



Environmental Impact Statement



**St Francis Catholic College -
Landscaping**

St Francis Catholic College

Submitted to NSW Department of Planning and Environment
On Behalf of The Catholic Education Office

June 2020

REPORT REVISION HISTORY

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		Prepared by	Verified by
		Justin Tse Project Planner	 David Ryan Executive Director

Disclaimer

This report has been prepared by City Plan Strategy & Development P/L with input from a number of other expert consultants (if relevant). To the best of our knowledge, the information contained herein is neither false nor misleading and the contents are based on information and facts that were correct at the time of writing. City Plan Strategy & Development P/L accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in information in this publication.

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DECLARATION AND CERTIFICATION

I certify that I have prepared the content of this Environmental Impact Statement (EIS) and to the best of my knowledge:

- it is in accordance with Schedule 2 of the Environmental Planning and Assessment Regulation 2000;
- it contains all available information that is relevant to the environmental assessment of the development to which the statement relates; and
- the information contained in the statement is neither false nor misleading.

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Date: 11 June 2020

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David Ryan

Executive Director, City Plan Strategy & Development

Date: 11 June 2020

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APPENDICES

Appendix	Document	Prepared by
1	Secretary's Environmental Assessment Requirements (SEARs)	Department of Planning & Environment
2	Survey Plan	LandTeam Australia
3	Landscape Plan	Arcadia Landscape Architects
4	Queuing Assessment	Bitzios Consulting
5	Staging Plan	JDH Architects
6	Design Quality Principles Statement	JDH Architects
7	ESD Statement	JHA Consulting Engineers
8	Stage 2 Detailed Site Investigation	GeoEnviro Consultancy
9	Acoustic Assessment	Day Design
10	Assessment of Compliance with Biodiversity Certification	EcoLogical
11	Waste Management Plan	JDH Architects
12	Construction Management Plan	JDH Architects
13	Correspondence from Agency Consultation	City Plan
14	Construction Traffic Management Plan	Bitzios Consulting
15	Quantity Survey Report	Wilde and Woollard
16	Stormwater Plan and Erosion and Sediment Control Plan	Henry and Hymas
17	Tree Impact Statement	Naturally Trees
18	Landscape Management Plan	JDH Architects
19	DPIE correspondence relating to Tree Impact Statement	DPIE
20	Soil and Water Management Plan	JDH Architects
21	Proposed Site Plan	JDH Architects
22	Construction Program	JDH Architects
23	Response to Request for Additional Information	City Plan

1. EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) has been prepared by City Plan Strategy and Development Pty Ltd (City Plan) for JDH Architects and on behalf of The Catholic Education Office (CEO). This EIS is submitted to the Minister for Planning and Environment for a State Significant Development Application (SSDA) pursuant to Part 4 of the Environmental Planning & Assessment Act 1979 (EP&A Act) and State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD).

This EIS relates to the staged DA associated and consistent with the concept development consent under Section 4.22 of the EP&A Act for St Francis Catholic College (SFCC) located at 130-150 Jardine Drive, Edmondson Park. Consent SSDA 8832, dated 12 February 2019, gave development consent the concept proposal for the development of St Francis College (K- Year 12) and Early Learning Centre on the development site for educational purposes, comprising:

- Educational establishment and early learning centre;
- Student capacity of up to 1,900 students and 80 child care places;
- Building footprints, envelopes and heights; and
- Car and bicycle parking.

A temporary school with a capacity for 400 children from Kindergarten to Year 8 has been operational on site since Term 1, 2018.

Approval is sought for landscaping along the site's southern and eastern boundaries. This landscaping includes plantings, excavation for a swale along the southern boundary and a boundary fence. The proposal is consistent the consent for SSDA 8832 and includes the retention of Tree 31 as identified in condition A14 of the consent for SSDA 8832.

Section 4 of this EIS provides a detailed description of the proposed development.

The Capital Investment Value (CIV) of the proposed expansion is \$554,000 (excl. GST). Although this does not exceed the \$20 million threshold for educational facilities as specified in Schedule 1 Clause 15(2) of the SRD SEPP, the proposal is classified as SSD by virtue of Clause 12. As the proposal is specified in Schedule 1 by reference to a minimum capital investment value and was the subject of a concept DA under Part 4 of the Act, the proposal is classified as SSD.

This EIS has been prepared in accordance with Clauses 6 and 7 of Schedule 2 of the EP&A Regs and addresses relevant matters for consideration as required under the EP&A Act and Environmental Planning and Assessment Regulation 2000 (EP&A Regs), including the following:

- Details of the proposed development, including analysis of feasible alternatives;
- Assessment of potential environmental impacts of the proposed development in accordance with the Secretary's Environmental Assessment Requirements (SEARs);
- Measures proposed to mitigate any adverse impacts on the environment; and
- Justification for the development and recommendation for planning approval.

This EIS responds to the SEARs issued by the Department of Planning and Environment (DPE) for the proposal on 9 September 2019 (**Appendix 1**). In accordance with the SEARs, this EIS provides an assessment of the environmental impacts of the proposed development and sets out the undertakings made by CEO to mitigate and manage any potential impacts arising from the development.

The development site and immediate locality are not subject to any prohibitive constraints such as flooding, bushfire hazards or ecologically sensitive land. As such, the site, which already operates as a school, remains suitable for the proposed development.

This EIS also considers the economic and social benefits of this development. Notably, the proposal represents a positive contribution to the rapidly developing Edmondson Park locality, where a strong

demand for new schools already exists. The proposal increases the natural tree canopy in the locality and screens the school from the neighbouring residential area. Importantly, this proposal strongly aligns with the design quality principles of the Education SEPP for the provision of high quality learning and teaching spaces, with the landscaped design responding to both the constraints of the site as well as providing an appropriate street front to each boundary. The proposal positively provides natural amenity to both users of the school and its residential neighbours.

Key potential impacts from the proposed development were identified as construction traffic and acoustic emissions. The potential environmental impacts of the proposal as outlined in this EIS are able to be satisfactorily mitigated subject to implementing the recommendations of the technical supporting documentation accompanying this EIS.

The EIS demonstrates that the potential impacts of the proposal can be satisfactorily managed and/or mitigated. In light of the above, and the public benefits of the proposal, we recommend that consent be granted to this application.

2. INTRODUCTION

2.1. Report Structure

Table 1 below outlines the structure of this EIS.

Table 1: Structure of EIS

Section	Description
1. Executive Summary	Summary of the EIS.
2. Introduction	Overview of the EIS and background to the proposal.
3. Site Analysis	Analysis of the development site.
4. Description of the Development	Detailed description of the proposed works.
5. Secretary's Environmental Assessment Requirements	An overview of the SEARs issued by the DPIE on 9 September 2019.
6. Consultation	Details of consultation undertaken with local and State government agencies, and the community generally, and a response to any issues raised.
7. Statutory Planning Considerations	Consideration of the relevant statutory planning considerations including relevant Acts, SEPPs and LEPs as they apply to the site and proposed development.
8. Policies	Consideration of the relevant strategic planning considerations as they apply to the site and proposed development.
9. Environmental Impact Assessment	Addresses the key issues identified in the SEARs.
10. Mitigation Measures	Provides a compilation of recommended mitigation measures for the proposed work.
11. Conclusion	Summarises the key issues and provides a recommendation to approve the proposed development.

2.2. The Site

SFCC is situated in the suburban release area of Edmondson Park, 45km from the Sydney CBD. The site is located at Nos. 130-150 Jardine Drive, Edmondson Park, in the Liverpool LGA.

The subject site is legally described as Lot 1 in DP 1245480. The site has a total area of 79,420sqm.

A detailed description of the site is provided in Section 3 of this EIS.

Refer to

Figure 1 for a locality plan of the site. A site survey is provided in **Appendix 2**.

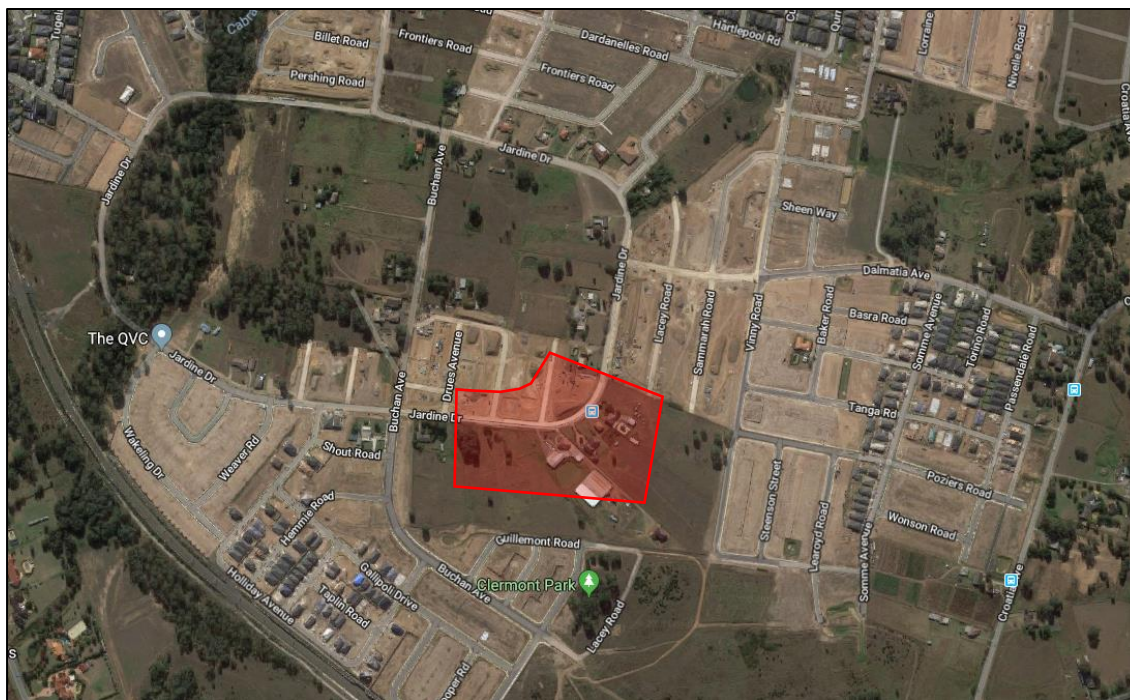


Figure 1: Locality plan, subject site outlined in red (Source: Google Maps)

2.3. Background

On 16 December 2016, the CEO received development consent (456/2016) from Liverpool City Council (LCC) to establish an educational establishment at the subject site. The application was for the purpose of establishing the school's initial stages and as such, relied on portable class rooms, administration facilities, halls, and the like. The consent allowed for 250 children between years K - 7, as well as 19 staff.

On 22 August 2017, the CEO received development consent (422/2017) to expand the previously approved educational establishment. The consent was for additional portable classrooms, capacity for an additional 150 students, and classes up to year 8.

Construction for the purposes of both abovementioned consents commenced in 2017 and the school began operations in Term 1 of 2018.

The site was partly zoned 'SP2 Infrastructure - Educational Establishment' until 2016. As such, it was widely recognised that a school could be developed at the site. In 2016, it was rezoned to 'R1 General Residential' largely as a result of the site's ownership being transferred from the NSW Government to the CEO. Educational Establishments are permissible with consent under the Liverpool Local Environmental Plan 2008 (LEP) in the R1 zone.

A separate staged concept SSDA 8832 was approved by the then DPE on 12 February 2019 for the 'development of St Francis College (K-Year 12) and Early Learning Centre on the development site for educational purposes, comprising:

- "Educational establishment and early learning centre;
- Student capacity of up to 1900 students and 80 child care places;
- Building footprints, envelopes and heights; and
- Car and bicycle parking".

The intent of this application was to establish the site's broader layout in order to cater for the locality's pre-school, primary and secondary Catholic educational demands up until approximately 2027. Statutory approvals for the stages of development of the school will be the subject of relevant applications in accordance with the Act.

A Section 4.55(1A) (4.55) application relating to SSDA 8832 was approved by the DPIE on 18 December 2019. This 4.55 application allowed for the creation of an additional landscaping stage which allows for the preparation of this current SSDA.

Section 4 of this EIS provides a detailed description of the proposed development subject to this SSDA.

2.4. Project Objectives

The proposed development forms part of a staged delivery of an educational establishment and associated services in the Edmondson Park locality. The intent of this application is to establish the site's landscaping and perimeter in the early stages of the school's development.

The overall aims of this project are to:

- Provide natural screening and improve the presentation of the site from roads and surrounding properties;
- Provide natural shade and reduce urban heat island effects; and
- Activate the concept consent SSDA 8832.

The wider proposal, being for a school, will provide obvious community and social benefits to the fast growing local community.

2.5. Project Summary

This proposal seeks approval for landscaping works located on the southern and eastern boundaries of the site. Ancillary works include the provision of boundary fencing and the installation of piping and drainage with connections to Council's stormwater system. A detailed description of the proposal is provided in Section 4.

2.6. The Proponent and Project Team

This SSDA and EIS are prepared on behalf of CEO. The principal consultant team for the project is set out in Table 2.

Table 2: Proponent and Project Team

Discipline	Consultant
Concept Plans and Urban Design	JDH Architects
Quantity Survey Report	Wilde and Woollard
Survey Plan	LandTeam Australia
Parking Requirements Report	Bitzios Consulting
Acoustic Assessment	Day Design
Utilities, Integrated Water Management & Stormwater	Henry & Hymas
ESD & Electrical Services	JHA Consulting Engineers



Contamination and Geotechnical Investigations	GeoEnviro Consultancy
Landscaping Plans	Arcadia

3. SITE ANALYSIS

3.1. The Regional Context

Edmondson Park is located approximately 10km from Liverpool CBD, 17km from Campbelltown CBD and 45km from Sydney CBD.

The regional context of the site is illustrated on Figure 2.

