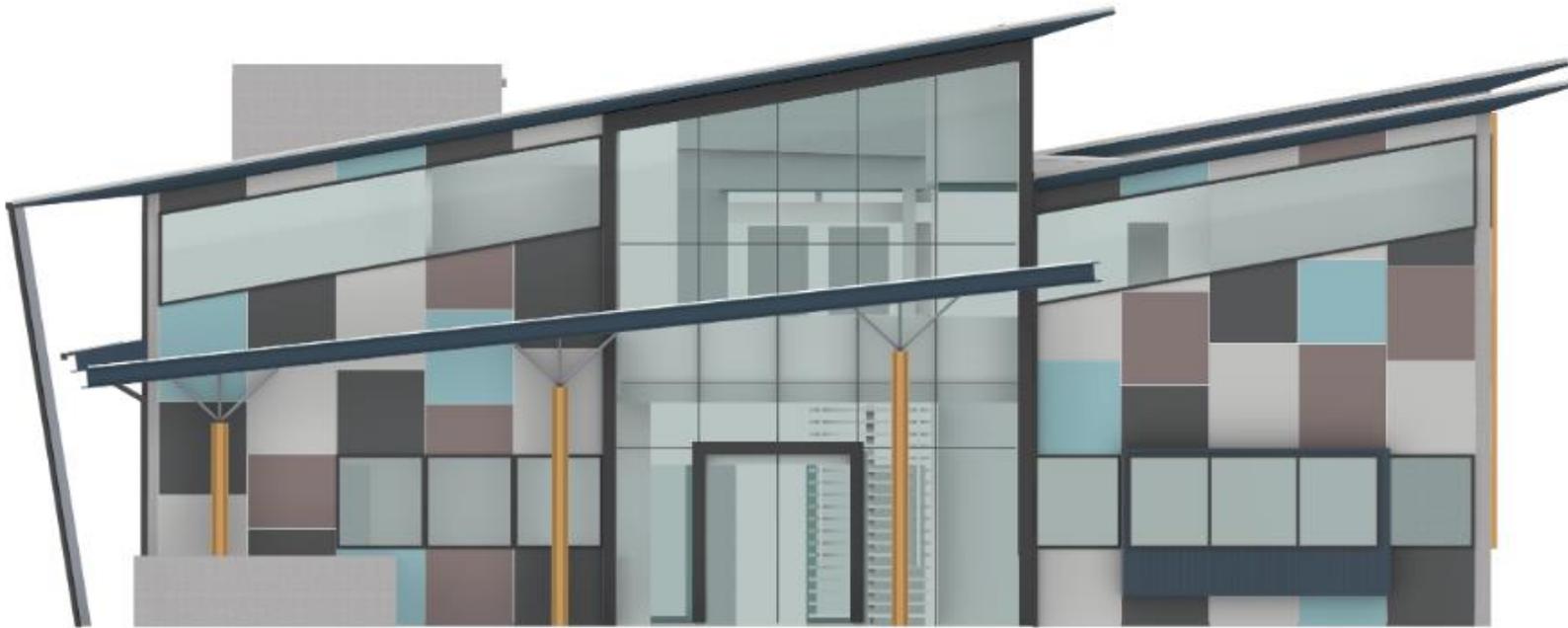


ENVIRONMENTAL IMPACT STATEMENT  
6A WATSFORD ROAD, CAMPBELLTOWN  
SSDA FOR CONSTRUCTION OF A TWO STOREY SCHOOL BUILDING WITH  
BASEMENT PARKING



Prepared on Behalf of: Warakirri College

Prepared by: Planning Lab

Issue Date: 5 March 2020

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# Contents

<b>Declaration .....</b>	<b>7</b>
<b>1. Executive Summary .....</b>	<b>8</b>
<b>2. Introduction .....</b>	<b>12</b>
2.1 Project Overview	12
2.2 Project Objectives	12
2.3 Alternatives	13
2.4 SEARs Response	14
<b>3. Site and Surrounding Context .....</b>	<b>23</b>
3.1 Site Identification	23
3.2 Surrounding Development	26
3.3 Topography	26
3.4 Flora and Fauna	26
3.5 Bush Fire	26
3.6 European and Aboriginal Archaeological Heritage	26
3.7 Transport Connections	27
3.8 Services and Utilities	27
<b>4. Proposed development .....</b>	<b>28</b>
4.1 Project Description	28
4.2 Development Overview	28
4.3 Built Form and Urban Design	32
4.4 External Finishes	34
4.5 Landscaping	34
4.6 Parking and School Drop Off	35
4.7 Accessibility	35
<b>5. Statutory Context .....</b>	<b>36</b>
5.1 Biodiversity Conservation Act 2016	36
5.2 State Environmental Planning Policy (State & Regional Development) 2011	36
5.3 State Environmental Planning Policy (Sydney Region Growth Centres) 2006	37
5.4 State Environmental Planning Policy (Infrastructure 2007)	37
5.5 State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017	40
5.6 State Environmental Planning Policy No. 64 – Advertising and Signage	48
5.7 State Environmental Planning Policy No.55 – Remediation of Land	51
5.8 Draft State Environmental Planning Policy (Remediation of Land)	52
5.9 Draft State Environmental Planning Policy (Environment)	52
5.10 Campbelltown Local Environmental Plan 2015	53
5.11 Campbelltown DCP 2015	53

<b>6.</b>	<b>Strategic Context</b> .....	<b>56</b>
6.1	NSW State Priorities	56
6.2	The Greater Sydney Regional Plan, A Metropolis of Three Cities	56
6.3	Future Transport Strategy 2056	57
6.4	State Infrastructure Strategy 2018 – 2038 Building the Momentum	57
6.5	Sydney’s Cycling Future 2013	58
6.6	Sydney’s Walking Future 2013	58
6.7	Sydney’s Bus Future 2013	58
6.8	Crime Prevention Through Environmental Design (CPTED) Principles	58
6.9	Better Placed: An Integrated Design Policy for the Built Environment of New South Wales	59
6.10	Healthy Urban Development Checklist (NSW Health, 2009)	61
6.11	Draft Greener Places Policy	62
6.12	Western City District Plan	62
6.13	Greater Macarthur 2040 - An Interim Plan for the Greater Macarthur Growth Area	62
6.14	Draft Glenfield to Macarthur Corridor Strategy	63
6.15	Reimagining Campbelltown CBD and Masterplan (Campbelltown Council)	63
<b>7.</b>	<b>Key Issues / Environmental Impact Assessment</b> .....	<b>64</b>
7.1	Environmental Amenity	64
7.2	Transport and Accessibility	65
7.3	ESD	66
7.4	Noise and Vibration	67
7.5	Contributions	68
7.6	Waste	68
7.7	Heritage and Archaeology	68
7.8	Social Impacts	69
7.9	Contamination	69
7.10	Utilities	69
7.11	Flooding and Drainage	69
7.12	Biodiversity	69
7.13	Sediment, Erosion and Dust Controls	70
<b>8.</b>	<b>Consultative Engagement</b> .....	<b>71</b>
8.1	Campbelltown City Council	71
8.2	Transport for NSW	71
8.3	Neighbouring Sites	71
8.4	Statutory Exhibition	72
<b>9.</b>	<b>Mitigation Measures</b> .....	<b>73</b>
<b>10.</b>	<b>Conclusion</b> .....	<b>75</b>
<b>11.</b>	<b>Appendices</b> .....	<b>76</b>

## Figures

Figure 1 - Locality map identifying the site (Six Maps).	23
Figure 2 - Aerial image identifying the site (Six Maps)	24
Figure 3 - The site viewed from Watsford Road (Google Maps)	24
Figure 4 - The site viewed from the Langdon Avenue commuter car park across the train line (Google Maps)	25
Figure 5 - View from Watsford Road looking north east with the site visible on the right hand side of the image	25
Figure 6 - View from Watsford Road looking south west with the site visible on the right left side of the image	25
Figure 7 - Render of northwest (Watsford Road) elevation	29
Figure 8 - Render of South east elevation	30
Figure 9 - Render of Southwest elevation	30
Figure 10 - Render of Northeast elevation	30
Figure 11 - Basement floor plan	31
Figure 12 - Ground floor plan	31
Figure 13 - Level 1 floor plan	31
Figure 14 - Streetscape character analysis	32
Figure 15 - 3D render of the proposed building	32

## Tables

Table 1 - SEARs summary	14
Table 2 - Compliance with the relevant clauses of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017	40
Table 3 - Compliance with Schedule 4 of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017	42
Table 4 - Compliance with Schedule 2 of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017	45
Table 5 - SEPP 64 Schedule 1 compliance	49
Table 6 - Compliance with the Campbelltown Local Environmental Plan 2015	53
Table 7 - Compliance with the Campbelltown Development Control Plan 2015	54
Table 8 - CPTED principles	58
Table 9 - Better Placed policy compliance	60
Table 10 - ESD Principles	66
Table 11 - Potential issues and mitigation measures	73

## Appendices

<b>Appendix No.</b>	<b>Report</b>	<b>Consultant</b>
Appendix A	Architectural Plans	Koturic + Co.
Appendix B	SEARs Request	N/A (issued by DPIE)
Appendix C	Traffic and Car Parking Assessment	GTK Consulting
Appendix D	Traffic Report Addendum	GTK Consulting
Appendix E	Biodiversity Waiver Request	Cumberland Ecology
Appendix F	Preliminary Site Investigation	Consulting Earth Scientists
Appendix G	Acoustic Assessment	Acoustic Logic
Appendix H	Quantity Surveyors Report	MBM Quantity Surveyors
Appendix I	External Finishes Schedule	Koturic + Co.
Appendix J	Landscaping Plans	Impact Planners
Appendix K	Access Assessment Report	BCA Logic
Appendix L	BCA Report	BCA Logic
Appendix M	Section J Report	BCA Energy
Appendix N	Trade Waste Management – Ongoing	Waste Tech Services
Appendix O	Stormwater Concept Plan	Harris Page & Associates
Appendix P	Construction Environmental Management Plan	Ibiz Design
Appendix Q	Hydraulic Services Plans	Harris Page & Associates
Appendix R	Flood Advice	Harris Page & Associates
Appendix S	Preliminary Geotechnical Report	Consulting Earth Scientists
Appendix T	Structural Engineering Concept Plan	Henry & Hymas Consulting Engineers
Appendix U	Survey Plans	Project Surveyors

## Declaration

This Environmental Impact Statement (EIS) has been prepared by Planning Lab on behalf of Warakirri College. It accompanies a State Significant Development application (SSDA) which proposes the construction and use of a two-storey school building with single level basement with the capacity to accommodate up to 120 students at 6A Watsford Road, Campbelltown.

### Address of proposed development

6A Watsford Road, Campbelltown – Lot 113 in DP 1183297.

### Planning Lab Details

Report prepared by: Giovanni Cirillo (Managing Director)

Qualifications: Bachelor of Urban and Regional Planning (Hons)

Graduate Diploma in Economics

Master of International Studies

Adjunct Associate Professor, The University of Sydney, School of Architecture, Design and Planning

Address: Level 24, Three International Towers, 300 Barangaroo Avenue, Sydney, NSW, 2000

### Certification

I, Giovanni Cirillo, certify that to the best of my knowledge this EIS:

- Has been prepared in accordance with Part 4 of the *Environmental Planning and Assessment Act 1979* and Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*.
- Addresses the requirements of Secretary's Environmental Assessment Requirements.
- Contains all available information that is relevant to the proposal described herein.
- Does not contain any information which is false or misleading.



03/03/2020

# 1. Executive Summary

## Purpose

This EIS has been prepared by Planning Lab on behalf of Warakirri College in support of SSDA SSD-10420. The application is supported by Architectural Drawings by Koturic & Co (Appendix A) which propose the development of a new Warakirri College campus at 6A Watsford Road, Campbelltown. It has been prepared in response to the Secretary's Environmental Assessment Requirements (SEARs) which are attached as Appendix B to this EIS. The EIS should be read in conjunction with the SEARs and the accompanying plans and reports which are included as appendices.

## The Site

The proposal relates to the property at 6A Watsford Road, Campbelltown ('the site') which is formally recognised as Lot 113 in DP 1183297. The site is rectangular in shape and encompasses an area of 1,748.2m<sup>2</sup>. Its sole frontage is to Watsford Road and there is a railway corridor on its southern border. The site is currently undeveloped and vacant.

## The Proposal

The proposal is for the construction of new Warakirri College campus at 6A Watsford Road, Campbelltown. Warakirri College provides an adult learning environment for people between the ages of 15 to 22 who have disconnected from mainstream education. Warakirri College gives them the opportunity to obtain their Year 10 Record of School Achievement and the Higher School Certificate (HSC) in a supportive and flexible learning environment. The proposed campus will accommodate up to 120 students and employ 12 full-time and two part-time staff members. Standard operating hours are to be weekdays between 8am-5pm for staff and 9am-3pm for students.

The population of school aged children in the Campbelltown area is projected by the NSW Department of Education to increase by 13,541 by 2036. The proposal will provide an additional educational facility to address this anticipated growth and to specifically provide educational opportunities for disadvantaged young people in the Campbelltown area.

The proposed Warakirri College building is two storeys with a single basement level that has been purpose-designed as an adult learning environment. The proposal involves the construction of a new building with the following elements on the currently vacant site:

- Site preparation: Excavation to facilitate a basement level.
- Basement: 11 car parking spaces for staff, including 1 disabled car parking space, bin room, bulk storage room, and an indoor recreational area (290m<sup>2</sup>), lift, and two stairs.
- Ground floor (internal): reception room, staff lunch room, collaborative learning area, bathrooms, function room, Head of Campus' office, food technology and science room with storage room, an external terrace for collaborative learning, stairs and lift.

- **Ground floor (external):** the ground floor level extends out to a garden area to the rear with places to sit, BBQ facilities, and a vegetable garden. Vehicular access to the site is provided by a 5.3m wide driveway connecting to two at grade car spaces and a down ramp to the basement. Pedestrian access is via a separate pathway located in the middle of the site and adjoined by landscaped front gardens. A bicycle rack is included adjacent to the main entrance.
- **First floor:** Eight learning spaces (classrooms), staff area with two offices, a quiet break out space, storage room, building services room, bathrooms, stairs and lift.
- **Signage:** An illuminated pylon sign (1.2m x 2.4m) is proposed within the front setback adjoining the pedestrian entrance to the site. Two school identification signs are proposed with one on the north-west elevation and one on the south-west elevation. Both identification signs are located on the roof of the covered entranceway.

## Consultation and Engagement

Warakirri College has consulted with stakeholders regarding the proposal including Campbelltown City Council, local community organisations which support disengaged youth and young people with disabilities, and neighbouring landowners and occupants. All consulted parties have been broadly supportive of the proposal. Warakirri College is engaged in positive ongoing discussions with several neighbouring properties about how the operations of Warakirri College may create mutually beneficial opportunities for both parties. This includes discussion of possibly sharing of facilities with neighbouring religious organisations and with strategically aligned non-profit organisations such as the Youth Workers' Network and the Opportunity Hub (subject to future approval if required).

## Site Suitability

The NSW Department of Education has estimated that the Western City District will have an additional 77,978 students by 2036 and that 13,541 of those students will be living in Campbelltown. The subject site is located within 400m walk from the Campbelltown Train Station and associated bus services. The site is ideally located to serve students living in Campbelltown and the surrounding region. The site is also demonstrated to be suitable as the project is unlikely to impact upon biodiversity and the site does not pose a significant risk of contamination. The acoustic impacts arising from the rail corridor can be appropriately managed.

## Transport

The site has been selected partly due to its close proximity to public transport including train and bus services which operate to Campbelltown Train Station and its immediate surrounds. The site is approximately 400m walk from Campbelltown Train Station and does not require students to cross any roads. Students are typically from disadvantaged backgrounds and previous experience of the Warakirri, indicates that students very rarely access the College by private vehicle. Students are issued with school Opal cards further incentivising the use of public transport. As a result, the Traffic and Car Parking Assessment by GTK and the accompanying Traffic Report Addendum (Appendix C and D) show that the proposed

development will generate a volume of traffic that is less than the existing daily variation on local roads and therefore will have negligible impacts on traffic flows or intersection capacities during operation.

The project represents a relatively small development and the impacts on traffic during construction are similarly expected to be negligible. They will not require the upgrading of road or intersection capacity.

## **Biodiversity**

The site's biodiversity has been assessed by Cumberland Ecology. The site is cleared and vacant land which contains predominantly exotic grasslands and a row of planted native vegetation. As the site is a highly modified area, the proposal is unlikely to have any significant impact on biodiversity values. The project presents very little likelihood of having significant impacts on a threatened species and is suitable for development. In consideration of the site and the proposal, Cumberland Ecology have prepared a Biodiversity Development Assessment Report Waiver Request (Appendix E) which establishes why the preparation of a Biodiversity Development Assessment Report is unnecessary.

## **Contamination**

A Preliminary Site Investigation looking for possible contamination has been undertaken by Consulting Earth Scientists (Appendix F). It recognised some unidentified fill material on site and recommended that during excavation, the affected material be disposed of at a suitably licensed facility. The Investigation found that there is no significant contamination risk based on a review of the site's historical uses and that the site is suitable for development.

## **Noise**

The primary noise impact on the College is the T8 rail corridor which is immediately south of the site. An Acoustic Assessment has been undertaken by Acoustic Logic which is Appendix G to this report. It demonstrates that the impacts of the rail corridor can be mitigated using appropriate construction materials and that the proposal is capable of complying with the relevant NSW Environmental Protection Authority policies. It also demonstrates that the proposal's operation noise output is capable of complying with the relevant standards and will not disturb the amenity of the area.

## **Assessment**

The proposal has been assessed against all of the items contained within the project SEARs as discussed in Section 2.4 'SEARs Response' of this EIS. The proposal broadly satisfies the SEARs in the following ways:

- The design is appropriate to the existing neighbourhood context – The two-storey contemporary design is compatible with the bulk and scale of existing development in the surrounding area. The prevailing setbacks are respected by the development. The proposal's high-quality contemporary design will add to the visual interest of Watsford Road.

- The proposal has been purpose-designed for use as an adult education facility – The proposed design will provide a purpose-built learning environment for students who have disconnected from mainstream education.
- The proposal is consistent with all applicable State and local planning policies and documents – The proposal responds to the growth that is anticipated in Campbelltown under the relevant strategic planning policies by providing an additional education facility. It locates this facility in close proximity to public transport which supports the Greater Sydney Region Plan’s concept of the 30-minute city concept which envisions services being accessible to most people within 30 minutes of their home.
- The proposal is in the public interest – It is in the public interest for as many people as possible to complete their Year 10 and HSC studies which is the primary goal of Warakirri College. This benefits the students as well as the broader community.
- The proposal has satisfied the requirements of the SEARs as has been demonstrated through this EIS.

