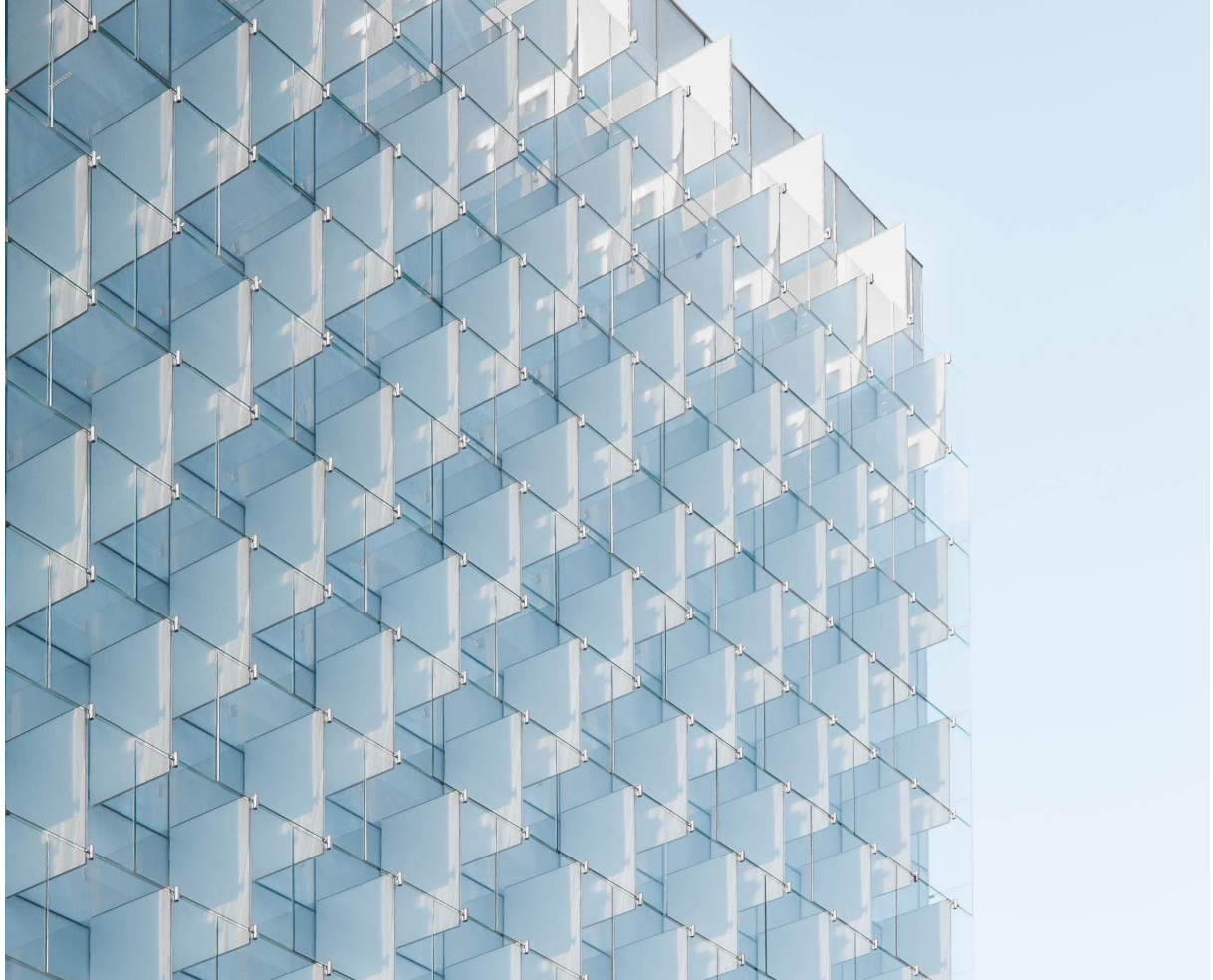


WILLOWTREE PLANNING



10 November 2021

Ref: WTJ21-151
SSD-27208140



ENVIRONMENTAL IMPACT STATEMENT: **St Aloysius' College Off-Site Campus**

48 Victoria Road and 2A-2B Gordon Street, Rozelle
Lot 1 DP 82780 and Lot 1169780

—
Prepared by Willowtree Planning Pty Ltd
on behalf of St Aloysius' College



SYDNEY | NEWCASTLE | GOLD COAST | BRISBANE



DOCUMENT CONTROL TABLE

Document Reference:	WTJ21-421 Rozelle EIS		
Contact:	Sally Prowd		
Version and Date	Prepared by	Checked by	Approved by
Version No. 1 – DRAFT	Sally Prowd Associate	Chris Wilson Director	Chris Wilson Director
Version No. 2 – DRAFT	Sally Prowd Associate	Chris Wilson Director	Chris Wilson Director

© 2021 Willowtree Planning Pty Ltd

This document contains material protected under copyright and intellectual property laws and is to be used only by and for the intended client. Any unauthorised reprint or use of this material beyond the purpose for which it was created is prohibited. No part of this work may be copied, reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopying, recording, or by any information storage and retrieval system without express written permission from Willowtree Planning (NSW) Pty Ltd





SECTION 4.12 CERTIFICATE

Declaration Form

Submission of Environmental Impact Statement (EIS)

prepared under the *Environmental Planning and Assessment Act 1979 – Part 4, Division 4.3, Section 4.12*

EIS Prepared by

Name	Sally Prowd
Qualifications	Bachelor of Town and Regional Planning (Hons I), University of Queensland
Address	Suite 4, Level 7 100 Walker Street North Sydney, NSW 2060

In Respect of	New Off-Site Campus for St Aloysius' College
---------------	----------------------------------------------

Development Application

Applicant Name	St Aloysius' College
Applicant Address	47 Upper Pit St Kirribilli NSW 2061

Land to be Developed	48 Victoria Road and 2A-2B Gordon Road, Rozelle includes parcels: <ul style="list-style-type: none">Lot 1 DP 82780Lot 2 DP 65961Lot 1 DP 169780
----------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

EIS	This document contains a complete EIS
-----	---------------------------------------





Certificate

I certify that I have prepared the contents of this EIS to the best of my knowledge:

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

Signature

Name Sally Prowd
Position Associate
Qualification BTRP, UQ Hons I

Date 10 November 2021

Signature

Name Chris Wilson
Position Managing Director
Qualification BTRP, UQ

Date 10 November 2021





TABLE OF CONTENTS

SECTION 4.12 CERTIFICATE	2
GLOSSARY OF KEY TERMS.....	10
EXECUTIVE SUMMARY	11
PROJECT DESCRIPTION	13
PUBLIC NOTIFICATION AND CONSULTATION	14
ENVIRONMENTAL IMPACT ASSESSMENT	14
JUSTIFICATION FOR THE PROPOSED DEVELOPMENT	15
PART A PRELIMINARY	16
1.1 INTRODUCTION	16
1.2 PROJECT TEAM	16
1.3 THE PROPONENT	17
1.4 CAPITAL INVESTMENT VALUE	17
1.5 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS	18
PART B SITE ANALYSIS	24
2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS	24
2.2 DEVELOPMENT HISTORY.....	29
2.4 SITE SUITABILITY	30
PART C PROPOSED DEVELOPMENT.....	31
3.1 OBJECTIVES OF THE PROPOSAL.....	31
3.2 DESCRIPTION OF THE PROPOSED DEVELOPMENT	31
3.2.1 Demolition	32
3.2.2 Site Preparation and Earthworks.....	32
3.2.3 Infrastructure	32
3.2.4 Built Form and Landscape.....	33
3.2.5 Operational Details	36
3.3 SUPPORTING PROJECT DOCUMENTATION	39
3.4 PROJECT NEED	39
3.5 CONSIDERATION OF ALTERNATIVES	40
PART D LEGISLATIVE AND POLICY FRAMEWORK.....	41
4.1 CONTROLS AND POLICIES.....	41
4.2 COMMONWEALTH PLANNING CONTEXT	42
4.2.1 Environment Protection and Biodiversity Conservation Act 1999.....	42
4.3 STATE PLANNING CONTEXT.....	42
4.3.1 Environmental Planning and Assessment Act 1979.....	42
4.3.2 Environmental Planning and Assessment Regulation 2000	44





4.3.3	Biodiversity Conservation Act 2016	49
4.3.4	Rural Fires Act 1997	49
4.3.5	Heritage Act 1977	49
4.3.6	State Environmental Planning Policy (State and Regional Development) 2011	49
4.3.7	State Environmental Planning Policy No. 55 – Remediation of Land.....	50
4.3.8	State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.....	51
4.3.9	State Environmental Planning Policy (Infrastructure) 2007.....	51
4.3.10	Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities)	52
4.4	STRATEGIC PLANNING CONTEXT.....	52
4.4.1	Greater Sydney Region Plan – A Metropolis of Three Cities.....	52
4.4.2	Eastern City District Plan	53
4.4.3	State Infrastructure Strategy 2018-2038 Building the Momentum.....	55
4.4.4	Our Place Inner West – Local Strategic Planning Statement.....	56
4.5	LOCAL PLANNING CONTEXT	56
4.5.1	Leichhardt Local Environmental Plan 2013.....	56
4.5.2	Draft Inner West Local Environmental Plan	60
4.5.3	Leichhardt Development Control Plan 2014	60
4.5.4	Former Leichhardt Local Government Area Section 7.12 Development Contributions Plan 2020.....	61
	PART E CONSULTATION	62
5.1	SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS	62
5.1.1	Sydney Water	62
5.1.3	Energy and Science Group	63
5.2	STAKEHOLDER CONSULTATION.....	63
5.2.1	Agency Consultation.....	63
5.2.2	Community Stakeholder Consultation	64
5.2.3	Additional Consultation	66
	PART F ENVIRONMENTAL RISK ASSESSMENT	67
6.1	SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS	67
6.1.1	Statutory and strategic context.....	67
6.1.2	Capital Investment Value and Employment.....	68
6.1.3	Built Form and Urban Design.....	68
6.1.4	Environmental Amenity	70
6.1.5	Trees and Landscaping	71
6.1.6	Ecologically sustainable development.....	73
6.1.7	Traffic and transport.....	75





6.1.8	Biodiversity	78
6.1.9	Noise and vibration	79
6.1.10	Stormwater and Wastewater.....	80
6.1.11	Flooding Risk.....	81
6.1.12	Hazards and risk.....	81
6.1.13	Contamination and Remediation	82
6.1.14	Waste Management	82
6.1.15	Environmental Heritage	84
6.1.16	Social Impact.....	84
6.1.17	Infrastructure requirements.....	84
6.1.18	Aviation.....	85
6.1.19	Construction, Operation and Staging	85
6.1.20	Contributions and Public Benefit.....	85
6.1.21	Engagement.....	86
PART G	PLANNED MANAGEMENT AND MITIGATION MEASURES FOR THE PROPOSED DEVELOPMENT	88
7.1	ADMINISTRATIVE COMMITMENTS.....	88
7.1.1	Commitment to Minimise Harm to the Environment.....	88
7.1.2	Terms of Approval.....	88
7.1.3	Occupation Certificate.....	88
7.1.4	Structural Adequacy	89
7.1.5	Operation of Plant and Equipment	89
7.1.6	Construction Environmental Management Plan.....	89
7.1.7	Monitoring of State of Roadways	89
7.1.8	Waste Receipts	89
7.1.9	Complaints Handling.....	89
7.2	SPECIFIC ENVIRONMENTAL COMMITMENTS.....	90
7.2.1	Air	90
7.2.2	Noise.....	90
7.2.3	Hazardous Materials.....	90
7.2.4	Traffic and Transport	90
7.2.5	Aboriginal Cultural Heritage	90
7.2.6	Waste Management	90
PART H	PROPOSED DEVELOPMENT JUSTIFICATION	92
8.1	JUSTIFICATION.....	92
8.1.1	Supports State, Regional and Local Planning Objectives	92
8.1.2	Demonstrates an Appropriate Use of a Permissible Development	92





8.1.3	Minimises Environmental Impacts	92
8.1.4	Creates Compatibility with Surrounding Development.....	92
8.1.5	Delivers Ecologically Sustainable Development.....	93
PART I CONCLUSION		94

FIGURES

Figure 1	Aerial of Site (Source: Nearmap, 2021).....	13
Figure 2	Cadastral Map (Source: Six Maps, 2021).....	25
Figure 3	Aerial Map (Nearmap, 2021).....	26
Figure 4	Cadastral Map (Source: Six Maps, 2019)	27
Figure 5	Aerial Map (Source: Nearmap, 2021)	27
Figure 6	Site Context Map (Source: NearMap, 2021)	28
Figure 7	48 Victoria Rd – Ground Floor Plans (<i>PMDL, 2021</i>)	33
Figure 8	48 Victoria Rd – L1 Floor Plans (<i>PMDL, 2021</i>).....	34
Figure 9	2A-2B Gordon St – L1 Floor Plan (<i>PMDL, 2021</i>)	35
Figure 10	Landscape Masterplan (Arcadia, 2021).....	36
Figure 11	Structure Plan for the Eastern City District Plan (Source: Greater Sydney Commission, 2018)	54
Figure 12	Zoning Map (Source: NSW Legislation, 2021)	57
Figure 13	Floor Space Ratio Map (<i>Legislation NSW, 2021</i>)	59
Figure 14	Heritage Conservation Map (<i>Legislation NSW, 2021</i>)	60
Figure 15	Consultation Area Map (<i>SixMaps, 2021</i>).....	65
Figure 16	48 Victoria Road Building Heights (<i>PMDL, 2021</i>)	69
Figure 17	Cycleways and Shared Paths (Trafix, 2021)	76
Figure 18	Pick Up an Drop Off Location (Source: Trafix, 2021).....	77
Figure 19	Water Quality Reduction Rates (Source: Stantec, 2021).....	81





TABLES

TABLE 1: PROJECT TEAM	16
TABLE 2: PROPONENT CONTACT DETAILS	17
TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED	18
TABLE 4: SITE CHARACTERISTICS	24
TABLE 5: PROPOSED DEVELOPMENT PARTICULARS.....	31
TABLE 6: STAFF AND STUDENT NUMBERS (WEEKDAY/ WEEKEND)	37
TABLE 7: DOCUMENT SCHEDULE	39
TABLE 8: EP&A ACT OBJECTS	42
TABLE 9: SCHEDULE 1 OF EP&A REGULATION	44
TABLE 10: SCHEDULE 2 OF EP&A REGULATION	46
TABLE 11: ZONING AND PERMISSIBILITY	57
TABLE 12: DEVELOPMENT STANDARDS – LLEP2013.....	58
TABLE 13: SYDNEY WATER	62
TABLE 14: AGENCY CONSULTATION RECORDS	64
TABLE 15: CONSIDERATION OF RESPONSES.....	66
TABLE 16: STATUTORY AND STRATEGIC CONTEXT DOCUMENTS	67





APPENDICES

Appendix 1	Secretary's Environmental Assessment Requirements
Appendix 2	Cost Report
Appendix 3	Survey Plan
Appendix 4	Architectural Plans
Appendix 5	Architectural Design Statement
Appendix 6	Landscape Plan
Appendix 7	Aboriginal Impact Assessment
Appendix 8	BDAR Waiver
Appendix 9	Ecological Site Investigation
Appendix 10	Heritage Impact Statement
Appendix 11	Preliminary Site Assessment
Appendix 12	Geotechnical Investigation
Appendix 13	Stormwater and Flooding Report
Appendix 14	Services and Infrastructure Report
Appendix 15	Community and Stakeholder Consultation Report
Appendix 16	Transport Assessment
Appendix 17	Hazardous Materials Survey
Appendix 18	BCA Assessment
Appendix 19	Access Report
Appendix 20	Acoustic Report
Appendix 21	Ecologically Sustainable Development Report
Appendix 22	Plan of Operational Management
Appendix 23	Social Impact Statement





GLOSSARY OF KEY TERMS

TERM	MEANING
BAM	Biodiversity Assessment Methodology
BCA	Building Code of Australia
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Regulation	<i>Biodiversity Conservation Regulation 2017</i>
BDAR	Biodiversity Development Assessment Report
BOS	Biodiversity Offset Scheme
CIV	Capital investment value
Council	Inner West Council
DPIE	Department of Planning, Industry and Environment
DCP	Development Control Plan
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPA	Environment Protection Authority
EPBC Act	<i>Commonwealth Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
GFA	Gross Floor Area
GSC	Greater Sydney Commission
ISEPP	<i>State Environmental Planning Policy (Infrastructure) 2007</i>
LGA	Local Government Area
MNES	Matter of National Environmental Significance
NSW RMS	NSW Roads and Maritime Services
OEH	NSW Office of Environment and Heritage
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
SEARs	Secretary's Environmental Assessment Requirements (SSD-27208140), dated 21 September 2021
SEPP	State Environmental Planning Policy
SEPP 33	<i>State Environmental Planning Policy No. 33 — Hazardous and Offensive Development</i>
Sqm or m²	Square metres
Subject site/site/study area	48 Victoria Road and 2A/B Gordon Street, Rozelle
SRD SEPP	<i>State Environmental Planning Policy (State and Regional Development) 2011</i>
TfNSW	Transport for NSW
Willowtree Planning	Willowtree Planning Pty Ltd





EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd (Willowtree Planning), on behalf of St Aloysius' College. The EIS is submitted to the Department of Planning, Industry and Environment (DPIE), in support of an application for State Significant Development (SSD), for the construction and operation of an off-site school campus, involving earthworks, provision of infrastructure and construction at 48 Victoria Road and 2A-2B Gordon Road, Rozelle.