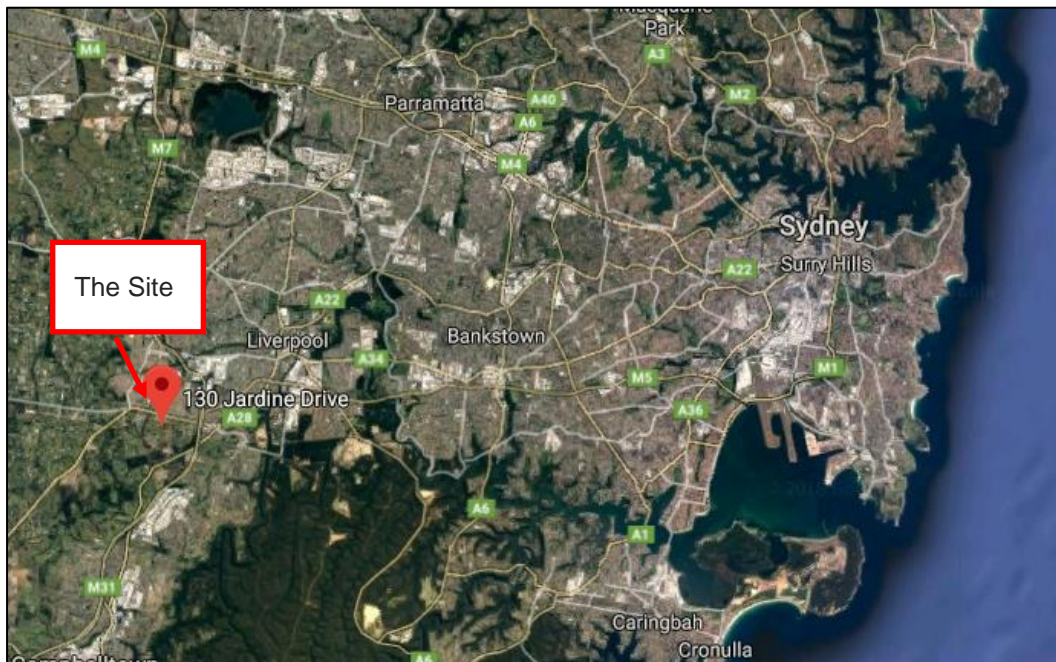


Figure 2: Aerial photograph showing the location of Edmondson Park relative to Sydney CBD, Liverpool and Campbelltown (Source: Google Maps)

3.2. Local Context

The site is located approximately 1km northwest of the Edmondson Park town centre and is within the suburban release area of Edmondson Park.

The area is rapidly developing with low to medium density residential development, retail and commercial floor space as part of a town centre, served by a heavy rail train station providing direct connectivity to Kingsford Smith Airport and the Sydney CBD.

The site is well connected to the major road network, including Camden Valley Way, Campbelltown Road and the M7 Westlink Motorway.

The site's surrounding context is illustrated below.



Figure 3: Site's local context (Source: Google Earth)

3.3. Legal Description

The site has a street address of 130-150 Jardine Drive, Edmondson Park and is legally described as Lot 1 in DP 1245480. Refer to Figure 4.



Figure 4: Site's lot boundaries, subject site outlined in red and shaded yellow (Source: SixMaps)

3.4. Ownership

SFCC is under the ownership of the Trustees of the Roman Catholic Church (TRCC).

3.5. Planning History

Until recently, development on the site generally comprised of single or two-storey detached dwellings with various detached sheds and the like. In addition, a large warehouse and a dam, previously used as part of a poultry farm, were located on the north and east of the site. All lots were used generally for agricultural or rural lifestyle purposes. All these structures have been demolished.

Previous applications related to the school are outlined as follows:

Table 3: Existing Approvals

Application	Description
a) Development consent DA-721/2015	Consent granted on 23 December 2015 for erection of 2.1m high diplomat fencing to the site boundaries, erection of an advertising sign and temporary storage of demountable class rooms.
b) Development consent DA-456/2016	Consent granted on 16 December 2016 for the construction of an educational establishment accommodating 250 children between kindergarten and year 7 and 19 staff. The development involved the removal of 18 trees, earthworks to fill an existing dam, construction of 12 classrooms, an administration building, multipurpose hall and demountable amenities, covered playground, temporary car park containing 67 spaces, bus drop off zone, vehicle access from Jardine Drive, associated signage, upgrading of existing public roads and construction of new public roads.
c) Development consent DA-422/2017	Consent granted on 22 August 2017 for the construction of additional general learning areas, expansion of car parking area, installation of signage, increase in student capacity of an approved educational establishment by an additional 150 students (total 400 students), and classes between K - 8.
d) Development consent SSDA 8832	Consent granted on 12 February 2019 for the concept proposal for the development of St Francis College (K- Year 12) and Early Learning Centre on the development site for educational purposes, comprising: <ul style="list-style-type: none"> ▪ Educational establishment and early learning centre; ▪ Student capacity of up to 1,900 students and 80 child care places; ▪ Building footprints, envelopes and heights; and ▪ Car and bicycle parking.
e) Modification of development consent SSDA 8832	Modification of consent granted on 18 December 2019 for the addition of a new definition and the modification of conditions and notations in Part A and Part B of Schedule 2 of the consent to enable proposed landscaping works to be undertaken as Stage 1 works.

Construction for the purposes of the first stage development of the school (as part of Development Consent 456/2016) commenced in 2017. Some of the approved portable classrooms and onsite parking areas have been established onsite.

The temporary school was officially opened in Term 1, 2018 and catered for 250 students between Kindergarten and Year 8, including 19 staff. A concept SSDA 8832 was approved in February 2019 for the expansion of the school and establishment of permanent facilities, however no works have currently commenced under this consent.

It is intended that this landscaping DA form the first stage (as part of the modified SSDA 8832) and provide for the commencement of works under the SSDA, thus activating the consent.

3.6. Access, Transport and Parking

3.6.1. Existing Access and Transport Arrangements

The site is bounded by the five (5) roads which are listed below. Currently, primary access is obtained from Jardine Drive.

- Jardine Drive: Is a two-way circulating road bisected by Buchan Avenue. Currently serves as the primary access point for the school's car park and drop-off/pick-up area. The existing bus bay is also located along this road.
- Poziers Road: This is an east-west local road connected to Jardine Drive and Croatia Avenue.
- Vinny Road: Is a north-south road at the eastern side of the site and intersects with Poziers Road. Vinny Road operates under a 50km/hr speed limit and links Buchan Avenue to Hartlepool Road.
- Guillemont Road: This is a two lane, east-west road bounds the southern side of the site and links Buchan Avenue with Lacey Road.
- Lacey Road: This is a recently constructed, two lane, east-west road (at SFCC) which intersects with Guillemont Road at the southern edge of the site. Currently construction site access is provided to the south eastern corner of the site near the intersection of Lacey and Vinny Road.

SFCC is located approximately 1km northwest from Edmondson Park Railway Station. Public bus services and the school's bus services are also available, such as bus route 869, which includes a stop at SFCC and services between Ingleburn and Liverpool Railway Stations via Prestons and Edmondson Park.

SFCC also contains a bus bay adjacent to Jardine Drive near its northern boundary which is designed to cater for the expected number of buses once SFCC is completed. The layout of this bus bay has sufficient capacity to accommodate all buses servicing the school without queuing onto the roadway.

Currently, the school bus bay is also used by service vehicles. Servicing takes place irregularly during the day outside of school peak hours. The existing arrangements will be maintained to ensure that service vehicles continue to safely and efficiently service the site.

3.6.2. Existing Parking Situation

As a result of a previous approval (DA-456/2016), the site currently has a car park with capacity to accommodate sixty-seven (67) car parking spaces (15 staff and 52 visitor parking spaces). A disabled car space is also proposed within the car park (68). The existing parking layout is shown in Figure 5. The recent concept DA 8832 approval has not resulted in any change to the existing parking layout.

Access to and from the car park is provided through two (2) separate driveways via Jardine Drive. Pedestrian access is provided adjacent to the car park entry via Jardine Drive.

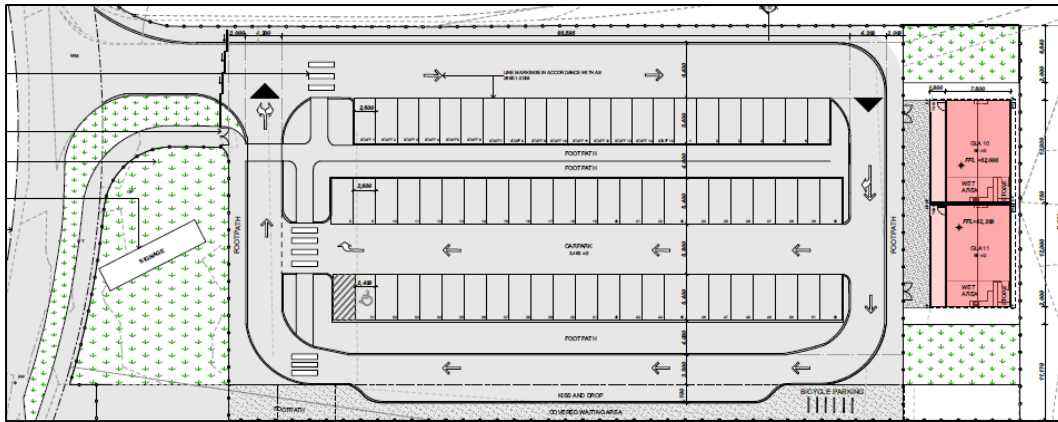


Figure 5: Existing parking layout (67 car spaces) (DA-456/2016) (Sources: JDH Architects & Bitzios)

3.7. Environmental Characteristics

3.7.1. Topography

Based on the Survey Plan by Land Team (**Appendix 2**), the site is generally level, with a gentle slope of less than 6 degrees downwards toward the front of the site (northern boundary).

The south western corner of the site is at an estimated RL of 67.5m ADH. The ground surface drops to approximately RL 60.5m at the northern corner, and RL 53.5m at the north-western corner of the site.

3.7.2. Trees and Ecology

Existing vegetation on the site is generally limited to turf. There is a limited number of mature trees located generally towards the boundaries of the site to the south. An existing mature tree (Tree 31) is located near the north eastern corner of the site.

3.8. Site Photos

Until recently, the surrounding locality was primarily vacant or used for hobby farms. As part of the locality's rezoning for urban purposes however, there has been extensive civil works to accommodate primarily low to medium density housing. Much of the locality remains as small to medium sized hobby farms.

Photos of the sites and surrounds are provided on the following pages.



Figure 6: View of SFCC from Jardine Dr (Source: City Plan)



Figure 7: View of existing bus bay along Jardine Dr (Source: City Plan)



Figure 8: Vehicular and pedestrian entry to the existing car park and temporary buildings on Jardine Dr (Source: City Plan)



Figure 9: Entry to the existing bus bay on Jardine Dr (Source: City Plan)



Figure 10: Exit from the existing bus bay on Jardine Dr (Source: City Plan)



Figure 11: Existing OSD between the boundary of the bus bay and Jardine Dr (Source: City Plan)



Figure 12: Rear view (north-western) of SFCC from Guillemont Rd (Source: City Plan)



Figure 13: Rear view (north-eastern) of SFCC from Guillemont Rd (Source: City Plan)



Figure 14: Adjacent dwelling at the north-eastern side along Jardine Dr (Source: City Plan)



Figure 15: Existing dwelling opposite the main entry on Jardine Drive (Source: City Plan)



Figure 16: Vacant land fronting the bus bay and ongoing development at the cnr of Jardine Dr and Donaldson Rd (Source: City Plan)



Figure 17: Existing development viewed from the cnr of Jardine Dr and Rattey Ave (Source: City Plan)



Figure 18: Internal road at the boundary of SFCC and 170 Jardine Dr (Source: City Plan)



Figure 19: Front view of adjacent vacant land at 170 Jardine Dr (Source: City Plan)



Figure 20: North-western view of Jardine Drive (Source: City Plan)



Figure 21: South-western view of Jardine Dr (Source: City Plan)



Figure 22: New roundabout at the north-eastern side of SFCC on Jardine Dr (Source: City Plan)



Figure 23: Edmondson Park Railway Station at the south-eastern side of SFCC (Source: City Plan)

4. DESCRIPTION OF THE DEVELOPMENT

An overview of the proposed works is provided in Section 2.5 of this EIS. The Landscape Plan by Arcadia Landscape Architects and the following sections of this EIS provide further details with respect to the description of the proposed development.

4.1. Overview

Key elements for the proposed development include the following:

Landscaping

- The proposed landscaping includes the following:
 - Plantings;
 - A swale on the southern boundary; and
 - A boundary fence.
- Plantings include native and exotic species of small and large trees, grasses, shrubs and groundcovers.
- The proposed landscaping follows the existing fall of the land and provides a natural screen to the school when viewed from the public domain.
- It is noted that the proposed landscaping which forms the scope of this SSDA is confined to the southern and eastern boundaries of the site.
- It is noted that the provision of a car parking area is not part of this SSDA. However, the proposed parking layout will have capacity to accommodate a total of 226 on-site car parking spaces once the development is fully completed. 6 parking spaces have been relocated and the northern and eastern car parking areas are now fully separated as a result of the proposed landscaping which involves the retention of Tree 31.

Stormwater and Drainage

- The proposal involves stormwater piping, the provision of 14 x 13m³ OSD tanks, kerbing and a bioretention basin of a volume of approximately 150m³. Stormwater drainage will be via a connection into an existing pit on Vinny Road to the north east of the site.

4.2. Tree Retention

This proposal involves the retention of Tree 31 consistent with consent condition A14 of SSDA 8832. No other trees are proposed to be removed or retained consistent to that previously approved in SSDA 8832.

4.3. Excavation and Filling

Minor excavation and filling is proposed to construct drainage systems and landscape swales. Details of these works are provided in the Stormwater Management Plan in **Appendix 16** and Landscape Plan in **Appendix 3**.