In consideration of the contents of this application as summarised above, it is strongly recommended that the NSW Department of Planning, Industry and Environment approve SSD-10420.

## 2. Introduction

### 2.1 Project Overview

This EIS has been prepared by Planning Lab on behalf of Warakirri College in support of SSDA SSD-10420. The application proposes the development of a new Warakirri College campus at 6A Watsford Road, Campbelltown. The proposed campus will accommodate up to 120 students and employ 12 full-time and 2 part-time staff members. Standard operating hours are to be weekdays between 8am-5pm for staff and 9am-3pm for students.

The proposed building is two storeys with a single basement level that has been purpose-designed as an adult learning environment. The proposed building is detailed in the architectural drawings by Koturic + Co (Appendix A) and includes the following elements on the currently vacant site:

- Site preparation: Excavation to facilitate a basement level.
- Basement: 11 car parking spaces for staff, including 1 disabled car parking space, bin room, bulk storage room, and an indoor recreational area (290m<sup>2</sup>), lift, and two stairs.
- Ground floor (internal): reception room, staff lunch room, collaborative learning area, bathrooms, function room, Head of Campus' office, food technology and science room with storage room, an external terrace for collaborative learning, stairs and lift.
- Ground floor (external): the ground floor level extends out to a garden area to the rear with places to sit, BBQ facilities, and a vegetable garden. Vehicular access to the site is provided by a 5.3m wide driveway connecting to two at grade car spaces and a down ramp to the basement. Pedestrian access is via a separate pathway located in the middle of the site and adjoined by landscaped front gardens. A bicycle rack is included adjacent to the main entrance.
- First floor: Eight learning spaces (classrooms), staff area with two offices, a quiet break out space, storage room, building services room, bathrooms, stairs and lift.
- Signage: An illuminated pylon sign (1.2m x 2.4m) is proposed within the front setback adjoining the pedestrian entrance to the site. Two school identification signs are proposed with one on the north-west elevation and one on the south-west elevation. Both identification signs are located on the roof of the covered entranceway.

### 2.2 Project Objectives

The objective of the proposal is to build a permanent Warakirri College campus in Campbelltown to assist more students who have disconnected from mainstream schooling to achieve their Year 10 Record of School Achievement Certificate and Higher School Certificate.

Warakirri College is an independent High School operated by MTC Australia. MTC Australia is a public benevolent institution specialising in delivering high impact employment, training and youth programs that help around 20,000 people every year to gain skills for employment and entrepreneurship, build self-worth, and enable possibilities for transformative change.

Warakirri College is a registered charity and Public Benevolent Institution which was first opened in Parramatta in 2008 where it began to help people between the ages of 15 to 22 years complete their high school studies. The school opened in Fairfield in 2011 and closed the smaller Parramatta campus in 2013 while expanding the Fairfield site. In 2017 a second campus was opened in Blacktown and in 2019 a third Campbelltown Campus was opened in an existing building in the Campbelltown CBD. However, the Campbelltown campus reached its maximum enrolment capacity within 6 months due to the significant need in the region. The proposal seeks to establish a second Campbelltown campus to address the existing demand for enrolments. Warakirri College accepts students referred by local high schools, the Department of Communities and Justice, the Department of Health and non-government community support organisations.

Warakirri differs from mainstream high school education by providing an adult learning environment with the following attributes:

- Students do not pay any fees.
- Smaller class sizes than mainstream schools.
- Provides a supportive and safe learning environment.
- Students face mental health challenges, come from complex family situations, have completed periods of juvenile detention, are managing early parenthood or are recent refugees.
- Students are encouraged to express their individuality including gender diversity.
- The teachers offer flexible teaching and learning techniques.
- The teachers and councillors have experience working with students from disadvantaged backgrounds.
- Approximately 65-80% of students are identified as having a disability (according to the Commonwealth Nationally Consistent Collection of Disability Data.)
- 30% of students in the Campbelltown Campus are Indigenous Australians.

The proposal is firmly in the public interest.

## 2.3 Alternatives

There are two alternatives to the proposal which are that Warakirri College either does not open a new campus, or selects an alternative site.

Warakirri has selected the subject site due to its availability, proximity to public transport networks and the Campbelltown CBD, proximity to the existing Campbelltown campus and suitable size. The property has been purchased for use by Warakirri College. There is no benefit in selecting an alternative site.

Warakirri College has occupied Level 2, 138 Queen Street, Campbelltown as their first Campbelltown campus which opened in June 2019. As an alternative to the proposal, Warakirri could continue to occupy only the Queen Street Campus, however, this option has three primary drawbacks:

1. The campus at 138 Queen Street can only accommodate 90 enrolled students. These spots were filled within six-months of opening due to the significant unmet demand for alternative educational pathways in the Campbelltown area. The additional 120 student places that a new campus would provide are urgently needed.

2. The proposed building is purpose-designed to provide an exceptional level of amenity to students and staff giving more break-out spaces, indoor sports/recreation areas and outdoor space providing an exceptional learning environment.
3. The Queen Street campus is leased which creates an element of uncertainty around the campus' ongoing operation. Warakirri College owns 6A Watsford Road which grants certainty around its ongoing operation in Campbelltown.

Continuing to operate only from the Queen Street campus would be a disadvantageous outcome for those students who are not able to find a place at an alternative school and for the broader community. In this scenario, Warakirri College would offer fewer students places and consequently employ fewer staff.

Warakirri College has used its extensive experience to guide the proposed design with a view to providing a long-lasting and high-quality educational establishment to serve the needs of students in the growing Campbelltown community.

## 2.4 SEARs Response

A copy of the SEARs issued for SSD-10420 on 5/02/2020 is contained within Appendix B. Table 1 below contains the SEARs and a reference to how this has been addressed with this EIS and/or the SSDA.

*Table 1 - SEARs summary*

SEARs	EIS RESPONSE
<b>General Requirements</b>	
<p>The Environmental Impact Statement (EIS) must be prepared in accordance with and meet the minimum requirements of clauses 6 and 7 of Schedule 2 the Environmental Planning and Assessment Regulation 2000 (the Regulation).</p> <p>Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development.</p> <p>Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include:</p> <ul style="list-style-type: none"> <li>· adequate baseline data</li> <li>· consideration of potential cumulative impacts due to other development in the vicinity (completed, underway or proposed) and</li> <li>· measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment.</li> </ul> <p>The EIS must be accompanied by a report from a qualified quantity surveyor providing:</p> <ul style="list-style-type: none"> <li>· a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the</li> </ul>	<p>This EIS has been prepared with reference to Schedule 2 the Environmental Planning and Assessment Regulation 2000.</p> <p>A Quantity surveyors report is included in Appendix H.</p>

<p>Regulation) of the proposal, including details of all assumptions and components from which the CIV calculation is derived</p> <ul style="list-style-type: none"> <li>· an estimate of the jobs that will be created by the future development during the construction and operational phases of the development and</li> <li>· certification that the information provided is accurate at the date of preparation.</li> </ul>	
<b>1. Statutory and Strategic Context</b>	
<p>Address the statutory provisions contained in all relevant planning instruments, including:</p> <ul style="list-style-type: none"> <li>· Biodiversity Conservation Act 2016</li> <li>· State Environmental Planning Policy (State &amp; Regional Development) 2011</li> <li>· State Environmental Planning Policy (Sydney Region Growth Centres) 2006</li> <li>· State Environmental Planning Policy (Infrastructure 2007)</li> <li>· State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017</li> <li>· State Environmental Planning Policy No. 64 – Advertising and Signage</li> <li>· State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55)</li> <li>· Draft State Environmental Planning Policy (Remediation of Land)</li> <li>· Draft State Environmental Planning Policy (Environment) and</li> <li>· Campbelltown Local Environmental Plan 2015.</li> </ul> <p><i>Permissibility</i></p> <p>Detail the nature and extent of any prohibitions that apply to the development.</p> <p><i>Development Standards</i></p> <p>Identify compliance with the development standards applying to the site and provide justification for any contravention of the development standards.</p> <p><i>Provisions</i></p> <p>Adequately demonstrate and document in the EIS how each of the provisions in the listed instruments are addressed, including reference to necessary technical documents.</p>	Section 5
<b>2. Policies</b>	
<p>Address the relevant planning provisions, goals and strategic planning objectives in the following:</p> <ul style="list-style-type: none"> <li>· NSW State Priorities</li> <li>· The Greater Sydney Regional Plan, A Metropolis of three cities</li> <li>· Future Transport Strategy 2056</li> <li>· State Infrastructure Strategy 2018 – 2038 Building the Momentum</li> <li>· Sydney’s Cycling Future 2013</li> <li>· Sydney’s Walking Future 2013</li> </ul>	Section 6

<ul style="list-style-type: none"> <li>· Sydney’s Bus Future 2013</li> <li>· Crime Prevention Through Environmental Design (CPTED) Principles</li> <li>· Better Placed: An integrated design policy for the built environment of New South Wales (Government Architect NSW (GANSW), 2017)</li> <li>· Healthy Urban Development Checklist (NSW Health, 2009)</li> <li>· Draft Greener Places Policy</li> <li>· Western City District Plan</li> <li>· Campbelltown (Sustainable City) Development Control Plan 2015</li> <li>· Greater Macarthur 2040 - an interim plan for the Greater Macarthur Growth Area</li> <li>· Draft Glenfield to Macarthur Corridor Strategy</li> <li>· Reimagining Campbelltown CBD and masterplan (Campbelltown Council).</li> </ul>	
<b>3. Operation</b>	
<ul style="list-style-type: none"> <li>· Provide details of the proposed school operations, including staff and student numbers, school hours of operation, and operational details of any proposed community use of school facilities.</li> <li>· Identify open space proposed to be used to meet the recreational needs of students.</li> <li>· Provide a detailed justification of suitability of the site to accommodate the proposal.</li> </ul>	Section 4
<b>4. Built Form and Urban Design</b>	
<ul style="list-style-type: none"> <li>· Address design quality and built form, with specific consideration of the overall site layout, open spaces and Crime Prevention Through Environmental Design.</li> <li>· 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.</li> <li>· 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.</li> </ul>	CPTED – Section 6.8  Schedule 4 – Section 5.5  Landscaping – Section 4.5 and Appendix J
<b>5. Environmental Amenity</b>	
<ul style="list-style-type: none"> <li>· Assess amenity impacts on the surrounding locality, including solar access, visual privacy, visual amenity and acoustic impacts.</li> <li>· Identify any proposed use of the school outside of school hours (including weekends) and assess any resultant amenity impacts on the immediate locality and proposed mitigation measures.</li> </ul>	Section 7.1
<b>6. Transport and Accessibility</b>	

<p>Include a transport and accessibility impact assessment, which details, but not limited to the following:</p> <ul style="list-style-type: none"> <li>· an assessment of all relevant vehicular traffic routes and intersections for access to / from the subject properties.</li> <li>· an assessment of construction and operational traffic impacts on existing intersections, capacity of the local and classified road network.</li> <li>· identify road network infrastructure upgrades that are required to maintain existing levels of service on both the local and classified road network for the development (if required).</li> <li>· the adequacy of public transport, pedestrian and bicycle networks in the vicinity of the site.</li> <li>· access arrangements, including car and bus pick-up/drop-off facilities if proposed, and measures to mitigate any associated traffic impacts and impacts on public transport, pedestrian and bicycle networks, including pedestrian crossings and refuges and speed control devices and zones.</li> <li>· proposed bicycle parking provision, including end of trip facilities, in secure, convenient, accessible areas close to main entries incorporating lighting and passive surveillance.</li> <li>· details of available on-site car parking spaces for teaching staff and visitors in accordance with existing parking codes and justification for the level of car parking provided on-site.</li> <li>· an assessment of the cumulative on-street parking impacts of cars and bus pick-up/drop-off, staff parking and any other parking demands associated with the development.</li> <li>· an assessment of road and pedestrian safety adjacent to the proposed development and the details of required road safety measures and personal safety in line with CPTED.</li> <li>· emergency vehicle access, service vehicle access, delivery and loading arrangements and estimated service vehicle movements (including vehicle type and the likely arrival and departure times).</li> <li>· the preparation of a preliminary Construction Pedestrian and Traffic Management Plan (CPTMP) to demonstrate the proposed management of the impact in relation to construction traffic addressing the following: <ul style="list-style-type: none"> <li>○ assessment of cumulative impacts associated with other construction activities (if any).</li> <li>○ an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity.</li> <li>○ details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process.</li> <li>○ details of anticipated peak hour and daily construction vehicle movements to and from the site.</li> </ul> </li> </ul>	<p>Section 7.2 and Appendix C, D &amp; P</p>
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<ul style="list-style-type: none"> <li>○ details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle.</li> <li>○ details of temporary cycling and pedestrian access during construction.</li> </ul> <p><i>Relevant Policies and Guidelines:</i></p> <ul style="list-style-type: none"> <li>· Guide to Traffic Generating Developments (Roads and Maritime Services)</li> <li>· EIS Guidelines – Road and Related Facilities (DoPI)</li> <li>· Cycling Aspects of Austroads Guides</li> <li>· NSW Planning Guidelines for Walking and Cycling</li> <li>· Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development</li> <li>· Standards Australia AS2890.3 (Bicycle Parking Facilities).</li> </ul>	
<b>7. Ecologically Sustainable Development (ESD)</b>	
<ul style="list-style-type: none"> <li>· Detail how ESD principles (as defined in clause 7(4) of Schedule 2 of the Regulation) will be incorporated in the design and ongoing operation phases of the development.</li> <li>· Include a description of the measures that would be implemented to minimise consumption of resources, water (including water sensitive urban design) and energy.</li> </ul>	Section 7.3
<b>8. Noise and Vibration</b>	
<ul style="list-style-type: none"> <li>· Identify and assess operational noise, including consideration of any public-address system, school bell, mechanical services (e.g. air conditioning plant), use of any school hall for concerts etc. (both during and outside school hours) and any out of hours community use of school facilities, and outline measures to minimise and mitigate the potential noise impacts on surrounding occupiers of land.</li> </ul> <p><i>Relevant Policies and Guidelines:</i></p> <ul style="list-style-type: none"> <li>· NSW Noise Policy for Industry 2017 (EPA)</li> <li>· Development Near Rail Corridors and Busy Roads – Interim Guideline (Department of Planning 2008).</li> </ul>	Section 7.4. and Appendix G.
<b>9. Contributions</b>	
<ul style="list-style-type: none"> <li>· Address Council’s ‘Section 7.11/7.12 Contribution Plan’ and/or details of any Voluntary Planning Agreement, which may be required to be amended because of the proposed development.</li> </ul>	Section 7.5
<b>10. Waste</b>	
<ul style="list-style-type: none"> <li>· Identify, quantify and classify the likely waste streams to be generated during construction and operation and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones,</li> </ul>	Section 7.6 and Appendix N & P

mechanical plant) for the site.	
<b>11. Heritage</b>	
<ul style="list-style-type: none"> <li>Where relevant, provide a statement of significance and an assessment of the impact on the heritage significance of any heritage items on or immediately adjacent the site in accordance with the guidelines in the NSW Heritage Manual (Heritage Office and DUAP, 1996).</li> <li>Address any archaeological potential and significance on the site and the impacts the development may have on this significance.</li> </ul>	Section 7.7
<b>12. Social Impacts</b>	
<ul style="list-style-type: none"> <li>Include an assessment of the social consequences of the proposal.</li> </ul>	Section 7.8
<b>13. Contamination</b>	
<ul style="list-style-type: none"> <li>Assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable for the proposed use in accordance with SEPP 55.</li> <li>Where relevant, undertake a hazardous materials survey of all existing structures and infrastructure prior to any demolition or site preparation works.</li> </ul> <p><i>Relevant Policies and Guidelines:</i></p> <ul style="list-style-type: none"> <li>Managing Land Contamination: Planning Guidelines - SEPP 55 Remediation of Land (DUAP, 1998)</li> <li>Sampling Design Guidelines (EPA, 1995)</li> <li>Guidelines for Consultants Reporting on Contaminated Sites (OEH, 2011)</li> <li>National Environment Protection (Assessment of Site Contamination) Measure (National Environment Protection Council, as amended 2013)</li> </ul>	Section 7.9
<b>14. Utilities</b>	
<ul style="list-style-type: none"> <li>Provide information on the existing capacity and any augmentation and easement requirements of the development for the provision of utilities.</li> </ul>	Section 7.10 and Appendix Q
<b>15. Contributions</b>	
<ul style="list-style-type: none"> <li>Address Council's 'Section 7.11/7.12 Contribution Plan' and/or details of any Voluntary Planning Agreement, which may be required to be amended because of the proposed development.</li> </ul>	Section 5.5
<b>16. Drainage</b>	

<ul style="list-style-type: none"> <li>· Detail measures to minimise operational water quality impacts on surface waters and groundwater.</li> <li>· Provide stormwater plans detailing the proposed methods of drainage without impacting on the downstream properties.</li> </ul> <p><i>Relevant Policies and Guidelines:</i></p> <ul style="list-style-type: none"> <li>· Guidelines for developments adjoining land managed by the Office of Environment and Heritage (OEH, 2013).</li> </ul>	<p>Section 7.10 and Appendix O &amp; R.</p>
<p><b>17. Flooding</b></p>	
<ul style="list-style-type: none"> <li>· Identify flood risk on-site (detailing the most recent flood studies for the project area) and consideration of any relevant provisions of the NSW Floodplain Development Manual (DIPNR, 2005), including the potential effects of climate change, sea level rise and an increase in rainfall intensity. If there is a material flood risk, include design solutions for mitigation.</li> </ul>	<p>Section 7.11 and Appendix O &amp; R</p>
<p><b>18. Biodiversity Assessment</b></p>	
<ul style="list-style-type: none"> <li>· Biodiversity impacts related to the proposed development (SSD-10420) are to be assessed in accordance with the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the <i>Biodiversity Conservation Act 2016</i> (s6.12), <i>Biodiversity Conservation Regulation 2017</i> (s6.8) and Biodiversity Assessment Method.</li> <li>· The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method.</li> <li>· The BDAR must include details of the measures proposed to address the offset obligation as follows: <ul style="list-style-type: none"> <li>○ the total number and classes of biodiversity credits required to be retired for the development/project</li> <li>○ the number and classes of like-for-like biodiversity credits proposed to be retired</li> <li>○ the number and classes of biodiversity credits proposed to be retired in accordance with the variation rules</li> <li>○ any proposal to fund a biodiversity conservation action</li> <li>○ any proposal to make a payment to the Biodiversity Conservation Fund.</li> </ul> </li> <li>· If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.</li> <li>· The BDAR must be submitted with all spatial data associated with the survey and assessment as per the BAM.</li> </ul>	<p>Section 7.12 and Appendix E</p>