In short, the proposal involves:

- Conversion of buildings at 48 Victoria Street and 2A/B Gordon Street for education purposes (school);
- Construction of a new lift on the building located at 48 Victoria Road;
- Internal alterations and fit-out to both existing buildings for educational uses; and
- Upgrades to the courtyard at 48 Victoria Road to provide outdoor playspace.

The proposed development relates to land at 48 Victoria Road and 2A-2B Gordon Road, Rozelle legally described as Lot 1 DP 82780, Lot 2 DP 65961 and Lot 1 DP169780. Such land is described throughout this EIS as the 'subject site'.

The subject site is located within the Inner West Council (LGA) and is zoned B2 Local Centre and SP2 Infrastructure pursuant to the *Leichardt Local Environmental Plan 2013* (LLEP2013). Development for the purpose of Educational Establishments (which by definition includes schools) are permitted with consent in both the B2 and SP2 zones, and therefore the desired future use of the Site for the purpose of an off-site campus can be carried out across the two sites.

The proposed development satisfies the definition of SSD pursuant to:

- Schedule 1, Clause 15 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP), being development for "*The purpose of a new school (regardless of the capital investment value) for educational establishments would qualify as SSD.*"

As such, this EIS must be prepared in accordance with the Secretary's Environmental Assessment Requirements (SEARs).

Under the *Environmental Planning & Assessment Act 1979* (EP&A Act), it is required that a request for SEARs must be made prior to the lodgement of any application for SSD. SEARs were requested for the proposed development (reference: SSD-27208140) and later issued by the DPIE on the 21 September 2021 (refer to **Appendix 1**).

In addition to the general requirements, the SEARs for the proposal outlines several Key Issues to be addressed as part of this EIS, including:

1. Statutory context
2. Capital Investment Value and Employment
3. Built form and Urban Design
4. Environmental Amenity
5. Trees and Landscaping
6. Ecologically Sustainable Development





7. Traffic, Transport and Accessibility
8. Biodiversity
9. Noise and Vibration
10. Stormwater and Wastewater
11. Flooding Risk
12. Hazards and Risks
13. Contamination and Remediation
14. Waste Management
15. Environmental Heritage
16. Social Impact
17. Infrastructure Requirements and Utilities
18. Aviation
19. Construction, Operation and Staging
20. Contributions and Public Benefit
21. Engagement

The findings of this EIS identify that the proposal can be accommodated, subject to suitable management and mitigation measures, without any adverse environmental impacts beyond that considered appropriate by the relevant legislation.

Further, the proposed off-site school campus will be consistent with the objectives of LLEP2013, B2 Local Centre and SP2 Infrastructure zone. Based on the findings of this EIS, the proposal would support the use of the site for educational purposes, providing community uses that service the needs of people who live in and work in the area as well as to provide adequate public, community and social infrastructure. The proposal is suitable for the local context and shall not result in any significant environmental impact. As such, it is recommended that the proposal be supported by the DPIE for approval.

SITE CONTEXT

The proposal relates specifically to two (2) existing sites. The subject sites are located within the Inner West Local Government Area (LGA) and subject to the provisions of the *Leichhardt Local Environmental Plan 2013* (LLEP2013).

Site 1 is identified as 48 Victoria Road, Rozelle, legally described as Lot 1 DP 82780 and Lot 2 DP 656961. The Site is zoned B2 Local Centre pursuant to LLEP 2013 currently owned by the Trustees of the Roman Catholic Church for the Archdiocese of Sydney.

The Site exhibits an area of **1,343m²** with a primary frontage to Victoria Road and secondary frontage to Gordon Street. Vehicular and pedestrian access is facilitated via Gordon Street. No vehicular access is offered to the Site via Victoria Road.

In its existing state, the Site is occupied by a two-storey brick building that is currently occupied by a commercial business. A small brick wall outlines the perimeter of the Site.

Site 2 is identified as 2A-2B Gordon Street, Rozelle, legally described as Lot 1 DP 169780. The Site is zoned SP2 Infrastructure, pursuant to LLEP 2013 and is currently owned by the Trustees of the Roman Catholic Church for the Archdiocese of Sydney.

The Site exhibits an area of **3,539m²** and has a 28m frontage to Victoria Road, 86m to Gordon Street, 46m to Quirk Street and 57m to Maney Street. The surrounding locality slopes down moderately to the south-east, however, the Site is generally level.





In its existing state the Site is occupied by St Joseph's Catholic Church Rozelle, the associated Parish Hall, a former convent used by the Gunawirra Community Facility and a former school building used by the Sydney Community College. The Site has previously been used as a primary school and associated educational facilities and church for many years. The school is no longer operating.

On-site parking is available via a single shared ingress and egress for vehicles providing approximately 19 car parking spaces. A separate entry and exit is provided for pedestrians a further 2m north of the carpark ingress and egress.

Development in the immediate locality is primarily commercial and industrial along Victoria Road, and small-scale residential in surrounding streets.

Figure 1 demonstrates the context of the sites.



Figure 1 Aerial of Site (Source: Nearmap, 2021)

PROJECT DESCRIPTION

The proposed development seeks development consent to allow for the fit-out and use of two existing buildings, as part of St Aloysius College, as detailed below:

- Construction of a new lift on the Building located at 48 Victoria Road;
- Internal alterations and fit-out to 48 Victoria Road educational uses; a
- Minor internal addition to 2A/A Gordon Street; and
- Upgrades to the courtyard at 48 Victoria Road to provide outdoor playspace.

The following are the aims and objectives of the project:





- Provide an additional teaching campus for tailored learning and educational opportunities for St Aloysius College
- Provide teaching facilities while the main St Aloysius Campus (Kirribilli) is being redeveloped;
- Ensure minimal environmental impact;
- Complement the existing uses of the buildings;
- Ensure development is compatible with surrounding development and the local context.

The Site and proposed design are considered to meet the objectives of the project as it allows for development partly on land that has been previously used for educational purposes.

PLANNING AND LEGISLATIVE FRAMEWORK

All relevant Federal and State legislation, as well as Environmental Planning Instruments (EPIs), have been considered in the preparation of this EIS. The proposal is considered to be satisfactory in terms of its legislative context, on the basis that:

- The proposal is permissible in the zone;
- The objectives of the zone are satisfied;
- The range of applicable SEPPs have been considered;
- Strategic documents that apply to the locality and wider region have identified that the proposed use is consistent with the strategic context of the area;
- The proposed development can satisfy the relevant provisions of the BCA and applicable Australian Standards.

Refer to **PART D** of this EIS.

PUBLIC NOTIFICATION AND CONSULTATION

A range of authorities have been consulted with during the preparation of this application. These include:

- Inner West Council
- Transport for NSW (TfNSW)
- Surrounding landowners and stakeholders
- Any other public transport, utilities or community service providers.

The consultation process is detailed in **PART E** and Appendix 15.

ENVIRONMENTAL IMPACT ASSESSMENT

An assessment of environmental impact has been undertaken against the relevant planning controls and policies. Additionally, a number of expert consultants have been engaged to specifically consider relevant aspects of the proposal. As a result, the proposed development complies with the relevant controls and it is considered that appropriate mitigation measures can be put in place to minimise any identified risks.

The proposed development is considered acceptable in a legislative sense.





JUSTIFICATION FOR THE PROPOSED DEVELOPMENT

Thorough consideration of the environmental impacts of the proposal has been undertaken in the environmental impact assessment process and in the preparation of the EIS. In assessing the impacts of the proposed development, consideration has been given to social, economic and environmental matters. As identified in this EIS, proposed development is not considered to represent an environmental risk, or a development that might be out of context with the surrounding locality.

OVERVIEW

The findings of this EIS demonstrate that the proposed development can proceed with consent. All assessed impacts have been examined and deemed acceptable, in relation to all the relevant legislative requirements applicable to the subject site. Furthermore, the proposed education establishment is consistent with the objectives of the *A Metropolis of Three Cities – Greater Sydney Region Plan*, the *Eastern City Plan*, and the State Infrastructure Strategy 2018-2038: Building the Momentum.

Based on the findings of this EIS, the subject site can successfully support a school campus, inclusive of related development, under this application, with acceptable environmental impacts. The proposed development is a logical use of a site that has been previously used for educational activities. The proposal is deemed to result in an additional teaching campus to allow for tailored learning and educational opportunities for St Aloysius's College especially whilst their Kirribilli campus is being redeveloped.

The proposed development is deemed suitable for its intended purpose, having regard to its regional and local context and would not result in any significant environmental impacts. As such, it is requested that the proposed development be approved, subject to reasonable and relevant conditions.





PART A PRELIMINARY

1.1 INTRODUCTION

This EIS has been prepared by Willowtree Planning, on behalf of St Aloysius' College. The EIS is submitted to the Department of Planning, Industry and Environment (DPIE), in support of an application for SSD, for the construction of a new off-site campus located at 48 Victoria Road and 2A-2B Gordon Road Rozelle.

The proposed development consists of an off-site school campus for the purpose of educational activities for St Aloysius' College. The proposed development would be operated by St Aloysius's College and have capacity for up to 200 students.

The proposal seeks to operate mainly during standard school hours (8am-4pm) with the school reception being open from 7:30pm – 5:00pm. Further operational details will be discussed in further **Section 3.2.5** of this EIS.

The particulars of this proposal are summarised below:

- Construction of a new lift on the Building located at 48 Victoria Road;
- Internal alterations and fit-out to 48 Victoria Road for educational uses;
- Minor alteration to 2A/B Gordon Street (heritage listed) for educational use; and
- Upgrades to the courtyard at 48 Victoria Road to provide outdoor playspace.

This EIS describes the subject site and proposed development. It also responds to the SEARs and assesses the proposed development in terms of all relevant matters set out in legislation, EPIs and associated planning policies.

The structure of this EIS is as follows:

- **PART A Preliminary**
- **PART B Site Analysis**
- **PART C Proposed Development**
- **PART D Legislative and Policy Framework**
- **PART E Consultation**
- **PART F Environmental Risk Assessment**
- **PART G Planned Management and Mitigation Measures**
- **PART H Proposed Development Justification**
- **PART I Conclusion**

1.2 PROJECT TEAM

The Project Team involved in the preparation of this application includes:

TABLE 1: PROJECT TEAM		
Documentation	Consultant	Location
Plans		
Survey Plan	Norton Survey Partners	Appendix 3
Architectural Plans	PMDL	Appendix 4





TABLE 1: PROJECT TEAM		
Documentation	Consultant	Location
Landscape Plans	Acadia	Appendix 6
Reports		
Acoustic Report	Stantec	Appendix 20
Access Report	BCA Logic	Appendix 19
Amenity Impact Statement	Willowtree Planning	Within EIS
Arboricultural Impact Assessment	Aborsafe	Appendix 7
BCA Assessment Report	BCA Logic	Appendix 18
Biodiversity Assessment Waiver	ADE	Appendix 9
Design Statement	PMDL	Appendix 5
Ecologically Sustainable Development Report	Integral	Appendix 21
Community and Stakeholder Consultation Report	Willowtree Planning	Appendix 15
Environmental Impact Statement	Willowtree Planning	Whole document
Stormwater and Flooding Report	Stantec	Appendix 13
Social Impact Statement	Sarah George Consulting	Appendix 23
Preliminary Site Investigation	EI Australia	Appendix 11
Geotechnical Investigation Report	STS Geotechnics	Appendix 12
Heritage	Ruth Daniell	Appendix 10
Services and Infrastructure Report	Integral	Appendix 14
Plan of Operational Management	St Aloysius College	Appendix 22
Hazardous Materials Survey	EI Australia	Appendix 17
Quantity Surveyors Cost Report	WT Partnership	Appendix 2
Traffic Impact Assessment	Traffix	Appendix 16
Waste Management Plan	St Aloysius College	Appendix 22/ EIS

1.3 THE PROPONENT

See **TABLE 2** below for contact details.

TABLE 2: PROPONENT CONTACT DETAILS	
Company Details	St Aloysius College
Contact Name	Mark Tannock
Position	Principal
Contact Number	+61 2 9936 5503
Email Address	SarahJane.McCreton@stalloysius.nsw.edu.au

1.4 CAPITAL INVESTMENT VALUE

The CIV of the proposed development in accordance with the CIV definition under the *Environmental Planning & Assessment Regulation 2000* (EP&A Regulation), is estimated to be \$2,015,684.00 (excluding GST).





A Quantity Surveyors (QS) Cost Report, prepared by WT Partnership, is included in **Appendix 2**.

1.5 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

An application requesting SEARs was submitted to the DPIE (reference: SSD-27208140). The SEARs were subsequently issued by DPIE on the 21 September 2021 and are addressed by this EIS.

For reference, the full SEARs, as issued, are annexed in **Appendix 1** of this EIS. An overview of how the SEARs have been satisfied are outlined in **TABLE 3**. This EIS is also consistent with the minimum requirements for an EIS, as set out in Clauses 6 and 7 of Schedule 2 of the EP&A Regulation.

TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED	
Requirements	Satisfied by
Content and Guidance	
Any Environmental Impact Statement (EIS) must meet the minimum form and content requirements as prescribed by Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i> (EP&A Regulation) and the <i>State Significant Development Guidelines</i> .	Refer to Section 4.3.2 of this EIS.
Issues and Assessment Requirements	
1. Statutory Context	
Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines.	Refer to PART D LEGISLATIVE AND POLICY FRAMEWORK of this EIS.
Identify compliance with applicable development standards and provide a detailed justification for any non-compliances.	Refer to PART D LEGISLATIVE AND POLICY FRAMEWORK of this EIS.
If the development is only partly State significant development (SSD) declared under clause 8(1) of the State and Regional Development SEPP, provide an explanation of how the remainder of the development is sufficiently related to the component that is SSD.	N/A. The development is State Significant Development as outlined in Section 4.3.6 of this EIS.
Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.	No concept approval or Gateway determinations apply to the site. Current consents on the site are addressed in Section 2.2 of this EIS.
2. Capital Investment Value and Employment	
Provide a detailed calculation of the capital investment value (CIV) of the development, prepared by a qualified quantity surveyor.	A Cost Report is provided at Appendix 2 .
Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of	Operational and construction jobs are considered in Section 3.2 of this EIS.





TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED

Requirements	Satisfied by
the development, including details of the methodology to determine the figures provided.	
3. Built Form and Urban Design	
Demonstrate how design quality will be achieved in accordance with the Education SEPP Design Quality Principles and the Design Guide for Schools (GANSW, 2018).	This has been considered in the Architectural Design Statement at Appendix 5 .
Address CPTED principles.	This has been addressed in Section Error! Reference source not found.
Assess how the development complies with the relevant accessibility requirements.	An Access Report is attached at Appendix 19 .
4. Environmental Amenity	
Address how good internal and external environmental amenity is achieved, including access to natural daylight and ventilation, pedestrian movement throughout the site, access to landscape and outdoor spaces.	Environmental amenity considerations have been considered in Section 6.1.9 of this EIS and in the Architectural Plans and Landscape Plans at Appendix 4 and 6 .
Assess amenity impacts on the surrounding locality, including acoustic impacts. A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated.	Acoustic considerations have been addressed in the Acoustic Report at Appendix 20 .
5. Trees and Landscaping	
Assess the number, location, condition and significance of trees to be removed and retained and note any existing canopy coverage to be retained on-site.	An Aboricultural Impact Assessment is included at Appendix 7 .
Provide a detailed site-wide landscape plan, that: <ul style="list-style-type: none"> ▪ details the proposed site planting, including location, number and ▪ species of plantings, heights of trees at maturity and proposed canopy coverage. ▪ provides evidence that opportunities to retain significant trees have ▪ been explored and/or informs the plan. ▪ considers equity and amenity of outdoor play spaces. ▪ demonstrates how the proposed development would: <ul style="list-style-type: none"> ○ contribute to long term landscape setting in respect of the site and streetscape. ○ mitigate the urban heat island effect and ensure appropriate comfort levels on-site. ○ contribute to the objective of increased urban tree canopy cover. ○ maximise opportunities for green infrastructure, consistent with <i>Greener Places</i>. 	Landscape Plans are provided at Appendix 6 .
6. Ecologically Sustainable Development (ESD)	





TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED

Requirements	Satisfied by
Identify how ESD principles (as defined in clause 7(4) of Schedule 2 of the EP&A Regulation) are be incorporated in the design and ongoing operation of the development.	An ESD Report is provided at Appendix 21.
Identify proposed measures to minimise consumption of resources and water, where applicable).	An ESD Report is provided at Appendix 21.
7. Traffic, Transport and Accessibility	
<p>Provide a transport and accessibility impact assessment, which includes:</p> <ul style="list-style-type: none"> an analysis of the existing transport network, including the road hierarchy and any pedestrian, bicycle or public transport infrastructure, current daily and peak hour vehicle movements, and existing performance levels of nearby intersections. details of the proposed development, including pedestrian and vehicular access arrangements (including swept path analysis of the largest vehicle and height clearances), parking arrangements and rates (including bicycle and end-of-trip facilities), drop-off/pick-up-zone(s) and bus bays (if applicable), and provisions for servicing and loading/unloading. analysis of the impacts of the proposed development (including justification for the methodology used), including predicted modal split, a forecast of additional daily and peak hour multimodal network flows as a result of the development (using industry standard modelling), potential queuing in drop-off/pick-up zones and bus bays during peak periods, identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cyclist conflict), and any cumulative impact from surrounding approved developments. measures to mitigate any traffic impacts, including details of any new or upgraded infrastructure to achieve acceptable performance and safety, and the timing, viability and mechanisms (including proposed arrangements with local councils or government agencies) of delivery of any infrastructure improvements in accordance with relevant standards. measures to promote sustainable travel choices for employees, students and visitors, such as connections into existing walking and cycling networks, minimising car parking provision, encouraging car share and public transport, providing adequate bicycle parking and high-quality end-of-trip facilities, and implementing a Green Travel Plan. a preliminary operational traffic and access management plan for the development, including drop-off/pick-up zones, bus bays and their operations. 	A Transport Assessment is provided at Appendix 16.





TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED

Requirements	Satisfied by
Provide a brief Construction Traffic Management Plan detailing predicted construction vehicle movements, routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated.	The Transport Assessment includes a draft Construction Traffic Management Plan at Appendix 16 .
8. Biodiversity	
Assess any biodiversity impacts associated with the development in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted or the site is on biodiversity certified land.	A BDAR Waiver has been prepared and submitted to DPIE. This is provided at Appendix 9 .
If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	A BDAR Waiver has been prepared and submitted to DPIE. This is provided at Appendix 9 .
9. Noise and Vibration	
Provide a noise and vibration assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment must detail construction and operational noise (including any public-address system, events, and out of hours use of school facilities) and vibration impacts on nearby sensitive receivers and structures, considers noise intrusion, and outline the proposed management and mitigation measures that would be implemented.	An Acoustic Report is provided at Appendix 20 .
10. Stormwater and Wastewater	
Provide a stormwater management plan, if additional stormwater works are proposed.	A Stormwater and Flooding Report is provided at Appendix 13 .
Where drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards of, the local council or other drainage or water authority.	N/A. No drainage infrastructure works are required to be handed over to Council.
11. Flooding Risk	
Identify any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the NSW Floodplain Development Manual.	A Stormwater and Flooding Report is provided at Appendix 13 .
Assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk where required.	A Stormwater and Flooding Report is provided at Appendix 13 .





TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED

Requirements	Satisfied by
12. Hazards and Risks	
Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with SEPP 33.	There are no proposed dangerous goods or hazardous materials to be stored on site.
Where required by SEPP 33, provide a Preliminary Hazard Analysis prepared in accordance with Hazardous Industry Planning Advisory Paper No.6 – Guidelines for Hazard Analysis.	N/A. A Preliminary Hazard Analysis is not required.
If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline, and prepare a hazard analysis.	N/A. The site is not adjacent to the pipeline corridor.
13. Contamination and Remediation	
In accordance with SEPP 55, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	A Preliminary Site Investigation is provided at Appendix 11 . A Hazardous Materials Survey is provided at Appendix 17 .
14. Waste Management	
Identify, quantify and classify the likely waste streams to be generated during construction and operation.	A Waste Management Plan is included in the Plan of Management (Appendix 22) and Construction Waste is considered in Section 6.1.8 of this EIS.
Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste.	
Identify appropriate servicing arrangements for the site.	
If buildings are proposed to be demolished or altered, provide a hazardous materials survey.	A Hazardous Materials Survey is provided at Appendix 17 .
15. Environmental Heritage	
Where there is potential for direct or indirect impacts on the heritage significance of items of environmental heritage, provide a Statement of Heritage Impact, prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.	An Heritage Impact Statement is provided at Appendix 10 .
16. Social Impact	
Include an assessment of social impacts of the proposed development.	A Social Impact Statement is provided at Appendix 23 .
17. Infrastructure and Requirements and Utilities	
In consultation with relevant service providers: <ul style="list-style-type: none"> assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. identify any infrastructure upgrades required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. 	A Services and Infrastructure Report is provided at Appendix 14 .





TABLE 3: HOW THE SEARS HAVE BEEN SATISFIED

Requirements	Satisfied by
<ul style="list-style-type: none"> provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development. 	
18. Aviation	
<p>If the development proposes a helicopter landing site (HLS), assess its potential impacts on the flight paths of any nearby airport, airfield or HLS.</p> <p>If the site contains or is adjacent to a HLS, assess the impacts of the development on that HLS.</p>	N/A. No helicopter landing is proposed as part of this SSDA.
19. Construction, Operation and Staging	
<p>Provide details of existing (if relevant) and proposed operations, including staff and student numbers, any before/after school care services and/or community use of school facilities.</p> <p>If staging is proposed, provide details of how construction and operation would be managed and any impacts mitigated.</p>	A Plan of Management is provided at Appendix 22 .
20. Contributions and Public Benefit	
<p>Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit.</p> <p>Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.</p>	<p>Contributions are addressed in Section 4.5.4 of this EIS.</p> <p>It is considered the proposal would have public benefit providing for educational facilities within the local government area.</p>
21. Engagement	
<p>Detail engagement undertaken and demonstrate how it was consistent with the Undertaking Engagement Guidelines for State Significant Projects. Detail how issues raised and feedback provided have been considered and responded to in the project. In particular, applicants must consult with:</p> <ul style="list-style-type: none"> the relevant Department assessment team. any relevant local councils. any relevant agencies, including Transport for NSW. the community. if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation. 	A Community and Stakeholder Consultation Report is provided at Appendix 15 .





PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The identified portion of land, that is the subject of this EIS is defined as 48 Victoria Road and 2A-2B Gordon Road, Rozelle, being Lot 1 DP 82780, Lot 2 DP 656961 and Lot 1 DP 169780.

The subject site comprises a total area of approximately 4,880m², with the following split:

- Site 1 - Lot 1 (DP 82780) and Lot 2 (DP 656961): 1,341m²
- Site 2 – Lot 1 (DP 169780): 3,539 m²

In its existing state, the subject site contains St Joseph's Catholic Church Rozelle, the associated Parish Hall, a former convent used by the Gunawirra Community Facility and a former school building used by the Sydney Community College. The Site has previously been used as a primary school and associated educational facilities and church for many years. The school is no longer operating.

An overview of site characteristics are included in **TABLE 4**, as follows.

TABLE 4: SITE CHARACTERISTICS	
Component	Description
Address and legal description	48 Victoria Road and 2A-2B Gordon Road, Rozelle, being Lot 1 DP 8278, Lot 2 DP 656961 and Lot 1 DP 169780.
Site area	4,880m ² (approx.) combined
Current use	<p>Site 1 - In its existing state, the Site is occupied by a two-storey brick building that is currently occupied by small commercial business. A small brick wall outlines the perimeter of the Site.</p> <p>Site 2 - In its existing state, the subject site contains St Joseph's Catholic Church Rozelle, the associated Parish Hall, a former convent used by the Gunawirra Community Facility and a former school building used by the Sydney Community College. A theatre use is also operating within the building. The Site has previously been used as a primary school and associated educational facilities and church for many years. The school is no longer operating.</p>
Topography	The site is relatively flat with a slight fall in the courtyard at Victoria Road from North to South.
Access	Vehicular and pedestrian access is facilitated via Gordon Street. No vehicular access is offered to the Site via Victoria Road. On-site parking is available via a is a single shared ingress and egress for vehicles to Site 2. A separate entry and exit is provided for pedestrians a further 2m north of the carpark ingress and egress.
Vegetation	There are existing trees on Site 1, with larger established trees and vegetation within the courtyard area behind the existing building. Site 2 has minimal vegetation, with some landscaping along Gordon Street boundary.
Watercourses	There are no surrounding watercourses.
Heritage	Site 2 is identified as an item of local heritage significance pursuant to LLEP 2013 described as Item 768 St Joseph's Catholic Church and former school, including interiors (Gordon Street, Rozelle).





TABLE 4: SITE CHARACTERISTICS	
Component	Description
	Site 2 is also located within the Hornsey Street Heritage Conservation Area. Further information regarding Heritage is discussed in Section 0 of this EIS.

The location of the subject site and existing site development are depicted in **Figure 2, Figure 3** and **Figure 4**.

2.1.1 48 Victoria Road, Rozelle

48 Victoria Road, Rozelle (Site 1) is zone B2 Local Centre and is currently owned by the Trustees of the Roman Catholic Church for the Archdiocese of Sydney. It has a primary frontage to Victoria Road and secondary frontages to Gordon Street and Prince Street. In its existing state, the Site is occupied by a two-storey brick building that is currently occupied by a small commercial business . A small brick wall outlines the perimeter of the Site.

See **Figure 2** and **Figure 3** below.



Figure 2 Cadastral Map (Source: Six Maps, 2021)



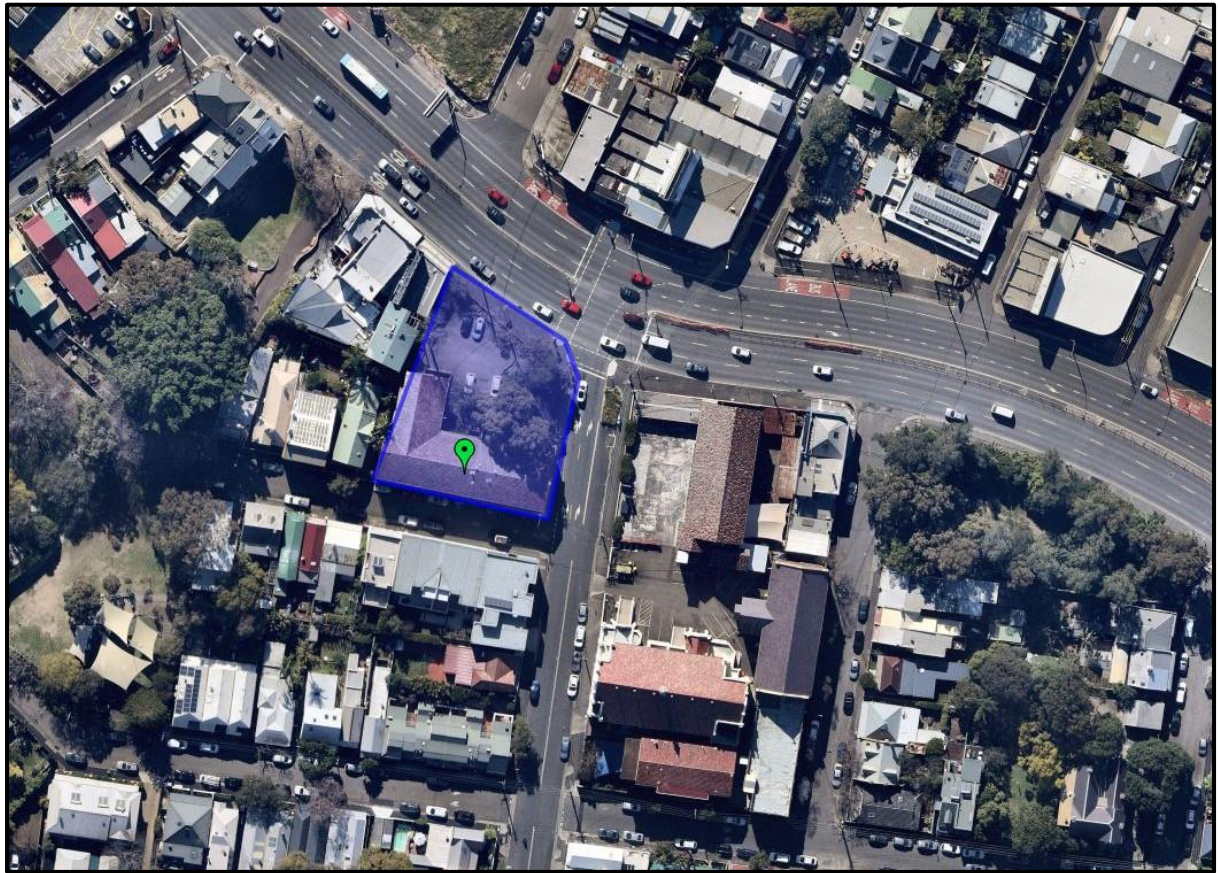


Figure 3 Aerial Map (Nearmap, 2021)

2.1.2 2A-2B Gordon Road, Rozelle

2A-2B Gordon Street, Rozelle (Site 2) is zoned SP2 Infrastructure, pursuant to LLEP 2013 and is currently owned by the Trustees of the Roman Catholic Church for the Archdiocese of Sydney. In its existing state the Site is occupied by St Joseph's Catholic Church Rozelle, the associated Parish Hall, a former convent and is also used by the Gunawirra Community Facility and a former school building used by the Sydney Community College and Genesian Theatre. The Site has previously been used as a primary school and associated educational facilities and church for many years. The school is no longer operating. The site has frontage to Gordon Street, Victoria Road and Maney Street. The site currently has vehicle access from Gordon Street and approximately 11 parking spaces.

See **Figure 4** and Figure 5 below.



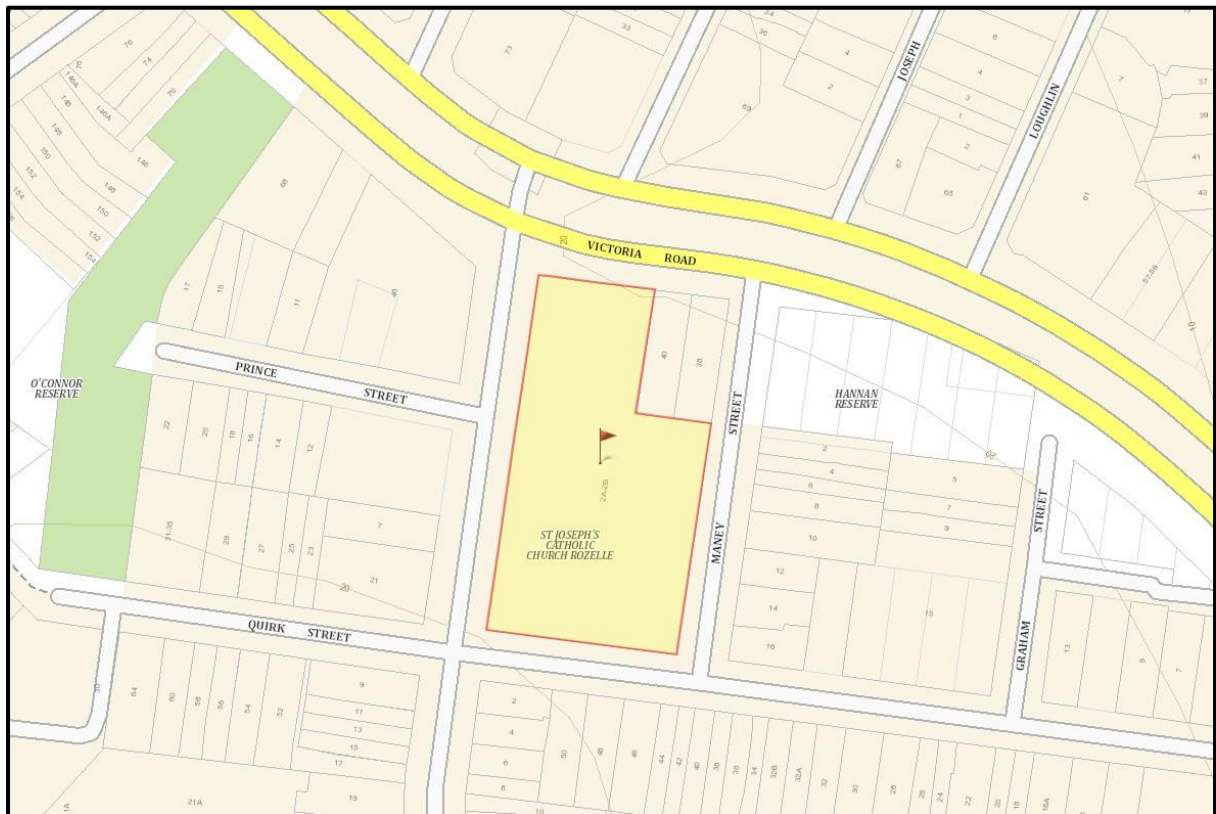


Figure 4 Cadastral Map (Source: Six Maps, 2019)



Figure 5 Aerial Map (Source: Nearmap, 2021)





2.1.3 Site Context

The site is located within the suburb of Rozelle, within the Inner West Local Government Area (LGA). The site is located 3km West of Sydney CBD and within a kilometre of the Sydney Harbour. The surrounding area is a mix of residential housing, both low and medium density and commercial development. The site is in close proximity to some schools, including Rozelle Public School which is located on Darling Street approximately 400m North-West.

The site is within 800m of the Sydney Superyacht Marina and 1km from the Sydney Fish Market which is currently undergoing redevelopment. The site has good public transport connections through bus links along Victoria Road and from the Tram at Rozelle Bay.



Figure 6 Site Context Map (Source: NearMap, 2021)





2.2 DEVELOPMENT HISTORY

2.2.1 Current Consents

Recent approval has been granted for part of the Site known as 2B Gordon Street, Rozelle. **DA/2020/0800** is for alterations for adaptive reuse of ground floor of Parish Hall as a licensed theatre and was approved on the 8 June 2021.

The proposed educational use would not adversely impact on this development application. It is understood that the theatre operates outside of school hours and on weekends, and as such there would be no cumulative impacts from these two uses. Furthermore, the proposed School use would not impact the operation of the Theatre use. A Plan of Management for the operations of the School has been provided at **Appendix 22**.