4.4. Landscaping Concept

The proposal includes landscaping works along the boundaries of the site previously approved as part of the Concept DA. In addition to this, the proposal also involves the retention of an existing tree (Tree 31) near the north eastern corner of the site as mandated by condition A14 of the SSD 8832 development consent.

The landscape design for the site perimeter will be fundamental to the integration of the built elements by establishing the boundaries of the site. It will create a positive environment that is stimulating and desirable for students, teachers and the community. Boundary planting will provide screening, shade and visual privacy to neighbours.



Figure 24: Stage One Landscape Plan (Source: Arcadia)



Figure 25: Extract from the Landscape Section (Source: Arcadia)

Large trees have been incorporated to provide a sense of scale, screening the school from the public domain and to provide shade and wind mitigation. 113 trees of mature heights varying from 1-12m are proposed. Further, a mix of shrubs, grasses and groundcovers are proposed

Water sensitive urban design principles have been used to create a low maintenance, environmentally sensitive landscape that has a distinctive tree canopy with diverse low shrub ground cover.

These elements for the proposed landscape design and strategy are demonstrated in the Landscape Concept Plan (**Appendix 3**) extracted at on the page over.

A soft landscape buffer of 3m between the carpark and site boundary (public domain) will comprise a mix of trees, shrubs and ground covers to increase shade and soften appearance of the continuous fence.

4.5. Traffic and Parking

Access to the proposed parking area for SFCC is proposed to largely remain the same as what was originally approved in SSDA 8832 with the exception of the north eastern car park to accommodate the retention of Tree 31. This has resulted in the relocation of two (2) car parking spaces from the northern car park to the southern car park and the separation of the car park into two separate parking areas. The number of car parking spaces provided (226 spaces) remain the same. Otherwise, access to the car park remains the same as proposed in the concept SSDA. For further details refer to SEAR 7 (Section 9.7 of this EIS), an amended queuing assessment in **Appendix 4** and a proposed site plan in **Appendix 21**.

4.6. Civil Engineering

In terms of drainage, the proposed system for the new landscaping will connect to the existing stormwater drainage system on site. The proposal involves the installation of stormwater piping, 14 x 13m³ OSD tanks and a bioretention basin of a volume of approximately 150m³. Stormwater drainage will be via a connection into an existing pit on Vinny Road to the north east of the site.

Kerbing to the car parking area immediately adjacent to the Guillemont Road entrance is proposed to operate two stormwater pits. The kerb is proposed to be 150mm in height.

For further details refer to SEAR 13 (Section 9.13 of this EIS) and plans prepared by Henry and Hymas at **Appendix 16**.

4.7. Staging

The proposed landscaping is to take place as part of the first (of 10) stages of the concept SSDA 8832 (as amended). Other stages remain and will be subject to separate approvals consistent with the approved concept. Detailed design of buildings with their envelopes and associated open areas will be subject to subsequent staged approvals. The Staging Plan accompanies this SSDA in **Appendix 5**.

4.8. Analysis of Alternative Options

A number of alternative options were considered during the preparation of the initial Section 4.55 (1A) with the preferred solution being that which best met both the immediate needs of SFCC and its staged expansion. During this process a number of constraints and opportunities have determined the layout and scope of Stage 1 landscaping works:

- Availability of locations along the boundary for an appropriately sized site/area to accommodate the required landscaping;
- Consistency with the approved concept SSDA;
- Incorporation of the proposal around existing infrastructure and the staged construction of buildings to allow continued operation;
- Location not to impose any significant impact or compromise existing functions and services to the community; and
- Alignment to SFCC's briefed requirements and the project's cost parameters.

4.9. Impact of not proceeding with the proposal

Generally, the key impacts of not proceeding with the proposal would include limiting amenity benefits associated with landscaping and drainage to students, staff and parents of SFCC. These include establishing a landscape perimeter to the school in its early stage of development, which will 'mature' with the school to provide shade, cooling and privacy.

In addition to the impacts identified above, failure to deliver this proposal would undermine the delivery of the broader service capacity of SFCC because this DA will activate the concept consent. Edmondson Park and the surrounding neighbourhoods are reliant upon SFCC as a major educational establishment in the south-western catchment. This would have a significant and detrimental impact on services provision for students within the Liverpool LGA. For these reasons, the impact of "doing nothing" is considered detrimental.

5. RESPONSE TO SEARS

This EIS has been prepared in accordance with the form and content requirements outlined in Schedule 2, Part 3, Clause 6 and 7 of the EP&A Regs and the specific SEARs for the development.

The SEARs were issued by the then DPE on 9 September 2019 and a copy is attached at **Appendix 1**.

The table below summarises the SEARS and includes a reference identifying where each requirement has been addressed in this EIS.

Table 4: SEARs

SEAR/Key Issues	Where Addressed in EIS
1. Statutory and Strategic Context	Sections 7 & 8
2. Built Form	Section 9.2
3. Environmental Amenity	Section 9.3
4. Contamination	Section 9.4
5. Ecologically Sustainable Development (ESD)	Section 9.5
6. Noise and Vibration	Section 9.6
7. Transport and Accessibility	Section 9.7
8. Staging	Section 9.8
9. Biodiversity	Section 9.9
10. Landscaping	Section 9.10
11. Sediment, Erosion and Dust Controls	Section 9.11
12. Construction Hours	Section 9.12
13. Drainage	Section 9.13
14. Waste	Section 9.14
15. Contributions	Section 9.15
Plans and Documents	All of the required plans and documentation stipulated in this section of the SEARs (where relevant) accompany this EIS as appendices.
Consultation	Section 6

6. CONSULTATION

In accordance with the SEARs for this project, consultation was undertaken with LCC.

6.1. Consultation with Liverpool City Council

The SEARs require consultation with LCC. City Plan contacted LCC by phone and email on 18 December 2019 to confirm Council's interest in the matter. A copy of the correspondence related to Council consultation is provided at **Appendix 13**. Council had no further comments on the matter.

7. STATUTORY PLANNING CONSIDERATIONS

7.1. Overview

The Secretary requires the assessment of the SSD Application in relation to the following statutory instruments:

- Environmental Planning and Assessment Act 1979;
- Environmental Planning and Assessment Regulation 2000;
- State Environmental Planning Policy (State & Regional Development) 2011;
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017;
- State Environmental Planning Policy No. 55 – Remediation of Land;
- Liverpool Local Environmental Plan 2008.

It is also noted that the Biodiversity Conservation Act 2016 applies to the proposed development.

Where relevant, these controls are addressed below.

7.2. Environmental Planning & Assessment Act 1979

7.2.1. Division 4.7 - State significant development

In accordance with Section 4.36 of Division 4.7, the proposal is declared State Significant Development pursuant to State Environmental Planning Policy (State & Regional Development) 2011. This is addressed at Section 7.5 of this EIS.

7.2.2. Section 4.15 - Evaluation

The proposed development has been evaluated and assessed against the relevant heads of consideration under Section 4.15 throughout this EIS.

The table below, identifies the matters for consideration under Section 4.15(1) that apply to SSD, in accordance with Section 4.40 of the EP&A Act.

Table 5: Section 4.15(1)(A) Matters for Consideration

Section 4.15	Comment
(a)(i) any environmental planning instrument	Consideration of the Liverpool LEP 2008 is undertaken in Section 7.9 of this EIS.
(a)(ii) any proposed instrument	Not applicable.
(a)(iii) any development control plan	Pursuant to Clause 11 of SEPP SRD, DCP's do not apply to SSD.
(a)(iiia) any planning agreement	Not applicable.
(a)(iv) the regulations	This SSDA is considered to satisfactorily meet the relevant requirements of the EP&A Regulation relating to applications and the requirements for EIS's in Schedule 2. Refer to Section 7.3 of this EIS.

(a)(v) any coastal zone management plan	Repealed.
(b) the likely impacts of that development	The likely impacts of the development have been considered in Section 9 of this EIS. Mitigation measures to manage the impacts identified are also discussed in Section 9 and set out in a table in Section 10 of this EIS.
(c) the suitability of the site for the development	<p>The site is located in a developing suburban area and with all urban and infrastructure services available or capable of augmentation to meet the needs of the development.</p> <p>The proposal is suitable for the site given it represents permissible development, with consent, according to the LLEP 2008. The proposal is for an existing school and is also able to be carried out with consent under Clause 35 of the Education SEPP.</p> <p>Investigations into contamination, flora and fauna, parking and traffic and services show that the site is suitable for the proposed development and capable of accommodating landscaping of the intensity proposed.</p> <p>Measures will be put in place to manage impacts during construction and operation to protect the amenity of adjoining residents and students, staff and parents to SFCC.</p>
(d) any submissions	This is a matter for the DPIE. Although, it is noted that an extensive community consultation process was undertaken. The feedback from stakeholders was overwhelmingly positive.
(e) the public interest	Having regard to the provisions of the EP&A Act and this EIS, it is concluded that the development is significantly in the public interest given it represents an improvement in the amenity of an existing school which provides educational services to the community. Further, the proposal is without adverse environmental impacts and has been found to be suitable for the subject site. Minor mitigation measures are discussed further in Section 9.
Biodiversity values exempt if: (a) On biodiversity certified land (b) Biobanking Statement exists	Not applicable.

7.2.3. Division 4.4 Concept Development Applications

Pursuant to Division 4.4 of the Act, this staged DA is associated with Consent to Concept SSDA 8832, dated 12 February 2019, as modified on 18 December 2019. In accordance with Section 4.24 of the Act, this DA is consistent with Stage 1 of the Concept Consent for landscape works, as follows:

- It involves the same area as described as 'Stage 1' of the Concept Consent;
- It satisfies consent conditions of SSDA 8832 to be satisfied in the lodgement of future development applications, including the retention of Tree 31 as identified in condition A14; and

- The proposal is for landscaping, including plantings, excavation for a swale along the southern boundary, stormwater works, minor kerbing works to facilitate landscaping and a boundary fence.

7.3. Environmental Planning & Assessment Regulation 2000

7.3.1. Requirements for Preparing an EIS - Schedule 2

Clause 6 and 7 of Schedule 2 of the EP&A Regs prescribes requirements for preparing an EIS. This EIS has been prepared in accordance with the EP&A Regs as set out at the table below.

Table 6: EP&A Regulation - Schedule 2 Requirements

Schedule 2	Comment
<p>4 Integrated development—requirements of approval bodies</p> <p>(1) An application for environmental assessment requirements must, in the case of a development application for integrated development, also include particulars of the approvals that are required.</p>	N/A.
<p>6 Form of environmental impact statement</p> <p>An environmental impact statement must contain the following information:</p> <p>(a) the name, address and professional qualifications of the person by whom the statement is prepared,</p> <p>(b) the name and address of the responsible person,</p> <p>(c) the address of the land:</p> <p>(i) in respect of which the development application is to be made, or</p> <p>(ii) on which the activity or infrastructure to which the statement relates is to be carried out,</p> <p>(d) a description of the development, activity or infrastructure to which the statement relates,</p> <p>(e) an assessment by the person by whom the statement is prepared of the environmental impact of the development, activity or infrastructure to which the statement relates, dealing with the matters referred to in this Schedule,</p> <p>(f) a declaration by the person by whom the statement is prepared to the effect that:</p> <p>(i) the statement has been prepared in accordance with this Schedule, and</p> <p>(ii) the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and</p>	All of these matters have been addressed in the body of this EIS.

<p>(iii) that the information contained in the statement is neither false nor misleading.</p>	
<p>7 Content of environmental impact statement</p> <p>(1) An environmental impact statement must also include each of the following:</p> <p>(a) a summary of the environmental impact statement,</p> <p>(b) a statement of the objectives of the development, activity or infrastructure,</p> <p>(c) an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure, having regard to its objectives, including the consequences of not carrying out the development, activity or infrastructure,</p> <p>(d) an analysis of the development, activity or infrastructure, including:</p> <p>(i) a full description of the development, activity or infrastructure, and</p> <p>(ii) a general description of the environment likely to be affected by the development, activity or infrastructure, together with a detailed description of those aspects of the environment that are likely to be significantly affected, and</p> <p>(iii) the likely impact on the environment of the development, activity or infrastructure, and</p> <p>(iv) a full description of the measures proposed to mitigate any adverse effects of the development, activity or infrastructure on the environment, and</p> <p>(v) a list of any approvals that must be obtained under any other Act or law before the development, activity or infrastructure may lawfully be carried out,</p> <p>(e) a compilation (in a single section of the environmental impact statement) of the measures referred to in item (d) (iv),</p> <p>(f) the reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development set out in subclause (4).</p> <p>(2) Subclause (1) is subject to the environmental assessment requirements that relate to the environmental impact statement.</p> <p>(4) The principles of ecologically sustainable development are as follows:</p> <p>(a) the precautionary principle, namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the</p>	<p>In response to this clause, we comment as follows:</p> <p>A summary of the EIS is contained in the Executive Summary at the commencement of this EIS;</p> <p>A statement of the objectives of the development is contained in the Introduction of this EIS at Section 2.4;</p> <p>An analysis of feasible alternatives and the consequences of not carrying out the development is undertaken in Section 4.8 and 4.9 of this EIS.</p> <p>An analysis of the development is undertaken in Section 4 of this EIS;</p> <p>An analysis of the likely impact on the environment is undertaken in Sections 7, Section 8 and Section 9 of this EIS;</p> <p>A full description of the measures proposed to mitigate any adverse effects of the development is contained at Section 10 of this EIS;</p> <p>A list of all of the measures referred to in (d)(iv) is in Section 10 of this EIS;</p> <p>The proposed development is consistent with principles of ESD, as set out in the response to SEAR 5 (Section 9.5 of this EIS).</p>

precautionary principle, public and private decisions should be guided by:

(i) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and

(ii) an assessment of the risk-weighted consequences of various options,

(b) inter-generational equity, namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,

(c) conservation of biological diversity and ecological integrity, namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,

(d) improved valuation, pricing and incentive mechanisms, namely, that environmental factors should be included in the valuation of assets and services, such as:

(i) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,

(ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,

(iii) environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.