<ul style="list-style-type: none"> <li>The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the <i>Biodiversity Conservation Act 2016</i>.</li> <li>Where a Biodiversity Assessment Report is not required, engage a suitably qualified person to assess and document the flora and fauna impacts related to the proposal.</li> </ul> <p><i>Note: Notwithstanding these requirements, the Biodiversity Conservation Act 2016 requires that State Significant Development Applications be accompanied by a Biodiversity Development Assessment Report unless otherwise specified under the Act.</i></p>	
<b>19. Sediment, Erosion and Dust Controls</b>	
<ul style="list-style-type: none"> <li>Detail measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles.</li> </ul> <p>Relevant Policies and Guidelines:</p> <ul style="list-style-type: none"> <li>Managing Urban Stormwater - Soils &amp; Construction Volume 1 2004 (Landcom)</li> <li>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA)</li> <li>Guidelines for development adjoining land managed by the Office of Environment and Heritage (OEH, 2013)</li> </ul>	Section 7.13 and Appendix P
<b>20. Waste</b>	
<ul style="list-style-type: none"> <li>Identify, quantify and classify the likely waste streams to be generated during construction and operation and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site.</li> </ul> <p><i>Relevant Policies and Guidelines:</i></p> <ul style="list-style-type: none"> <li>Waste Classification Guidelines (EPA, 2014)</li> </ul>	Section 7.5 and Appendix N & P
<b>21. Construction Hours</b>	
<ul style="list-style-type: none"> <li>Identify proposed construction hours and provide details of the instances where it is expected that works will be required to be carried out outside the standard construction hours.</li> </ul>	Appendix P
<b>Plans and Documents</b>	
<p>The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Regulation. Provide these as part of the EIS rather than as separate documents.</p> <p>In addition, the EIS must include the following:</p>	The required plans and documents have been

<ul style="list-style-type: none"> <li>· Architectural drawings showing key dimensions, RLs, scale bar and north point, including: <ul style="list-style-type: none"> <li>○ plans, sections and elevation of the proposal indicative furniture layouts and program</li> <li>○ details of proposed signage, including size, location and finishes</li> </ul> </li> <li>· Site Survey Plan, showing existing levels, location and height of existing and adjacent structures / buildings and site boundaries</li> <li>· Site Analysis and Context Plans</li> <li>· Sediment and Erosion Control Plan</li> <li>· Shadow Diagrams</li> <li>· Landscape architectural drawings showing key dimensions, RLs, scale bar and north point, including: <ul style="list-style-type: none"> <li>○ integrated landscape plans at appropriate scale, with detail of new and retained planting, shade structures, materials and finishes proposed, including articulation of outdoor spaces</li> <li>○ plan identifying significant trees, trees to be removed and trees to be retained or transplanted</li> </ul> </li> <li>· Geotechnical and Structural Report</li> <li>· Accessibility Report</li> <li>· Arborist Report (where relevant)</li> <li>· Salinity Investigation Report (where relevant)</li> <li>· Acid Sulphate Soils Management Plan (where relevant) and</li> <li>· Schedule of materials and finishes.</li> </ul>	<p>provided as required.</p>
<b>Consultation</b>	
<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups, special interest groups, including local Aboriginal land councils and registered Aboriginal stakeholders, and affected landowners. In particular, you must consult with:</p> <ul style="list-style-type: none"> <li>- Campbelltown City Council</li> <li>- Transport for NSW (TfNSW)</li> <li>- Transport for NSW (Roads and Maritime Services) (TfNSW RMS)</li> <li>- Sydney Trains.</li> </ul> <p>Consultation with should commence as soon as practicable to agree the scope of investigation.</p> <p>The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>	<p>Section 8</p>

### 3. Site and Surrounding Context

#### 3.1 Site Identification

The proposal relates to the property at 6A Watsford Road, Campbelltown ('the site') which is formally recognised as Lot 113 in DP 1183297. The site is rectangular in shape and encompasses an area of 1,748.2m<sup>2</sup>. Its sole frontage is to Watsford Road and there is a railway corridor on its southern border.

The site is cleared and vacant land which contains predominantly exotic grasslands and a row of planted native vegetation. It experiences a fall of about 3.86m from the south-eastern boundary near the rail corridor to the north-western boundary at Watsford Road.

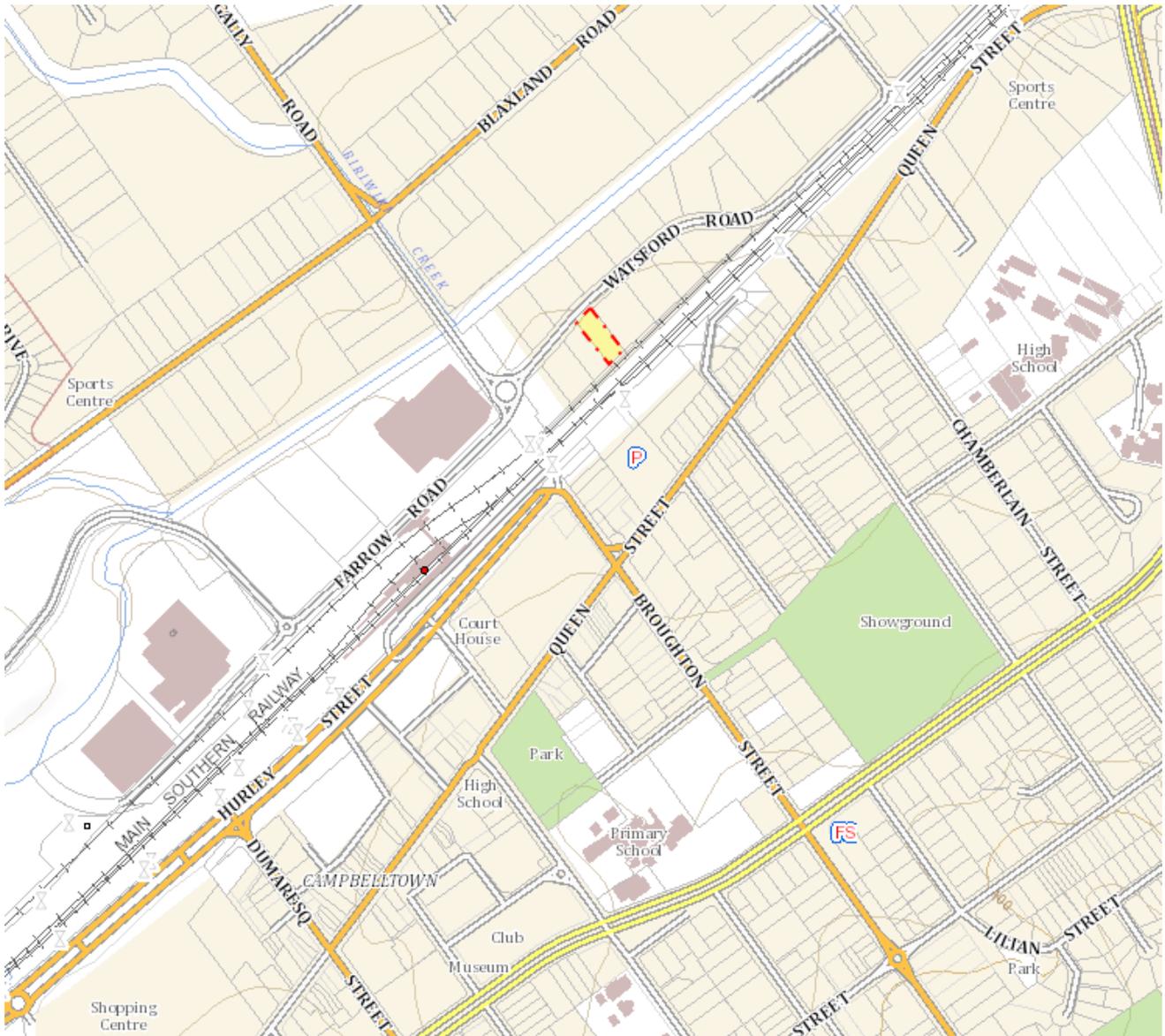


Figure 1 - Locality map identifying the site (Six Maps).



Figure 2 - Aerial image identifying the site (Six Maps)



Figure 3 - The site viewed from Watsford Road (Google Maps)



Figure 4 - The site viewed from the Langdon Avenue commuter car park across the train line (Google Maps)



Figure 5 - View from Watsford Road looking north east with the site visible on the right hand side of the image



Figure 6 - View from Watsford Road looking south west with the site visible on the right left side of the image

## 3.2 Surrounding Development

The site is located within an industrial business park and backs onto the T8 railway line to the south-east. The southwestern neighbouring building is a two-storey office used as a radio station. The north-eastern neighbour is a Pedders Suspension workshop which is a single storey mechanic workshop building with no windows facing the site. Directly opposite the site at 5 Watsford Road is the Hillsong South West Campus. At 7 Watsford Road is the National Indoor Sports Centre. In the general vicinity, there are also several other places of worship and indoor sporting facilities. It is significant that places of worship do not operate during school hours and the three sports centres experience their busiest hours after school and during school holidays when the students do not attend.

The site is in close proximity to public transport being about a 400m walk from Campbelltown train Station and within easy walking distance of numerous bus services. It is similarly close to the Campbelltown CBD where a range of services are available.

## 3.3 Topography

The ground level of the site undulates with the highest point along the southwestern boundary being 3.86m higher than the ground level at the lowest point along the north-eastern boundary. The site's topography will necessitate some excavation but does not present any constraints that would impede the proposed development.

## 3.4 Flora and Fauna

A Biodiversity Development Assessment Report Waiver Request has been prepared by Cumberland Ecology (Appendix E) to consider the site's biodiversity value. The site is cleared and vacant land which contains predominantly exotic grasslands and a row of planted native vegetation. As the site is a highly modified area, the proposal is unlikely to have any significant impact on biodiversity values. The project presents very little likelihood of having significant impacts on a threatened species and is suitable for development.

## 3.5 Bush Fire

The subject site is not noted on the 'Campbelltown City Council LGA - Bush Fire Prone Land Map' as being bushfire prone.

## 3.6 European and Aboriginal Archaeological Heritage

The site is not known to contain any items of European heritage significance, nor is it located within a heritage conservation area.

The site is mapped as being 'urban/industrial' on the Campbelltown Council 'Zones of Aboriginal Archaeological Sensitivity' map. The site is not known to contain any items of Aboriginal archaeological significance.

### 3.7 Transport Connections

The site is located on Watsford Road. It is a wide road in a commercial area which accommodates on street parking on both sides of the road without impeding moving vehicles. There are no parking restrictions applied. Commercial buildings line the street with irregularly spaced and infrequent driveways. Driveways are typically long, wide and have good visibility to the street. While on-street parking is available on Watsford Road, Warakirri College does not intend to rely upon its use to meet parking obligations. However, during the construction phase, on-street parking will necessarily be utilised to some extent.

The site is located a 400m walk from Campbelltown Train Station which is serviced by the T8 train line. Near the train station are several bus stops which are serviced by a range of bus services. A designated footpath extends from the Train Station to 4 Watsford Road. Students can access the site from Campbelltown Train Station without being required to cross any roads and without any obstacles.

A Traffic and Car parking Assessment and Traffic Report Addendum have been prepared by GTK Consulting to accompany this SSDA as Appendix C and D.

### 3.8 Services and Utilities

There are existing reticulated water, sewer and electrical infrastructure in the site's vicinity and which is servicing the neighbouring buildings. The site is capable of being connected to the necessary services and utilities.

## 4. Proposed development

### 4.1 Project Description

The development involves the construction of a 2-storey school building with one basement level to be used as the Campbelltown North campus for Warakirri College. The building will have the capacity to accommodate up to 120 students. At full capacity, the college will be operated by 12 full-time equivalent (FTE) staff members. Regular staff will include nine full-time teachers; one head of campus; a counsellor; and two part-time receptionists. Standard operating hours are to be weekdays between 8am-5pm for staff and 9am-3pm for students. The nearby National Indoor Sports Centre will be used for physical education activities.

Warakirri College provides secondary education to disadvantaged young people between the ages of 15 and 22 who have disconnected from mainstream education. Warakirri College fosters a supportive adult educational environment for students, many of whom have disabilities, to obtain their Year 10 Record of School Achievement and their HSC. The College is a State and Commonwealth Government funded Special Assistance School (SAS) and students do not pay fees.

Warakirri College operates three existing campuses located in Fairfield, Blacktown and the Campbelltown CBD. The Watsford Road Campbelltown campus will provide additional places for students who cannot currently be accommodated at the Campbelltown Queen Street campus.

At Warakirri College students learn in very small groups where teachers can offer individualised support to cater for the diversity of learning needs. Classes are culturally diverse with a mix of ages and abilities. Students have the opportunity to work on projects that interest them, gain qualifications and do work experience. This approach provides an opportunity for students who have disconnected from mainstream education to complete their secondary studies in a more accommodating environment. Each year around 70-80% of Warakirri College's Year 10 students continue to HSC studies and around 70% of Year 10 and HSC graduates went on to employment, TAFE or university studies.

Warakirri College is a registered charity and public benevolent institution which is wholly operated by MTC Australia. MTC Australia is also a public benevolent institution and their vision is to shape a society where everyone has the means and motivation to create a life of their choosing. Founded in Sydney in 1989, MTC now provides high impact employment, training and youth programs that help around 20,000 people every year.

### 4.2 Development Overview

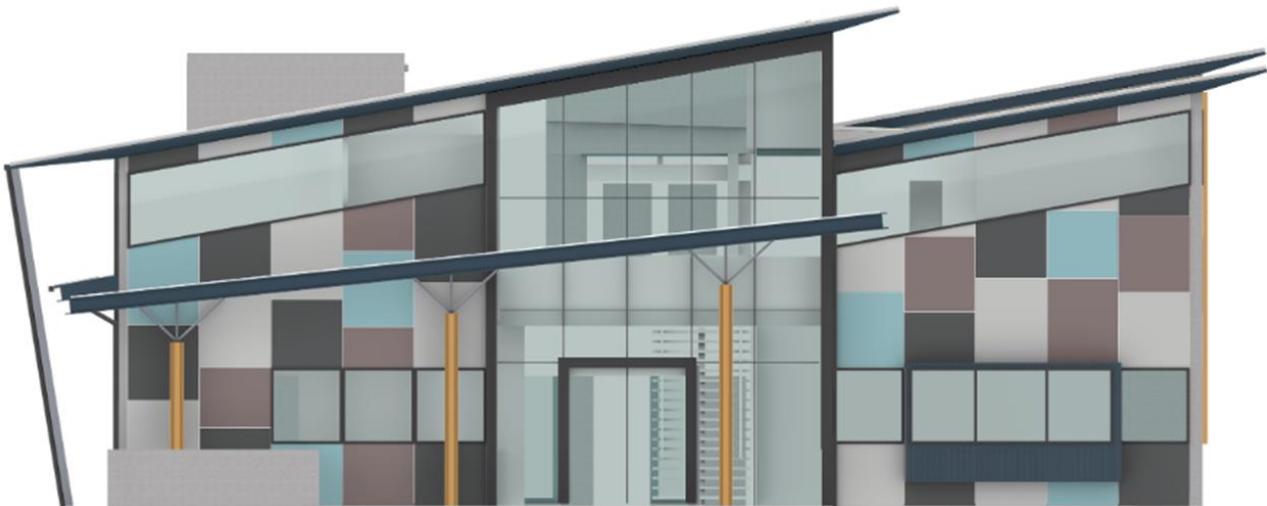
This SSDA proposes the construction of a two-storey building with basement car parking and indoor sport/recreational area for use as a new secondary college campus to be operated by Warakirri College.

More specifically, this SSDA seeks consent to construct a new building with the following elements as shown in the architectural drawings by Koturic + Co (Appendix A):

- Site preparation: Excavation to facilitate a basement level.

- Basement: 11 car parking spaces for staff, including 1 disabled car parking space, bin room, bulk storage room, and an indoor recreational area (290m<sup>2</sup>), lift, and two stairs.
- Ground floor (internal): reception room, staff lunch room, collaborative learning area, bathrooms, function room, Head of Campus' office, food technology and science room with storage room, an external terrace for collaborative learning, stairs and lift.
- Ground floor (external): the ground floor level extends out to a garden area to the rear with places to sit, BBQ facilities, and a vegetable garden. Vehicular access to the site is provided by a 5.3m wide driveway connecting to two at grade car spaces and a down ramp to the basement. Pedestrian access is via a separate pathway located in the middle of the site and adjoined by landscaped front gardens. A bicycle rack is included adjacent to the main entrance.
- First floor: Eight learning spaces (classrooms), staff area with two offices, a quiet break out space, storage room, building services room, bathrooms, stairs and lift.
- Signage: An illuminated pylon sign (1.2m x 2.4m) is proposed within the front setback adjoining the pedestrian entrance to the site. Two school identification signs are proposed with one on the north-west elevation and one on the south-west elevation. Both identification signs are located on the roof of the covered entranceway.

The construction phase of the development is anticipated by MBM Quantity Surveyors (Appendix H) to generate the equivalent of 17 full-time jobs during the construction phase.