2.2.2 Previous Development Consents

D/2008/551

For 48 Victoria Road development consent was granted for the relocation of existing plant equipment (air conditioning and refrigeration and screen walls). Consent was granted on the 22nd of December 2008.

D.A.134/96

Development consent was granted for St Josephs Primary School to allow for the use of 10 existing classrooms to conduct adult education classes. Consent was granted on the 18th of July 1996. Numerous submissions were made to the DA before consent was made mainly relating to parking and provision of parking and traffic generation in the area as well as increases in noise and air pollution.

D.A.105/87

The DA was in regard to commercial alterations and change of use. The site was proposed to house a building on the corner of Gordon Street and Victoria Road to be converted for commercial purposes as an engineer's consulting office. This including the refurbishment of the existing building and walkways between what was classrooms. Consent was granted on the 29th of September 1987.

D.A.1358

This DA was in regard to the extension of the boy's school which was approved in October 1959.

Previous developments demonstrate the use of the site for educational purposes within the last century with continued development consents granted for the site for the current owners the Trustees of the Roman Catholic Church.

2.3 LAND OWNERSHIP

The land that is the subject of this application, is owned by the following entities:

- Lot 1 DP 169780 – The trustees of the Roman Catholic Church
- Lot 2 DP 656961 – The trustees of the Roman Catholic Church
- Lot 1 DP 82780 – The Trustees of the Roman Catholic Church

The current ownership of both sites lies in the possession of The Trustees of the Roman Catholic Church.





2.4 SITE SUITABILITY

The site is considered suitable for the proposed development for the following reasons:

- The site is zoned for the purpose of a school and a school is permissible within the zoning;
- Historically the site has operated as a school;
- The proposal would support the ongoing operations of the established College through the provision of a campus new and upgraded facilities to enable the fostering of high quality educational and learning experiences;
- The proposed development primarily supports the existing school at Kirribilli, noting there will be no increase in student numbers for this existing school;
- The site benefits from existing buildings that can be retrofitted for school purposes;
- The site is serviced by existing services and infrastructure that are capable of supporting the proposed development;
- The proposal would not detrimentally affect any item or area of heritage or archaeological significance;
- The proposal may be developed with appropriate visual amenity given its surrounding context;
- The design of the development has considered surrounding properties and would maintain a suitable level of amenity including with respect to solar access, visual privacy, acoustic privacy and views;
- All potential environmental impacts of the proposal would be suitably mitigated within the site; and
- The proposal would generate and maintain employment opportunities during both construction and operational phases.

The proposal is justified on the basis that it is compatible with the locality in which it is proposed and has no unacceptable economic, environmental or social impacts.





PART C PROPOSED DEVELOPMENT

3.1 OBJECTIVES OF THE PROPOSAL

The proposal seeks consent for use of the sites for an educational establishment. The following are the aims and objectives of the project:

- Provide an additional teaching campus for tailored learning and educational opportunities for St Aloysius College
- Provide teaching facilities while the main St Aloysius Campus (Kirribilli) is being redeveloped;
- Ensure minimal environmental impact;
- Complement existing uses of the buildings;
- Ensure development is compatible with surrounding development and the local context.

The Site and proposed design are considered to meet the objectives of the project as it allows for development partly on land that has been previously used for educational purposes.

3.2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

Consent is sought to develop the subject site for educational purposes, in accordance with the following provisions outlined in **TABLE 5**.

TABLE 5: PROPOSED DEVELOPMENT PARTICULARS	
Project Element	Development Particular
Site Area	Site 1 (Victoria Road) exhibits 1,343 sqm Site 2 (Gordon Street) exhibits 3,439 sqm
Primary Land Use	Educational Establishment
Alterations proposed	<u>Site 1</u> : addition of a new lift, new glazing to walls and windows, new handrails, new internal walls, new floor finishes, modification to services, new toilet and shower facilities installed. <u>Site 2</u> : addition of a handrail to staircase in the existing building.
Capacity	Maximum 200 students on site
GFA	994 sqm (Site 1) No additional floor space is proposed to either Site.
Floor Space Ratio	No change is proposed to the FSR of either Site.
Building Height	9.37m (8.4m to top of new lift) (Site 1)
Number of Stories	2 Storey building (Site 1 and Site 2)
Landscaping	614 sqm of hard landscaping (Site 1) 126 sqm of soft landscaping (Site 1) No landscaping is proposed to Site 2.
Trees	45 sqm of tree canopy cover
Earthworks	Minor earthworks will be required for the lift. Trenching
Car parking	4 parking spaces to be leased on Site 2 (existing spaces)
Access	Pedestrian access off Gordon Street only to both sites





	Service vehicle access from Gordon Street to Site 1 Vehicular access from Gordon Street to Site 2
Infrastructure and Services	Existing infrastructure and services will be utilised, with additional upgrades required for the main switchboard and internet as further detailed below in Section 3.2.2 .
CIV	\$2,015,684.00
Construction Jobs	25
Operational Jobs	20
Construction Timeframe	16-18 week construction (to commence late 2022)

Full details of the proposal are included in the Architectural Plans at **Appendix 4**.

3.2.1 Demolition

To facilitate the proposed development, minor demolition works are proposed internally to 48 Victoria Road, including:

- Internal walls;
- Sliding doors;
- Removal of existing boarded window openings;
- Removal of carpet and vinyl floors.

The kitchenette will be demolished at 2A/B Gordon Street.

3.2.2 Site Preparation and Earthworks

Minimal site preparation works will be required. There will be minor ground disturbance to allow for the new lift to be installed. There will also be some earthworks to facilitate the stormwater drainage and to allow for the landscaping works.

3.2.3 Infrastructure

A Services and Infrastructure Report has been prepared and provided at **Appendix 14**.

Electrical Services:

The main switchboard is proposed to be replaced and situated in a more suitable location, within a 2hr fire rate cupboard or room. The existing electricity supply is sufficient for the proposed development.

Telecommunications:

An existing Telstra ADSL line is expected to be redundant and replaced by a new fibre connection to support the bandwidth requirements of the school.

Sewer Drainage:

The existing sewer connects to Sydney Water on the western boundary of the site. The capacity of the existing sewer is suitable for the proposed development.

Potable Water:



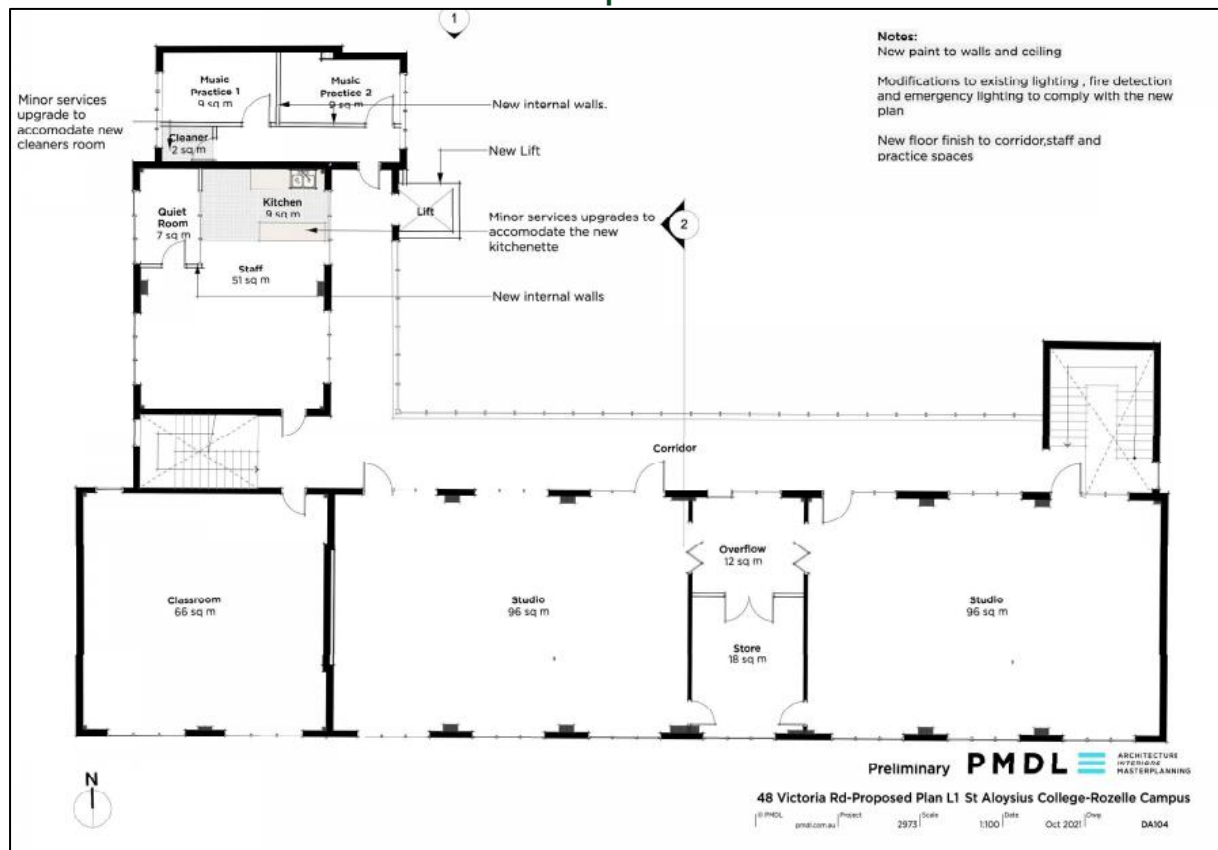


Figure 8 48 Victoria Rd – L1 Floor Plans (PMDL, 2021)

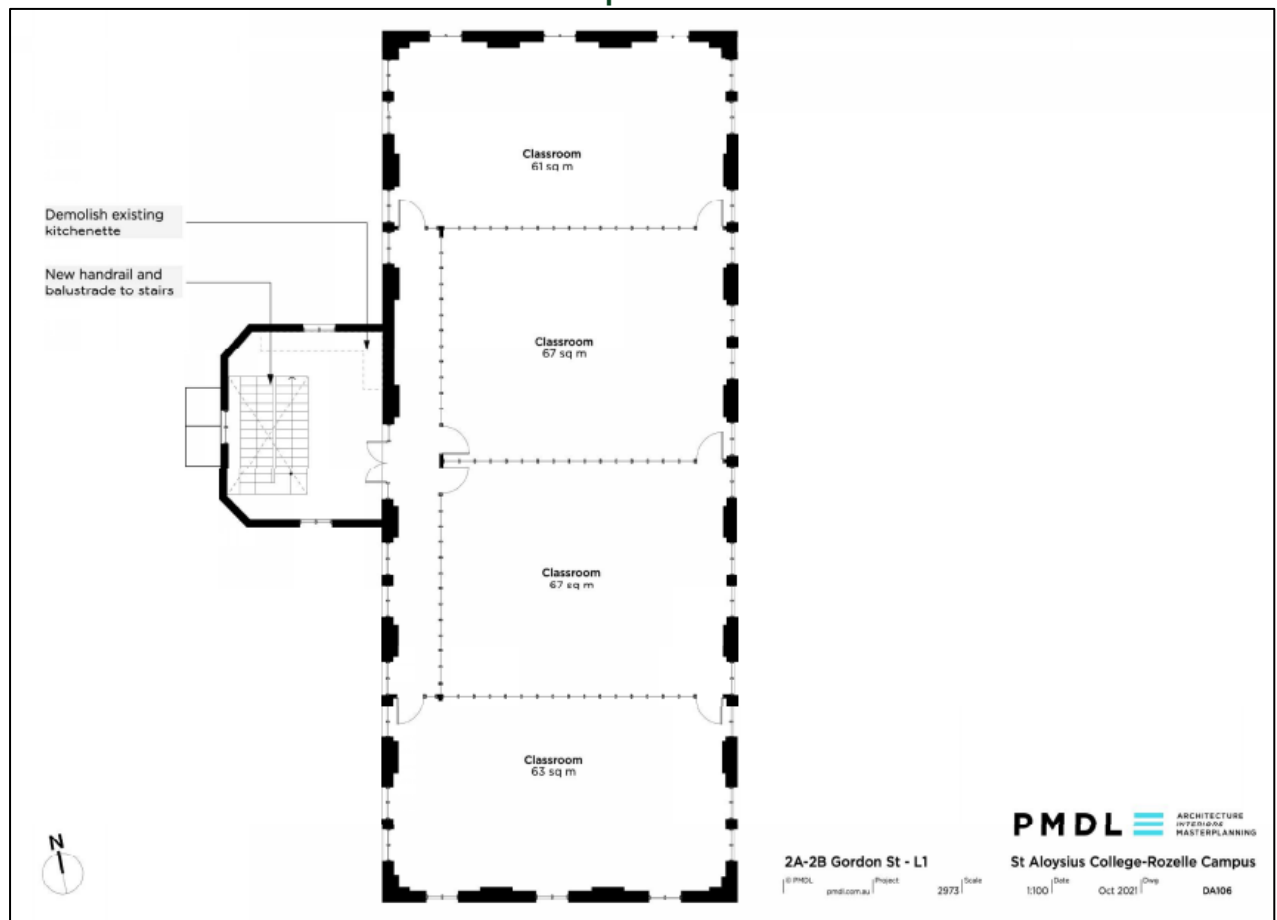


Figure 9 2A-2B Gordon St – L1 Floor Plan (PMDL, 2021)

The landscaping proposed will include additional soft planting within the courtyard of Site 1, with tiered playground levels separating passive and active play spaces. The courtyard will include seating, half basketball court, handball courts, tables and chairs and accessible ramps to each area of the playground. Planting is focused to the existing central planting area and along Victoria Road and Gordon Street. **Figure 10** shows the overall landscape masterplan for the site and playground facilities. Further detail is provided in the Landscape Plans (**Appendix 6**). The existing landscaping on the boundary of Site 2 will be retained.



Figure 10 Landscape Masterplan (Arcadia, 2021)

3.2.5 Operational Details

The proposed operational details of the Rozelle SAC campus are provided in the Plan of Operational Management provided at **Appendix 22**.

Operating Hours:

- School Hours: 8:00am – 4:00pm
- School Reception: 7:30am – 5:00pm

Miscellaneous Activities/Events

- Kirribilli main campus and existing sporting campuses will be utilised.
- The College currently hosts Performing Arts events and community events throughout the year on weekdays and weekends, and these conclude no later than 10.30pm. It is anticipated these would occur on the main campus.
- All students are on campus for core school hours, with students also participating in a range of extracurricular programs before and after school off-site.
- On an annual basis, the College will correspond with immediate residents to advise of the proposed yearly activities.





Staff/ Students

The maximum anticipated employee and student numbers on site at any one time is expected to be 200 students and 15 staff spread across the two sites. It is anticipated that student numbers for the first enrolment would be circa 160-180 students.

TABLE 6: STAFF AND STUDENT NUMBERS (WEEKDAY/ WEEKEND)				
Type	Day (8:00-15:15)	Morning (7:00-12:00)	Afternoon (12:00-17:00)	Night (17:00-22:30)
Student	200	200	50-200	-
Employee (Teaching)	10*	10*	10*	-
Employee (Administration/ Maintenance)	5*	5*	5*	-
Visitors (Community)	Unknown	Unknown	Unknown	-
Total	215	215	215	
Note: No operation during holiday periods				

There is potential for some evening activities to occur on site if the School could utilise the Theatre facilities. These events would be planned and notified to the community in advance.

Access, Staff and Security

- Appropriate security systems will be installed throughout the new facilities.
- All staff and authorised contractors are identified using appropriate visible identification.
- The College engages an external security firm for after-hours security.
- The College has an on-site Facilities Manager on call.
- Due to the number of campuses at the College, there are four (4) full-time Maintenance Officers in addition to the Facilities Manager.
- External contractors are at times required on-site for repairs.
- Public access to facilities will be restricted to dedicated entries.

Cleaning

- Cleaning of common areas will take place outside of operating hours.
- A cleaning register will be maintained and updated daily.
- Waste storage hubs will be provided and collection practices followed in accordance with the College's Waste Management Plan contained within this POM.

Noise

- Noise mitigation measures will be implemented to minimise the impact on adjoining residences and the surrounding public domain.
- All visitors to the Site will be requested to leave the premises in a quiet and orderly fashion.
- A register of complaints will be utilised to record the details of any complaints made by a person to staff including time, date and nature of complaint.
- Loitering at the front of the premises by students or other members of the College community will be monitored and actively discouraged.

Transport

- Most staff and students will use public transport to this site. Availability is frequent during peak periods.





- The College will provide a Shuttle Service to/from Rozelle to its main Campus in Kirribilli:
 - AM: 1 large coach
 - PM: 1 large coach

Safety and Student Movement

- The College will maintain an active supervision roster of teaches before and after school to monitor student movement.
- Priority will be placed on the student movement on and near Victoria Road and students will be instructed to move only at signed locations in and around the Campus. Particular emphasis will be placed on:
 - Victoria Road crossing at Gordon Street with bus stops to the East of Gordon Street .
 - West Bound - Victoria Road at Evans Street Stop ID: 203922.
 - East Bound - White Bay, Victoria Road Stop ID: 203916.
- Student movement across Gordon Street will be supervised by teachers both in-between lesson times and at recess and lunch breaks.
- Teacher supervisors will be clearly identifiable and trained in supervision.