7.4. Biodiversity Conservation Act 2016

The Biodiversity Conservation Act 2016 established a scheme for the biodiversity certification of land as part of the recent biodiversity reforms. The site has been confirmed to be biodiversity certified under the BC Act. Under Section 8.4 of the BC Act, an assessment of the likely impacts of the development on biodiversity certified land is not required. Nevertheless, biodiversity is addressed in detail in the response to SEAR 9 (Section 9.9 of this EIS).

7.5. State Environmental Planning Policy (State and Regional Development) 2011

The aim of State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD) is to identify development that is SSD. Pursuant to the SEPP SRD a project will be SSD if it falls into one of the classes of development listed in Schedule 1 of the SEPP. *"Development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school"* in Clause 15 of Schedule 1 are identified as SSD and are considered to be development of State significance.

The works have a combined CIV of \$554,000 (excl. GST), with the QS Report provided in **Appendix 15**. Although this does not exceed the \$20 million threshold for educational facilities as specified in Schedule

1 Clause 15(2) of the SRD SEPP, the proposal is classified as SSD by virtue of Clause 12, which is as follows:

If—

(a) development is specified in Schedule 1 or 2 to this Policy by reference to a minimum capital investment value, other minimum size or other aspect of the development, and

(b) development the subject of a concept development application under Part 4 of the Act is development so specified,

any part of the development that is the subject of a separate development application is development specified in the relevant Schedule (whether or not that part of the development exceeds the minimum value or size or other aspect specified in the Schedule for such development).

As the proposal is specified in Schedule 1 by reference to a minimum capital investment value and was the subject of a concept DA under Part 4 of the Act, the proposal is classified as SSD.

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

The State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP) facilitates the delivery of, amongst other uses, appropriately designed and located educational establishments. Relevant to this SSDA, Part 4 of the Education SEPP relates to Schools and prescribes specific development controls.

Clause 33 - definition of 'prescribed zone' under this clause refers to land use zone R1 General Residential, as identified for the subject site. Refer to Section 7.8 below.

Clause 35 - development permitted with consent, Subclause (1) states that development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone. As the proposed landscape works are for the purpose of a school and in a prescribed zone, the works may be carried out.

Subclause (6) states that before determining a development application, the consent authority must take into consideration:

the design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4.

Schedule 4 provides a list of seven (7) School Design Quality Principles. The proposed development responds to the design quality principles listed in Schedule 4, which are addressed in detail at SEAR 5 (Section 9.5 of this EIS) in **Appendix 6**.

Clause 42 - development consent may be granted for development for the purpose of a school that is SSD even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted.

Height of buildings and FSR controls are applicable to the site. However, this SSD is exempt from these particular standards as provided by Clause 42 and the proposal does not involve the construction of buildings.

The proposal relates only to landscaping and proposes no change to student or staff numbers. Thus, Clause 57 does not apply to the proposal.

Refer to SEAR 7 (Section 9.7 of this EIS) for detail on transport and accessibility.

7.8.2. Clause 2.3 - Zone Objectives

Clause 2.3(2) of the LLEP 2008 states that the consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone.

The objectives of the R1 General Residential zone are below:

To provide for the housing needs of the community.

To provide for a variety of housing types and densities.

To enable other land uses that provide facilities or services to meet the day to day needs of residents.

To ensure that housing densities are broadly concentrated in locations accessible to public transport, employment, services and facilities.

To facilitate development of social and community infrastructure to meet the needs of future residents.

The proposed development is consistent with the above objectives in that the proposal facilitates the future development of social and community infrastructure to meet the educational needs for future residents as sought by the R1 zone objectives. The school is located in an appropriate site within a suburban release area within relatively close proximity to public transport

7.8.3. Land Use Definition and Permissibility

The subject site is zoned R1 General Residential under the LLEP 2008.

Educational Establishments, or schools, are permissible with consent in the R1 zone.

The LEP's definition of Educational Establishments is consistent with the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP).

The LLEP 2008 and the Education SEPP define an "educational establishment " as follows:

"Educational establishment means a building or place used for education (including teaching), being:

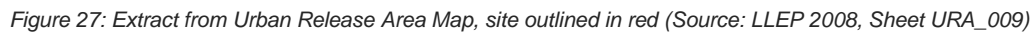
(a) a school, or

(b) a tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act."

The proposed landscaping SSDA is consistent with the use defined above as it is directly ancillary to the use of an already approved school. As the site is located within a prescribed zone as provided in Clause 33, the proposal for landscaping may be carried out pursuant to Clause 35 Subclause (1).

7.8.4. Part 6 - Urban Release Area

The site is identified within an Urban Release Area. The surrounding locality also forms part of an Urban Release Area as seen in **Figure 27**. There have been extensive civil works in the surrounding area to accommodate primarily low to medium density housing. The demand for new schools (and the improvement of existing schools) in the area already exists.



8. POLICIES AND GUIDELINES

8.1. Overview

The SEARs require the following non-statutory policies to be addressed in the subject EIS:

- NSW State Priorities;
- Greater Sydney Region Plan: A Metropolis of Three Cities;
- Crime Prevention Through Environmental Design (CPTED) Principles;
- Healthy Urban Development Checklist, NSW Health;
- Better Placed - An integrated design policy for the built environment of NSW 2017; and
- Liverpool Development Control Plan 2008.

These policies are addressed below, where relevant.

8.2. NSW State Priorities

The NSW Government has identified a series of state priorities, targeting particular problems and objectives for the growth and development of the state. The NSW Government is currently actioning 18 priorities. These priorities are divided into the following five headings:

1. Strong budget and economy;
2. Building infrastructure;
3. Protecting the vulnerable;
4. Better services; and
5. Safer communities.

The proposal is consistent with the NSW State priorities as follows:

- The proposal will enable the delivery of essential educational infrastructure by augmenting and enhancing existing education and community services at SFCC;
- The proposed design takes into account the established Crime Prevention through Environmental Design (CPTED) principles. These are addressed at Section 8.5 of this EIS.

The proposed development is also consistent with the following Premier's "personal" priorities:

- Creating jobs;
- Building infrastructure;
- Improving education results; and
- Protecting our kids.

8.3. Greater Sydney Region Plan: A Metropolis of Three Cities

The Greater Sydney Region Plan was released in March 2018 by the Greater Sydney Commission (GSC).

The Plan encompasses a global metropolis of three cities – the Western Parkland City, the Central River City and the Eastern Harbour City (**Figure 28**). It is envisioned that people of Greater Sydney will live within 30 minutes of their jobs, education and health facilities, services and great places.

Relevant sections of the Greater Sydney Region Plan are outlined in Table 12.

Table 12: Consistency with the Greater Sydney Region Plan

Direction	Comment
Chapter 4 - Liveability A city for the people Housing the city A city of great places	Greater Sydney is forecast to grow from 4.7 million people to 8 million people by 2056. Housing targets include 750,000 additional homes over the next 20 years and 817,000 new jobs to meet the needs of a changing economy. The proposal will assist with improving the amenity of the existing school and streetscape and facilitate meeting future demands for educational facilities in the area.
Chapter 5 - Productivity A well-connected city Jobs and skills for the city	The proposal will provide additional employment opportunities through the construction and operational phase through landscaping establishment and ongoing maintenance.
Chapter 6 - Sustainability A city in its landscape An efficient city A resilient city	The proposal adopts a range of sustainability measures such as stormwater capture and reuse as well as extensive landscaping.

Edmondson Park is located within the Western Parkland City, the approximate location of the site is shown in .



Figure 28: 'A Metropolis of Three Cities', subject site identified with a red star (Source: Greater Sydney Region Plan - GSC)

8.4. Greater Sydney Commission's Western City District Plan

The proposal is consistent with the following Planning Priorities in the GSC's Western City District Plan:

- Providing services and social infrastructure to meet people's changing needs; and
- Increasing urban tree canopy cover and delivering Green Grid connections; and
- Fostering healthy, creative, culturally rich and socially connected communities.

The proposal involves landscaping for the purposes of an existing school, which is to be expanded with the provision of permanent buildings. The proposal, whilst in the short term will provide shade, natural amenity and site establishment for the school, will allow for the expansion of the existing SFCC and in doing so will improve the educational services and facilities available within the Liverpool LGA. This will deliver greater liveability outcomes for the school within a growing residential area.

8.5. Crime Prevention Through Environmental Design (CPTED) Principles

Crime Prevention through Environmental Design (CPTED) is a recognised model which provides that if development is appropriately designed it can reduce the likelihood of crimes being committed. Introducing CPTED measures in the design of this development is anticipated to assist in minimising the incidence of crime and contribute to perceptions of increased public safety.

The planning, layout and proposed materials of the proposed permanent buildings at SFCC have taken into consideration the principles of Crime Prevention Through Environmental Design ("CPTED"). CPTED outlines four key principles, and the SFCC has been designed in accordance with these. This is discussed in detail as part of SEAR 2 in Section 9.2.3.

Based on the CPTED assessment the proposal is consistent with CPTED principles and the safety or security of students and staff resulting from this proposal are appropriately managed.

8.6. Healthy Urban Development Checklist

The purpose of the Healthy Urban Development Checklist (HUDC) is to assist health professionals to provide advice on urban development policies, plans and proposals. It is intended to ensure that the advice provided is both comprehensive and consistent. The HUDC provides a useful mechanism for upfront guidance in the identification of key health issues, relevant supporting evidence and recommendations, also suggesting how positive effects can be maximised and negative health effects minimised.

The HUDC is structured into ten chapters, each one focused on a characteristic that is important for healthy urban development. The proposal is consistent with the relevant provisions of the HUDC as follows:

- The proposal involves landscaping and increased natural amenity for students, staff, parents and other users of SFCC, resulting in an improvement of open space and social infrastructure in a school;
- The proposed development will generate additional employment during construction;
- As set out in Section 8.10 above, the proposed development promotes principles of Crime Prevention Through Environmental Design (CPTED) and promotes community safety and security; and
- A consultation process has been undertaken with relevant stakeholders to encourage stakeholder involvement in the process of preparing this landscaping SSDA.

The proposal provides shade, temperature regulation and reduces the urban heat island effect, all of which are conducive to a healthier environment. With regard to the above, the proposal is consistent with the relevant provision of the HUD checklist.

8.7. Better Placed - An integrated design policy for the built environment of NSW 2017

Better Placed - an integrated design policy for the built environment of NSW" ("Better Placed") was published by the NSW Government Architects Office in 2017 as is described as follows:

Better Placed is a policy for our collective aspirations, needs and expectations in designing NSW. It is about enhancing all aspects of our urban environments, to create better places, spaces and

buildings, and thereby better cities, towns and suburbs. To achieve this, good design needs to be at the centre of all development processes from the project definition to concept design and through to construction and maintenance.

Better Placed is an integrated design policy for the built environment of NSW which advocates for sharing the responsibility in delivering good processes and outcomes for NSW, with a focus on "good design".

Better Placed identifies seven Design Objectives for NSW including, better fit, better performance, better for community, better for people, better working, better value & better look and feel. Consideration of the seven (7) Design Objectives is undertaken in Table 7 below.

Table 7: Consistency with BPDP

Objective	Response
<p>1) Better fit - contextual, local and of its place</p> <p>Good design in the built environment is informed by and derived from its location, context and social setting. It is place-based and relevant to and resonant with local character, and communal aspirations. It also contributes to evolving character and setting.</p>	<p>The design of the proposed development responds to the site's location and context. The proposal involves a combination of trees, shrubs, groundcovers and grasses on the boundary of the site to provide a natural screen for the school and promote natural amenity to its users. The proposal involves the planting of native trees and plants responding to the natural fall of the land.</p> <p>The appropriateness of the proposal with regard to its context is addressed further in Section 9.2.3 of this EIS.</p>
<p>2) Better performance - sustainable, adaptable and durable</p> <p>Environmental sustainability and responsiveness is essential to meet the highest performance standards for living and working. Sustainability is no longer an optional extra, but a fundamental aspect of functional, whole of life design.</p>	<p>External area design will implement best practices of water sensitive urban design, including permeable paving and indigenous low water usage plants to increase stormwater retention, decrease total suspended solids and mitigate the urban heat island effect. The carbon sequestration of the plants will also combat climate change contributions.</p>
<p>3) Better for community - inclusive, connected and diverse</p> <p>The design of the built environment must seek to address growing economic and social disparity and inequity, by creating inclusive, welcoming and equitable environments. Incorporating diverse uses, housing types and economic frameworks will support engaging places and resilient communities.</p>	<p>Some of the community benefits related to the proposed development include the following:</p> <ul style="list-style-type: none"> ▪ The proposed development responds to the need to visually and functionally establish the site of the school before further redevelopment occurs; ▪ The proposal will provide shade and wind benefits to users of surrounding roads; and ▪ The planting of trees and other vegetation improve the natural amenity of the public domain. <p>It is considered that the proposed development, being a school, will have positive social impacts.</p>
<p>4) Better for people - safe, comfortable and liveable</p> <p>The built environment must be designed for people with a focus on safety, comfort</p>	<p>The key focus of the proposal is to improve natural amenity to the school and in doing so provide comfortable educational facilities for students and staff. The proposal</p>

and the basic requirement of using public space. The many aspects of human comfort which affect the usability of a place must be addressed to support good places for people.	allows for natural screening when viewed from the public domain and shade for student recreational activities. The proposal has also been designed in accordance with the CPTED principles, as described in Section 8.5 of this EIS.
<p>5) Better working - functional, efficient and fit for purpose</p> <p>Having a considered, tailored response to the program or requirements of a building or place, allows for efficiency and usability with the potential to adapt to changes over time. Buildings and spaces which work well for their proposed use will remain valuable and well-utilised.</p>	The proposed landscaping will encourage the use of the wider site for passive and active recreation due to the provision of natural amenity and shade, ensuring that the whole school grounds are well utilised by students and staff.
<p>6) Better value - creating and adding value</p> <p>Good design generates ongoing value for people and communities and minimises costs over time. Creating shared value of place in the built environment raises standards and quality of life for users, as well as adding return on investment for industry.</p>	The proposed landscaping will contribute to establishing a sense of place for the school by providing natural elements complementing existing and future built form. Additional natural amenity for the site can contribute to the wellbeing and performance of both students and staff particularly as the school expands and increases in size.
<p>7) Better look and feel - engaging, inviting and attractive</p> <p>The built environment should be welcoming and aesthetically pleasing, encouraging communities to use and enjoy local places. The feel of a place, and how we use and relate to our environments is dependent upon the aesthetic quality of our places, spaces and buildings. The visual environment should contribute to its surroundings and promote positive engagement.</p>	<p>The design of the previously approved school has prioritised pedestrian connectivity across campus through the provision a clear welcoming pathway enhanced by a landscape setting, allowing students, staff and visitors to move safely into college grounds. The layout of the proposal provides open and green visual connections, and links to the adjoining Clermont Park. This landscaping SSDA serves to complement this vision being similar to the landscaping approved in the landscape concept and will not obscure sight lines throughout the school.</p> <p>Overall, it is considered that the proposed design strategies will create a school which is engaging, inviting and attractive.</p>

Further to the above, the proposal makes a wider contribution to the Edmondson Park locality. It will contribute to the creation of an improved, contemporary and equitable natural environment as encouraged in the Better Placed Design Objectives.