*Figure 7 - Render of northwest (Watsford Road) elevation*



*Figure 8 - Render of South east elevation*



*Figure 9 - Render of Southwest elevation*



*Figure 10 - Render of Northeast elevation*

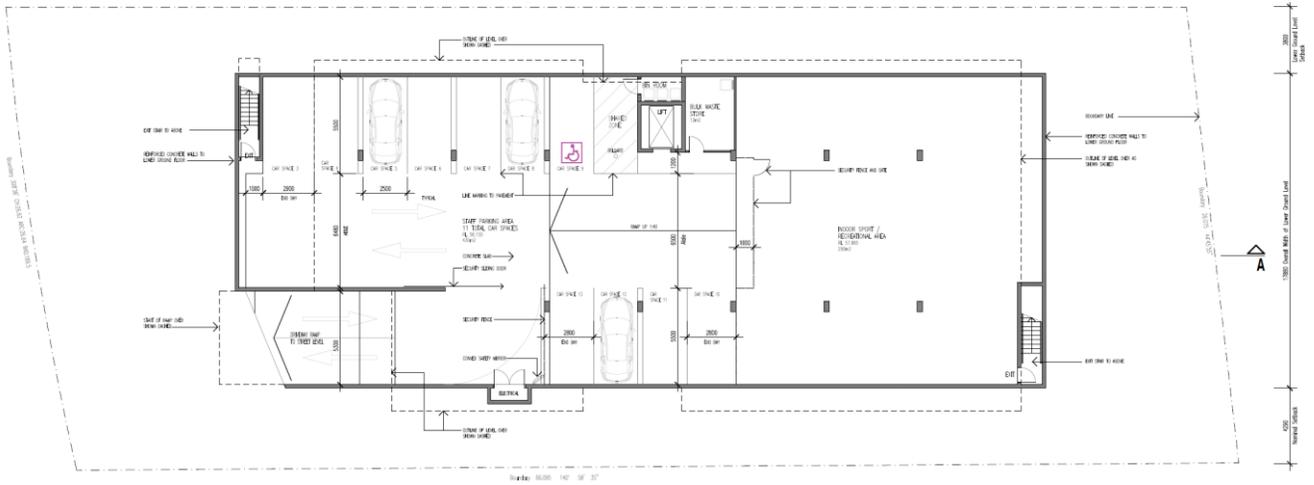


Figure 11 - Basement floor plan

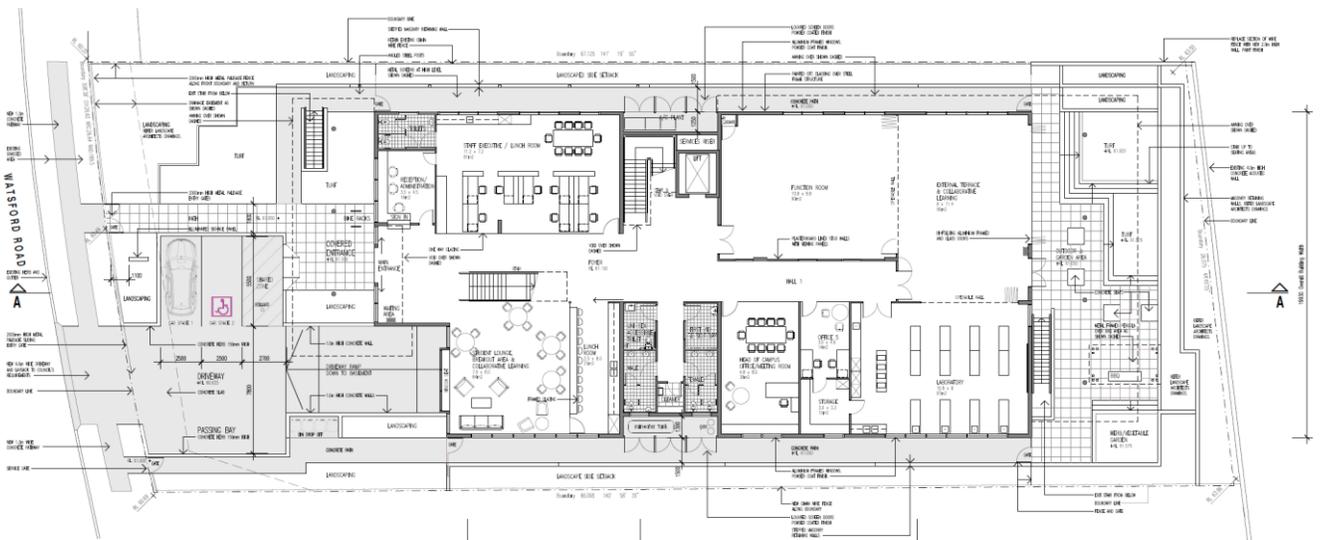


Figure 12 - Ground floor plan

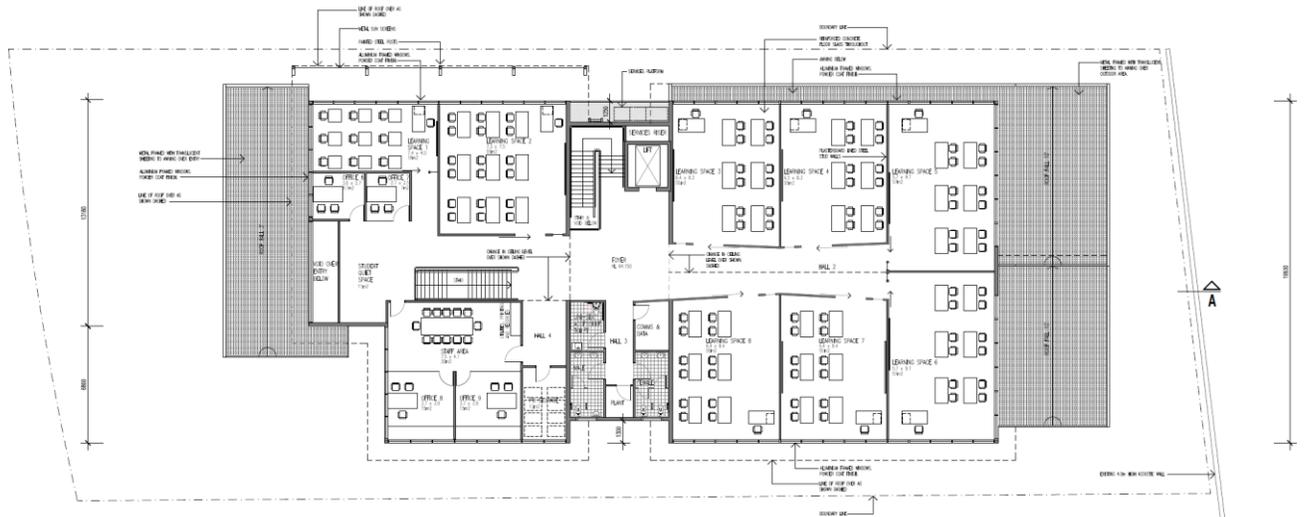


Figure 13 - Level 1 floor plan

### 4.3 Built Form and Urban Design

The proposed built form has been designed to complement the surrounding area, minimise environmental impacts on surrounding development and provide an exceptional learning environment for staff and students.

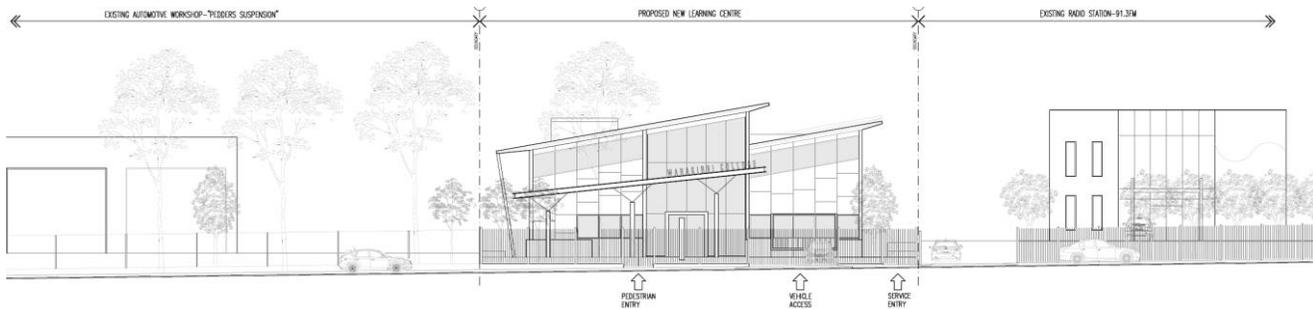


Figure 14 - Streetscape character analysis



Figure 15 - 3D render of the proposed building

#### Complements the Surrounding Area

The surrounding area is commercial and light industrial in character. It is characterised by two-storey warehouse-style developments with large setbacks and minimal articulation as shown in figures 3-6 and 11. The proposed design is commensurate with the predominant scale of surrounding buildings being 2-storeys. It utilises a large front setback responding to neighbouring buildings and provides significant side setbacks in keeping with the neighbourhood character. The front fence is proposed to be a palisade fence which will not obscure sightlines to the main façade which matches the fencing of 6 Watsford Road.

The design has a highly articulated and modulated front façade which makes use of sloped roofs and awnings. While the scale is consistent with surrounding development, the use of angular forms will make the building

visually distinctive and add visual interest to the street. Landscaped setbacks are common along Watsford Road and the landscape design of the proposal is consistent with this existing character and of a high quality so as to provide additional visual interest.

The proposal is broadly consistent with the existing pattern of development but will enhance the visual interest of the street.

#### Minimise Environmental Impacts

The proposal is located within a business zoned area and is not in close proximity to any sensitive land uses. Notwithstanding, the amenity of the neighbouring sites has been considered in the design.

The proposal is to be constructed north of the railway line. Accordingly, it will have no adverse shadow impact on surrounding developments, which in any event, are commercial buildings which do not contain sensitive land uses.

Warakirri will serve a maximum of 120 students between the ages of 15-22. The College's sports and recreation area is located at the basement level which will ensure minimal noise impacts as a result of its use. A student breakout and lunch area is located on the ground floor of the building which will similarly limit noise from students during break periods. An outdoor garden area is provided to the rear of the site which is laid out to discourage the areas use for sports or similar activities limiting the noise creation from this area.

The College intends to use the National Indoor Sports Centre, which is located across Watsford Road, for the students' formal sport classes.

The proposal includes a Landscape design by Impact Planners which includes planting of trees, reaching heights of up to 6m once mature, along the side boundaries of the site. While the neighbouring sites are commercial in use, this will ensure that there is an appropriate visual separation between the sites.

#### Amenity of Students

Warakirri College currently operates three campuses. The experience of operating these campuses has informed the proposed design which is purpose-built for Warakirri College.

The design is largely open plan with flexible and adaptable spaces such as the function areas at Ground Level. The classrooms are designed to a variety of sizes to accommodate different class styles. A variety of spaces are provided allowing students space to take time for themselves such as the 'student quiet space' on Level 1 which serves the significant number of students who suffer extreme anxiety. The campus has been designed to provide high levels of natural light with large windows in all classrooms while using eaves to limit glare and direct sun exposure.

The campus has been purposefully designed to provide an exceptional adult learning environment for the students of Warakirri College.

## 4.4 External Finishes

The proposed school building has been designed to use high-quality external materials and finishes which are appropriate to the site's context. The materials are durable and will require low levels of maintenance. The materials include:

- Lysaght Trimdeck profiled roof cladding
- Polycarbonate profiled awning sheeting
- Structural steel with galvanised finish
- Metal Profiled cladding on eaves and gutters
- Precast concrete off-form finish
- Compressed Fibre Cement (CFC) wall cladding
- Ribbed metal wall cladding
- Powder coated aluminium window and door frames
- Metal palisade fencing
- Expanded mesh panel screen and doors

For more details see the External Schedule of Finishes and Materials at Appendix I.

## 4.5 Landscaping

A Landscape Plan has been prepared by Impact Planners and is Appendix J to this EIS. The landscaping is intended to nurture a green aspect while providing visual separation between the site, its neighbours and the train line. The concept includes the following key elements:

- Native vegetation selected to be attractive, low maintenance.
- Artificial grass used in open sections to minimise water use and maintenance.
- Vegetation lined entryway to mark the College's entrance.
- A small open space at the entrance to provide an extended outdoor area.
- A ground-level courtyard at the rear of the site with spaces for students to sit and interact including concrete seats and steps. The courtyard area is partially covered by an awning to allow use in all weather.
- Raised artificial grass seating areas providing steps for use as seating.
- A raised vegetable and herb garden.
- A barbecue located under a pergola.
- Separation of the site from the railway corridor and neighbouring buildings using vegetation in raised planter boxes.

All proposed flora species have been chosen to ensure they are safe within a school environment. They will assist in fostering an attractive and safe environment and contribute to the green character of Campbelltown.

## 4.6 Parking and School Drop Off

The proposal includes 11 permanent basement car spaces (including one accessible space) which will be reserved for staff. The site's vehicle entry and exit point is from Watsford Road. Access to the basement parking is restricted by a security gate. The site also includes two parking spaces (one is accessible) at the ground level which will be for visitors and drop offs.

The current experience of Warakirri College suggests that the great majority of students will access the school through a combination of walking and public transport. Students are issued with school Opal cards subsidising their use of public transport. Many of Warakirri's students come from disadvantaged backgrounds and they rarely access the site by private vehicle. It is extremely rare for students to access the site with their own private vehicle. Therefore, the two short term visitor spaces on the Ground Level will be sufficient to accommodate the few school drop-offs which may be made by private vehicle.

Four bicycle parking spaces are also proposed at the main entrance which will be for the use of staff and students.

Pedestrian access to the site is available from Watsford Road through a primary entrance gate which leads to the main entrance. This access point provides equitable access and does not have any steps.

## 4.7 Accessibility

Warakirri College is designed to be an inclusive environment for all students. The existing proposal will allow wheelchair access to all primary areas of the College and is capable of complying with the relevant accessibility standards. An Access Assessment Report (Appendix K) and a BCA Report (Appendix L) have been prepared by BCA Logic which demonstrates that the design is capable of meeting all relevant access requirements.

## 5. Statutory Context

The proposal will be considered against the following statutory planning policies as dictated in the SEARs:

- *Biodiversity Conservation Act 2016*
- State Environmental Planning Policy (State & Regional Development) 2011
- State Environmental Planning Policy (Sydney Region Growth Centres) 2006
- State Environmental Planning Policy (Infrastructure 2007)
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017
- State Environmental Planning Policy No. 64 – Advertising and Signage
- State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55)
- Draft State Environmental Planning Policy (Remediation of Land)
- Draft State Environmental Planning Policy (Environment)
- Campbelltown Local Environmental Plan 2015
- Campbelltown DCP 2015

### 5.1 Biodiversity Conservation Act 2016

Cumberland Ecology has undertaken an assessment of the need for a Biodiversity Assessment Report (BDAR) under the NSW *Biodiversity Conservation Act 2016*. They have recommended that the Department of Planning, Industry and Environment provide a waiver as their investigation has shown the project is highly unlikely to have any significant impact on biodiversity values. The Biodiversity Development Assessment Report Waiver Request is attached as Appendix E.

The waiver request was provided to the Department of Planning, Industry and Environment by email on 18/02/2020 and its receipt was acknowledged. If the waiver is accepted by the Department, the proposal's requirements under the NSW *Biodiversity Conservation Act 2016* will have been satisfied.

### 5.2 State Environmental Planning Policy (State & Regional Development) 2011

Schedule 1 of the State Environmental Planning Policy (State & Regional Development) 2011 details general criteria defining state significant developments. Regarding educational establishments Clause 15 states:

#### **15 Educational establishments**

- (1) Development for the purpose of a new school (regardless of the capital investment value).
- (2) *Development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school.*

*(3) Development for the purpose of a tertiary institution (within the meaning of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017), including associated research facilities, that has a capital investment value of more than \$30 million.*

The proposal is for the development of a new school and is accordingly a state significant development. In response, this application is being lodged as an SSDA with the NSW Department of Planning, Industry, and Environment.

### 5.3 State Environmental Planning Policy (Sydney Region Growth Centres) 2006

State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (Growth Centres SEPP) sets out the provisions for development that is located within the Sydney Priority Growth Areas. The site is located in the Greater Macarthur Precinct. The proposal's compliance with 'Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area' is considered under Section 6.13 of this EIS. The proposal is not inconsistent with the Growth Centres SEPP.

### 5.4 State Environmental Planning Policy (Infrastructure 2007)

Subdivision 2 of the Infrastructure SEPP requires development in or adjacent to rail corridors to consider the impact of rail noise or vibration on the future site users of the subject site.

More specifically,

- Clause 85 Development adjacent to rail corridors - requires that development which involves the use of a crane in airspace above a rail corridor requires the rail authority must be notified and their comments taken into consideration during assessment.
- Clause 86 *Excavation in, above, below or adjacent to rail corridors* - requires any development that involves the penetration of ground to a depth of at least 2m below ground level within 25m of a rail corridor to be referred to the rail authority for review and comment.
- Clause 87 *Impact of rail noise or vibration on non-rail development* - requires development for the purpose an educational establishment to take into consideration the likely adverse impact cause by rail noise or vibration, and any guidelines issued by the Secretary.

#### **85 Development adjacent to rail corridors**

*(1) This clause applies to development on land that is in or adjacent to a rail corridor, if the development—*

*(a) is likely to have an adverse effect on rail safety, or*

*(b) involves the placing of a metal finish on a structure and the rail corridor concerned is used by electric trains, or*

*(c) involves the use of a crane in air space above any rail corridor, or*

*(d) is located within 5 metres of an exposed overhead electricity power line that is used for the purpose of railways or rail infrastructure facilities.*

*Note. Clause 45 also contains provisions relating to development that is within 5 metres of an exposed overhead electricity power line.*

**Comment** – The development site is adjacent to a rail corridor and involves the use of a crane. The Construction Environmental Management Plan which accompanies this EIS considers the use of a crane on-site and requires that approval be granted by the rail authority prior to the use of any equipment in the airspace over the rail corridor, should that be required.

*(2) Before determining a development application for development to which this clause applies, the consent authority must—*

*(a) within 7 days after the application is made, give written notice of the application to the rail authority for the rail corridor, and*

*(b) take into consideration—*

*(i) any response to the notice that is received within 21 days after the notice is given, and*

*(ii) any guidelines that are issued by the Secretary for the purposes of this clause and published in the Gazette.*

**Comment** – The consent authority must provide written notice to the rail authority.

**Clause 86 Excavation in, above, below or adjacent to rail corridors**

*(1) This clause applies to development (other than development to which clause 88 applies) that involves the penetration of ground to a depth of at least 2m below ground level (existing) on land—*

*(b) within 25m (measured horizontally) of a rail corridor, or*

**Comment** – The site is within 25m horizontally of a rail corridor.

*(2) Before determining a development application for development to which this clause applies, the consent authority must—*

*(a) within 7 days after the application is made, give written notice of the application to the rail authority for the rail corridor, and*

*(b) take into consideration—*

*(i) any response to the notice that is received within 21 days after the notice is given, and*

*(ii) any guidelines issued by the Secretary for the purposes of this clause and published in the Gazette.*

**Comment** – The consent authority must provide written notice to the rail authority.

*(3) Subject to subclause (5), the consent authority must not grant consent to development to which this clause applies without the concurrence of the rail authority for the rail corridor to which the development application relates.*

*(4) In deciding whether to provide concurrence, the rail authority must take into account—*

*(a) the potential effects of the development (whether alone or cumulatively with other development or proposed development) on—*

*(i) the safety or structural integrity of existing or proposed rail infrastructure facilities in the rail corridor, and*

*(ii) the safe and effective operation of existing or proposed rail infrastructure facilities in the rail corridor, and*

*(b) what measures are proposed, or could reasonably be taken, to avoid or minimise those potential effects.*

*(5) The consent authority may grant consent to development to which this clause applies without the concurrence of the rail authority concerned if—*

*(a) the rail corridor is owned by or vested in ARTC or is the subject of an ARTC arrangement, or*

*(b) in any other case, 21 days have passed since the consent authority gave notice under subclause (2)(a) and the rail authority has not granted or refused to grant concurrence.*

**Comment** – It is noted that the concurrence of the rail authority is required.

#### **Clause 87 Impact of rail noise or vibration on non-rail development**

*(1) This clause applies to development for any of the following purposes that is on land in or adjacent to a rail corridor and that the consent authority considers is likely to be adversely affected by rail noise or vibration—*

*(d) an educational establishment or centre-based child care facility.*

*(2) Before determining a development application for development to which this clause applies, the consent authority must take into consideration any guidelines that are issued by the Secretary for the purposes of this clause and published in the Gazette.*

**Comment** – This clause will apply to the proposal which is for an educational establishment. The relevant noise and vibration criteria have been addressed in the Acoustic Assessment by Acoustic Logic (Appendix G).