Access to facilities by the community

- With the signing of an appropriate Venue Hire Agreement, the College is available for local community events, including (but not limited to), Church services, local government gatherings and community events. The College will waive hire cost for suitably qualified not-for-profit organisations.

Access to community facilities

- The College will seek to partner with the Genesian Theatre Company for the use of these facilities in the Old Parish Hall.
- The College will seek to partner with the Sydney Community College under the terms of the lease with the Parish.

Waste Management

- The Campus will produce approximately 10 tonnes of general waste annually with a reclaim rate of over 90%.
- The College uses commercial waste contractors who remove separated waste streams on a weekly basis.

Evacuation

- All employees are inducted into the College's evacuation procedures.
- All staff and students are trained for both an emergency evacuation and lockdown, and the College utilises practice drills for both emergency situations.
- Evacuation procedures are displayed throughout the College.
- All external visitors are required to sign-in at Reception before being accompanied by a staff member through the Site as/if required, ensuring the College maintains an account of people on the Site.
- Emergency procedures in future buildings will be aligned with the College's existing excavation and lockdown policies.

Complaints Approach

- The College has a well-established complaints procedure and is required to have this as a part of its accreditation and registration with NSW Educational Standards Authority (NESA).
- Should a complaint be received, the details of the complaint are taken by the responding staff member and will include:
 - Full name and contact details of complainant.
 - Date and details of the specific matter of disturbance.
 - Explanation to complainant that the matter will be addressed directly by College.
- The College then investigates the complaint, seeks to mitigate issue that has been raised and responds accordingly to the Complainant.





3.3 SUPPORTING PROJECT DOCUMENTATION

Documents provided in support of the proposal are outlined in **TABLE 7**.

TABLE 7: DOCUMENT SCHEDULE		
Appendix No.	Documentation	Consultant
Appendix 1	Secretary's Environmental Assessment Requirements	NSW DPIE
Appendix 2	Cost Report	WT Partnership
Appendix 3	Survey Plan	PMDL
Appendix 4	Architectural Plans	PMDL
Appendix 5	Architectural Design Statement	PMDL
Appendix 6	Landscape Plan	Arcadia
Appendix 7	Aboricultural Impact Assessment	Arborsafe
Appendix 8	BDAR Waiver	EES
Appendix 9	Ecological Site Inspection	ADE
Appendix 10	Heritage Impact Statement	Ruth Daniell
Appendix 11	Preliminary Site Assessment	EI Australia
Appendix 12	Geotechnical Investigation	STS Geotechnics
Appendix 13	Stormwater and Flooding Report	Stantec
Appendix 14	Services and Infrastructure Report	Integral
Appendix 15	Community and Stakeholder Consultation Report	Willowtree Planning
Appendix 16	Transport Assessment	Traffix
Appendix 17	Hazardous Materials Survey	EI Australia
Appendix 18	BCA Assessment	BCA Logic
Appendix 19	Access Report	BCA Logic
Appendix 20	Acoustic Report	Stantec
Appendix 21	Ecologically Sustainable Development Report	Integral
Appendix 22	Plan of Operational Management	St Aloysius College
Appendix 23	Social Impact Statement	Sarah George

3.4 PROJECT NEED

The development will provide necessary alternate schooling facilities for St Aloysius College whilst they complete construction works at their main campus in Kirribilli. This will allow for a reduction in disturbances to children's learning whilst this construction is carried out. After construction is completed at the main campus the secondary campus at the selected site/s will continue to provide tailored learning and educational opportunities for the school. The site selected is ideal for the use of an educational establishment as it has previously been used for teaching and religious purposes within the last century.

The proposed additional school campus, provides for additional educational services within the Inner West LGA, and supports the intentions of the Eastern City District Plan to ensure there is adequate social infrastructure provision. The proposed development also seeks to utilise existing buildings with minor interventions, reducing building waste and preserving heritage items through their continued use.





3.5 CONSIDERATION OF ALTERNATIVES

The purpose of the proposed development is to allow for education space throughout construction of the main Kirribilli campus, but also intends to offer a unique off-site campus to allow for a tailored education approach for one year level. The proposed development seeks to ensure:

- It provides an additional teaching campus for tailored learning and educational opportunities for St Aloysius College;
- It provides teaching facilities while the main St Aloysius Campus (Kirribilli) is being redeveloped;
- It has minimal environmental impact;
- It complements the existing uses of the buildings;
- It is compatible with surrounding development and the local context.

(a) 'Do Nothing' Scenario

This scenario was dismissed as the objectives of the proposal would not be met, including allowing for the retention of sufficient teaching space while the main campus is being redeveloped. If the proposed development was not to proceed, this would compromise the ability of SAC to provide ample teaching facilities for their students during the redevelopment. Furthermore, it would not support the reuse of the existing buildings on site for an educational use.

(b) Development on an Alternative Site

Consideration to alternative sites were made, however these were dismissed as the subject site resulted in the most beneficial outcomes for the proposal as:

- It is appropriately zoned to allow for educational establishments;
- It results in the re-use of established buildings that were previously used for educational purposes;
- The proposal does not result in adverse amenity impacts to the surrounding area;
- The proposal will not impact on the existing heritage on Site 2; and
- The site is situated in a locality which already contains 20% of the SAC exiting enrollments.

The proposal is justified on the basis it is compatible with the locality in which it is proposed while having no unacceptable economic, environmental or social impact.

(c) Different Site Configuration

The configuration of the development is led by the existing built form on site and as such it is unlikely there is any alternative solution that would allow for an improved development outcome. If the site were to be demolished and redeveloped, this would have far greater environmental and amenity impacts.





PART D LEGISLATIVE AND POLICY FRAMEWORK

4.1 CONTROLS AND POLICIES

The following current and draft Commonwealth, State, Regional and Local planning controls and policies have been considered in the preparation of this application.

Commonwealth Planning Context

- *Environment Protection and Biodiversity Conservation Act 1999*

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2000*
- *Biodiversity Conservation Act 2016*
- *Rural Fires Act 1997*
- *Heritage Act 1977*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities)*

Strategic Planning Context

- *Greater Sydney Region Plan – A Metropolis of Three Cities*
- *Eastern City District Plan*
- *Our Place Inner West: Local Strategic Planning Statement*

Local Planning Context

- *Leichardt Local Environmental Plan 2013*
- *Draft Inner West Local Environment Plan 2020*
- *Leichardt Development Control Plan 2013*

This proposal has been carefully assessed against the requirement and objectives of all of the above planning statutory and policy documents. A detailed analysis is set out in the following sections:





4.2 COMMONWEALTH PLANNING CONTEXT

4.2.1 Environment Protection and Biodiversity Conservation Act 1999

Under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species), must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval on a Commonwealth level. If an action is considered likely to have significant impact on MNES, it is declared a "Controlled Action" for which formal Commonwealth approval is required.

Referral to the Commonwealth Minister is not required.

4.3 STATE PLANNING CONTEXT

4.3.1 Environmental Planning and Assessment Act 1979

Pursuant to Section 4.36(2) of the EP&A Act, a *State environmental planning policy may declare any development, or any class or description of development, to be State significant development.*

The proposed development constitutes SSD as detailed in **Section 4.3.6**.

Further, the proposal is deemed to be entirely consistent with the EP&A Act, particularly Clause 1.3.

The following responses are provided regarding each Object listed in Clause 1.3:

TABLE 8: EP&A ACT OBJECTS	
Object	Description
(a)	<p><i>to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,</i></p> <p>Response:</p> <p>The proposed development promotes the social and economic welfare of the community as it provides social infrastructure and additional educational establishments within the LGA. The proposal will also support the generation of additional jobs throughout operation and construction.</p> <p>The proposed development also supports the conservation and management of the States natural and other resources, through the re-use of existing buildings and through additional ecologically sustainable development principles that are proposed, for example through increasing soft landscaping elements across the site and increasing energy and water efficiency.</p>
(b)	<p><i>to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i></p> <p>Response:</p> <p>The intent of the proposed development is to facilitate ecologically sustainable development through the re-use of existing development.</p>





TABLE 8: EP&A ACT OBJECTS

Object	Description
	<p>The following Ecologically Sustainable Development (ESD) measures are proposed for the development:</p> <ul style="list-style-type: none"> ▪ Energy – including improved energy efficiency across the buildings. ▪ Water Efficiency – including improved water efficiency. ▪ Ecology – enhancing biodiversity through use of endemic species.
(c)	<p><i>to promote the orderly and economic use and development of land,</i></p> <p>Response:</p> <p>The development is considered orderly as it does not seek to create any additional built form and is located within an inner city location. The proposal is considered logical as it is sited within buildings that were previously used for education purposes.</p>
(d)	<p><i>to promote the delivery and maintenance of affordable housing,</i></p> <p>Response:</p> <p>This objective is not applicable as the proposal is not for housing.</p>
(e)	<p><i>to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,</i></p> <p>Response:</p> <p>The site has minimal existing biodiversity or vegetation on site. It is considered that the proposal would assist in improving biodiversity on the site.</p>
(f)	<p><i>to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</i></p> <p>Response:</p> <p>As identified in the Heritage Impact Statement (Appendix 10), there would be no detrimental impacts to the Heritage building, due to the proposal. It is not considered there is any Aboriginal Cultural Heritage contained on the site.</p>
(g)	<p><i>to promote good design and amenity of the built environment,</i></p> <p>Response:</p> <p>The proposed development utilises existing built form, and the minor alterations and additions proposed are of high quality and in keeping with the original design. The proposal seeks to retain the high quality and aesthetics of the existing buildings.</p>
(h)	<p><i>to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,</i></p> <p>Response:</p> <p>The proposed development would be implemented through best-industry practice standards and measures. The proposal has been designed in accordance with the BCA. This incorporates into the design, all statutory and functional requirements of the BCA, regarding access, egress and fire, which are deemed necessary to safeguard the safety of building occupants and the longevity of the development. A BCA Report and Access Report are provided at Appendix 18 and 19.</p>
(i)	<p><i>to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,</i></p> <p>Response:</p> <p>The proposed development is considered to impact positively on other existing (and proposed) developments within the locality, which is further reinforced throughout the supporting specialist reports and the body of this EIS. Where possible impacts have been identified, appropriate management and mitigation measures have been applied accordingly.</p>





TABLE 8: EP&A ACT OBJECTS

Object	Description
	<p>It is noted, that throughout the assessment process, relevant agencies have been consulted and provided opportunity to both assess the proposed development and provide comments. Community consultation has been conducted which has assisted to inform the final submitted design and reinforces compliance with this objective. This has included numerous Government agency meetings and notification letters to both Government agencies and all key stakeholders.</p> <p>Several meetings have been held with stakeholders, which are detailed further in PART E of this EIS.</p>
(j)	<p><i>to provide increased opportunity for community participation in environmental planning and assessment.</i></p> <p>Response:</p> <p>Community and stakeholder engagement has been undertaken for the proposed development. This has included meetings and notification letters to both agencies and all potentially-impacted residents and the existing SAC community.</p> <p>A Community and Stakeholder Participation Strategy (located in Appendix 15) has been prepared, in support of this SSD Application, offering a summary and analysis of all community and stakeholder consultation sessions, distilling into themes, and those items identified in the consultation process, as significant. It is anticipated further community consultation will continue throughout the SSDA process and ongoing during operation should the proposed development be approved.</p>

4.3.2 Environmental Planning and Assessment Regulation 2000

The EP&A Regulation is the EP&A Act's primary subordinate legislation and contains key operational provisions for the NSW planning system, including those relating to EIS'.

Schedule 1 – Forms

Pursuant to Schedule 1 of the EP&A Regulation, this EIS includes all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1, as detailed in **TABLE 9**.

TABLE 9: SCHEDULE 1 OF EP&A REGULATION

Requirements	Satisfied by
Part 1 Development applications	
2 Documents to accompany development application	
<i>(1) A development application must be accompanied by the following documents—</i>	
<i>(a) a site plan of the land,</i>	Refer to Appendix 4 of this EIS.
<i>(b) a sketch of the development,</i>	Refer to Appendix 4 of this EIS.
<i>(c) a statement of environmental effects (in the case of development other than designated development or State significant development),</i>	Not applicable to this SSD Application.
<i>(d) in the case of development that involves the erection of a building, an A4 plan of the building that indicates its height and external configuration, as erected, in relation to its site (as referred to in clause 56 of this Regulation),</i>	Not applicable to this SSD. The height of the lift addition has been provided at Appendix 4 .





TABLE 9: SCHEDULE 1 OF EP&A REGULATION

Requirements	Satisfied by
(e) <i>an environmental impact statement (in the case of designated development or State significant development),</i>	Refer to whole EIS document .
(f) <i>a species impact statement (in the case of land that is, or is part of, critical habitat or development that is likely to significantly affect threatened species, populations or ecological communities, or their habitats), but not if the development application is for State significant development,</i>	Not applicable to this SSD Application.
(g) <i>if the development involves any subdivision work, preliminary engineering drawings of the work to be carried out,</i>	Not applicable to this SSD Application.
(h) <i>if an environmental planning instrument requires arrangements for any matter to have been made before development consent may be granted (such as arrangements for the provision of utility services), documentary evidence that such arrangements have been made,</i>	Refer to Section 6.1.17 of this EIS.
(i) <i>if the development involves a change of use of a building (other than a dwelling-house or a building or structure that is ancillary to a dwelling-house and other than a temporary structure)—</i> <i>(i) a list of the Category 1 fire safety provisions that currently apply to the existing building, and</i> <i>(ii) a list of the Category 1 fire safety provisions that are to apply to the building following its change of use,</i>	Refer to Section 6.1.3 of this EIS and the BCA Assessment at Appendix 18 .
(j) <i>if the development involves building work to alter, expand or rebuild an existing building, a scaled plan of the existing building,</i>	Refer to Appendix 4 of this EIS.
(k) <i>if the land is within a wilderness area and is the subject of a wilderness protection agreement or conservation agreement within the meaning of the Wilderness Act 1987, a copy of the consent of the Minister for the Environment to the carrying out of the development,</i>	Not applicable to this SSD Application.
(kl) <i>in the case of development comprising mining for coal (within the meaning of section 380AA of the Mining Act 1992)—documentary evidence that the applicant holds an authority under the Mining Act 1992 in respect of coal and the land concerned or has the written consent of the holder of such an authority to make the development application,</i>	Not applicable to this SSD Application.
(l) <i>in the case of development to which clause 2A applies, such other documents as any BASIX certificate for the development requires to accompany the application,</i>	Not applicable to this SSD Application.
(m) <i>in the case of BASIX optional development—if the development application is accompanied by a BASIX certificate or BASIX certificates (despite there being no obligation under clause 2A for it to be so accompanied), such other documents as any BASIX certificate for the development requires to accompany the application,</i>	Not applicable to this SSD Application.





TABLE 9: SCHEDULE 1 OF EP&A REGULATION

Requirements	Satisfied by
<p>(n) if the development involves the erection of a temporary structure, the following documents—</p> <p>(i) documentation that specifies the live and dead loads the temporary structure is designed to meet,</p> <p>(ii) a list of any proposed fire safety measures to be provided in connection with the use of the temporary structure,</p> <p>(iii) in the case of a temporary structure proposed to be used as an entertainment venue—a statement as to how the performance requirements of Part B1 and NSW Part H102 of Volume One of the Building Code of Australia are to be complied with (if a performance solution, to meet the performance requirements, is to be used),</p> <p>(iv) documentation describing any accredited building product or system sought to be relied on for the purposes of section 4.15(4) of the Act,</p> <p>(v) copies of any compliance certificates to be relied on,</p>	Not applicable to this SSD Application.

Schedule 2 – Environmental Impact Statements

This EIS has been prepared in accordance with clauses 6 and 7 of Schedule 2, as detailed in **TABLE 10**.

TABLE 10: SCHEDULE 2 OF EP&A REGULATION

Requirements	Satisfied by
General Provisions	
6 Form of environmental impact statement	
An environmental impact statement must contain the following information—	
(a) the name, address and professional qualifications of the person by whom the statement is prepared,	Refer to page 2 of this EIS.
(b) the name and address of the responsible person,	Refer to page 2 of this EIS.
(c) the address of the land— (i) in respect of which the development application is to be made, or (ii) on which the activity or infrastructure to which the statement relates is to be carried out,	Refer to Section 2.1 of this EIS.
(d) a description of the development, activity or infrastructure to which the statement relates,	Refer to Section 0 of this EIS.
(e) an assessment by the person by whom the statement is prepared of the environmental impact of the development, activity or infrastructure to which the statement relates, dealing with the matters referred to in this Schedule,	Refer to PART F of this EIS.
(f) a declaration by the person by whom the statement is prepared to the effect that— (i) the statement has been prepared in accordance with this Schedule, and	Refer to page 2 and of this EIS.