Section 2.1 of the Policy relates to a well-designed built environment. The proposed development relates to this section as outlined in Table 8 on the following page.

Table 8: Better Placed Design Policy - Principles of a well-designed environment

Good Design Features	Comments/Response
A well-designed environment is:	
Healthy for all members of our communities, promoting physical activity and walkable environments, social cohesion, and community safety and security to support people’s well-being.	<p>The proposed development has been designed in response to these principles by:</p> <ul style="list-style-type: none">▪ Promoting and facilitating a walkable and safe environment;▪ Responding to the current and future recreational needs of the school by providing natural amenity and landscaping conducive to the use and wellbeing of students and staff;▪ Integrating with the local community and character of its immediate surrounds, including residents, students, parents and staff; and▪ Providing safe and accessible facilities for students, staff and visitors.
Responsive to the needs and aspirations of local people, now and into the future, inviting innovative use and habitation, interaction, productivity and enjoyment.	
Integrated, by drawing together the relationships between parts and elements, considering interfaces at multiple scales, and working to common goals and aspirations.	
Equitable by presenting opportunities for all segments of our community so residents and visitors have access to and can move about freely between public domain, infrastructure, open space and buildings.	
Resilient to the dynamic, challenging conditions of our time, to adapt and evolve while retaining essential qualities and values.	
In places that reflect these qualities, each building, area or space:	
Is a better fit within a rich, evolving and diverse environment, and contributes to the character and quality of place.	<p>The proposed development reflects these qualities through the following features:</p> <ul style="list-style-type: none">▪ The landscape design complements the character of the area and is sensitive to the adjoining residential areas;▪ The proposal integrates an environmentally sustainable design, minimising the use of resources, and therefore, minimising the impacts on the environment;▪ The proposal integrates natural landscape screening and buffers to create balance for the school with the public domain;
Performs better by existing in balance with natural systems and resources, supporting comfortable living and the natural benefits of air, sun, light and views without detrimental environmental impacts.	
Is better for the community, where all residents and visitors feel welcome, included and valued, and where the streets, open spaces and community buildings are inviting and accessible.	

Is better for people because they are safe, comfortable and vibrant, supporting social interaction and enjoyable, healthy lifestyles.	<ul style="list-style-type: none"> ▪ The proposal is better for the community by providing an environment that is safe, comfortable and accessible for all users; ▪ The proposed development is supported by pedestrian links throughout the school campus enhancing the site's functionality and natural environment.
Is better working by accommodating fit for purpose activities, and also responding to changes over time, where interventions create new use potentials, while retaining the embedded value in our built environment.	
Delivers better value economically, socially, environmentally and culturally for clients and users, and in return are highly valued by community.	
Reflects a better look and feel because they are refined, aesthetically considered and built to last, creating an engaging, rich and balanced experience for residents and visitors.	

8.8. Liverpool Development Control Plan 2008

The Liverpool Development Control Plan (DCP) 2008 provides more detailed provisions, supplementing the provisions of the LLEP 2008.

Under the provisions of Clause 11 of SEPP (State and Regional Development), Development Control Plans do not apply to State Significant Development. Therefore, the Liverpool DCP 2008 does not apply to this SSDA. However, cues have been taken from the controls that would ordinarily apply to SFCC to ensure that the proposal is generally consistent with the desired future character for the site.

9. ENVIRONMENTAL IMPACT ASSESSMENT

9.1. Overview

In addition to the statutory and strategic controls addressed in Section 7 and 8 of this EIS, the SEARs state that the environmental impacts of the proposal must be assessed, and specify key issues be considered throughout the assessment of any such impacts.

This section contains the assessment of environmental impacts, other relevant considerations and includes recommended mitigation measures where necessary. Each matter raised within the SEARs is addressed separately below.

9.2. Built Form (SEAR 2)

SEAR 2 requires that the application:

Clearly demonstrate how design quality will be achieved in accordance with Schedule 4 Schools – Design Quality Principles of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 and the GANSW Design Guide for Schools.

Provide a detailed site-wide landscape strategy, including consideration of equity and amenity of outdoor play spaces, and integration with built form, security, shade, topography and existing vegetation.

Address CPTED Principles.

Demonstrate good environmental amenity including access to landscape and outdoor spaces and future flexibility.

9.2.1. Design Quality Principles

The proposal does not involve the construction of buildings and relates only to landscaping and associated works. The proposed landscaping is located around the future school buildings and car park on the perimeter of the school. These works serve to establish the boundaries of the site and promote the natural amenity of outdoor spaces. Currently, large portions of the site are cleared with minimal landscaping throughout and the proposed landscaping will act as a screen from the public domain which clearly marks school boundaries.

JDH Architects have prepared a response to the Design Quality Principles in Schedule 4 of the Education SEPP. This table is provided in **Appendix 6** and has been extracted as follows:

Principle	Response
Principle 1 – Context, built form and landscape	<p>The site landscape works subject to the submission will provide a landscape buffer to the surrounding context. The levels of the site perimeter have been investigated to create a fully landscaped gentle undulation between the existing footpath and road and the school along with the incorporation of a planted swale to redirect water.</p> <p>The works propose to retain the one significant tree remaining on the property. The intention is to reinstate significant native planting to the embankment thereby significantly improving the neighbourhood character and streetscape quality.</p> <p>The required future carparking works have been positioned beyond the landscape buffer and largely below the existing street level in order to minimise their visual</p>

	impact. Equally the site perimeter fencing has also been set back within the landscape zone such that the streetscape appearance will focus on the Native planting in preference to the school's pragmatic requirements.
Principle 2 – Sustainable, efficient durable and	<p>The reintroduction of significant native planting in combination with the planted swale to capture water runoff will significantly reduce or eliminate the need for additional irrigation. The proposed OSD and bio-retention basin will additionally harness the on-site water.</p> <p>As the native planting matures it will provide sun-shading to both the perimeter of the school as well as the adjoining footpaths. This will reduce the heat load of the site and the resultant requirement for mechanical cooling.</p>
Principle 3 – Accessible inclusive &	<p>The project considers that a welcoming environment for students, parents, teachers and community of all different backgrounds is essential to promote a happy and safe school.</p> <p>Designated apertures have been created in the landscape buffer for controlled vehicular and pedestrian access and egress to the school. By limiting the number of campus access points this will enhance safety and security by providing a clear school entry and visibility through the site.</p>
Principle 4 – Health and safety	<p>The project considers the health and safety of all potential users to ensure that everyone can enjoy the campus safely. Safety in design has been considered at all stages of the project and any identified safety concerns have been designed out early in the design process.</p> <p>The one directional parking methodology employed prioritises pedestrians and avoid conflicts between vehicles and people.</p> <p>Site perimeter security fence has been incorporated into the landscape buffer zone. This provides safety for the users of the campus by restricting access to the nominated entry points and improving security through greater passive surveillance. The incorporation of the fence within the landscape zone ensures that the campus balances this whilst remaining welcoming and considerate of its neighbours.</p>
Principle 5 – Amenity	<p>The significant native landscape buffer areas provided around the perimeter will enhance the amenity of the site and soften the transition between the streetscape, future carparking works and main campus beyond. The project has taken great care to retain the existing significant tree and incorporate planting of additional native trees and plants to improve the appearance of the site.</p>
Principle 6 – Whole of life, flexible and adaptive	<p>The approved concept plan has been based on the staged growth of the college to a maximum size of approximately 1,900 students. The college is undergoing expansion through various stages in such a way to minimise potential interruption of any future development proposed.</p> <p>The proposed landscape works are designed for both immediate use and future adaptation as the campus expands to full capacity.</p> <p>Long lasting, low maintenance native planting and materials are proposed to ensure longevity of the landscape buffer.</p>

Principle 7 – Aesthetics	<p>The project aims to engage with the site context through the creation of a native landscape buffer between at the site perimeter and by enhancing the street presence of the school with respect to the residential neighbouring blocks.</p> <p>The gradual undulation of the landscape zone creates the opportunity for a variety of planting zones whilst reducing the visual impact of the future carparking works from the street. This will enhance not only the public street presence but also create an engaging and attractive environment.</p>
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Therefore, the proposal is consistent with the Design Quality Principles of the Education SEPP.

9.2.2. Landscape Strategy

The proposal is for perimeter landscaping which will establish the site and school and provide natural amenity to students and staff. Landscaping has been proposed in conjunction with the concept master plan for the school, with the indicative layout of the school already approved. The proposed landscaping is consistent with the approved concept plan as demonstrated by comparability with the location, quantity, and character of the proposed landscaping.

The proposal relates well to the school oval, car park and buildings as demonstrated in the landscape sections, with native tree plantings largely located on embankments between the boundary fence and car parking / oval areas and swales also capturing drainage.

The location and function of outdoor learning spaces is not yet known and will be the subject of future applications which will provide detail on the nature of school buildings and associated structures.

Consistent with condition B9 of Consent SSD 8832, the Landscape Specification prepared by JDH Architects in **Appendix 18** documents how landscaping will be managed during construction.

9.2.3. CPTED Principles

Crime Prevention through Environmental Design (CPTED) is a recognised model which provides that if development is appropriately designed it can reduce the likelihood of crimes being committed. Introducing CPTED measures in the design of this development is anticipated to assist in minimising the incidence of crime and contribute to perceptions of increased public safety.

CPTED outlines four key principles and the proposed landscaping SFCC has been designed in accordance with these, as assessed in Table 9.

Table 9: Response to CPTED principles

CPTED Principle	Response
Surveillance	This principle provides that crime targets can be reduced by effective surveillance, both natural and technical. Clear sight lines will be provided into pedestrian and car park areas and entrances/ exits. New landscaping will not block important sightline and all entrances and exits are clearly marked and visible.
Access Control	This principle provides that barriers to attract/restrict the movement of people minimises opportunities for crime and increases the effort required to commit crime. Boundary fencing and landscaping will delimit the school's boundaries with the design of the fence discouraging unauthorised scaling and access.

	The four entries from each of the adjacent roads will be controlled with gates and security systems, including after-school hours.
Territorial Reinforcement	This principle provides that well-used places reduce opportunities for crime and increase risk to criminals. There is a clear delineation between the public streets and footpath verges and the extent of SFCC, which will be achieved with fences and soft landscaping with mature trees and shrubs.
Space Management	This principle provides that space which is appropriately utilised and well cared for reduces the risk of crime and antisocial behaviour. SFCC has continual procedures and practices with respect to space management. It is anticipated that soft landscape maintenance on a regular basis. The operation of such procedures and practices on the site will not be altered by this proposal and space management will remain a priority in the operation of SFCC.

Based on the discussion above the proposal is consistent with CPTED principles and the safety or security of patients and staff resulting from this proposal are appropriately managed.

9.3. Environmental Amenity (SEAR 3)

SEAR 3 requires that the application:

Assess amenity impacts on the surrounding locality, including acoustic, visual and water management impacts of the proposed works. A high level of environmental amenity for any surrounding residential land uses must be demonstrated.

Provide a detailed site-wide landscape strategy, including consideration of equity and amenity of outdoor learning spaces, and integration with built form, security, shade, topography and existing vegetation.

Include an assessment of the potential visual impacts of the development and construction of the proposed pavement on the amenity of the surrounding area.

9.3.1. Public Domain

The public domain is addressed by street setbacks and soft landscaping and planting along the boundary lines. The internal road and car parking are located between the future location of school buildings and the boundary line, which will be softened with landscaping. The existing fence along the boundaries will maintain security during the staging of the development. The proposed landscaping is well integrated with the school and access points and will provide entry points from all adjacent roads, capturing views through the buildings into the central courtyard, providing a welcoming environment.

9.3.2. Solar Access and Overshadowing

The proposed landscaping is situated on the boundaries of the site and are separated from existing and future buildings by the proposed car park. The proposal is also separated to surrounding residential dwellings by Guillemont and Vinny Roads. As such, given the nature of the proposal, there is sufficient separation from the proposal to future buildings to ensure solar access is provided to the future school buildings and surrounding dwellings.

9.3.3. Acoustic Impacts

The acoustic impacts of the proposal are assessed in SEAR 6 (Section 9.6 of this EIS).