Regarding internal noise levels, the Educational Facilities Standards and Guidelines (EFSG) states that rail noise for general learning areas shall be assessed consistent with the requirements of Clause 87 of the SEPP (Infrastructure) 2007, and that the internal noise level requirements for school classrooms presented in NSW DoECC Interim Guidelines for Assessment of Noise from Rail Infrastructure Projects is to be used in the assessment. To this end, an Acoustic Assessment was undertaken by Acoustic Logic and is attached as

Appendix G. The Acoustic Assessment considered the proposed development would be able to provide acceptable internal noise levels subject to the adoption of construction material and standard recommendations, including:

- Glazed windows and doors with minimum 6.38mm glazing laminated thickness and supported with acoustic seals.
- Roof and ceiling construction with specified internal and external roof lining thickness, and truss system.
- External wall construction with specified internal and external roof lining thickness, and truss system.

In terms of vibration comfort, the train vibration measurements conducted and illustrated in assessment report identified that the vibration dose experienced at the site when a train passes is within comfortable and acceptable levels prescribed by the applicable British and Australian Standards.

Accordingly, the provisions of SEPP (Infrastructure) 2007 are considered to have been satisfied by the proposal.

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

State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (‘the Education SEPP’) applies to the development of child care centres, schools, TAFEs and universities. Under Clause 8, the Education SEPP overrides any controls which would otherwise apply to the site under the Campbelltown LEP 2015 and DCP 2015 where they contradict the provisions of the Education SEPP.

The site is located in a B5 zone under the Campbelltown LEP 2015 which does not permit the development of Educational Facilities. Under Clause 33 of the Education SEPP, a B5 Business Development Zone is listed as being a “prescribed zone”. Under Clause 35(1) “Development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone”. The Education SEPP prevails and Educational Facilities are permitted within the B5 zone.

The consent authority for the development of a new school campus on site would be required under Clause 35(6) to consider:

*“(a) the design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4, and*

*(b) whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.”*

Table 2, below, considers the proposal’s compliance with Clause 35 of the Education SEPP. Table 3 considers the proposal’s compliance with the 7 design principles contained in Schedule 4.

*Table 2 - Compliance with the relevant clauses of the State Environmental Planning Policy (Educational Establishments*

CLAUSE	SPECIFIC PROVISIONS	COMPLIANCE
35(1)	<i>Development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone.</i>	<p><b>Complies.</b></p> <p>The site is located within a B5 zone which is a prescribed zone under the SEPP.</p>
35(5)	<i>A school (including any part of its site and any of its facilities) may be used, with development consent, for the physical, social, cultural or intellectual development or welfare of the community, whether or not it is a commercial use of the establishment.</i>	<p><b>Complies.</b></p> <p>The proposal is for use of the site by Warakirri College which is a public benevolent institution with charity status. No use of the site other than by Warakirri College is currently proposed. This does not preclude the possible future use of the site for other forms of community benefit.</p>
35(6)	<p><i>Before determining a development application for development of a kind referred to in subclause (1), (3) or (5), the consent authority must take into consideration:</i></p> <p><i>(a) the design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4, and</i></p> <p><i>(b) whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.</i></p>	<p><b>Complies.</b></p> <p>a) The proposal generally complies with the principles of Schedule 4. As shown in the table below, to the extent that the proposal varies from the requirements of the Schedule, it is contextually appropriate and justified by the nature of the School as a Special Assistance School run as an adult learning environment.</p> <p>b) The proposed design does not preclude the possibility of Warakirri College offering some form of community use of the facilities in the future. Existing Warakirri College campuses regularly share facilities by making space available for community uses such as meetings, training sessions and conferences for the Youth Workers Network, local community groups, indigenous community groups. This would be subject to future discussions with relevant groups and development consent if required.</p>
35(9)	<i>A provision of a development control plan that specifies a requirement, standard or control in relation to development of a kind referred to in subclause (1), (2), (3) or (5) is of no effect, regardless of when the development control plan was made.</i>	<p><b>Complies.</b></p> <p>The Campbelltown DCP 2015 does not provide guidance for school developments.</p>

Table 3 - Compliance with Schedule 4 of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017

PRINCIPLE	COMPLIANCE
<p><b>Principle 1—context, built form and landscape</b></p> <p><i>Schools should be designed to respond to and enhance the positive qualities of their setting, landscape and heritage, including Aboriginal cultural heritage. The design and spatial organisation of buildings and the spaces between them should be informed by site conditions such as topography, orientation and climate.</i></p> <p><i>Landscape should be integrated into the design of school developments to enhance on-site amenity, contribute to the streetscape and mitigate negative impacts on neighbouring sites.</i></p> <p><i>School buildings and their grounds on land that is identified in or under a local environmental plan as a scenic protection area should be designed to recognise and protect the special visual qualities and natural environment of the area, and located and designed to minimise the development’s visual impact on those qualities and that natural environment.</i></p>	<p><b>Complies.</b></p> <p>The development responds appropriately to the shape and orientation of the block, and to neighbouring developments providing 3.25m side setbacks.</p> <p>The internal layout and organisation of the building has been designed caringly for use as a learning centre and is considered to achieve an appropriate balance of maximising solar access whilst minimising heat gain through the use of a south-north descending skillion roof form and supporting large glazed windows to the learning spaces.</p> <p>Landscaping is integrated into the design of the building and will provide appropriate streetscape amenity and affords adjoining properties with a greater level of privacy.</p>
<p><b>Principle 2—sustainable, efficient and durable</b></p> <p><i>Good design combines positive environmental, social and economic outcomes. Schools and school buildings should be designed to minimise the consumption of energy, water and natural resources and reduce waste and encourage recycling.</i></p> <p><i>Schools should be designed to be durable, resilient and adaptable, enabling them to evolve over time to meet future requirements.</i></p>	<p><b>Complies.</b></p> <p>The building has been designed to minimise consumption of energy and improve water capture through the use of a skillion roof design directed into accompanying water tanks on the southern side of the building, and climate considered placement of windows.</p> <p>The proposal is demonstrated in the Section J Report by BCA Energy (Appendix M) to satisfy Section J of the National Construction Code, in terms of building energy efficiency requirement.</p> <p>The building would be theoretically capable of being converted towards an alternative permissible use, such as a commercial office or child care centre, in the future.</p>

<p><b>Principle 3—accessible and inclusive</b></p> <p><i>School buildings and their grounds should provide good wayfinding and be welcoming, accessible and inclusive to people with differing needs and capabilities.</i></p> <p><i>Schools should actively seek opportunities for their facilities to be shared with the community and cater for activities outside of school hours.</i></p>	<p><b>Capable of complying.</b></p> <p>The entrance is clearly visible from the street, and the building incorporates a reception desk directly next to the entrance in support of site visitor wayfinding. The building is relatively small and the open design of both above-ground levels will make wayfinding simple and straightforward for the building’s users.</p> <p>The design has been demonstrated to be capable of satisfying the relevant accessibility standards in the accompanying Access Assessment Report (Appendix K) and BCA Report (Appendix L) both produced by BCA Logic.</p> <p>By virtue of providing schooling opportunities to students have disconnected from mainstream schooling, the proposal supports the realisation of greater inclusiveness schooling within the community.</p> <p>The building includes a function room which is connected to an external terrace. This area could theoretically be used by the community outside of school hours for a variety of purposes.</p>
<p><b>Principle 4—health and safety</b></p> <p><i>Good school development optimises health, safety and security within its boundaries and the surrounding public domain, and balances this with the need to create a welcoming and accessible environment.</i></p>	<p><b>Capable of complying.</b></p> <p>The proposal includes a security fence on the perimeter of the site to promote the safety of students and staff.</p> <p>Landscaping is proposed within the setbacks of the lot which softens the visual appearance of the proposed building and ensures it will become a positive element within the Watsford Road streetscape.</p>
<p><b>Principle 5—amenity</b></p> <p><i>Schools should provide pleasant and engaging spaces that are accessible for a wide range of educational, informal and community activities, while also considering the amenity of adjacent development and the local neighbourhood.</i></p> <p><i>Schools located near busy roads or near rail corridors should incorporate appropriate noise mitigation measures to ensure a high level of amenity for occupants.</i></p> <p><i>Schools should include appropriate, efficient, stage</i></p>	<p><b>Capable of complying.</b></p> <p>The building’s frontage is setback appropriately from Watsford Road and the neighbouring developments.</p> <p>An existing acoustic wall is being retained between the development and the rail line in order to provide acoustic protection.</p> <p>The Acoustic Assessment by Acoustic Logic (Appendix G) demonstrates the proposal’s compliance with the applicable acoustic standards and suitability in terms of local acoustic amenity subject to the adoption of</p>

<p><i>and age appropriate indoor and outdoor learning and play spaces, access to sunlight, natural ventilation, outlook, visual and acoustic privacy, storage and service areas.</i></p>	<p>recommended construction standards.</p> <p>Warakirri College services students of 15 to 22 years in age and does not require large outdoor play areas. The design includes multiple spaces for students to use during breaks including an indoor sport/recreational area, student lounge, external terrace and an outdoor garden area.</p>
<p><b>Principle 6—whole of life, flexible and adaptive</b></p> <p><i>School design should consider future needs and take a whole-of-life-cycle approach underpinned by site wide strategic and spatial planning. Good design for schools should deliver high environmental performance, ease of adaptation and maximise multi-use facilities.</i></p>	<p><b>Capable of complying.</b></p> <p>The design is capable of accommodating additional community uses as per Principle 3.</p> <p>Sustainability has been considered under Principle 2.</p> <p>The building would be theoretically suitable for future conversion towards office use, or possibly child-care use, should Warakirri no longer operate from the building.</p>
<p><b>Principle 7—aesthetics</b></p> <p><i>School buildings and their landscape setting should be aesthetically pleasing by achieving a built form that has good proportions and a balanced composition of elements. Schools should respond to positive elements from the site and surrounding neighbourhood and have a positive impact on the quality and character of a neighbourhood.</i></p> <p><i>The built form should respond to the existing or desired future context, particularly, positive elements from the site and surrounding neighbourhood, and have a positive impact on the quality and sense of identity of the neighbourhood.</i></p>	<p><b>Not applicable</b></p> <p>The proposed design presents a frontage which is appropriate to the context of the surrounding development and which will make a positive contribution to the streetscape.</p> <p>As illustrated in the accompanying Landscape Plan, the proposal will incorporate an aesthetically pleasing landscape design.</p> <p>The site is located within close proximity to a variety of public transport, public open spaces and commercial facilities.</p>

In addition to the design principles outlined in Schedule 4, the Education SEPP provides controls under Schedule 2 for complying development where existing schools make alterations or additions. While the development of a new school is not complying development, these controls have been used to guide design and assessment. The proposed development is considered against the relevant controls from Schedule 2 in the Table 4 below.

Table 4 - Compliance with Schedule 2 of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017

CLAUSE	CONTROL	COMPLIANCE								
2 Building height	<i>The building height of a building (whether a new building, or an existing building as a result of an addition or alteration):</i> <i>(a) must not exceed 4 storeys, and</i> <i>(b) must not exceed 22m from ground level (mean).</i>	<b>Complies.</b> The building design is two storeys and 9.3m in height.								
3 Side and rear setback	<table border="1"> <thead> <tr> <th>Building height</th> <th>Side and rear setback</th> </tr> </thead> <tbody> <tr> <td>12m or less</td> <td>1m</td> </tr> <tr> <td>12m-15m</td> <td>2.5m</td> </tr> <tr> <td>15m-22m</td> <td>10m</td> </tr> </tbody> </table>	Building height	Side and rear setback	12m or less	1m	12m-15m	2.5m	15m-22m	10m	<b>Complies.</b> The building design is less than 12m in height and requires a minimum side and rear setbacks of 1m. The side setbacks are 3.25m. The rear setback greatly exceeds 1m.
Building height	Side and rear setback									
12m or less	1m									
12m-15m	2.5m									
15m-22m	10m									
4 Front setback	<i>(1) A new building must have a front setback:</i> <i>(a) that is not less than the average distance of the front setbacks of all existing development that is located within 70m of the building</i>	<b>N/A</b> The relevant front setback control will be as applied by the Campbelltown DCP 2015 which requires a 10m setback. A building setback of greater than 10m has been applied in the design of the proposal.								
5 Design and materials	<i>A new building or an alteration or addition to an existing building must comply with the following:</i> <i>(a) any new external walls or roof of the building must be constructed of non-reflective material,</i> <i>(b) any external walls of the building that face a public road or reserve must contain windows.</i>	<b>Complies.</b> <i>(a) The building is proposed to be constructed of non-reflective materials, including colourbond roof and walls with precast concrete with off-form finish.</i> <i>(b) Windows to Watsford Road are proposed.</i>								
6 Noise	<i>A new building or (if the development is an alteration or addition to an existing building for the purpose of changing its use) an existing building that is to be used for the purpose of a school or school-based child care must be designed so as not to emit noise exceeding an LAeq of 5 dB(A) above background</i>	<b>Complies.</b> The proposal is demonstrated to be capable of complying with applicable acoustic standards subject to the use of select								

	noise when measured at any lot boundary.	building materials as recommended in the Acoustic Assessment in (Appendix G).
<p><b>10</b></p> <p><b>Waste</b></p>	<p>(1) A garbage and waste storage area for recyclable and non-recyclable waste materials and receptacles for those materials must:</p> <p>(a) be provided as part of the development, and</p> <p>(b) be located entirely within the lot on which the development is being carried out and not on a road or road reserve, and</p> <p>(c) comply with the following appendices in the document titled <i>Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities (ISBN 978 1 74293 944 5)</i>, published by the NSW Environment Protection Authority in December 2012:</p> <p>(i) Appendices A and B, for the size and location of garbage and storage areas and the size of waste receptacles,</p> <p>(ii) Appendices C and D, for the design of openings of waste storage areas and loading bay turning circles for waste removal vehicles,</p> <p>(iii) Appendix E, for standard signs for waste storage areas,</p> <p>(iv) Appendix F, for the design and operational capacity of waste storage areas.</p> <p>(2) The waste storage area must:</p> <p>(a) be screened, and</p> <p>(b) be located behind the primary road frontage building line, and</p> <p>(c) not be located in any car parking, loading or landscaped area, and</p>	<p><b>Complies.</b></p> <p>A bin room and bulk storage room are provided within the basement level in proximity to lift access. A ‘bin cupboard’ drop-off area is provided on the western boundary adjacent to the basement ramp.</p> <p>A Trade Waste Management Plan has been prepared by Waste Tech Services and attached as Appendix N which demonstrates that the proposed waste areas are suitable for the development.</p>
<p><b>11</b></p> <p><b>Earthworks</b></p>	<p>(1) Earthworks for the purposes of the development must:</p> <p>(a) be structurally supported in accordance with subclause (2), and</p> <p>(e) if the works are on a lot adjacent to a rail corridor—have a setback at least 3m from the corridor.</p>	<p><b>Capable of Compliance.</b></p> <p>(1) The proposed earthworks are setback greater than 3m from the lot’s rear boundary with the rail corridor.</p>

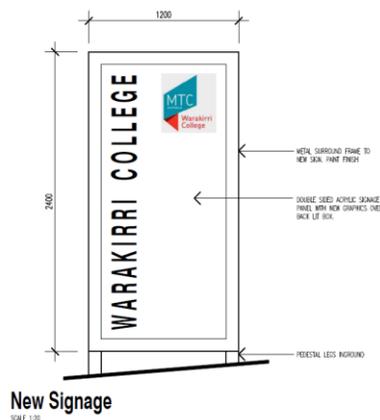
	<p><i>(2) Structural support for earthworks more than 1m above or below ground level (existing) must take the form of a retaining wall or other form of structural support that:</i></p> <ul style="list-style-type: none"> <li><i>(a) has been certified by a professional engineer, and</i></li> <li><i>(b) has adequate drainage lines connected to an existing stormwater drainage system for the site, and</i></li> <li><i>(c) does not redirect the flow of any water or cause sediment to be transported onto an adjoining property, and</i></li> <li><i>(d) is not higher than 3m, and</i></li> <li><i>(e) is separated from any other structural support on the site by at least 2m, measured horizontally.</i></li> </ul> <p><i>(3) Fill, for the purpose of the development, must:</i></p> <ul style="list-style-type: none"> <li><i>(a) not raise the ground level (existing) more than 2m, and</i></li> <li><i>(b) be wholly contained by structural support in accordance with subclause (2), and</i></li> <li><i>(c) be located at least 40m from any waterbody (natural).</i></li> </ul>	<p>(2) Construction of the proposed retaining walls can be subject to certification by a professional engineer as prescribed within a development consent.</p> <p>(3) The development is designed in with the site contours in mind. Ground-level is not sought to be raised.</p>
<p>12 Drainage</p>	<p><i>(1) All stormwater drainage collecting as a result of the development must be conveyed by a gravity fed or charged system to:</i></p> <ul style="list-style-type: none"> <li><i>(a) a public drainage system, or</i></li> <li><i>(b) an inter-allotment drainage system, or</i></li> <li><i>(c) an on-site disposal system.</i></li> </ul> <p><i>(2) All stormwater drainage systems within a lot and the connection to a public or an inter-allotment drainage system must:</i></p> <ul style="list-style-type: none"> <li><i>(a) if an approval is required under section 68 of the Local Government Act 1993, be approved under that Act, or</i></li> <li><i>(b) if an approval is not required under section 68 of the Local Government Act 1993, comply with any requirements for the disposal of stormwater drainage contained in a development control plan that is applicable to the land.</i></li> </ul>	<p><b>Complies.</b></p> <p>The proposed concept stormwater drainage system uses a gravity-fed system and connects to the street drainage system of Watsford Road.</p> <p>Refer to the accompanying Stormwater Plans in Appendix O.</p>

## 5.6 State Environmental Planning Policy No. 64 – Advertising and Signage

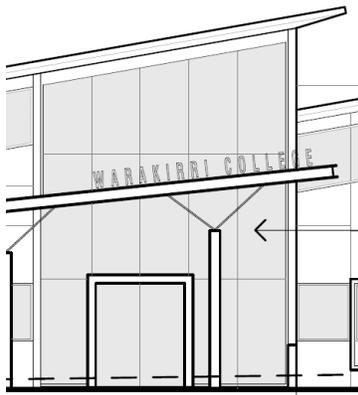
State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64) aims to regulate advertising and signage. Clause 8 requires that to grant consent to signage, the consent authority must be satisfied that the signs are consistent with the policy objectives under 3(1)(a) and the assessment criteria under Schedule 1.