TABLE 10: SCHEDULE 2 OF EP&A REGULATION

Requirements	Satisfied by
<p>(ii) <i>the statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and</i></p> <p>(iii) <i>that the information contained in the statement is neither false nor misleading.</i></p>	
7 Content of environmental impact statement	
(1) <i>An environmental impact statement must also include each of the following—</i>	
(a) <i>a summary of the environmental impact statement,</i>	Refer to page 11 of this EIS.
(b) <i>a statement of the objectives of the development, activity or infrastructure,</i>	Refer to Section 3.1 of this EIS.
(c) <i>an analysis of any feasible alternatives to the carrying out of the development, activity or infrastructure, having regard to its objectives, including the consequences of not carrying out the development, activity or infrastructure,</i>	Refer to Section 3.5 of this EIS.
<p>(d) <i>an analysis of the development, activity or infrastructure, including—</i></p> <p>(i) <i>a full description of the development, activity or infrastructure, and</i></p> <p>(ii) <i>a general description of the environment likely to be affected by the development, activity or infrastructure, together with a detailed description of those aspects of the environment that are likely to be significantly affected, and</i></p> <p>(iii) <i>the likely impact on the environment of the development, activity or infrastructure, and</i></p> <p>(iv) <i>a full description of the measures proposed to mitigate any adverse effects of the development, activity or infrastructure on the environment, and</i></p> <p>(v) <i>a list of any approvals that must be obtained under any other Act or law before the development, activity or infrastructure may lawfully be carried out,</i></p>	<p>Refer to Section 3.2 of this EIS.</p> <p>Refer to PART B and PART F of this EIS.</p> <p>Refer to PART F of this EIS.</p> <p>Refer to PART G of this EIS.</p> <p>Refer to PART D of this EIS.</p>
(e) <i>a compilation (in a single section of the environmental impact statement) of the measures referred to in item (d)(iv),</i>	Refer to PART G of this EIS.
(f) <i>the reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development set out in subclause (4).</i>	Refer to PART H of this EIS.
(2) <i>Subclause (1) is subject to the environmental assessment requirements that relate to the environmental impact statement.</i>	Refer to Section 1.5 of this EIS.
<p>(3) <i>Subclause (1) does not apply if—</i></p> <p>(a) <i>the Planning Secretary has waived (under clause 3(9)) the need for an application for environmental assessment requirements in</i></p>	Not applicable.





TABLE 10: SCHEDULE 2 OF EP&A REGULATION

Requirements	Satisfied by
<p><i>relation to an environmental impact statement in respect of State significant development, and</i></p> <p><i>(b) the conditions of that waiver specify that the environmental impact statement must instead comply with requirements set out or referred to in those conditions.</i></p>	
<p>(4) <i>The principles of ecologically sustainable development are as follows—</i></p> <ol style="list-style-type: none"> 1. <i>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> <ol style="list-style-type: none"> (i) <i>careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and</i> (ii) <i>an assessment of the risk-weighted consequences of various options,</i> 2. <i>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> 3. <i>conservation of biological diversity and ecological integrity, namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,</i> 4. <i>improved valuation, pricing and incentive mechanisms, namely, that environmental factors should be included in the valuation of assets and services, such as—</i> <ol style="list-style-type: none"> (i) <i>polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,</i> (ii) <i>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> (iii) <i>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>Refer to Section 0 of this EIS.</p>





Schedule 3 – Designated Development

Section 4(1) of the EP&A Regulation states, that any development described in Part 1 of Schedule 3, would be declared to be Designated Development for the purposes of the EP&A Act.

The proposal is for an educational establishment which is not listed as Designated Development.

4.3.3 Biodiversity Conservation Act 2016

The BC Act is the key legislation in NSW, relating to the protection and management of biodiversity and threatened species. The purpose of the BC Act is to “maintain a healthy, productive and resilient environment, for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development”. The BC Act is supported by a number of regulations, including the *Biodiversity Conservation Regulation 2017* (BC Regulation).

The proposed development site is largely clear of vegetation and does not contain any areas of biodiversity value, as such a BDAR waiver was sought. This BDAR Waiver request and relevant site studies is provided at **Appendix 9**. The BDAR Waiver granted by EES is provided at **Appendix 8**.

4.3.4 Rural Fires Act 1997

The *Rural Fires Act 1997* (RF Act) aims to prevent, mitigate and suppress bushfire in local government areas across the site, including protection of assets, infrastructure, and people.

Under Clause 100B of the RF Act, a bushfire safety authority may be required for development on bushfire prone land for a special fire protection purpose. A school is considered a special fire protection purpose, however the site is not considered to be bushfire prone. As such no further assessment is required under the RF Act.

4.3.5 Heritage Act 1977

The *Heritage Act 1977* (Heritage Act) aims to encourage the conservation and adaptive reuse of the States heritage. The Heritage Act requires that development should consider the impacts to the significance of the heritage item prior to any approval.

The proposed development will re-use an existing heritage building for education purposes, for which the building was previously used. Minor internal works are proposed to ensure the building is fit-for-purpose. It is not considered that the proposed works would be detrimental to the heritage item as addressed in the Heritage Impact Statement provided at **Appendix 10**.

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

The SRD SEPP identifies development that is State Significant Development, State significant infrastructure and critical State significant infrastructure, and regionally significant development.

Proposed developments that are listed in Schedule 1 of SRD SEPP are identified as being SSD. Clause 15 of Schedule 1 of SRD SEPP 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 development concerns an educational establishment which as stated in Clause 15 does not require a set CIV to reach state significance status. The development therefore is pursuant to the State and Regional Development SEPP 2011.

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

Under the provisions of *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55), where a development application is made concerning land that is contaminated, the consent authority must not grant consent unless:

- (a) it has considered whether the land is contaminated, and*
- (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or would be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land would be remediated before the land is used for that purpose.*

An Preliminary Site Investigation (22 October 2021) has been prepared by EI Australia (**Appendix 11**) to investigate and document the potential contamination of the subject site, assess the suitability of the site for the proposed use (or make recommendations to enable such a use to occur). It is noted that no investigation was undertaken for Site 2 given there are no groundworks proposed.

Based on the findings of their investigations, EI Australia have concluded the following:

- The site has historically been used for a commercial building and car parking with low density residential purposes surrounding.
- The site was not subject to any regulatory notices and surrounding sites have not been notified as contaminated to the EPA.
- Soil sampling and analysis were conducted and contaminant concentrations in the soils were found to be below the adopted human health-based criteria and ecological criteria for site land use settings.
- Copper, nickel and zinc were reported in groundwater at slightly higher levels than the adopted ecological criteria, however the concentrations are low and typical of background quality in urban settings and present a low human health and environmental risk.
- It is considered the site is suitable for educational purposes.

The Preliminary Site Investigation recommends that the recommendations of the Hazardous Materials Survey (**Appendix 17**) be carried out during refurbishment. Surplus soil material should be classified prior to off-site disposal, and any unexpected contamination be identified during redevelopment an environmental consultant must be engaged to provide guidance for remediation or management.

This recommendation has been included within the management and mitigation measures outlined in **PART G** of this EIS.





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

The *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (ESEPP) aims to facilitate the effective delivery of educational establishments and early education and care facilities across the State.

Part 4 of the ESEPP relates specifically to schools and identifies Prescribed Zones within which, pursuant to Clause 35(1), development for a school may be carried out by any person with development consent. The B2 Local Centre and SP2 Infrastructure zone (within which the site is located) is a Prescribed Zone for the purpose of Part 4 of the ESEPP, therefore the proposed development is permissible with consent.

Pursuant to Clause 35(6), *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:*

- (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.*

The Design Quality Principles outlined in Schedule 4 relate to context, built form and landscape; sustainability, efficiency and durability; accessibility and inclusivity; health and safety; amenity; whole of life; flexibility and adaptivity; and aesthetics. These principles have been addressed in the Architectural Design Statement at **Appendix 5**. It is considered that the proposed development has been designed to appropriately respond to these principles.

4.3.9 State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policies (Infrastructure) 2007 (ISEPP) provides the legislative planning framework for infrastructure and the provision of services across NSW.

Schedule 3 of the ISEPP nominates 'traffic generating development' which requires referral to Transport for NSW (TfNSW) (formerly Roads and Maritime Services (RMS)). Educational Establishments or Schools are not expressly considered in Schedule 3 and therefore the generic threshold applies. Development *for any other purpose* on a site with access to a non-classified road requires referral to TfNSW if it has capacity for 200 or more motor vehicles per hour.

The proposal would not provide for 50 or more motor vehicles per hour, as confirmed in the Transport Assessment (**Appendix 16**). The referral threshold is therefore not triggered and referral to TfNSW is not required pursuant to Schedule 3 of the ISEPP.

Clause 102 of the ISEPP has regard for the impact of road noise or vibration on non-road development. The site is located adjacent to Victoria Road, which has a daily average volume of 40,000 vehicles which triggers consideration under this clause for an educational establishment. The Acoustic Report (**Appendix 20**), has detailed the relevant internal noise levels for the school facilities to ensure there are no undue impacts from the road noise.





4.3.10 Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities)

The Explanation of Intended Effects (EIE) for the ESEPP amendments was on exhibition until 17 December 2020. The following amendments have been proposed in relation to schools, as outlined in the EIE:

- Provide clarity around the definition of an 'educational establishment' to ensure it captures circumstances where a new school/campus is proposed some distance from an existing registered school, so the new campus is assessed as a new school;
- Allow student housing as a development permitted with consent, within the boundaries of an existing school.
- With respect to 'Development Permitted without Consent', it is proposed to increase the student cap by 10%, or by one (1) classroom (approximately 30 students), whichever is greater.
- Increase the validity timeframe for short-term portable classrooms from 24 months to 48 months.
- Amend the thresholds for State Significant Development under Schedule 1, Clause 15 of the SRD SEPP to include the following provisions to satisfy the classification for SSD:
 - Introduce a requirement for the capital investment value for new schools to be \$20 million; and
 - Increase the capital investment value for alterations and additions to existing schools from \$20 million to \$50million.

The proposed amendments to the ESEPP seek to amend the CIV thresholds for the purpose of a new school. Currently all new schools are SSD. The review considers that this approval pathway is inappropriate for small-scale schools. The CIV threshold triggers for SSD within SRD SEPP are proposed to be changed to the following; \$20 million CIV for a new school.

The new threshold will allow for new smaller-scale schools to go through as local development.

4.4 STRATEGIC PLANNING CONTEXT

4.4.1 Greater Sydney Region Plan – A Metropolis of Three Cities

The *Greater Sydney Region Plan – A Metropolis of Three Cities* divides the Sydney Region into three (3) Cities, with a vision of growth until 2056. The Plan aims to anticipate the housing, education, health and employment needs of a growing and vastly changing population. The overall vision pursues an objective of transforming 'Greater Sydney' into a Metropolis of Three Cities, including:

- The Western Parkland City;
- The Central River City; and
- The Eastern Harbour City.

The division into three cities puts workers and the wider community closer to an array of characteristics such as, intensive jobs, 'city-scale' infrastructure and services, entertainment and cultural facilities. By managing and retaining industrial land close to city centres and transport, this will ensure critical and essential services are readily available to support local businesses and community members and residents. Once constructed and operational, the subject site would achieve economic growth and prosperity, as well as encourage employment-generating opportunities within an area zoned for such permissible purposes, that is considered relatively close in conjunction to residential communities, providing an ease of commute. The proposed





development across the site considers the education and community facility access outcomes that can be achieved for the immediate and wider localities within the Eastern Harbour City Precinct..

The proposed development addresses the following objectives outlined by the Greater Sydney Commission:

Objective 1 – Infrastructure supports the three cities: including facilitating investment in major economic drivers including the location and timing of critical support infrastructure, such as health and education facilities for job creation and agglomeration benefits.

Objective 6 – Services and infrastructure meet communities changing needs: with the NSW Dept of education estimating the need for 270,000 more students in Greater Sydney by 2036, the demand for school places is increasing, and this proposal will allow education opportunities closer to existing community. This development follows the suggested incorporating of joint and shared use of facilities, encouraging schools to share the use of facilities for the community outside of school hours. Improving the local communities access to facilities.

Objective 7 – Communities are healthy, resilient and socially connected: a focus on walkability is a key focus of the plan and the close proximity of services and resources for people within their local area is key to provide more socially connected areas across the three cities. The site is located along Victoria Road in Rozelle where there are an abundance of local businesses and transport connections, allowing for students, employees and visitors to take advantage of the well-connected location of the proposed campus.

In summary, the subject site and proposed development contributes to the objectives set out in the *Greater Sydney Region Plan – A Metropolis of Three Cities* by addressing the need for greater access to community facilities and schools as the Greater Sydney population continues to increase.

4.4.2 Eastern City District Plan

The subject site forms part of the Eastern Harbour City District, as identified in **Figure 11** below and is subject to the provisions of the *Eastern City District Plan*.





Figure 11 Structure Plan for the Eastern City District Plan (Source: Greater Sydney Commission, 2018)

Greater Sydney's three (3) cities discussed above reaches across five (5) districts. The Region Plan identifies the Site as being located in the Eastern City District. The District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision for Greater Sydney. The District Plan informs local strategic planning statements and local environmental plans, the assessment of planning proposals, as well as community strategic plans and policies.

The *Eastern City District Plan* covers the areas around the existing Harbour CBD including the Inner West LGA in which the subject site is located. The Plan sets out a twenty-year vision to help achieve the goals contained in *A Metropolis of Three Cities* – the GSC vision for developing Sydney as a world-class future city. The GSC reinforces the Plan's potential for achievement by outlining the following strategies, including:





- Strengthening the international competitiveness of the Harbour CBD, supported by the Innovation Corridor, health and education precincts and the District's strategic centres;
- Boosting innovation and creative industries alongside knowledge-intensive jobs growth;
- Stimulating the night-time economy within a responsive regulatory environment;
- Protecting international trade and freight routes;
- Retaining industrial and urban services land;
- Nurturing quality lifestyles through well-designed housing in neighbourhoods close to transport and other infrastructure;
- Sustaining communities through vibrant public places, walking and cycling, and cultural, artistic and tourism assets;
- Aligning growth with infrastructure, including transport, social and green infrastructure, and delivering sustainable, smart and adaptable solutions;
- Being innovative in providing recreational and open space areas, and increasing urban tree canopy;
- Transitioning to a low-carbon, high efficiency District through precinct-scale initiatives;
- Building effective responses to climate change and natural and urban hazards.

The NSW Department of Education estimates that an additional 42,850 students will need to be accommodated in government and non-government schools in the District by 2036. Inner West Council is anticipated to absorb 12-13 per cent of this growth.

The District Plan recognises that schools help to create and support inclusive and vibrant neighbourhoods. Planning for either new schools or the use of existing schools, must respond to growth and changing demand in innovative ways such as more efficient use of land, contemporary design, greater sharing of spaces and facilities, and flexible learning spaces.

It is considered that the proposed development will achieve the aims of the District Plan through provision of school facilities that are co-located with other services and support innovative learning solutions, while supporting sustainable development principles.

4.4.3 State Infrastructure Strategy 2018-2038 Building the Momentum

The *NSW State Infrastructure Strategy 2018-2038* sets out the NSW Government's infrastructure vision for the state over the next 20 years, across all sectors. It is underpinned by the Region Plan, *Regional Development Framework* and *Future Transport 2056*. The Strategy focuses on achieving sustainable growth in the NSW population and economy by aligning investment in infrastructure with the way we build our communities and achieve innovation in service delivery.

The Strategy seeks to:

- Better integrate land use infrastructure;
- Deliver infrastructure to maximise value for money;
- Optimise asset management;
- Make our infrastructure more resilient;
- Improve digital connectivity;
- Use innovative service delivery models.

In accordance with the objectives of the Strategy, the proposal would deliver school infrastructure in an area experiencing significant population growth. The continued growth of the Inner West LGA would therefore be supported by the infrastructure required to attain local amenity.

The proposed future use of the Site will need to account for the Site constraints so as to ensure the longevity of the asset and safety of future users. This would also be achieved through adaptive design of the proposed future use.





The related NSW Government publication on 'Building Schools and Skills' emphasises investment in schools to provide more student places and classrooms across the Site to accommodate the current and expected surge in enrolments. Specifically, through the 'School Assets Strategic Plan' the NSW Government is:

- *Ensuring that our schools can flexibly accommodate increasing student numbers with school expansions and modular buildings;*
- *Involving the community in new approaches to planning. Instead of upgrading education infrastructure one school at a time, we are collaborating with the community to determine how best to distribute students and deliver new and upgraded facilities within an area or region;*
- *Making it easier for school infrastructure projects to start by streamlining the approvals process in a new education-based State Environmental Planning Policy; and*
- *Investigating how we can better harness innovative technologies and equip our education facilities for the digital age.*

The proposed development would provide modern, technologically-equipped energy efficient and flexible facilities that will complement the existing education facilities of St Aloysius' College, Kirribilli. Accordingly, the proposed development would provide opportunity to support the requirements of the student-base, be conducive to best-practice teaching and learning models, and accommodate emerging, innovative techniques.

4.4.4 Our Place Inner West – Local Strategic Planning Statement

Our Place Inner West – Local Strategic Planning Statement (LSPS) sets the vision for the area to 2036 and actions to achieve this vision. The LSPS focuses on six themes including, ecological sustainability, liveable neighbourhoods, sustainable transport, create communities and a strong economy, healthy communities, progressive leadership. The LSPS aligns with the regional and district plans and develops the local planning framework. The LSPS vision is for *a place of creative, connected, sustainable and productive neighbourhoods - as vibrant, innovative and diverse as our community*. The LSPS also sets out 14 planning priorities to meet the strategic themes.

The proposed development aligns with priorities 9 – *a thriving local economy*, by providing for diverse employment opportunities and priority 13 - *Develop diverse and strong stakeholder relationships through collaboration with government, community and business to deliver positive planning outcomes and realise the benefits of growth*, through providing opportunities for shared use by the community.