9.3.4. Visual Impacts

The proposal does not involve the construction of any buildings or hardscaped area. As such, built form visual impacts are considered to be minimal.

The proposal involves the planting of native and exotic species in a manner largely consistent with the landscaping proposed in the approved landscape concept plan. The landscape design has been considered the context of the surrounding area, prepared by Arcadia Landscape Architects in **Appendix 3**. The proposal enhances the natural amenity of the site and serves as a natural buffer between the school buildings and the public domain. As such, any associated visual impacts resulting from the proposal are considered to be positive.

No pavement is proposed as part of this landscaping DA.

9.3.5. Water Management

Details relating to water management are provided in SEAR 12 relating to drainage.

9.3.6. Landscape Strategy

Details relating to landscape strategy are provided above in SEAR 2.

9.4. Contamination (SEAR 4)

SEAR 12 requires that the application:

Assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable for the proposed use in accordance with SEPP 55.

Relevant Policies and Guidelines:

- Managing Land Contamination: Planning Guidelines - SEPP 55 Remediation of Land (DUAP)

9.4.1. Assessment

SEPP 55 has been addressed at Section 7.7 of this EIS.

Soil conditions remain unchanged from those addressed in previous development applications as no works have been undertaken on the areas which are the subject of this application.

The contamination assessment previously carried out by GeoEnviro Consultancy finds that *"the risk of gross ground contamination within the site is generally considered low and can be made suitable for the proposed school facilities"*. The school facilities as specified in this report is inclusive of boundary landscaping forming the subject of this SSDA. No change of use is proposed from what was previously approved and the proposal is consistent with the approved concept SSDA for the site.

A Phase 2 Contamination Assessment carried out by GeoEnviro Consultancy in December 2019 in **Appendix 8** adopts health based soil investigation levels (HBILs) as site criteria. *"HBILs are scientifically based, generic assessment criteria designed to be used in the first stage of an assessment of potential risks to human health from chronic exposure to contaminants. They are intentionally conservative and are based on a reasonable worst-case scenario."*

For the purpose of assessing the contamination status of the site, the criteria for developed open space such as parks, playgrounds, playing fields (eg ovals), secondary schools and footpath that being HBIL C has been adopted as the Site Criteria."

Laboratory test results conclude that all soil samples tested were below detection limits for concentrations of contaminated material and within the Site Criteria. The risk of groundwater contamination was also considered to be negligible.

This Phase 2 assessment concluded that *"the risk of gross ground contamination from previous landuse and activities causing adverse health risk to future occupants of the property is considered low and therefore the site is suitable for the proposed landscaping works"*.

Nonetheless, the assessment recommends that surface rubbish be disposed off site and buried rubbish fill is to be removed if found and disposed of. Based on the findings of this Phase 2 Assessment, the site is suitable for the proposed landscaping use.

9.5. Ecologically Sustainable Design (SEAR 5)

SEAR 5 requires that the application:

Detail how ESD principles (as defined in clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000) will be incorporated in the design and ongoing operation phases of the development.

Include a description of the measures that would be implemented to minimise consumption of resources, water (including water sensitive urban design) and energy.

Include details of plant selections for landscaping works.

Relevant Policies and Guidelines:

- NSW and ACT Government Regional Climate Modelling (NARClIM) climate change projections.

9.5.1. Relationship to Principles of Ecologically Sustainable Development (ESD)

The principles of ESD are defined by Clause 7(4) of Schedule 2 of the EP&A Regulation. Each principle is set out in the following table with a description of how they have been incorporated in the proposal. Additional detail is provided in the ESD report prepared by JHA Engineers in **Appendix 7**.

ESD Principle	Means of Incorporation
(a) the precautionary principle, namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by: (i) careful evaluation to avoid, wherever practicable, serious or	This development is being designed in accordance with a range of ESD goals that pertain to the design, construction and operational stages. The development team will ensure that the landscaping construction works minimise the impact on the environment in the areas of energy, water and noise through compliance with a CEMP.

irreversible damage to the environment, and (ii) an assessment of the risk-weighted consequences of various options,	
(b) inter-generational equity, namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,	This development will not cause any significant impact on the health, diversity and productivity of the environment. The ecological benefits of tree planting are well known, including the mitigation of carbon emissions. The extent of tree and vegetation planting on the site will provide some benefits in this respect to future generations.
(c) conservation of biological diversity and ecological integrity, namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,	<p>Vegetation on the subject site is generally limited to turf with a number of trees, including Tree 31. There are a limited number of mature trees located generally towards the front boundaries of the site. Until recently, the surrounding locality was primarily used for hobby farms and vacant land. As part of the locality's rezoning for urban purposes however, there has been extensive civil works to accommodate primarily low to medium density housing. It is noted that the locality, including the subject site, is biodiversity certified land according to the SEPP (Sydney Region Growth Centres) 2006.</p> <p>The proposal will include new landscaping, inclusive of shrubs and trees. These design initiatives will contribute to the retention of the appearance and amenity of the streetscape. In addition, the development team shall follow a detailed tree management plan that aligns with Council requirements. Protection of retained trees shall be in line with best practice and AS 4970-2009 Protection of Trees on Development Sites. Bonds will be applied to ensure maintenance procedures are followed for the protection of trees, with compliance reporting required for the duration of the bond.</p> <p>A detailed list of plant selections has also been provided in the ESD Report.</p>
<p>(d) improved valuation, pricing and incentive mechanisms, namely, that environmental factors should be included in the valuation of assets and services, such as:</p> <p>(i) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,</p> <p>(ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services,</p>	The design of this development has employed costing of different options to determine the optimum strategy with regards to major items of plant, with decisions being made based on whole of life costs in addition to capital expenditure.

including the use of natural resources and assets and the ultimate disposal of any waste,

(iii) environmental goals, having been established, should be pursued in the most cost-effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems."

9.5.2. Minimising Resource Consumption

A number of measures will be implemented to minimise consumption of water resources. Further detail is provided in the Design Quality Principles report in **Appendix 6**.

The reintroduction of significant native planting in combination with the planted swale to capture water runoff will significantly reduce or eliminate the need for additional irrigation. The proposed OSD and bio-retention basin will additionally harness the on-site water.

As the native planting matures it will provide sun-shading to both the perimeter of the school as well as the adjoining footpaths. This will reduce the heat load of the site and the resultant requirement for mechanical cooling.

9.5.3. Plant Selection

Details relating to plant selection are provided in Section 9.10 in SEAR 10.

9.6. Noise and Vibration (SEAR 6)

SEAR 6 requires that the application:

Identify and provide a quantitative assessment of the main noise and vibration generating sources during site preparation, bulk excavation, construction; and

Outline measures to minimise and mitigate the potential noise impacts on school operations and surrounding occupiers of land.

Relevant Policies and Guidelines:

- *Interim Construction Noise Guideline (DECC)*
- *Assessing Vibration: A Technical Guideline 2006*

This EIS is accompanied by an Acoustic Report prepared by Day Design and provided at **Appendix 9**. The proposed landscape works remain similar in scope to the landscape works proposed under SSDA 8832 and are considered to present similar acoustic impacts during installation and site establishment.

Noise levels from construction equipment have been calculated from residential premises (refer to Figure 29 below). Environmental noise loggers were used to continuously monitor ambient noise levels and

provide statistical information during extended periods of time. The location of these loggers are identified in Figure 29 below.



Figure 29: Location plan for noise assessment (Source: Day Design)

Noise emission criteria adopted in the assessment included the following considerations:

- Background noise level;
- NSW Industrial Noise Policy (EPA);
- Modifying factors (tonality, impulsiveness, intermittency or low-frequency); and
- AAAC Noise Criteria for Outdoor Play Areas.

The assessment shows that the noise levels emitted by the proposed construction / installation will, on occasion, exceed the acceptable noise level requirements as established by the EPA NSW Industrial Noise Policy. This is due to the location of the proposed works being along the boundary of the site (and close to residential neighbours) and the nature of the proposed works which require heavy machinery and the use of power tools.

This is detailed in the sections below with the corresponding mitigation measures.

9.6.1. Construction Noise and Vibration

The main sources of noise during the landscape works include heavy machinery such as mini excavators, trucks and hand held pneumatic and electric power tools. No large vibration impact items of machinery are likely to be required.

During the landscape construction phase, work will occur along the boundaries of the site, in close proximity to the residential neighbours. The calculated noise levels do not meet predicted levels of noise emission and noise levels will likely exceed the Noise Management Levels established. The following work practices are recommended to be implemented where necessary and practicable:

- Works to be staged to minimise noise impact
- Impact noise will be limited
- Substitution of equipment to quieter will be considered to minimise noise
- Management plan to ensure construction vehicles arrive and depart during construction hours only
- Reversing alarms to be of “quacker” broadband alarm style.
- The hours of construction works, including the delivery of materials is only permitted on site as follows:
 - Monday to Friday inclusive 7.00am to 6.00pm
 - Saturday 8.00am – 1:00pm
 - No work on Sunday & Public Holidays

Further detail to recommended mitigation measures are provided in Section 10 and in the Acoustic Report in **Appendix 8**. As the proposed construction activities are not constant throughout specified construction hours and will be managed by a number of mitigation measures, the acoustic impacts are considered acceptable.

9.7. Transport and Accessibility (SEAR 7)

SEAR 7 requires the SSDA to include a preliminary Construction Traffic and Pedestrian Management Plan (CTMP) to demonstrate the management of the impact in relation to construction traffic. These matters are addressed in the following table.

A detailed CTMP has been prepared by Bitzios for the proposed development (**Appendix 9**). Each of the individual requirements set out in SEAR 7 are addressed in the CTMP.

Table 10 provides a list of each individual requirement set out in SEAR 7, a response giving reference to the TIA and where appropriate, further and more detailed discussion following the table.

Table 10: Response to SEAR 7 - Transport and Accessibility

SEAR 7 Requirement	Response
In relation to construction traffic:	Not applicable. No other construction activities are proposed to occur during Stage 1 landscaping.
assessment of cumulative impacts associated with other construction activities (if any);	
Details of how construction would be managed so as not to interfere with school operations;	The Guillemont Road/construction roadway intersection is located at a position that provides appropriate separation from the external road network to reduce the distance which construction and school traffic are required to interact. It is located to the south of the school whereas school activities, including vehicular access, bus stops and pick up/ drop off are located.

	<p>The construction roadway and associated construction works within the site are not expected to impact the existing pedestrian network, parking and school bus services surrounding the site, as there is currently no pedestrian pathway, student/ staff parking area or student entry fronting the southern site boundary. The indicative on-site temporary car park is located away from existing school facilities and access points.</p> <p>During all stages of the works, the loading and unloading and storage of all plant, equipment and/or materials will only occur within the site area, separated from existing car parking areas and pedestrian pathways.</p>
an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity;	<p>The project is expected to have minimal impact on the safety and operation of surrounding intersections during construction, including the Jardine Drive/Poziers Road, Poziers Road/Vinny Road and Dalmatia Avenue/Vinny Road roundabouts and the McFarlane Road/Guillemont Road priority controlled intersection. These intersections have sufficient sight distances and can adequately cater for the types of construction vehicles required.</p> <p>Furthermore, surrounding roads have footpaths for pedestrians and existing heavy vehicle movements would be very minimal given the prevailing residential land use, and the true impacts of heavy vehicle movements are not likely to be felt until Bernera Road, which connects with the external road network. It is noted that there will be a temporary increase in traffic volumes during construction as a result of commuting workers to the site, deliveries of equipment and the haulage of materials to and from the site.</p>
details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process;	<p>A construction program detailing the anticipated construction duration and highlighting significant milestone stages and events during the construction process is yet to be confirmed as it will form part of the detailed project management program provided by the head contractor prior to the construction works.</p>
details of anticipated peak hour and daily construction vehicle movements to and from the site;	<p>Construction works for the project, including the delivery of machinery and materials to and from the site are yet to be confirmed specifically at this stage, however the CTMP has provided indicative construction vehicle movement numbers for Stage 2 and 3. Given the nature of the proposed landscaping works, construction vehicle movement numbers for Stage 1 will be lower, and over a much shorter period, than the numbers quoted below.</p> <p><i>"The average truck movements in the first 8-10 weeks will be between 3-5 trucks per day, though on some days there may only be cars/utes/vans which will be an additional 20-30 movements. This will cover movements relating to float trucks bringing in plant(excavator/piling rig), trucks exporting</i></p>

	<p><i>materials, pile drilling rig, reinforcement deliveries, concrete trucks, boom pumps and formwork materials, truck transportation, general transport trucks for materials and craneage for scheduled materials lifts</i></p> <p>▪ <i>For the duration thereafter, there will be approximately 1-2 trucks per day, though on some days there may only be cars/utes/vans which will be an additional 20-30 movements. The truck movements during this period will relate to concrete trucks, boom pumps, reinforcement deliveries, general transport trucks for materials, scaffold drops/erection and craneage for scheduled materials lifts"</i></p> <p>Standard construction hours are between 7:00am-6:00pm Monday to Friday and 8:00am-1:00pm Saturday. Construction vehicle traffic movements should be scheduled to occur outside school peak periods between 7:30am-9:00am and 2:00pm-3:30pm.</p>
<p>details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle;</p>	<p>The indicative location of the on-site temporary car park associated with construction vehicles is located away from existing school facilities and access points.</p> <p>Construction vehicle access during the construction phase of the project is proposed to be via a single gate from McFarlane Road west of Vinny Road. Construction vehicles will enter/exit the gates in a forward direction. Inbound vehicles will ingress via Vinny Road and outbound vehicles will egress via McFarlane Road. Construction vehicle movements are expected to occur between the site and Camden Valley Way (and then to the broader network). Heavy vehicle inbound and outbound routes have been proposed from the M5 to the east, M7 to the north, Camden Valley Way to the west and Hume Motorway to the south.</p> <p>A temporary car park will be provided for construction workers within the school boundaries. The exact details of a temporary on-site car park will be determined by the lead contractor. The site is large enough such that it can accommodate a temporary on-site car park without unreasonable impacts, particularly with the implementation of erosion and sediment control measures as outlined in the Soil and Water Management Plan in Appendix 16. It is considered reasonable to determine the exact location of the car park at a later stage as it cannot be determined with sufficient certainty at this stage, where adequate space for the car park would be available.</p>
<p>traffic and transport impacts during construction, including cumulative impacts associated with other construction activities, and how these impacts will be mitigated for any associated traffic, pedestrian, cyclists, parking and public transport, including</p>	<p>The construction roadway and associated construction works within the site are not expected to impact the existing pedestrian network, parking and school bus services surrounding the site, as there is currently no pedestrian pathway, student/ staff parking area or student entry fronting the southern site boundary. The indicative on-site temporary car park is located away from existing school facilities and</p>

the preparation of a draft Construction Traffic Management Plan to demonstrate the proposed management of the impact.	access points. This car park is located near the south eastern corner of the site as outlined in the Soil and Water Management Plan in Appendix 16 , and sediment and security fencing and has access to Guillemont Road as outlined in the CTMP in Appendix 14 .
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In addition to the above, the layout of the car park has been amended relative to the existing approval in order to retain Tree T31 near the north eastern corner of the site. The proposed car park will not be continuous from Jardine Drive to the north west to Guillemont Road to the south and no vehicular access will link the northern and eastern/southern car parking areas together. Minor adjustments have been made to the layout of both parking areas which result in the relocation of two (2) car parking spaces from the northern car park to the eastern/southern car parking area. The number of car parking spaces (226) provided remains the same. This is shown in the proposed site plan in **Appendix 21**.