The proposed development includes one business identification sign and two building identification signs, as described below:

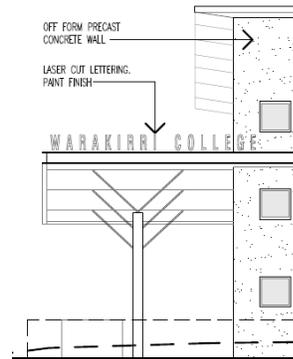
- 1) Pylon sign, located in the middle of the site, adjacent to the front boundary. The sign is 1.2m wide and 2.4m high and will be backlit.
- 2) Building identification sign (displaying Warakirri College) located on the entrance awning on the north-west elevation. The sign is less than 2.5m<sup>2</sup> in size.
- 3) Building identification sign (displaying Warakirri College) located on the entrance awning on the south-west elevation. The sign is less than 2.5m<sup>2</sup> in size.



1) Pylon sign



2) North west elevation



3) South west elevation

### Clause 3 Aims, objectives etc

(1) *This Policy aims:*

(a) *to ensure that signage (including advertising):*

- (i) is compatible with the desired amenity and visual character of an area, and*
- (ii) provides effective communication in suitable locations, and*
- (iii) is of high quality design and finish, and*

**Comment** – The proposal is consistent with the relevant aims in so far as:

- (i) The signs are located within a business park where surrounding development make use of large format business identification signage including wall signs and free-standing signs. The proposed signs are modest in comparison to size of surrounding signs.

- (ii) The signs simply communicate the College’s name and operating organisation. The pylon sign is appropriately located in the buildings front landscaping but within the school’s fence. The sign will assist in wayfinding for passing cars and pedestrians without presenting any form of hazard. The building identification signs are located appropriately above the primary entrance.
- (iii) The pylon sign is proposed to use a metal frame and a double-sided acrylic signage panel with a backlit box. The business identification signs use free-standing letters located within architectural building elements. The proposed signs represent a high-quality design and finish.

Schedule 1 provides eight criteria for the assessment of signage. They are considered in Table 5 below.

Table 5 - SEPP 64 Schedule 1 compliance

CRITERIA	REQUIREMENT	COMPLIANCE
<b>1 Character of the area</b>	<ul style="list-style-type: none"> <li>• <i>Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?</i></li> <li>• <i>Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?</i></li> </ul>	<p><b>Complies.</b></p> <p>The signs are located within a business park where surrounding development make use of large format business identification signage including wall signs and freestanding signs. The proposed signs are modest in scale compared to existing surrounding signs. Their design, style and quality that is compatible with the existing character of the business park in which the proposal is located.</p> <p>The signs conform to the established theme of clutter free and clear visual identification of the business within the park.</p>
<b>2 Special areas</b>	<ul style="list-style-type: none"> <li>• <i>Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?</i></li> </ul>	<p><b>Complies.</b></p> <p>The signage will be located in a newer portion of the Campbelltown industrial / business park.</p> <p>The signs are proposed on a site which is not located on a ridge or highly visible within the business park or extended area. Accordingly, the proposal will not impact on any high visual quality vistas or landscapes.</p>
<b>3 Views and vistas</b>	<ul style="list-style-type: none"> <li>• <i>Does the proposal obscure or compromise important views?</i></li> <li>• <i>Does the proposal dominate the skyline and reduce the quality of vistas?</i></li> </ul>	<p><b>Complies.</b></p> <p>The proposal is sensibly located within the site and of an appropriate scale to ensure that the</p>

	<ul style="list-style-type: none"> <li>• <i>Does the proposal respect the viewing rights of other advertisers?</i></li> </ul>	views to and from adjoining properties are not unduly impacted.
4 Streetscape, setting or landscape	<ul style="list-style-type: none"> <li>• <i>Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?</i></li> <li>• <i>Does the proposal contribute to the visual interest of the streetscape, setting or landscape?</i></li> <li>• <i>Does the proposal reduce clutter by rationalising and simplifying existing advertising?</i></li> <li>• <i>Does the proposal screen unsightliness?</i></li> <li>• <i>Does the proposal protrude above buildings, structures or tree canopies in the area or locality?</i></li> <li>• <i>Does the proposal require ongoing vegetation management?</i></li> </ul>	<p><b>Complies.</b></p> <p>The scale and placement of the proposed pylon sign is coherent with the existing signage in the business park streetscape.</p> <p>The high-quality design and finish proposed for the building identification signs will contribute to the overall visual interest of the college building and therefore contribute positively to the Watsford Road streetscape.</p> <p>The pylon sign is designed to ensure ease and clear identification of the subject site whilst being set in sympathetically the established business park environment.</p> <p>The signs are clear of vegetation and do not require ongoing management.</p>
5 Site and building	<ul style="list-style-type: none"> <li>• <i>Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?</i></li> <li>• <i>Does the proposal respect important features of the site or building, or both?</i></li> <li>• <i>Does the proposal show innovation and imagination in its relationship to the site or building, or both?</i></li> </ul>	<p><b>Complies.</b></p> <p>The proposed signs are designed to be secondary to the main use of the building and this is illustrative of the scale and proposed use of high-quality materials and colouring in the construction of the signs.</p> <p>The signs are appropriate for the proposed use as an adult learning education facility.</p>
6 Associated devices and logos with advertisements and advertising structures	<ul style="list-style-type: none"> <li>• <i>Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?</i></li> </ul>	<p><b>Not applicable.</b></p> <p>No safety devices or the like are required to support the proposed signs.</p>
7 Illumination	<ul style="list-style-type: none"> <li>• <i>Would illumination result in unacceptable glare?</i></li> <li>• <i>Would illumination affect safety for pedestrians, vehicles or aircraft?</i></li> </ul>	<p><b>Complies.</b></p> <p>The pylon sign will be backlit. The scale and luminance of this sign is appropriate to the applicable business park.</p>

	<ul style="list-style-type: none"> <li>• <i>Would illumination detract from the amenity of any residence or other form of accommodation?</i></li> <li>• <i>Can the intensity of the illumination be adjusted, if necessary?</i></li> <li>• <i>Is the illumination subject to a curfew</i></li> </ul>	<p>The soft illumination of this sign will not impact the safety of pedestrians, vehicles or aircraft.</p>
<p><b>8 Safety</b></p>	<ul style="list-style-type: none"> <li>• <i>Would the proposal reduce the safety for any public road?</i></li> <li>• <i>Would the proposal reduce the safety for pedestrians or bicyclists?</i></li> <li>• <i>Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?</i></li> </ul>	<p><b>Complies.</b></p> <p>The business identification signs are small in size and significantly setback from Watsford Road.</p> <p>The pylon sign is similarly of a relatively small scale and is setback over a metre from the property boundary. The sign’s illumination will be subtle and static.</p> <p>The safety of the Watsford Road users will not be impacted by distracting elements or obscuring of sightlines resulting from the proposed signs.</p>

## 5.7 State Environmental Planning Policy No.55 – Remediation of Land

State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55) aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Clause 7(1) requires that a consent authority must not consent to development unless it has considered land contamination. Clause 7 requires the development proposing a change of use to enable development for educational purposes must be accompanied by a Preliminary Site Investigation (PSI).

A PSI was carried out by ‘Consulting Earth Scientists’ and is submitted as part of this SSDA as Appendix F. In their assessment, Consulting Earth Scientists found no evidence of any previous development having occurred at the site and found no significant contamination risk based on a review of the site’s historical uses.

A limited soil sampling programme was also undertaken with two boreholes excavated to a depth of 8.5m below ground level. The boreholes identified fill material to a depth of 2.6m below ground level which has been on site since prior to 1956. The samples were not impacted above human health or ecologically based low density residential land use (including childcare facilities) screening criteria.

A preliminary conceptual site model was also created in accordance with the Guidelines for Consultants Reporting on Contaminated Sites (NSW Office of Environment and Heritage (OEH), 2011).

The PSI demonstrates that the site is has a low risk of contamination with the report concluding:

*“The preliminary site investigation indicates that there is a low risk of contamination having occurred at the site arising from the site’s history prior to the current land use. The current land used has a low risk of contamination.*

*Where the development requires that soils are to be disposed of offsite, materials should be appropriately classified in accordance with the NSW EPA Waste Classification Guidelines (2014), and disposed of at a suitably licenced was facility, capable of accepting the waste.”*

The PSI finds low risk of site contamination and does not recommend that a detailed site investigation be undertaken. The PSI by Consulting Earth Scientists satisfies the requirements of SEPP 55.

## 5.8 Draft State Environmental Planning Policy (Remediation of Land)

The Draft State Environmental Planning Policy (Remediation of Land) (Remediation SEPP) is intended to repeal and replace the existing SEPP 55. The Remediation SEPP will maintain SEPP 55’s key operation framework by continuing to require consent authorities to consider contamination in determining applications. The new provisions in the Remediation SEPP relate to the carrying out of remediation and review thereof.

The subject site has been assessed against SEPP 55 where it has been shown to pose a low risk of contamination. No site remediation work has been recommended under the PSI by Earth Science Consultants and therefore the new provisions relating to the review of remediation works included in the draft Remediation SEPP are not applicable to the proposal. The carrying out of the PSI satisfies the requirements of the draft Remediation SEPP.

## 5.9 Draft State Environmental Planning Policy (Environment)

The Draft State Environmental Planning Policy (Environment) (draft Environment SEPP) is intended to combine several SEPPs while modernising and updating their content. It involves the repeal and replacement of the following SEPPs:

- State Environmental Planning Policy No. 19—Bushland in Urban Areas
- State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011
- State Environmental Planning Policy No. 50—Canal Estate Development
- Greater Metropolitan Regional Environmental Plan No. 2—Georges River Catchment
- Sydney Regional Environmental Plan No. 20—Hawkesbury-Nepean River (No.2-1997)
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005
- Willandra Lakes Regional Environmental Plan No. 1—World Heritage Property

The site’s biodiversity value has been considered in the Biodiversity Development Assessment Report Waiver Request by Cumberland Ecology (Appendix E). The Waiver Request considers the requirements of the NSW *Biodiversity Conservation Act 2016*. It demonstrates that the project is highly unlikely to have any significant impact on biodiversity values. The proposal is not inconsistent with the draft Environment SEPP.

## 5.10 Campbelltown Local Environmental Plan 2015

The proposal is consistent with the requirements of the Campbelltown LEP 2015 with the exception of zoning permissibility. Educational facilities are not permitted in the B5 zone; however, this is explicitly overruled by Clause 35 of the Education SEPP. Therefore, the proposal is not inconsistent with the Campbelltown LEP 2015.

*Table 6 - Compliance with the Campbelltown Local Environmental Plan 2015*

CLAUSE	CONTROL	COMPLIANCE
<b>Part 2 Land Use</b>	Zone B5 – Business Development	<b>Non-compliant, however, overridden by Education SEPP.</b>  Educational Facilities are not permitted in the B5 zone under the Campbelltown LEP 2015. This is overridden by the Education SEPP which lists B5 zones as prescribed zones under Clause 33 in which educational Facilities are permitted with consent under Clause 35.
<b>4.3 Height</b>	15m	<b>Complies.</b>  The proposed development reaches a height of 9.3m.
<b>4.4 FSR</b>	None Applied	<b>N/A</b>
<b>5.1 Land Reservation Acquisition</b>	The site is not identified on the Land Reservation Acquisition Map.	<b>N/A</b>
<b>5.10 Heritage</b>	Neither the site nor any surrounding sites are identified as being heritage listed sites.	<b>N/A.</b>  Noting the location of the site, the topography of the local area, and the distance to the nearest heritage listed item, the proposed development impact on any heritage values.

## 5.11 Campbelltown DCP 2015

The Campbelltown DCP 2015 is divided into parts applying to specific types of development. There is no part which specifically applies to the development of a school or educational establishment. The most relevant controls are listed under Part 6 which contains controls relevant to commercial development and the B5 zone. The proposed development is considered against the most relevant commercial provisions below.

Table 7 - Compliance with the Campbelltown Development Control Plan 2015

CLAUSE	CONTROL	COMPLIANCE
<p><b>6.3 Desired Character of B5 Zones</b></p>	<p><i>The areas zoned B5 shall be characterised by:</i></p> <ul style="list-style-type: none"> <li>• <i>well designed and articulated facade treatments addressing the primary streets.</i></li> <li>• <i>buildings with active street level frontages.</i></li> <li>• <i>large expanses of visible/assessable creeper with adequate access and manoeuvring provisions.</i></li> <li>• <i>easily accessible loading dock facilities that are designed to operate separately to any public/retail function.</i></li> <li>• <i>landscaping that softens car parking areas and enhances the streetscape.</i></li> <li>• <i>street trees.</i></li> </ul>	<p><b>Complies.</b></p> <p>The proposed development addresses the street and incorporates vertically and horizontally articulated elements comprising a range of materials providing an interesting and visually appealing façade.</p> <p>The design includes large windows to the street frontage. To the extent that the use and required setbacks allow, an active frontage is provided.</p> <p>The driveway, supported by a stop and wait space, and parking zones will allow for forward entry and exit and affords sufficient space for manoeuvring vehicles.</p> <p>A landscaped setback is included in the proposal which will soften the visual appearance of parking areas. The proposal does not affect any street trees but does include the planting of trees within the site.</p>
<p><b>6.4.1 Building Form and Character</b></p>	<p>Buildings are to be designed to ensure that they are architecturally treated and visually interesting. Building entries are to be easily identified from the street and expansive blank walls are to be avoided.</p>	<p><b>Complies.</b></p> <p>The design addresses the street and is vertically and horizontally articulated using a range of materials to create a visually interesting façade. The building entrance will be readily apparent from the street.</p>
<p><b>6.4.1.1 Commercial Development Floor Area</b></p>	<p><i>a) The maximum gross floor area of any single retail premises within any business in areas zoned B1, B2 and B5 shall not exceed 500 square metres unless the proposal has been supported by an economic impact assessment, prepared by a suitably qualified person.</i></p>	<p><b>N/A</b></p> <p>The proposal is not for a retail premises and therefore this section will not apply.</p>
<p><b>6.4.1.2 Building Setbacks</b></p>	<p>A 10m front setback is required from the primary street frontage. Development is to be setback a minimum of 30m to the</p>	<p><b>Complies.</b></p> <p>A front setback in excess of 10m has been provided. The building is setback greater than</p>

	main southern railway corridor. Council may consider a reduction in the rear railway setback from 30m to 5m where a vegetated screen/landscaped area is provided to Councils satisfaction. No side setback control is given.	30m from the Commuter Rail Line.  An existing high concrete acoustic wall and stepped retaining walls provide a significant screen against the noise of the rail corridor.
6.4.1.3 Fencing	<p>a) <i>Commercial fencing shall be a maximum 2.4 metres in height.</i></p> <p>b) <i>The use of sheet metal fencing is not permitted.</i></p>	<p><b>Capable of compliance.</b></p> <p>2m tall palisade fencing is proposed along the perimeter of the site.</p>
6.4.2 Car Parking and Access	<p>Car parking must be designed to accommodate forward entry and exit of vehicles and be in accordance with the relevant Australian Standards.</p> <p>Required rates of parking are addressed in the Campbelltown DCP 2015, however, no relevant rate is provided in relation to Educational Facilities.</p>	<p><b>Complies.</b></p> <p>A total of 13 parking spaces are provided, with 2 spaces for persons with a disability. Cars can enter and exit in a forward direction.</p> <p>The Traffic and Parking Assessment and addendum, prepared by GTK consulting which accompanies this DA as Appendix C and D, considers the provision of 13 car parking spaces (including 2 spaces for persons with a disability) to be sufficient to meet College requirements.</p> <p>Furthermore, the Traffic and Parking Assessment concluded the proposal is suitable in relation to Council's DCP, Australian Standards, RMS guidelines and the likely traffic impacts on the surrounding road network.</p>
6.4.4 Landscaping	A landscape plan is required with all new commercial developments.	<p><b>Complies.</b></p> <p>A Landscape Plan prepared by Impact Planners accompanies this DA as Appendix J.</p>
6.7 Commercial Waste Management	Commercial Development is required to ensure that appropriate facilities are provided for the storage and collection of waste.	<p><b>Complies.</b></p> <p>A bin room and bulk storage room are provided within the basement level in proximity to lift access. A 'bin cupboard' drop-off area is provided on the western boundary adjacent to the basement ramp.</p> <p>A Commercial Waste Management Plan has been prepared by Waste Tech to accompany this application as Appendix N.</p>

## 6. Strategic Context

### 6.1 NSW State Priorities

The NSW State Priorities (known as the Premier's Priorities) are a set of targets seeking to address difficult issues that have been insufficiently addressed in the past.

The Premier's Priorities include increasing the proportion of Aboriginal students attaining year 12 by 50% by 2023 while maintaining cultural identity.

Warakirri College is for students aged 15–22 who have disconnected from mainstream education or don't feel comfortable in a traditional school. Students can be referred from their current school or can apply directly to the college. While not specifically targeted to Aboriginal students, any student disconnected from mainstream education is able to apply to the College where they will be assisted to attain Year 10 and Year 12 studies in an environment that is flexible and welcoming of all backgrounds. The Warakirri Campus in Queen Street Campbelltown has enrolled approximately 30% Aboriginal students. It is anticipated that a similar percentage would enrol at the proposed Watsford Road Campus which would be about 40 aboriginal students each year, who were otherwise disengaged from school.

The proposal is consistent with the Premier's Priorities.

### 6.2 The Greater Sydney Regional Plan, A Metropolis of Three Cities

The Greater Sydney Regional Plan, A Metropolis of Three Cities provides a framework for the future strategic planning direction of Sydney.

