrastructure NSW formally requests that the Secretary issue her Environmental Assessment Requirements for the project to facilitate the preparation of the EIS to accompany the SSD Application for the project.

Please contact SINSW below, should you have any queries about this matter.

Clint Zammit
SINSW Project Director
+614 4716 1931
clint.zammit1@det.nsw.edu.au

Yours sincerely,



Ross Gardner

Director