An amended queuing assessment has been prepared by Bitzios in **Appendix 4** which has been revised to reflect the amended car park design. Although the construction of a car parking area does not form part of this current proposal, the anticipated impacts of vehicle queuing associated with the indicative amended car park design have been considered.

The amended car park design and resulting queuing is seen to be acceptable. The report states that *"the queuing length to the drop-off/pick-up zone in the northern car park is shorter by seven (7) vehicles, and the overall on-site queuing provision is 60 vehicles, resulting in a capacity of 1,800 vehicles per hour. Noting the maximum peak hour traffic is calculated to be 1,174 vehicles per hour, the proposed development is expected to have sufficient queuing capacity"*.

Therefore, the traffic and queuing impacts associated with the proposal remain acceptable.

9.8. Staging (SEAR 8)

SEAR 8 requires that the application:

Provide details regarding the staging of the proposed development; and
Provide details regarding how the staging of works will be managed to minimise the impact of on the operation of the school.

Staging of works has been addressed previously in Section 4.7 of this EIS.

The intent of this SSDA is to establish the site's boundary landscaping in order to provide natural amenity for students and staff and to facilitate future development approved under SSDA 8832. It is intended that the proposed works allow for the commencement of the concept SSDA consent. The proposed works are to take place in one stage.

A Staging Plan and Construction Program for the redevelopment of the wider school is provided in **Appendix 5** and **22** respectively

As approval has been issued for the proposed concept layout, statutory approvals for the individual buildings will be sought as Complying Development Certificates in conjunction with the Education SEPP, or with Development Applications.

Associated impacts with the future growth and expansion of the school have been considered as part of SSDA 8832.

The staging strategy has been designed to expand the school's facilities gradually with the growth of the surrounding locality. The proposal will develop the permanent buildings of the college over multiple stages over the next 10 years, with the final stages to include the removal of the existing portable buildings.

9.9. Biodiversity (SEAR 9)

SEAR 9 requires that the application:

Advise and provide comment on the current status of the existing biodiversity certification on the subject site as identified in the South West Growth Centre - Biodiversity Certification map under section 43 of the Biodiversity Conservation (Savings and Transition) Regulation 2017.

The *Biodiversity Conservation Act 2016* (BC Act) commenced on 25 August 2017 and sets out, among other things, to establish a scheme for assessing the likely impacts on biodiversity values of proposed development and land use change.

The Biodiversity Conservation (Savings and Transitions) Regulation (BCR) saves important provisions from legislation and regulations that has been repealed by the new legislation, in particular the *Threatened Species Conservation Act 1995*, and establishes transitional arrangements for the biodiversity reforms.

Specifically, of relevance to the proposed works, the site has been identified in land classified as 'Existing Certified Land' within the 'South West Growth Centre - Biodiversity Certification' map under Section 43 of the BCR. This section relates to preservation of bio-certification of Sydney Region Growth Centres, SEPPs and EPIs. Refer to Figure 30 below.

As discussed in Section 7.4 of this EIS, Section 8.4 of the BC Act prescribes the effect of biodiversity certification for development, including SSDs. The effect is that biodiversity impacts are not required to be taken into consideration for the development carried out as part of this proposal. This was confirmed by a referral letter from the Office of Environment and Heritage (OEH) accompanying SSDA 8832.

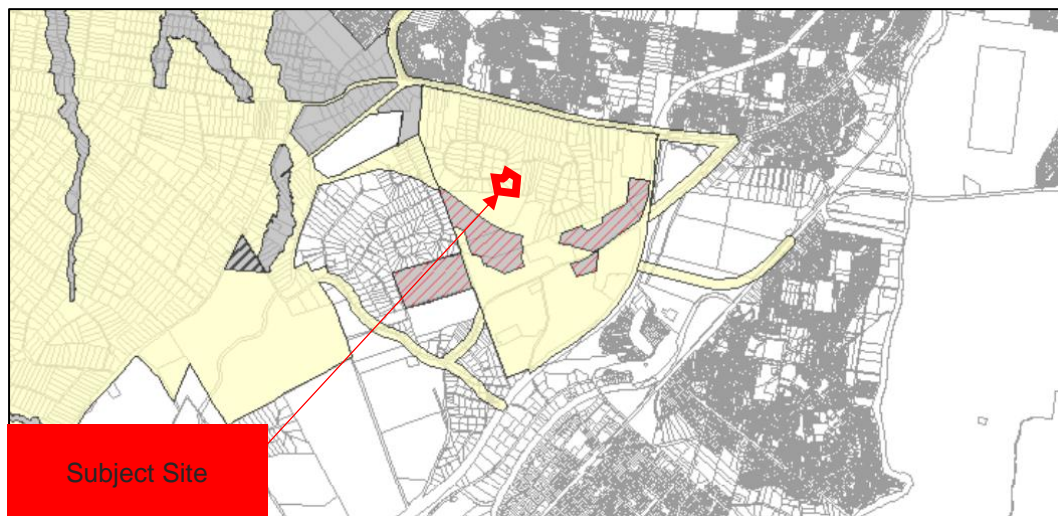


Figure 30: Extract from South West Growth Centre - Biodiversity Certification (Source: OEH)

Notwithstanding this, a biodiversity certification letter has been provided by EcoLogical in **Appendix 10** accompanying this SSDA. The proposal involves the removal of weeds and disturbed ground cover vegetation, managed lawn and areas of disturbed soil with minimal biodiversity value. The report concludes that *"the proposed development is not likely to have any significant impact on biodiversity values, and thus the proposed works comply with existing biodiversity certification on the subject site."*

Thus, the proposal is compliant with the terms of the existing biodiversity certification for the subject site.

9.10. Landscaping (SEAR 10)

9.10.1. Tree Removal

The proposed development involves landscaping near the eastern and southern boundaries. Proposed changes to the existing quantum of landscaping on the site include the removal of weeds and disturbed ground cover vegetation, managed lawn, and large areas of bare, disturbed soil.

EcoLogical's biodiversity certification letter in **Appendix 10** states that *"field surveys identified that minimal native vegetation was present within the subject site: one Corymbia maculata (Spotted Gum) was present in the north east of the subject site and this will be retained. Occasional individuals of Einadia trigonos and Themeda triandra were observed amongst dense areas of weeds within the subject site."*

Consistent with Condition A14 of Consent SSD8832 and as evidenced by the landscape plan prepared by Arcadia in **Appendix 3**, Tree 31 has been retained and incorporated into the landscape plan. This has resulted in the car park being split into a northern car park with access from Jardine Drive and an eastern/southern car park with access from Guillemont Road. An amended queuing assessment has been undertaken and prepared by Bitzios in **Appendix 4**.

Consistent with Condition A15 of consent SSD 8832, a Tree Impact Statement (TIS) is provided in Appendix 17 from Naturally Trees dated 10 October 2019, evaluating the potential to retain Trees 21-23 and 30.

The trees cannot be retained as they will be *"directly or indirectly impacted by the approved road and footpath development. The trees are susceptible to construction impacts and changes in environmental conditions"*.

The TIS had been submitted to the Planning Secretary on 28 January 2020. The DPIE endorsed the TIS on 6 February 2020 in **Appendix 19**.

No other native vegetation is identified on the development area.

9.10.2. Proposed planting

A planting schedule and palette are provided in the Landscape Plans in **Appendix 3** which is compliant with Conditions A14-17 and B10 in the consent for SSDA 8832. A variety of trees, shrubs, grasses and groundcovers are identified to be planted in the boundary landscaped area, which include bioretention basins and a swale. The mature size and pot size of proposed plantings is also provided. Consistent with condition A16 of Consent SSD 8832, all trees identified in the Landscape Planting Schedule in **Appendix 3** have a minimum 100L pot size.

14 brush box trees are proposed on the eastern and southern boundaries consistent with condition A17 of SSDA 8832.

The Design Quality Principles Statement in **Appendix 6** states that *"the gradual undulation of the landscape zone creates the opportunity for a variety of planting zones whilst reducing the visual impact of the carparking from the street. This will enhance not only the public street presence but also create an engaging and attractive environment."*

An extract of the planting palette is provided in Figure 31 below.

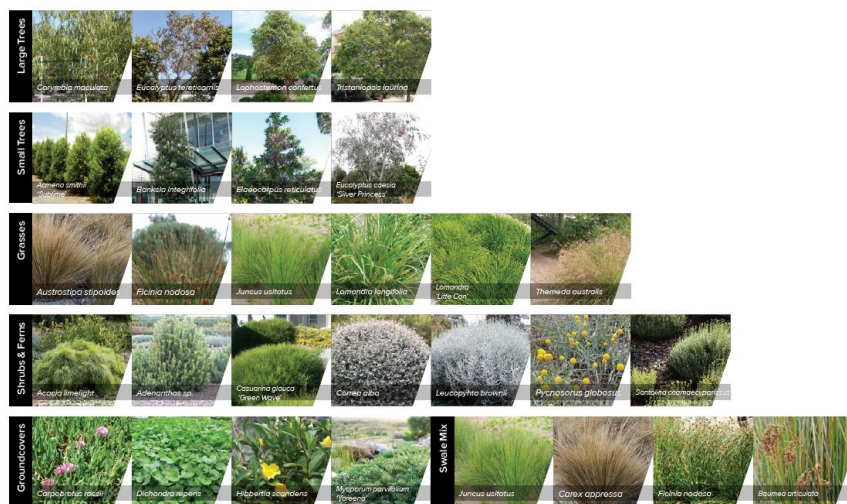


Figure 31: Planting Palette (Source: Arcadia)

The location of these plants is provided in the softworks plan in the Landscape Plans.

9.11. Erosion and Sediment Control (SEAR 11)

SEAR 11 requires that the application:

Detail measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles.

→ *Relevant Policies and Guidelines:*

- *Managing Urban Stormwater – Soils & Construction Volume 1 2004 (Landcom)*
- *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA)*
- *Guidelines for development adjoining land and water managed by DECCW (OEH, 2013)*

Erosion and sediment control measures will be implemented during site establishment. These measures include geotextile inlet filters, sediment fencing and sandbag kerb sediment traps. Stabilised site access will be implemented to the surrounding internal and external roads and within the construction compound to ensure all hard and soft surface runoff is collected.

The Erosion and Sediment Control Plan is provided as part of the Stormwater Plans in **Appendix 16**. Sediment control fencing proposed as part of the temporary carpark for construction vehicles is provided in the Soil and Water Management Plan in **Appendix 20**. Other measures will be taken consistent with the construction management plan provided with SSDA 8832 to ensure that erosion and sedimentation is managed.

9.12. Construction Hours (SEAR 12)

SEAR 12 requires that the application:

Identify proposed construction hours for the proposed landscaping and kerbing works and provide details of the instances where it is expected that works will be required to be carried out outside the standard construction hours.

Construction works, including the delivery of materials is only permitted on site as follows:

- Monday – Friday 7.00am to 6.00pm
- Saturday 8.00am – 1:00pm
- No work is permitted on Sundays and public holidays.

Any additional works outside these hours will require permission from Liverpool Council for special requirements such as oversized deliveries or works that need to be carried out whilst students and staff are not on site.

These hours are consistent with the construction management plan provided with SSDA 8832. Further information in relation to the management of construction related impacts are provided in the Construction Management Plan in **Appendix 12**.

9.13. Drainage (SEAR 13)

SEAR 13 requires that the application:

Detail drainage associated with the proposal, including conceptual stormwater and drainage infrastructure.

Relevant Policies and Guidelines:

Guidelines for development adjoining land and water managed by DECCW (OEH, 2013).

9.13.1. Stormwater Drainage Design

The drainage and stormwater system is designed to ensure that stormwater runoff is minimised, water quality was achieved, and flooding on site is controlled. Stormwater control for the proposal involves stormwater piping connecting to existing stormwater pipes and proposed OSD, the provision of 14 x 13m³ OSD tanks and a bioretention basin of a volume of approximately 150m³. Stormwater drainage will be via proposed OSD to Vinny Road to the east, existing catchment to Poziers Road to the north and existing OSD towards Jardine Drive to the north west. For the carpark directly adjacent to Guillemont Road, drainage will be facilitated by 150mm high kerbing to two stormwater pits. The proposed kerbing is shown in the Site Detail Plan in the Stormwater and Erosion Control Plan in **Appendix 16**.