Objective 6 of the Greater Sydney Regional Plan is 'services and infrastructure meet communities changing needs' which considers the need for additional educational facilities. It describes schools as 'essential local infrastructure' and identifies that an additional 270,000 school students will need to be accommodated across Sydney by 2036. The proposed College campus will accommodate up to 120 students once complete and supports Objective 6.

Objective 14 of the Greater Sydney Regional Plan is 'integrated land use and transport creates walkable and 30-minute cities' which seeks to establish a transport network whereby most residents can access the nearest metropolitan centre or cluster within 30-minutes where services will be co-located to increase walkability. The proposed school is located in close proximity to the Campbelltown Train Station which forms part of the Campbelltown Macarthur Metropolitan Cluster. The proposed location of the College supports the vision of 30-minute city as outlined in the Greater Sydney Regional Plan.

The proposal is consistent with the Greater Sydney Regional Plan.

### 6.3 Future Transport Strategy 2056

The Future Transport Strategy 2056 is a 40-year strategy for NSW supported by plans for regional NSW and for Greater Sydney. Chapter 3 considers future transport in greater Sydney and is aligned with the metropolis of three cities vision contained in the Greater Sydney Region Plan.

The Future Transport Strategy takes on the 30-minute city concept where ‘people can conveniently access jobs and services within 30 minutes by public or active transport, 7 days a week’. The proposal is located approximately 400m walking distance from Campbelltown Train Station and from nearby associated bus terminals. The proposed location supports the vision of the 30-minute city as outlined in the Greater Sydney Regional Plan.

The proposal is consistent with the Future Transport Strategy 2056.

### 6.4 State Infrastructure Strategy 2018 – 2038 Building the Momentum

The State Infrastructure Strategy 2018-2038 Building the Momentum is a 20-year strategy providing advice on the current state of NSW's infrastructure and the needs and priorities over the next 20 years. It looks beyond the current projects and identifies policies and strategies needed to provide infrastructure that meets the needs of a growing population and a growing economy.

Chapter 9 of the State Infrastructure Strategy 2018 considers transport with the strategic objective:

*‘ensure the transport system creates opportunities for people and businesses to access the services and support they need’.*

One of the key recommendations there-under is to ‘invest in transport infrastructure that is integrated with land use to create opportunities for agglomeration and enhance productivity, liveability and accessibility, in support of the policy goal of a ‘30-minute city’’. The proposal is approximately 400m walking distance from Campbelltown Train Station and from nearby associated bus terminals. The proposed location supports the vision of 30-minute city as outlined in the Greater Sydney Regional Plan.

Chapter 13 of the State Infrastructure Strategy 2018 considers education with the strategic objective:

*‘Deliver infrastructure to keep pace with student numbers and provide modern, digitally-enabled learning environments for all students’*

The Strategy projects that over the next 20 years enrolments in government and non-government schools will increase by almost 200,000 students and 100,000 students respectively. The proposal is an independent high school capable of accommodating up to 120 students during year 10 to 12 studies which will assist to provide educational opportunities to Sydney’s growing student population. The proposed building will have full ICT connectivity as Warakirri College has a policy that the student to laptop ratio should be 1:1. Enhancing digital literacy is a major goal for the Warakirri curriculum and the proposal will further the delivery of modern, digitally-enabled learning environments for students.

The proposal is consistent with the State Infrastructure Strategy 2018.

## 6.5 Sydney's Cycling Future 2013

Sydney's Cycling Future 2013 presents the direction for the planning, prioritisation and provision of bike transport in Sydney. The proposal includes the provision of bicycle parking racks at the main entrance to encourage students and staff to travel by bicycle. Campbelltown and the surrounding suburbs contain a variety of existing bike paths and smaller local roads which can be used to access the site.

The proposal is not inconsistent with Sydney's Cycling Future 2013.

## 6.6 Sydney's Walking Future 2013

Sydney's Walking Future 2013 aims to create a culture of walking for transport by promoting walking as a viable and attractive transport choice, especially for getting to and from work and school. The proposed College is approximately 400m walking distance from Campbelltown Train Station and from nearby associated bus terminals. It is likely that many students and staff will combine walking and public transport use to access the site.

The proposal is consistent with Sydney's Walking Future 2013.

## 6.7 Sydney's Bus Future 2013

Sydney's Bus Future 2013 outlines the NSW Government's long-term plan to redesign Sydney's bus network to meet the needs of users. The proposed College is located approximately 400m from the Campbelltown Bus Station and from bus stops along Farrow Road terminating at the Train Station. Students and teachers will be able to access the site by bus.

The proposal is consistent with Sydney's Bus Future 2013.

## 6.8 Crime Prevention Through Environmental Design (CPTED) Principles

The Crime Prevention Through Environmental Design (CPTED) Guidelines have been prepared by the NSW Police to provide guidance for developments to implement design features which limit crime. The Guideline provides four CPTED principles which are considered in relation to the proposal in Table 8 below:

*Table 8 - CPTED principles*

PRINCIPLE	DEFINITION	RESPONSE
<b>Surveillance</b>	The attractiveness of crime targets can be reduced by providing opportunities for effective surveillance, both natural and technical.	The College is designed to face Watsford Road with main reception windows and 2 <sup>nd</sup> storey offices providing passive surveillance of the road. A palisade fence is proposed along the frontage which will not obstruct sightlines in or out of the property.

		<p>The proposed design is capable of being effectively lit which will be considered in the detailed design phase.</p> <p>The proposed landscaping is in raised beds and provides long sightlines. It does not provide the opportunity for offenders to conceal themselves or to entrap victims.</p>
<b>Access control</b>	<p>Physical and symbolic barriers can be used to attract, channel or restrict the movement of people. They minimise opportunities for crime and increase the effort required to commit crime.</p>	<p>The College is designed to have a 2m high palisade fence to Watsford Road and its side boundaries with a corresponding metal entrance which creates a distinctive physical barrier to delineate public and private space.</p> <p>The primary entrance gate directs pedestrians along the front entrance path and to the College's main entrance.</p> <p>The rear outdoor and garden area is designed as the primary outdoor gathering space for students during breaks and activities. It is an enclosed area.</p> <p>Staff areas and storerooms can utilise lockable doors to restrict access A security sliding door is proposed in the basement parking level.</p>
<b>Territorial reinforcement</b>	<p>Community ownership of public space sends positive signals. People often feel comfortable in, and are more likely to visit, places which feel owned and cared for.</p>	<p>The front fence and gate will create a clear transition between the public and private space.</p> <p>The space will be used in accordance with the school terms and its maintenance will be the responsibility of the staff.</p>
<b>Space management</b>	<p>Popular public space is often attractive, well maintained and well used space. Linked to the principle of territorial reinforcement, space management ensures that space is appropriately utilised and well cared for.</p>	<p>The proposal is for a new building which will project an image that the space is to be respected.</p> <p>The staff of Warakirri College will ensure that it is clean, well maintained and that repairs will be prompt.</p>

## 6.9 Better Placed: An Integrated Design Policy for the Built Environment of New South Wales

Better Placed is a policy which establishes a baseline of what is expected in order for development to achieve good design. Seven objectives are provided which are key considerations in good design of the built environment which are considered in Table 9.

Table 9 - Better Placed policy compliance

OBJECTIVE	CRITERIA	RESPONSE
<p><b>1. Better fit Contextual, local and of its place</b></p>	<p><i>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, heritage and communal aspirations. It also contributes to evolving and future character and setting.</i></p>	<p>The proposal is located within a business park. Warakirri will provide year 10-12 level high school education opportunities to young people in the area who have had difficulties in mainstream schooling. The proposed building reflects this ambition in providing classrooms to accommodate smaller classes and common areas designed to accommodate students between the ages of 15-22 years.</p> <p>The proposed 2 storey bulk and scale is contextually appropriate and suits the surrounding character of the area.</p>
<p><b>2. Better performance sustainable, adaptable and durable</b></p>	<p><i>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.</i></p>	<p>A Section J Report has been prepared by BCA Energy which accompanies this application as Appendix M. Therein, the proposal is shown to be capable of meeting its requirements under Section J of the NCC demonstrating an appropriate consideration of environmental issues.</p>
<p><b>3. Better for community inclusive, connected and diverse</b></p>	<p><i>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.</i></p>	<p>Warakirri College is expressly designed to cater to students from a wide range of diverse backgrounds. This seeks to address social disparity and inequality through education available at no cost to the student.</p>
<p><b>4. Better for people safe, comfortable and liveable</b></p>	<p><i>The built environment must be designed for people with a focus on safety, comfort 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.</i></p>	<p>The proposed design provides a large amount of space for the College’s maximum student capacity of 120. It provides both indoor and outdoor recreation areas. Classrooms are suitably sized for small classes. The proposal is for a high-quality adult learning environment.</p>
<p><b>5. Better working</b></p>	<p><i>Having a considered, tailored response to the program or requirements of a building</i></p>	<p>The building has been designed with large floor plates which could be easily adapted in</p>

<b>functional, efficient and fit for purpose</b>	<i>or place, allows for efficiency and usability with the potential to adapt to change. Buildings and spaces which work well for their proposed use will remain valuable and well-utilised.</i>	time to suit the College’s changing needs or to convert towards an alternative commercial use.
<b>6. Better value creating and adding value</b>	<i>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</i>	Warakirri College is the intended ongoing occupant of the building. The building has been thoughtfully designed to their specific needs.
<b>7. Better look and feel engaging, inviting and attractive</b>	<i>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.</i>	The scale of the proposal is consistent with the built form requirements of the Campbelltown DCP 2015. The proposed materials and finishes include frameless glass, metal roofs and steel posts, off form concrete and painted cladding. This materiality is of high quality and the proposed form is contemporary.

## 6.10 Healthy Urban Development Checklist (NSW Health, 2009)

The Healthy Urban Development Checklist is prepared by NSW Health and seeks to ensure that development in New South Wales is sustainable and minimises the potential to exasperate lifestyles diseases and risk factors. The proposal is not inconsistent with any aspect of the checklist and has the following consistent attributes:

- Encourages incidental physical activity.
- Is accessible through public transport.
- Provides jobs and education services in an accessible location.
- Is an infill development.
- Provides a secure development which deters crime.
- Is an accessible development.
- Address social disadvantage by providing education services for disadvantaged students who need assistance outside of mainstream schooling.

The proposal is consistent with the Healthy Urban Development Checklist.

## 6.11 Draft Greener Places Policy

The Draft Greener Places Policy is a green infrastructure policy produced by the Government Architect NSW to guide the planning, design and delivery of Green Infrastructure in urban areas across NSW. It aims to create a healthier, more liveable and sustainable urban environment by improving community access to recreation and exercise, supporting walking and cycling connections, and improving the resilience of urban areas.

The site does not contain any existing trees. The proposed Landscape Plan includes a range of native vegetation including trees. The proposal is not inconsistent with the Draft Greener Places Policy.

## 6.12 Western City District Plan

The Western City District Plan is derived from the Greater Sydney Region Plan and provides a range of priorities and actions specific to the Western District.

Under Planning Priority W3 (Providing services and social infrastructure to meet people's changing needs) the Plan identifies the following in relation to demand for educational facilities:

*The NSW Department of Education estimates that an extra 77,978 students will need to be accommodated in both government and nongovernment schools in the District by 2036. Growth in students is projected to be greatest in Camden (26,403), Liverpool (21,072), Campbelltown (13,541) and Penrith (11,008) local government areas.*

These projections indicate that there will be a significant shortfall in school places within the Western District without the provision of additional facilities. The proposal will support this objective by providing an additional educational facility within the Campbelltown LGA.

The proposal is consistent with the Western City District Plan.

## 6.13 Greater Macarthur 2040 - An Interim Plan for the Greater Macarthur Growth Area

Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area sets a vision for the Growth Area as it develops and changes. It provides a framework for urban renewal along the rail corridor from Glenfield to Macarthur and land release areas from Menangle Park to Appin. The interim plan involves the proposed rezoning of precincts. The subject site is located within the Campbelltown Precinct which has the following goals under the Interim Plan:

- *Provide a range of building heights, with high rise buildings close to the station to maximise pedestrian activity and increase trade for local businesses.*
- *Retain the character of areas east of Lindesay Street, with a mixture of detached dwellings, townhouses and terraces.*
- *Plan for a large floor plate, campus-style office park west of the station.*

The Interim Plan indicates that land immediately north-west of Campbelltown Train Station is intended to be rezoned to 'high rise residential'. The current business zone in which the site is located is intended to continue

to be zoned 'Employment'. New high density residential in the area will increase the demand for educational facilities which the proposal will assist in satisfying.

The proposed use as an educational establishment does not conflict with the identified ongoing zoning of the site and surrounds as 'employment'. The zoning of nearby land to high rise residential indicates increased demand for education services in the area which the proposal provides. The proposal is not inconsistent with the Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area.

## 6.14 Draft Glenfield to Macarthur Corridor Strategy

The Glenfield to Macarthur Urban Renewal Corridor is located in the south-west subregion. Over the next 20 years, demand for an additional 664,000 homes and 689,000 jobs will be generated in the south-west subregion. To support this growth, the Draft Glenfield to Macarthur Urban Renewal Corridor Strategy seeks to identify housing, employment and urban renewal opportunities around the Campbelltown-Macarthur region. Since the publication of the Draft Glenfield to Macarthur Corridor Strategy a Campbelltown Precinct Plan has been finalised which provides more detailed strategic planning advice and is consistent with the Greater Macarthur 2040: An Interim Plan for the Greater Macarthur Growth Area. The proposal is not inconsistent with the Draft Glenfield to Macarthur Urban Renewal Corridor Strategy.

## 6.15 Reimagining Campbelltown CBD and Masterplan (Campbelltown Council)

The Reimagining Campbelltown CBD Report and Masterplan consider the impact of the Western Districts predicted future growth on the Campbelltown CBD. The Report finds under section 3.2 that by 2036 there will be an additional 36,000 secondary school students within the Macarthur Region. Under Section 3.4 it identifies an existing local job deficit. Warakirri College proposes to accommodate 120 secondary school students and to employ 12 full-time staff members and two part-time staff members.

Building block 3 (well-connected 30-minute city) of the Report states that:

*"The extent of land use intervention will need to be based on a multi-modal 30-minute or better city catchment. The 30-minute urban area would ensure all levels of amenity, from the city centre to the local neighbourhood village is accessible within 30 minutes, either by walking, biking or transit."*

The proposal is located within 400m walking distance of Campbelltown Train Station and bus services. It is ideally located to facilitate a 30-minute or less commute for students and staff living within the Macarthur area.

The proposal responds positively to some of the key issues identified in the Reimagining Campbelltown CBD Report and is compatible with the future vision for the Campbelltown CBD.

## 7. Key Issues / Environmental Impact Assessment

### 7.1 Environmental Amenity

#### **Solar access**

The proposal has been designed to maximise natural light throughout the building while minimising the impacts of heat and glare. The design minimises heat gain through the use of a south-north descending skillion roof form which also provides natural shade over the north facing windows in summer. Large windows are provided on the southern elevation to provide natural light.

The neighbouring buildings are both commercial. The southwestern neighbour may experience some minor overshadowing during the morning in mid-winter but the impact will be minimised through the large setbacks of both buildings and the building height of 9.3m. The proposal will have no shadow impact on the public domain.

The proposal has considered solar impacts and provided an appropriate response in order to mitigate impacts. It does not result in any unacceptable solar or overshadowing impacts.

#### **Visual privacy**

The neighbouring sites are both commercial and have lower privacy requirements than residential developments. 8 Watsford Road has a windowless façade facing towards the subject site. 6 Watsford Road does have windows along its façade closest to the site.

The proposed design has incorporated side setbacks of 3.25m to each boundary to provide adequate separation. The building is surrounded by landscaped setbacks which are proposed to include a variety of vegetation which will grow up to 6m in height. This vegetation will provide an additional degree of visual separation and privacy between the neighbouring sites.

#### **Visual Amenity**

The surrounding area is commercial and light industrial in character. It is characterised by two-storey warehouse-style developments with large setbacks and minimal articulation. The proposed design is commensurate with the predominant scale of surrounding buildings being 2 storeys. It utilises a large front setback responding to neighbouring buildings and provides significant side setbacks in keeping with the neighbourhood character. The front fence is proposed to be a palisade fence which will not obscure sightlines to the main façade which is consistent with the existing character.

The proposed building design has a highly articulated and modulated front façade which makes use of sloped roofs and awnings. While the scale is consistent with surrounding development, the use slopes will make the building visually distinctive adding visual interest to the street. Similarly, the proposed landscaped setback is consistent with the existing character of the street but will be of a high quality so as to provide additional visual interest.

The proposal is broadly consistent with the existing pattern of development but will enhance the visual interest of the street.

## 7.2 Transport and Accessibility

Traffic and Transport have been considered in detail in the Traffic and Parking Report and the related Traffic Report Addendum by GTK consulting (Appendix C and D). The Reports show the impact of the proposal to be minimal. The construction impacts of the proposal have been considered in the Construction Environmental Plan by Ibiz Design (Appendix P).

### Public Transport

The site is located approximately 400m from the Campbelltown Train Station which is on the T8 'Airport and South' train line. Trains operate in northerly and southerly directions every 15 minutes. A variety of bus services also intersect with the Campbelltown Train Station and CBD including the following routes; 877, 878, 881, 882, 883, 884 and 885. These bus services provide access to the surrounding suburbs. The availability of train services amplifies the number of potential students living within a 30-minute commute of the College.

The site can be accessed from Campbelltown Train Station without students needing to cross any roads. A footpath extends to 4 Watsford Road.

### Bicycle Parking

The proposal includes a bicycle rack at the main entrance which can accommodate four bicycles.

### Parking and Drop-off

The site provides a total of 13 car parking spaces which is comprised of 11 staff parking spaces (one accessible) located in a secure basement and two visitor spaces (one accessible) located at ground level. The parking includes a total of two accessible spaces.

In accordance with AS 2890.1:2004 the lower ground floor car parking area is a Class 1 facility. The aisle width is a minimum 6.48 metres and staff car parking spaces are 2.5 metres wide and minimum 5.4 metres long. The spaces for persons with a disability are 2.4 metres wide adjacent to a 2.4 metres wide 'shared area', both of which are 5.4 metres long. Spaces located adjacent to a wall or fence are a minimum 2.7 metres wide and the traffic aisle has been extended 1.0 metre at either end of the car park. All of these dimensions comply with AS 2890.1:2004.

The experience of Warakirri College from having operated four campuses is that very few students arrive at school by private vehicle and it is extremely rare for students to drive their own vehicle and park at the College. Students are issued with school Opal cards incentivising the use of public transport. As a result, no dedicated parking has been allocated for students. Two visitor spaces may be used during drop-off.