4.5 LOCAL PLANNING CONTEXT

4.5.1 Leichhardt Local Environmental Plan 2013

The Sites are subject to the provisions of *Leichhardt Local Environmental Plan 2013* (LLEP2013). Relevant permissibility and development standards are summarised in the subsequent sections of this report.

Zoning and Permissibility

The Site is zoned B2 Local Centre and SP2 Infrastructure pursuant LLEP 2013 (refer to **Figure 12**). Zone objectives and permissibility for the B2 and SP2 Zone are outlined in **TABLE 11** below.



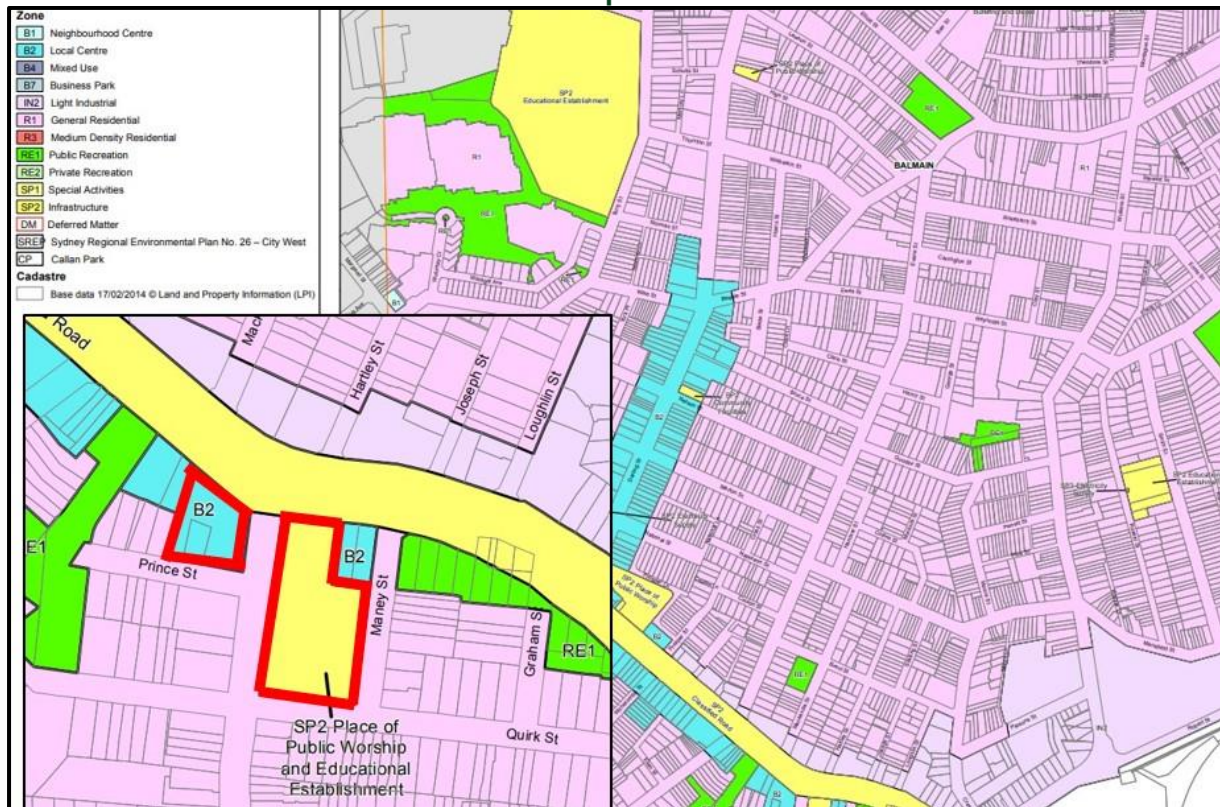


Figure 12 **Zoning Map** (Source: NSW Legislation, 2021)

TABLE 11: ZONING AND PERMISSIBILITY	
Clause	Provision Applicable to the Site
Zone - B2 Local Centre (48 Victoria Road, Rozelle)	
Objectives	<ul style="list-style-type: none"> To provide a range of retail, business, entertainment and community uses that serve the needs of people who live in, work in and visit the local area. To encourage employment opportunities in accessible locations. To maximise public transport patronage and encourage walking and cycling. To ensure that development is appropriately designed to minimise amenity impacts. To allow appropriate residential uses to support the vitality of local centres. To ensure that uses support the viability of local centres. To provide a mixture of compatible land uses. To reinforce and enhance the role, function and identity of local centres by encouraging appropriate development to ensure that surrounding development does not detract from the function of local centres. <p>To integrate suitable business, office, residential, retail and other development in accessible locations.</p>
Permitted without Consent	Home occupations
Permitted with Consent	Attached dwellings; Boarding houses; Centre-based child care facilities; Commercial premises; Community facilities; Dual



TABLE 11: ZONING AND PERMISSIBILITY

Clause	Provision Applicable to the Site
	occupancies; Dwelling houses; Educational establishments ; Entertainment facilities; Function centres; Information and education facilities; Medical centres; Multi dwelling housing; Oyster aquaculture; Passenger transport facilities; Recreation facilities (indoor); Registered clubs; Residential flat buildings; Respite day care centres; Restricted premises; Roads; Rural workers' dwellings; Semi-detached dwellings; Service stations; Shop top housing; Tank-based aquaculture; Tourist and visitor accommodation; Any other development not specified in item 2 or 4
Prohibited	Agriculture; Air transport facilities; Airstrips; Animal boarding or training establishments; Biosolids treatment facilities; Camping grounds; Caravan parks; Cemeteries; Correctional centres; Crematoria; Depots; Eco-tourist facilities; Extractive industries; Farm buildings; Forestry; Freight transport facilities; General industries; Heavy industrial storage establishments; Heavy industries; Helipads; Highway service centres; Industrial training facilities; Marinas; Mooring pens; Open cut mining; Pond-based aquaculture Port facilities; Recreation facilities (major); Rural industries; Sewage treatment plants; Storage premises; Transport depots; Truck depots; Vehicle body repair workshops; Warehouse or distribution centres; Waste disposal facilities; Waste or resource transfer stations; Water treatment facilities; Wharf or boating facilities; Wholesale supplies
Zone SP2 – Infrastructure (Place of Public Worship and Educational Establishment) (2A-2B Gordon Street, Rozelle)	
Objectives	<ul style="list-style-type: none"> To provide for infrastructure and related uses. To prevent development that is not compatible with or that may detract from the provision of infrastructure. <p>To ensure the adequate provision of public, community and social infrastructure.</p>
Permitted without Consent	Nil
Permitted with Consent	Aquaculture; Centre-based child care facilities; Community facilities; Entertainment facilities; Flood mitigation works; Information and education facilities; Passenger transport facilities; Recreation areas; Recreation facilities (indoor); Respite day care centres; Roads; The purpose shown on the Land Zoning Map, including any development that is ordinarily incidental or ancillary to development for that purpose
Prohibited	Any development not specified in item 2 or 3

Accordingly, Educational Establishments (which by definition includes schools) are permitted with consent in both the B2 and SP2 zones, and therefore the proposed development is permissible with consent.

The relevant development standards and controls have been considered in **TABLE 12** below.

TABLE 12: DEVELOPMENT STANDARDS – LLEP2013

Clause	Comment
Principal development standards	



Clause	Comment
Clause 4.1 Minimum Lot Size	Site 2 has a minimum lot size of 200 sqm. No subdivision is proposed.
Clause 4.3 Height of Building	There is no maximum building height control over the Site. The proposed development will not increase the height of the existing buildings. The additional lift will be 8.
Clause 4.4 Floor Space Ratio	The site has a maximum Floor Space Ratio (FSR) of 1:1 (refer to Figure 13). The proposed development does not propose increased floorspace, as it utilises the existing floorspace within the existing buildings.
Clause 5.10 Heritage Conservation	<p>Site 2 is identified as an item of local heritage significance (5) pursuant to LLEP 2013 (refer to Figure 14), described as follows:</p> <p><i>Item 768: St Josephs Catholic Church and former school, including interiors (Gordon Street, Rozelle).</i></p> <p>The Site is also located within the Hornsey Street Heritage Conservation Area (refer to).</p> <p>The proposed development is not considered to have detrimental impact on the Heritage item. No changes are proposed to the exterior of the building and internal works are to be in keeping with the character of the building. A Heritage Impact Statement is provided at Appendix 10.</p>
Clause 6.1 Acid Sulfate Soils	The site has potential to contain Class 5 Acid Sulfate Soils. The soils conditions are considered appropriate for development. A Geotechnical Investigation is provided at Appendix 12 .



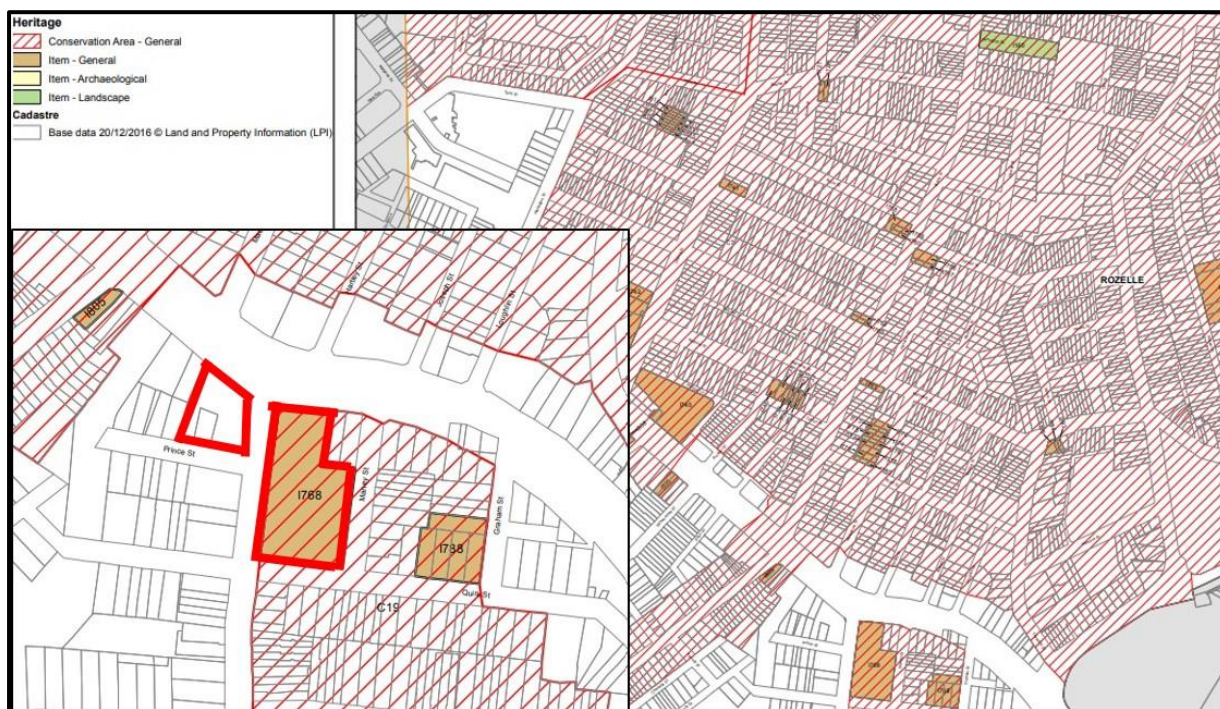


Figure 14 Heritage Conservation Map (Legislation NSW, 2021)

4.5.2 Draft Inner West Local Environmental Plan

Council currently has three principal LEPs that apply to development within the area. The draft Inner West Local Environmental Plan 2020 (draft LEP) will consolidate these LEPs into one document.

The draft has been approved by Council and was submitted to the State Government (Department of Planning, Industry and Environment (DPIE)) for finalisation at the end of June 2020. The draft is currently with DPIE for finalisation.

It is noted that there are no changes proposed by the Draft LEP that would affect the proposed development.

4.5.3 Leichhardt Development Control Plan 2014

The *Leichhardt Development Control Plan 2013* (LDCP2013) provides a non-statutory instrument to guide development in the Leichhardt LGA.

LDCP 2013 supplements LLEP2013 and provides more detailed provisions to guide development. Clause 11 of the SRD SEPP provides that:

Development control plans (whether made before or after the commencement of this Policy) do not apply to:
(a) State significant development

Clause 35(9) of the ESEPP, which relates to schools that are permitted with consent, provides that:





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.

Accordingly, the provisions of a DCP would not be applicable to the development. However, it is considered that the proposed development would meet the key outcomes of the LDCP 2013 as follows:

- C1.1 Site Context and Analysis: An analysis of the site and context has been undertaken within the Architectural Design Statement (**Appendix 5**).
- C1.3 Alterations and Additions: The proposed alterations and additions are in keeping with original building and are designed to complement the scale, form and materials of the building and surrounding streetscape.
- C1.4 Heritage Conservation Areas and Heritage Items: The proposed development will utilise part of an existing heritage item. It is considered there will be no detrimental impacts to the heritage and fosters positive re-use of heritage items as outlined in the Heritage Impact Statement (**Appendix 10**).
- C1.8 Contamination: A Preliminary Site Investigation (**Appendix 11**) has been undertaken and has found there are no significant contaminants that would affect the use of the site for education purposes.
- C1.9 Safety by Design: The proposed development has considered the principles of crime prevention through design as detailed in **Section 6.1.3** of this EIS.
- C1.10 Equity of Access and Mobility: The proposed development includes the addition of a lift to improve accessibility on site. An Access Report is provided at **Appendix 19**.
- C1.11 Parking: Four parking spaces are to be leased for the development, this has been further justified within the Transport Assessment provided at **Appendix 16**.
- C1.12: Landscaping: Additional landscaping has been provided on site, increasing the amount of soft landscaping

4.5.4 Former Leichardt Local Government Area Section 7.12 Development Contributions Plan 2020

The *Former Leichardt Local Government Area Section 7.12 Development Contributions Plan 2020* aims to assist in the delivery of services and infrastructure by Council.

The levy will not be imposed in respect of development relating to:

- 1. Where the proposed cost of carrying out the development is \$100,000 or less;*
- 2. For the purpose of disabled access;*
- 3. For the sole purpose of providing affordable housing, which is undertaken by a 'social housing provider';*
- 4. For the purpose of reducing the consumption of mains supplied potable water, or reducing the energy consumption of a building;*
- 5. For the sole purpose of the adaptive re-use of an item of environmental heritage;**
- 6. For the purpose of 'seniors housing' as defined in State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, which is undertaken by a 'social housing provider';*
- 7. That has been the subject of a condition under section 7.11 (or its predecessor – section 94) under a previous development consent, relating to the subdivision of the land on which the development is to be carried out; and*
- 8. Applications submitted by or on behalf of Inner West Council.*

It is considered that the proposal falls partly within development that would not be subject to contributions and as such no contributions would be anticipated due to work or use of Site 2. Any contributions for Site 1 would be subject to the requirements of the Contributions plan.





PART E CONSULTATION

5.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

An application to receive SEARs was submitted to DPIE, with the SEARs (reference: SSD-27208140) subsequently issued on 21 September 2021.

A copy of the issued SEARs is included in **Appendix 1**.

During the preparation of the SEARs, the DPIE also consulted with key stakeholders, and in the process obtained a list of their Key Issues for the proponent(s) to assess throughout this EIS. TfNSW, The Environmental Protection Authority (EPA) had no further issues or comments on the SEARs. The following sections outline key issues raised from other agencies.

5.1.1 Sydney Water

Sydney Water provided the following comments which have been addressed in **TABLE 13** below.

TABLE 13: SYDNEY WATER	
Requirements	Satisfied by
Water-related Infrastructure	
<i>The proponent of development should determine service demands following servicing investigations and demonstrate that satisfactory arrangements for drinking water, wastewater, and recycled water (if required) services have been made.</i>	A Services and Infrastructure Report is provided at Appendix 14 . It is considered existing services would be sufficient.
<i>The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed development does not adversely impact on any existing water, wastewater or stormwater main, or other Sydney Water asset, including any easement or property. When determining landscaping options, the proponent should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes and therefore should be avoided.</i>	A Services and Infrastructure Report is provided at Appendix 14 . The proposed development is not considered to impact on existing infrastructure.
<i>Strict requirements for Sydney Water's stormwater assets (for certain types of development) may apply to this site. The proponent should ensure that satisfactory steps/measures been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets. The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.</i>	A Services and Infrastructure Report is provided at Appendix 14 . The proposed development is not considered to affect flooding, water quality or heritage items.
Integrated Water Cycle Management	
<i>The proponent should outline any sustainability initiatives that will minimise/reduce the demand for drinking water, including any alternative water supply and end uses of drinking and non-drinking water that may be proposed, and demonstrate water sensitive urban design (principles are used), and any water conservation measures that are likely to be proposed. This will allow Sydney Water to</i>	An ESD Report is provided at Appendix 21 . Water conservation measures including water efficient fixtures and a low water use landscape design are proposed.





TABLE 13: SYDNEY WATER

Requirements	Satisfied by
<i>determine the impact of the proposed development on our existing services and required system capacity to service the development.</i>	

5.1.3 Energy and Science Group

EES requested should a Waiver be requested, it should clearly demonstrate that the proposed development is unlikely to have any significant impact on biodiversity values. A BDAR Waiver was prepared and is attached at **Appendix 9**. The BDAR Waiver approval from EES is attached at **Appendix 8**.