The proposed stormwater drainage system has sufficient capacity to convey all potential flows through the implementation of a network of pits and pipes of different sizes. Flows are also controlled in consideration with neighbouring properties, while incorporating the ESD principles outlined in SEAR 5 (refer to Section 9.5 of this EIS).

A Sediment and Erosion Control Plan has also been prepared by Henry and Hymas to ensure there is no flow displacement or deposition within the existing watercourses. This plan is provided as part of the Civil Engineering Plans at **Appendix 16**.

9.14. Waste (SEAR 14)

SEAR 14 requires that the application:

Identify, quantify and classify the likely waste streams to be generated during construction and describe the measures to be implemented to manage, reuse, recycle and safely deposit of this waste. Identify appropriate servicing arrangements for the site.

A Waste Management Plan (WMP) is provided at **Appendix 11** for the proposal. The WMP states the type of waste generated and the amount reused, recycled or disposed during demolition and construction.

Excavated material is to be reused on site as fill. Other waste generated during construction is anticipated to consist of construction material and garden organics. Waste material generated is to be picked up and reused/recycled by the appointed contractor. The amount of waste generated is to be relatively small which will result in minimal impacts to its surrounds.

9.15. Contributions (SEAR 15)

SEAR 14 requires that the application:

Address Council's Section 94 Contribution Plan and/or details of any Voluntary Planning Agreement, which may be required to be amended because of the proposed development.

The site is affected by the Liverpool Contributions Plan 2008 - Edmondson Park. This Plan outlines the type of development that Council will levy and the nexus between development and facilities to be funded by contributions under Section 7 of the EPA Act.

Under Section 3.6 of this Plan, all development in Edmondson Park, including non-residential development, is subject to be levied if it generates the need for additional amenities, facilities and services which Council provide.

No road or drainage works are proposed in addition to what was originally approved as part of SSDA 8832. The proposal does not increase the number of students or staff otherwise approved in SSDA 8832 and does not represent an intensification in use nor the increase for additional public amenities, facilities and services.

Therefore, the proposal, being for landscaping, does not satisfy the definition of development required to pay Section 7.11 contributions. The proposal also does not require the provision, extension or augmentation of public amenities or public services and does not satisfy the definition of development required to pay Section 7.12 contributions.

9.15.1. Voluntary Planning Agreement

There are no voluntary planning agreements (VPAs) in place as proposed.

9.15.2. Recommendation

We recommend that no additional development contributions be imposed on the proposed development as the proposal does not intensify the use of the site and provides community and environmental benefits.

As part of consent DA-456/2016, a contribution payment of \$943,426 was made on 12 January 2017 (Reference: PA456/2016).

9.16. Plans and Documents

9.16.1. Overview

The "Plans and Documents" section of the SEARs provides a list of "Plans and Documents" to be submitted as part of the SSDA. All of the plans and documents identified in this section of the SEARs have been provided where necessary. Refer to Table 11 below.

Table 11: Plans and Documents

Plan and Documents	Prepared by	Found at Appendix
Site and Context Plan	Arcadia Landscape Architects	3
Site Survey	LandTeam	1
High quality files of maps and figures of the subject site and proposal	various	
Full set of Landscape Architectural Documentation, prepared by an AILA registered landscape architect, which includes the following: cover sheet	Arcadia Landscape Architects	3
Sediment and Erosion Control Plan	Henry and Hymas	2
Demolition Plan (showing trees to be retained, removed or transplanted)	n/a. No trees to be removed or transplanted. Only one tree to be retained. This information is provided in the General Arrangement Plan.	n/a
General Arrangement Plan	Arcadia Landscape Architects	3
Set-out Plan	Arcadia Landscape Architects	3
Levels and Grading Plan	Henry and Hymas	2
Softscape Plan	Arcadia Landscape Architects	3
Hardscape Plan	n/a - no hardscape proposed	n/a
materials and finishes schedule (including plant schedule)	Arcadia Landscape Architects	3
construction details (e.g. planting details, staking, etc.)	Arcadia Landscape Architects	3
civil/structural engineering details (if applicable)	Henry and Hymas	2

9.17. Social and Economic Benefits

A range of social and economic benefits that will result from the proposed development are addressed generally throughout this EIS. This section of the EIS consolidates those "benefits" as follows.

The social impacts that will result from the proposal are set out below:

- Improved amenity for students, their families and staff via the visual, shading and cooling attributes of the proposed landscaping that responds to the Design Guidelines under the Educational SEPP; and
- Adds to the identity and 'sense of place' for the school with the community of Edmondson Park

The economic impacts that will result from the proposal include the direct and indirect increase in employment opportunities during construction and ongoing maintenance phases of the landscaping. This will result in a positive contribution to the local economy.

9.18. Cumulative Impacts

This EIS has assessed the cumulative impacts of the proposed development and the matters for consideration nominated within the SEARs. Subject to the mitigation measures outlined below, the proposal is considered to have a net positive impact on the SFCC site and the surrounding locality.

10. MITIGATION MEASURES

The following measures have been compiled following review and consideration of the issues raised in consultation with government agencies and input from various subconsultants in response to the SEARs (Section 9).

Schedule 2 of the EP&A Regs requires a full description of the measures proposed to mitigate any adverse effects of the development on the environment. The mitigation measures at Table 12 below indicate the responsibilities required to prevent potential environmental impacts arising from the proposed works. This will ensure that the project is environmentally, socially and economically sustainable. The proposed mitigation measures will be applied (as relevant) to each of the future detailed development design, approval and construction phases.

Table 12: Mitigation Measures

Issues	Action
General	<p>The development will be undertaken in accordance with the Environmental Impact Statement prepared by City Plan Strategy & Development (including relevant accompanying Appendices) and drawings prepared by JDH Architects.</p> <p>All construction documentation and will be certified in accordance with Section 6.28 of the EP&A Act.</p>
Maintenance of vehicular access	<p>The CMP notes that access to the existing school will remain from Jardine Drive and Poziers Road, while all construction access will be from Guillemont Road and Vinny Road. This arrangement will allow for the separation of school traffic/pedestrians from construction traffic.</p>
Construction Traffic Management	<p>The measures stated in the Construction Traffic Management Plan prepared by Bitzios will be undertaken.</p> <p>Prior to implementation, construction traffic management measures will require the preparation of an approved Traffic Control Plan (TCP). TCPs indicate the road worksite arrangements to ensure the safety of all road users as well as workers at the site. Traffic Control Subcontractors and an 'Application to Carry Out Works or Erect a Structure on or Over a Public Road' will be obtained if required.</p>
Hours of Work	<p>The proposed working hours are as follows:</p> <p>Monday to Friday: 7am to 6pm</p> <p>Saturday: 8am to 1pm</p> <p>Sundays and public holidays: No work.</p> <p>Any additional works outside these hours will require permission from Liverpool Council for special requirements such as oversized deliveries or works that need to be carried out whilst students and staff are not on site.</p>
Approvals	<p>The Proponent will obtain all necessary approvals required by State and Commonwealth legislation in undertaking the development.</p> <p>The Proponent will continue to liaise with Liverpool City Council during the development process, particularly with regard to any proposed road closure or impact on Council infrastructure.</p>

Erosion and Sediment Control	<p>All sediment control devices are to be constructed, placed and maintained in accordance with respective council specifications and Landcom's "Soil and Construction" Manual.</p> <p>A detailed soil and sedimentation plan is to be prepared in accordance with The Blue Book prior to construction and will be included in the Construction Management Plan. The plan is to be prepared in accordance with the preliminary erosion and sediment control plan prepared by Henry and Hymas and accompanying this EIS.</p>
Contamination	The recommendations of the Phase 2 Contamination Assessment prepared by GeoEnviro Consultants will be satisfied.
Demolition and Construction Waste Management	A waste management plan will be prepared by the head contractor prior to the commencement of construction works on site. The waste subcontractor will supply builder's waste bins for the onsite collection and storage of general waste material.
Services	The Proponent will comply with the requirements of the relevant public authorities in regard to the connection to, relocation and/or adjustment of services affected by the construction of the proposed development.
Accessibility	The design of the landscaped area will permit effective, appropriate, safe and dignified use by all people, including those with disabilities and will be in accordance with the relevant guidelines for access and mobility and relevant accessibility standards.
Drainage	All final civil documentation will be prepared generally in accordance with the plans prepared by Henry and Hymas.
Tree protection	The protective measures contained in the Arborist Report and Method Statement prepared by Naturally Trees will be adopted and implemented.
Transport and parking Management	The recommendations of the Traffic Impact Assessment prepared by Bitzios Consulting in relation to transport management will be implemented.
Noise and Vibration	<p>The recommendations of the Acoustic Report prepared by Day Design will be implemented to ensure that any potential adverse construction and operational noise and vibration impacts are adequately managed and mitigated.</p> <ul style="list-style-type: none"> ▪ Locating mechanical plant away from nearby residences, as far as reasonably practical; ▪ Constructing acoustical enclosures around items of mobile plant such as generators; ▪ Erecting temporary sound barrier screens along the boundaries of the site near adjacent residential buildings; ▪ All plant and machinery should be selected with consideration to low noise options where practicable and available; ▪ Ensuring that not more than one item of plant is operating simultaneously within close proximity of any given residence to minimise cumulative noise impacts; ▪ Equipment and machinery with the capacity to generate excessive noise such as generators and compressors be located as far away as practicable from residences;

	<ul style="list-style-type: none"> ▪ The use of hydraulic or electric controlled units where feasible and the use of other quiet equipment; ▪ Regular inspection and maintenance of equipment, especially mufflers; ▪ Reducing the line-of-sight noise transmission to residences or other sensitive land uses using temporary barriers; ▪ Construction only taking place during approved hours (7:00 am to 6:00 pm, Monday to Friday inclusive and 8:00 am to 1:00 pm Saturdays, no Sundays or public holidays); ▪ Works that result in impulsive or tonal noise emissions shall only be undertaken: <ul style="list-style-type: none"> ▫ 8:00 am and 4:00 pm Monday to Friday inclusive; ▫ In continuous blocks, not exceeding 3 hours each, with a minimum respite from those activities and works of not less than one hour between each block. ▪ Workers and contractors shall be trained in work practices to minimise noise emission; ▪ Truck drivers shall be informed of designated vehicle routes, parking locations, acceptable delivery hours or other relevant practices; ▪ A Community Liaison Officer may be appointed prior to the commencement of works to receive and manage noise complaints and implement a Construction Complaints Management System; ▪ Implementing noise monitoring systems in the event of complaints, following calibration, procedure and monitoring standards consistent with government policy; and ▪ Regular checking of noise emission levels of plant, equipment and issuing of an Equipment Noise Certificate. <p>Additional detail in relation to acoustic attenuation strategies are provided in the Acoustic Report in Appendix 8. These may be implemented as a condition of consent to mitigate acoustic related impacts.</p>
Ecologically Sustainable Development	The detailed design of the development is to incorporate all of the ESD principles and measures set out in the ESD Statement prepared by JHA Consulting Engineers.
CPTED	Clear sight lines are provided to ensure safety and security for the students and visitors to the site once installation is complete. Fencing is provided limiting unauthorised access to the school.
Construction Management	<p>The Construction Management Plan (CMP) prepared by JDH Architects will be adhered to. Upon engagement, each of the head contractors will be required to prepare a Construction and Environmental Management Plan (CEMP), which details the methodology for carrying out the works in order to minimise impacts.</p> <p>These detailed CMPs are to be generally in accordance with this preliminary CMP prepared by JDH Architects and accompanying this EIS.</p>

11. CONCLUSION

This EIS accompanies a SSDA for the Stage 1 landscaping works at SFCC along the eastern and southern perimeters of the site.

In accordance with the requirements of Schedule 2 of the EP&A Regulation, this EIS considers the relevant statutory instruments and strategic documents, social and environmental impacts and associated mitigation measures.

This EIS provides an assessment of the environmental risks of the proposed development in accordance with the SEARs issued by the DPIE on 9 September 2019 and sets out the undertakings by the applicant to manage and minimise potential impacts arising from the development.

Subject to the mitigation measures outlined in Section 10 of this EIS, we recommend approval of this application for the following reasons:

- The existing school has minimal landscaping and the proposed landscape design for the site perimeter will be fundamental to the integration of the built elements by establishing the boundaries of the site;
- The proposed landscaping is consistent with the landscape plan approved as part of SSDA 8832 and involves the retention of Tree 31 consistent with the consent;
- Boundary planting will provide screening, shade and visual privacy to neighbours;
- The proposal provides shade, temperature regulation and reduces the urban heat island effect;
- The proposal provides CPTED benefits by delineating the school and restricting access to unauthorised visitors;
- It will create a positive natural environment for the school that is stimulating and desirable for students, teachers and the community;
- The proposal demonstrates and integrates the design quality principles established within the Educational SEPP;
- The potential environmental impacts of the proposal as outlined in this EIS are almost exclusively limited to during the construction phase and are able to be satisfactorily mitigated subject to implementing the recommendations of the technical supporting documentation accompanying this EIS; and
- The social benefits associated with the school outweigh any environmental impacts and its approval is therefore in the public interest.

The EIS fulfils the requirements of the EP&A Act and EP&A Regulation and addresses all relevant matters for consideration prescribed by the SEARs, demonstrating that the potential impacts of the proposal can be satisfactorily managed or mitigated.

The establishment of landscaping at the early stages of the development of a newly established school enables it to grow and mature simultaneously with the school facilities and population, enhancing its benefits to the school's amenity, comfort, environment and aesthetics.

In light of the above, and the significant public benefits of the proposal, we recommend that the proposal be approved.