## Traffic Generation

The College is anticipated to generate 13 vehicle trips during the AM peak and 13 during the PM peak. This amount is less than the daily variation of traffic volumes on the local road network and will have negligible impact on existing traffic flows, and intersection capacities.

## Access

Vehicular entry and exit to the site will be from Watsford Road. The proposal provides sight distances greatly in excess of those required under the relevant Australian Standard (AS2890.1:2004). This ensures that drivers exiting the site have visibility of the road in excess of 5 seconds of vehicle travel when the 50km/h speed limit is observed. The landscaping utilising low shrubs and ground cover around the driveway to protect sightlines.

Within the site, space has been provided to allow vehicles to pass on the basement access ramp and to pass within the ground level areas. The parking has been designed in accordance with the relevant Australian Standards and will provide a safe and efficient parking layout.

## Construction Traffic

The project represents a relatively small development and the impacts on traffic during construction are expected to be negligible. They will not require the upgrading of any roads or intersection capacity. There are significant amounts of available and non-signposted on-street parking in the vicinity of the site which will be utilised during construction.

## 7.3 ESD

The principles of Ecologically Sustainable Design (ESD) are provided in Schedule 2, Clause 7(4) of the *Environmental Planning and Assessment Regulation 2000*. They are considered in relation to the proposal in Table 10.

Table 10 - ESD Principles

PRINCIPLE	RESPONSE
<i>(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 irreversible damage to the environment, and</i>	The environmental impacts of this proposal have been considered throughout this EIS and have been shown to be manageable. The proposal is of a relatively small scale and does not present any threat of serious or irreversible environmental damage.

<p><i>(ii) an assessment of the risk-weighted consequences of various options,</i></p>	
<p><i>(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</i></p>	<p>The proposal relates to a previously cleared property that is located within an existing urban area. The health, diversity and productivity of the environment will not be impacted by the proposal.</p>
<p><i>(c) conservation of biological diversity and ecological integrity, namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,</i></p>	<p>Biodiversity has been considered in the Biodiversity Development Assessment Report Waiver Request by Cumberland Ecology (Appendix E) which finds that the project is not anticipated to have a significant impact on biodiversity values.</p>
<p><i>(d) improved valuation, pricing and incentive mechanisms, namely, that environmental factors should be included in the valuation of assets and services, such as—</i></p> <p><i>(i) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,</i></p> <p><i>(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,</i></p> <p><i>(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.</i></p>	<p>Environmental factors have been considered in this proposal. The proposal for construction and operation of an educational facility is not anticipated to create significant amounts of pollution on site.</p>

## 7.4 Noise and Vibration

Noise and vibration resulting from surrounding land uses and the potential noise output of the College have both been considered in the Acoustic Assessment by Acoustic Logic at Appendix G.

The Acoustic Assessment indicates that with the use of specified building materials, the building will comply with all required noise objectives. Vibrations from the railway line were shown to be compliant with the relevant Australian Standards and will not negatively affect the proposed building.

Noise output from the College will be generated by mechanical plant and equipment as well as by the people on site. The mechanical plant will be selected at the construction certificate (CC) stage of development and will be capable of achieving compliance. The College does not use any PA system or school bells and does not propose any alternative out of hours uses. The highest likely point of noise generation is in the indoor sport and recreation area which is located in a basement that will be enclosed in concrete. Noise generated on the above ground levels of the College is estimated to be approximately 70 dB(A) sound pressure. At the nearest receiver locations, the noise emissions of Warakirri College are anticipated to be well within acceptable levels. To ensure an appropriate acoustic environment for Warakirri College and the surrounding neighbourhood, the recommendations of the Acoustic Assessment will be implemented.

## 7.5 Contributions

The Campbelltown Local Infrastructure Contributions Plan 2018 applies to the Campbelltown LGA. Development with a cost of more than \$200,000 is subject to a levy of 1% of the development cost. It is anticipated that the payment of the applicable contribution will form a condition of consent.

## 7.6 Waste

Construction Waste Management is addressed in the Construction Environmental Management Plan (Appendix P). No garbage will be stored on site so materials will be removed directly from the site on a regular basis using skip bins. Concrete, timber, bricks and tiles will be recycled at a concrete crushing yard. Cardboard, paper and carpets will also be recycled. Other materials will be disposed off at rubbish depots in the Sydney Metropolitan area.

A Trade Waste Management Plan has been prepared by Waste Tech Services to address operational waste considerations and accompany this application as Appendix N. The waste plan describes the method by which a commercial waste contractor will perform weekly collections of rubbish and commingled recycling waste streams. Garbage collection will occur within the site. The proposal includes adequate space for garbage, recycling and bulky waste storage.

## 7.7 Heritage and Archaeology

The site is not known to contain any items of European heritage significance, nor is it located within a heritage conservation area. The site is mapped as being 'urban/industrial' on the Campbelltown Council 'Zones of Aboriginal Archaeological Sensitivity' map. The site is not known to contain any items of Aboriginal archaeological significance. Noting the location of the site, the topography of the local area and the distance to the nearest heritage listed item, the proposed development will not have any impact on any heritage values.

## 7.8 Social Impacts

There is a need within the community for education pathways for students who have not found a suitable environment in mainstream schooling. Many of Warakirri College's students come from disadvantaged backgrounds. The College provides them with an opportunity to complete their Year 10 and HSC studies in an environment with additional support and which does not charge fees.

Each year about 70-80% of Warakirri College's Year 10 students continued on to HSC studies. Approximately 70% of Year 10 and HSC graduates progressed on to employment or further education after leaving Warakirri. Higher levels of educational attainment benefit both students and the community at large.

## 7.9 Contamination

A PSI looking for possible contamination has been undertaken by Consulting Earth Scientists (Appendix F). Their assessment found no significant contamination risk based on a review of the site's historical uses and is suitable for development. The PSI did identify fill of unknown origin located on a mound at the north and southeastern boundary. This unidentified fill was not detected in boreholes and appear to affect only a small and visible area of the site. The PSI recommends that where soils are to be disposed of offsite, materials should be appropriately classified in accordance with the NSW EPA Waste Classification Guidelines (2014), and disposed of at a suitably licenced facility, capable of accepting the waste. The proposal is capable of compliance during the construction phase.

## 7.10 Utilities

The site is located within an established business park near the Campbelltown CBD. There is existing reticulated water, sewer and electrical infrastructure in the site's vicinity and which is servicing the neighbouring buildings. The site is capable of being connected to the necessary services and utilities.

A Hydraulic Services Plan has been produced by Harris Page & Associates to accompany this application as Appendix Q. It details how the proposal will be connected to the existing water main and sewer main.

## 7.11 Flooding and Drainage

Harris Page and Associates have produced a Stormwater Concept Plan which is Appendix O to this EIS. They have also provided a Letter of Advice in relation to the site's flood affectation which is Appendix R to this EIS. Their advice is that the subject site is not subject to flood impact or flood-related development controls. The site is not at risk of flooding and the effects of stormwater will be appropriately managed.

## 7.12 Biodiversity

A Biodiversity Development Assessment Report Waiver Request has been prepared by Cumberland Ecology (Appendix E) to consider the site's biodiversity value. The site is cleared and vacant land which contains predominantly exotic grasslands and a row of planted native vegetation. As the site is a highly modified area,

the proposal is unlikely to have any significant impact on biodiversity values. The project presents very little likelihood of having significant impacts on a threatened species and is suitable for development.

### 7.13 Sediment, Erosion and Dust Controls

A Construction Environmental Management Plan has been prepared by Ibiz Design to accompany this application (Appendix P). The Plan considers sediment, erosion and dust controls.

Sediment and erosion controls will ensure that direct impacts (land disturbance) are limited to the works area, and that secondary impacts do not impact adjacent areas by:

- Disturbance area will be minimised and clearly demarcated.
- Works will only be conducted within the works zone.
- Vehicle movements will be restricted to the defined roads/tracks.
- Where possible, works area will be designed to ensure stormwater runoff drains into the site.
- Where runoff from the site is required, it will be via the longest flow path possible to ensure maximise sediment retention. Flows to undisturbed areas will be prioritised.
- Where required, sediment controls will be put in place. These will include, but not be limited to, rock check dams, sediment basins, sediment fences and silt socks.
- Sediment controls will be reviewed during site inspections and/or after significant rainfall (more than 10mm in 24hrs resulting in site runoff).

Dust is to be managed primarily with emission controls at the source by:

- minimising the size of areas being disturbed
- addressing dust awareness as part of the site induction process
- using watercarts and surface treatments as required.
- vehicle movements are to be kept to established tracks

The implementation of the Construction Environmental Management Plan will ensure the appropriate management of sediment, erosion and dust.

## 8. Consultative Engagement

### 8.1 Campbelltown City Council

On the 30<sup>th</sup> of August 2019, a preliminary version of the proposal was discussed with representatives of the planning department at Campbelltown City Council in a pre-DA meeting. At this stage, the proponent had legal advice that the proposal did not fall under the SSD assessment pathway and could instead be assessed as a DA by Campbelltown Council. The proposal was discussed on this basis and Campbelltown Council indicated their broad support for the proposal.

The proposal was subsequently submitted to Council as a DA before being referred to the Department of Planning, Industry and Environment where it was decided that the proposal should instead be determined under the SSD pathway. During this time, Council had begun their initial assessment of the proposal. Campbelltown City Council has been aware of the project since its early stages and has been generally supportive. Council will be provided with the opportunity to provide comments during the application's exhibition period.

### 8.2 Transport for NSW

Transport for NSW will be notified of the application under the requirements under Clauses 85 and 86 of the Infrastructure SEPP. The Infrastructure SEPP requires the 'rail authority' to be notified and for the consent authority to take their comments into consideration in determining the application. The comments of TfNSW will be considered during the proposal's assessment if required.

### 8.3 Neighbouring Sites

Warakirri College has been in contact with the landowners/occupants of many of the surrounding sites who are all generally supportive of the proposed use. The consultation conducted with neighbours is described below. All neighbouring sites, as discussed below, have the contact information of the Warakirri College Principal who they can contact should they wish to raise any concerns or suggestions. They will also have the opportunity to make submissions during the application's exhibition period.

#### **Win TV – 6 Watsford Road, Campbelltown**

Win TV own and occupy the neighbouring 6 Watsford Road and were the previous owners of 6A Watsford Road. They sold the site to Warakirri College in full knowledge of the site's intended use. Warakirri has subsequently been in preliminary discussions with Win TV about the possibility of students doing work experience at the station. Win TV has shown ongoing support for the proposal.

### **Pedders Suspension – 8 Watsford Road, Campbelltown**

Warakirri College has been in contact with the store manager who has not raised any concerns with the proposed development.

### **Hillsong Church South West Campus – 5 Watsford Road, Campbelltown**

Warakirri College has spoken with a representative of Hillsong about the proposal and the possibility of sharing facilities. Hillsong Church South West Campus indicated support for the proposal and conversations around possible forms of mutual co-operation are ongoing.

### **National Indoor Sports Centre – 7 Watsford Road, Campbelltown**

The owner of National Indoor Sports Centre has said in discussions with Warakirri College that he would welcome the development as it would potentially be the basis for a new customer relationship. This is mutually beneficial to Warakirri College as the year 10 cohort requires weekly access to an indoor sports facility as part of their schooling.

## **8.4 Statutory Exhibition**

Under Schedule 1 Clause 9 of the Environmental Planning and Assessment Act 1979 the public exhibition period for State significant development is a minimum of 28 days. The community will have the opportunity to provide submissions regarding the proposal which will form an additional avenue of community consultation.

## 9. Mitigation Measures

Several potential impacts of the development have been identified throughout this EIS and the supporting documentation. Table 11 below provides a summary of these impacts and the measures which will be taken to mitigate these impacts.

*Table 11 - Potential issues and mitigation measures*

ELEMENT	POTENTIAL IMPACT	MITIGATION MEASURES
<b>Visual Amenity</b>	Adverse visual impact on Watsford Road	The proposed architectural style and the building's bulk, scale, setbacks and materiality are all compatible with the existing streetscape. The use of angular modulation will contribute to the visual interest of the proposal.
<b>Acoustic Impacts on the College</b>	Noise impacts occurring from the T8 train line.	<p>The Acoustic Assessment by Acoustic Logic (Appendix G) has recommended that the following elements be incorporated during the detailed design phase to mitigate noise impacts from the T8 train line:</p> <ul style="list-style-type: none"> <li>• Glazed windows and doors with minimum 6.38mm glazing laminated thickness and supported with acoustic seals.</li> <li>• Roof and ceiling construction with specified internal and external roof lining thickness, and truss system.</li> <li>• External wall construction with specified internal and external roof lining thickness, and truss system.</li> </ul> <p>The recommendations of the Acoustic Assessment will be implemented in full.</p>
<b>Noise Generation of the College</b>	Noise generation from the College's operation and construction.	<p>Mechanical plant and equipment will be selected during the detailed design phase of development. The equipment will be selected in accordance with the recommendations of the Acoustic Assessment (Appendix G).</p> <p>The loudest area of the College's operation is anticipated to be when the indoor sports/recreation area is in use. This area is located within the basement to which the façade is concrete minimising noise emissions and ensuring that they are compliant with the relevant standards.</p>
<b>Biodiversity</b>	Vegetation clearing resulting in a loss of flora and fauna.	The subject site is currently cleared and vacant land which contains predominantly exotic grasslands and a row of planted native vegetation. As the site is a highly modified

		area, the proposal is unlikely to have any significant impact on biodiversity values.
<b>Transport and Accessibility</b>	Traffic impacts and public transport use	<p>The proposed design has incorporated 11 dedicated staff parking spaces which is equal to the number of full-time permanent staff. Two visitor parking spaces are also provided.</p> <p>The provided on-site parking, in conjunction with the site's proximity to public transport, will ensure that the development is able to satisfy its own parking requirements without relying on on-street parking.</p> <p>Students are encouraged to use public transport by being issued with school Opal cards which provide subsidised transport.</p>
<b>Crime and public safety</b>	Crime risks to students, staff, visitors and the public.	<p>The proposed design has incorporated CPTED principles in order to deter crime and increase public safety. The following principles have been included:</p> <ul style="list-style-type: none"> <li>• Populated areas of the building are oriented towards Watsford Road providing passive surveillance.</li> <li>• A 2m high palisade fence is proposed around the building's perimeter which does not obscure sightlines and which clearly marks the boundary between public and private space.</li> <li>• The proposed building is capable of being well lit around footpaths and entrances.</li> <li>• The school will be maintained to a high standard with any damage or graffiti to be promptly rectified.</li> <li>• Staff will provide a strong and visible presence within the school grounds.</li> </ul>
<b>Contamination</b>	Risk to human health from contamination.	<p>The Preliminary Site Investigation by Consulting Earth Scientists identified a minor area of visible unidentified fill on the southern boundary of the site. As per the recommendations of the PSI, where soils are to be disposed of offsite, materials should be appropriately classified in accordance with the NSW EPA Waste Classification Guidelines (2014), and disposed of at a suitably licenced facility, capable of accepting the waste.</p>

## 10. Conclusion

Warakirri College assists students between the ages of 15 to 22 who have disconnected from mainstream education to complete their high school studies. They do this by offering a flexible adult learning environment with staff who are experienced in working with students from diverse backgrounds. Warakirri currently operates three campuses, including a recently opened campus in Campbelltown which the proposed campus is will complement in order to meet the demand for Warakirri's services in this region.

Warakirri College's experience has been brought to bear used in designing the proposed campus. It will provide an adult learning environment of exceptional quality for up to 120 students. The alternative to the proposal is to continue to operate only the smaller Queen Street Campbelltown campus and to not develop a new campus in Campbelltown. This would mean a reduction of in the number of students in the Campbelltown area who could enrol at Warakirri College and reduced teaching and support jobs.

Campbelltown and the surrounding district are forecast in all relevant strategic planning documents to experience significant population growth by 2036 which will necessitate additional school infrastructure. The strategic planning documents also emphasise the need for services to be located in close proximity to public transport in support of a 30-minute city. The proposal supports these objectives by providing an additional educational facility that is located within 400m of the Campbelltown Train Station and associated bus services. The business zone in which the site is currently located is indicated in local strategic plans to remain business zoned in the foreseeable future ensuring that the use by Warakirri College will remain suitable to the changing character of the area.

The building's proposed height and scale are compliant with the requirements of the Campbelltown LEP 2013 and Campbelltown DCP 2013. The design is of high quality and is contextually suitable to its location along Watsford Road. The internal layout and site planning have considered the requirements of the Education SEPP and are compliant. The building is highly suited to its proposed use, is compliant with the relevant statutory requirements and appropriate to the area's current and future character.

The environmental impacts of the proposal have been considered at length within this EIS. The land has been shown to be suitable for the proposed development in terms of biodiversity, archaeological, contamination and geotechnical considerations. Mitigation techniques have been considered to ensure compliance with the relevant acoustic standards. Traffic is unlikely to be detrimentally affected as parking is provided for staff and students are expected to primarily use active and public transport modes. A range of mitigation techniques have been identified in order to ensure that the impacts of the proposal are minimal and acceptable.

Pre-lodgement consultation has been undertaken with a variety of stakeholders. Campbelltown City Council has been consulted in a Pre-DA meeting and during a previous application where they were generally supportive. TfNSW will be notified during the assessment process. Surrounding landowners have been supportive of the proposal. Of the four neighbouring and opposite sites, three have opened ongoing dialogues with Warakirri College about the possibility for some form inter-organisational collaboration or involvement.

The proposed development will assist young people to complete their high school education and supports employment during both the construction and operation phases of the development. The environmental impacts of the proposal are minimal and appropriate. On balance, the proposal is firmly in the public interest.

## 11. Appendices

## Appendix A Architectural Plans

## **Appendix B      SEARs Request**

## **Appendix C      Traffic and Car Parking Assessment**

## **Appendix D      Traffic Report Addendum**

## **Appendix E      Biodiversity Waiver Request**

## **Appendix F      Preliminary Site Investigation**

## **Appendix G      Acoustic Assessment**

## Appendix H      Quantity Surveyors Report

## **Appendix I      External Finishes Schedule**



## **Appendix K      Access Assessment Report**

## Appendix L      BCA Report

## Appendix M Section J Report

## **Appendix N      Trade Waste Management – Ongoing**

## **Appendix O      Stormwater Concept Plan**

## **Appendix P      Construction Environmental Management Plan**

## Appendix Q    Hydraulic Services Plans

## **Appendix R      Flood Advice**

## **Appendix S      Preliminary Geotechnical Report**

## **Appendix T      Structural Engineering Concept Plan**

## **Appendix U    Survey Plans**