With regards to flooding, water and soils EES recommended the standard EES flooding, water and soils requirements were addressed. A Stormwater and Flooding Report is provided at **Appendix 13**. A Geotechnical Report is provided at **Appendix 12**.

5.2 STAKEHOLDER CONSULTATION

As recommended under the SEARs, the following stakeholder consultation has been undertaken. Stakeholders that have been consulted include:

- Inner West Council
- Transport for NSW
- Local residents and stakeholders
- St Josephs Church
- Sydney Community College
- Genesian Theatre
- Guniwarra
- SAC Community

A comprehensive level of community and stakeholder engagement has been undertaken for the proposed development. This has included meetings and notification letters to both agencies and all potentially-impacted residents and community.

A Community and Stakeholder Participation Strategy (located in **Appendix 15** of this EIS) has been prepared in support of this SSD Application, offering a summary and analysis of all community and stakeholder consultations, distilling into themes, and those items identified in the consultation process, as significant.

The information provided herein, demonstrates that genuine consultation has already taken place with stakeholders, seeking feedback on the proposed development.

5.2.1 Agency Consultation

In preparation of this EIS relevant agencies were consulted with to inform the proposed development. Agency consultation undertaken to date includes, but is not limited to, those detailed in **TABLE 14**.





TABLE 14: AGENCY CONSULTATION RECORDS

Stakeholder	Consultation Notes
DPIE	<p>Two scoping meetings were held and the key items raised included:</p> <ul style="list-style-type: none"> ▪ Requesting proposal clarification of site works; ▪ Raised concerns over traffic, access and safety of students; ▪ Further detail regarding operation of the school and how it operates with other existing uses; ▪ Clarification on the proposed new Industry Specific SEARs and SSD process.
TfNSW	<p>Two meetings were held with TfNSW and discussed:</p> <ul style="list-style-type: none"> ▪ Traffic flows to and from the Site; ▪ Victoria Road interface; ▪ Bus routes and parking options including shuttle services; ▪ Safety of students crossing roads and getting to and from the campus; ▪ Private car pick up/drop off; ▪ Staff parking; ▪ Cycling and bicycle parking;
Inner West Council	<p>Two meetings were held with Inner West Council and discussed:</p> <ul style="list-style-type: none"> ▪ Overall proposed development; ▪ Interface and relation with existing uses on site; ▪ Importance of addressing transport impacts, including parking; ▪ Community consultation, advising to capture a large catchment. <p>An additional meeting is being held with the General Manager of Inner West Council on the 9th of November 2021.</p>

5.2.2 Community Stakeholder Consultation

As part of the engagement and communication process, the following consultation was undertaken by St Aloysius College:

- Letterbox drop;
- 2X Online Public meetings;
- Email and Website.

5.2.2.1 Purpose of engagement

The stakeholder and community engagement process aimed to:

- Provide an outline of key project and site details of relevance to the community and stakeholders
- Identify key community and agency stakeholders to the development





- Outline the project's approach to communications and consultation at the planning, approval, construction and operational phases
- Provide a list of communications tools to be utilised
- Address the SEARs issued by the DPIE

5.2.2.2 Engagement overview

Engagement and consultation associated with the proposed development has been conducted with both Community and Agency Stakeholders.

Community Stakeholders were notified of the development and invited to engage via leaflet, delivered via post to all adjacent and nearby properties identified in **Figure 15**. The engagement leaflet included an overview of the proposed development and invited the receivers to participate in consultation on the project, offering virtual platform meetings and further information through the website. A copy of the engagement letter is included within the Community and Stakeholder Participation Strategy, which forms **Appendix 15** of this EIS.



Figure 15 Consultation Area Map (SixMaps, 2021)

In response to the invitation to engage, a total of 41 people engaged over the two sessions provided. No further feedback was received via email.

5.2.2.3 Engagement feedback

The feedback received through the consultation sessions were through a mix of written and verbal questions. These issues or items for consideration are expressed within **TABLE 15** below, along with how the proposed development has or will respond to these matters.





TABLE 15: CONSIDERATION OF RESPONSES

Issue or Concern	Project Response
Staff travel	Staff may travel to the campus with students from the main campus, or arrive independently, with use of a carpark on site or through public transport. This would be closely monitored by SAC.
Impacts to existing operation and uses on the Site.	The proposal would not seek to alter the operation or any of the existing uses on site. It is considered that the school can operate without impacting any existing uses of the site.
Traffic, public transport, parking.	The traffic and parking impacts have been comprehensively considered in the Transport Assessment (Appendix 16). Students that are not local or unable to catch public transport would utilise the coach from the main Kirribilli campus. Existing student public transport useage is high for SAC. Four parking spaces are provided on site.
Development process and stages	This EIS forms part of the submission to DPIE for this SSD application. Further public exhibition is expected to be undertaken by DPIE prior to any approval being granted.
Future impacts to residents and monitoring.	SAC is committed to continued engagement with the community throughout operation. A complaints approach is outlined in the Plan of Management at Appendix 22 .

5.2.3 Additional Consultation

Additional consultation was undertaken with specific parties including;

- St Josephs Parish and its community;
- Sydney Community College;
- Guniwarra; and
- Genesian Theatre

St Josephs Parish is supportive of the development, given they are providing a lease. Consultation was undertaken with the wider Parish community to notify them of the development. No further feedback has been provided to date.

After discussions with Guniwarra, the crypt space was removed from this SSD application so that this charity organisation can continue to utilise the space for storage without conflict.

Consultation with the Genesian Theatre company was based around the opportunity to utilise the theatre space and for students to assist in technical performance aspects as part of the service program.

Ongoing consultation has been undertaken with Sydney Community College, as they will be co-located with SAC. Ongoing coordination and management is envisioned to be managed through a board.





PART F ENVIRONMENTAL RISK ASSESSMENT

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The SEARs (reference: SSD- 27208140) issued by the NSW DPIE on 21 September 2021 identify the following key issues:

1. Statutory context
2. Capital Investment Value and Employment
3. Built form and Urban Design
4. Environmental Amenity
5. Trees and Landscaping
6. Ecologically Sustainable Development
7. Traffic, Transport and Accessibility
8. Biodiversity
9. Noise and Vibration
10. Stormwater and Wastewater
11. Flooding Risk
12. Hazards and Risks
13. Contamination and Remediation
14. Waste Management
15. Environmental Heritage
16. Social Impact
17. Infrastructure Requirements and Utilities
18. Aviation
19. Construction, Operation and Staging
20. Contributions and Public Benefit
21. Engagement

The abovementioned matter(s), and other necessary matters, are addressed in the following section(s).

6.1.1 Statutory and strategic context

This section of the EIS evaluates the statutory and strategic context of the proposed development, in relation to the SEARs and addresses its specific matters.

In response to item 1. Statutory and strategic context of the SEARs, **TABLE 16** specifies the location of each assessment of the relevant statutory and strategic documents.

TABLE 16: STATUTORY AND STRATEGIC CONTEXT DOCUMENTS	
Key Issue	Response / Location of Assessment
<i>Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines.</i>	Refer to PART D LEGISLATIVE AND POLICY FRAMEWORK of this EIS.
<i>Identify compliance with applicable development standards and provide a detailed justification for any non-compliances.</i>	Refer to Section 4.5.1 of this EIS.





TABLE 16: STATUTORY AND STRATEGIC CONTEXT DOCUMENTS

Key Issue	Response / Location of Assessment
<i>If the development is only partly State significant development (SSD) declared under clause 8(1) of the State and Regional Development SEPP, provide an explanation of how the remainder of the development is sufficiently related to the component that is SSD.</i>	Not applicable. The development is considered SSD as outlined in Section 4.3.6 of this EIS.
<i>Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.</i>	Refer to Section 2.2 of this EIS.

6.1.2 Capital Investment Value and Employment

A Cost Report has been prepared and is provided at **Appendix 2**. The project works are estimated to cost \$2,015,684.00.

The proposal is considered to allow for approximately 20 full time equivalent operational jobs through the provision of on-site staff and cleaning staff that would be required. This has been calculated based on the estimated number of students for the school and on existing staffing ratios at SAC.

During the construction phase, it is estimated 25 full time equivalent jobs would be created, this is based on the small number of contractors required for internal fitout works and has been calculated as follows:

- Internal fitout works = 8
- Lift works = 4
- Landscaping works = 5
- Other: 8
- Total = 25

6.1.3 Built Form and Urban Design

This section of the EIS evaluates the urban design of the proposed development in relation to the SEARs. The proposed development utilises the existing built form and does not proposed additional height or floor space. The additional lift element is proposed to be in keeping with the existing building materials and will be at a height of 8.4m which sits below the existing roofline of 9.37m, as shown in **Figure 16** below.



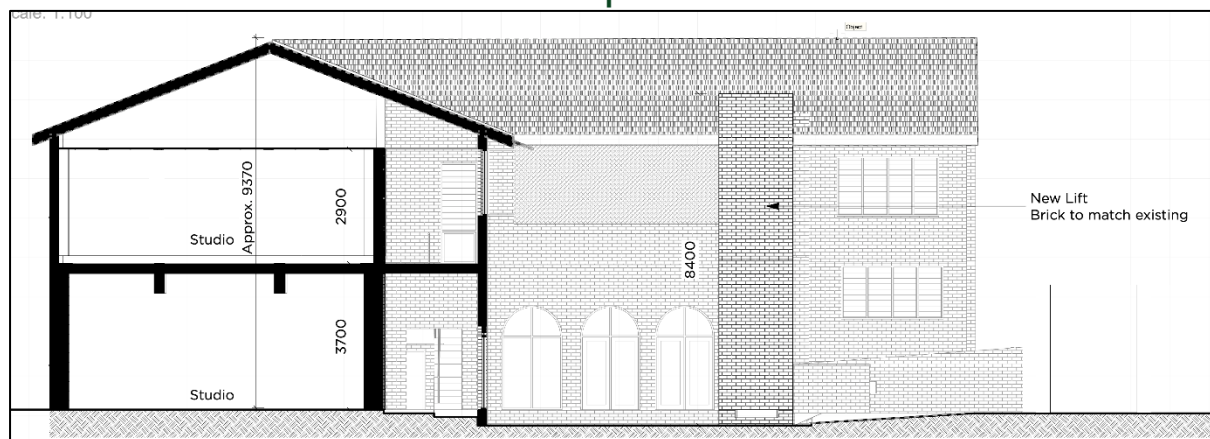


Figure 16 48 Victoria Road Building Heights (PMDL, 2021)

The proposed internal works have also been considered to be in keeping with the established building fabric, complement the building and improve and make good those parts of the building that have fallen into disrepair. Overall it is considered that the design is appropriate given the context of the site and existing development. Further detail of the proposed development is provided in the Architectural Plans and Architectural Design Statement provided at **Appendix 4 and 5**.

The proposed development is also considered to be consistent with the requirements under the *Building Code of Australia 2019* (BCA), as detailed in the BCA Report (**Appendix 18**). Further recommendations outlined in the BCA Report can be addressed prior to construction and during detailed construction and fitout stage. The BCA Report specifies the relevant fire resistance requirements of building materials to ensure fire safety is achieved on site.

6.1.3.1 ESEPP Design Quality Principles

The ESEPP outlines seven design quality principles which have been addressed in the Architectural Design Statement (**Appendix 5**) and relate to Context, Built Form and Landscape; Sustainable, Efficient and Durable; Accessible and Inclusive; Health and Safety; Amenity; Whole of Life, Flexibility and Adaptive; and Aesthetics. The proposed development has been designed in accordance with these principles and is considered to meet these principles.

6.1.3.2 Crime Prevention Through Environmental Design

CPTED Guidelines were prepared by the NSW Police in conjunction with DPIE. CPTED provides a clear approach to crime prevention and focuses on the 'planning, design and structure of cities and neighbourhoods'. The main aims of CPTED are to:

- Limit opportunities for crime;
- Manage space to create a safe environment through common ownership and encouraging the general public to become active guardians; and
- Increase the perceived risk involved in committing crime.

The CPTED Guidelines provide four (4) key principles to limit crime, being:

- Surveillance;
- Access Control;
- Territorial re-enforcement; and
- Space/activity management.





Principle 1 – Surveillance

The attractiveness of crime targets can be reduced by providing opportunities for effective surveillance, both natural and technical.

- The proposed development orientates indoor and outdoor areas and incorporates transparent materials and finishes where appropriate, so as to promote passive surveillance within the school but achieve appropriate privacy with respect to external receivers;
- Building openings and active areas have been designed and located to achieve an appropriate level of visibility from other areas of the school;
- The proposal utilises low-level landscaping in appropriate locations to ensure there is no obstruction of surveillance opportunities; and
- Lighting will be appropriately located and controlled so as to enable the maintenance of sight-lines and surveillance after dark, whilst not causing light spill or glare for neighbouring properties.

Principle 2 – Access Control

Access control can be defined as physical and symbolic barriers that are used to 'attract, channel or restrict the movement of people'.

- During and after school hours, access would be allowed via secure access points only onto Gordon Street;
- Fencing exists around both sites, but is proposed to be increased and improved on Site 1 to ensure the safety and security of the students.
- Directional signage and design features would facilitate legibility and direct all site-users to the appropriate access points and areas of the school.

Principle 3 – Territorial Reinforcement

- The provision of boundary treatments will emphasise the separation between the private and public realm; and
- Well maintained planters, gardens and pavers will indicate the development is well-used and cared for to reduce criminal activity.

Principle 4 – Space Management

- Space management strategies to be implemented include activity coordination, site cleanliness, rapid repair of vandalism, rapid removal of graffiti and the replacement of decayed physical elements;
- Landscaping and paved areas will be well maintained;
- Continued repairs and maintenance will discourage vandalism;
- High quality materials, varied façade treatments and landscaping along boundaries will assist in discouraging vandalism and graffiti.

Accordingly, through the integration of CPTED in design, the school has been planned to deter crime.

6.1.3.3 Accessibility

An Access Report has been prepared and is provided at **Appendix 19**. The proposed development provides a lift to ensure Site 1 is fully accessible. Accessible ramps are provided within the courtyard to ensure equitable access to all areas of the outdoor playspace. Appropriate accessible facilities are provided on site and can be refined throughout the detailed design process.

6.1.4 Environmental Amenity

This section of the EIS considers the environmental amenity of the proposed development including internal and external amenity for the proposal and to adjoining neighbours, including:

- Access to natural daylight and ventilation;





- Pedestrian movement throughout the site;
- Access to landscape and outdoor spaces;
- Acoustic impacts; and
- Environmental amenity impacts to residential/sensitive land uses.

6.1.4.1 Daylight and Ventilation

The proposed development utilises existing buildings, which have large glass windows which allow for natural daylight into the classrooms. The windows of the classrooms can be opened to allow for natural ventilation however, mechanical ventilation is also proposed.

6.1.4.2 Pedestrian Movement

Pedestrian movement is facilitated through the site via one gate to Gordon Street, and then through internal stairs or lift on Site 1. Site 2 also has pedestrian access to Gordon Street and pedestrian access through the stairwell. Pedestrian movement between the two sites will be minimised as much as practicable. When this does occur, it is envisioned that students would be supervised and utilise the existing signalised crossing at Gordon and Victoria Street. Given the smaller site areas, pedestrian movement internally is considered to be logical and guided by built form and landscaping elements, without the need for extensive directional signage to be incorporated. It is considered relevant internal signage can be installed as required for amenities and in particular office location for any visitors.

6.1.4.3 Landscape and Outdoor Space

The majority of landscaping and outdoor space is provided on Site 1, and this would be where students would have lunch breaks. Sports and other outdoor learning required would be facilitated off campus through existing SAC sites, with the potential to look at the option to lease additional facilities in closer proximity to the Site should the development approval be granted.

The Landscape Plans (**Appendix 6**) demonstrate that there is provision of seating, active playspace through provision of a half basketball court and handball courts, interspersed with soft landscaping elements for shade.

6.1.4.4 Acoustic Impacts

An Acoustic Report has been prepared and provided at **Appendix 20**. It considers that operational noise (including traffic noise) would be at an acceptable level so as not to disturb adjoining residential receptors. Furthermore, construction noise could be managed through work practices such as doing certain works during less sensitive hours.

6.1.4.5 Neighbouring Environmental Amenity

There are residential properties in close proximity to the proposal. As outlined above, the Acoustic amenity of the buildings is considered to have minimal impacts to the surrounding residences. It is also noted that the core school hours are within core work hours and it is assumed a large proportion of residents may not be at home. Furthermore, there would be no issues from lighting, overshadowing impacts or privacy issues as the proposed development utilises the existing built form and is oriented internally so as not to overlook neighbouring properties.

6.1.5 Trees and Landscaping

This section of the EIS considers the existing and proposed trees on the site, and the landscaping proposed.





6.1.5.1 Trees

The existing trees on site are a combination of small shrubby exotic trees and fair to poor condition and larger native species in poor to good condition, as well as five dead trees. Twelve trees are required to be removed on site. These trees to be removed at all low or no retention value, with only two trees required to be removed to facilitate the actual development.

The proposal would have direct impacts to two trees through removal, which would require a full redesign or relocation of development to allow for their retention and is not considered a viable or appropriate response. There are also development impacts to the trees through root damage due to encroachment into the Tree Protection Zone (TPZ), through soil compaction, level changes or direct root severance. While there are twelve trees requiring removal, it is considered many of these would have been removed regardless of the proposed development.

Tree retention will require specific protection requirements for eight trees and generic protection measures for a further three trees. There are some excavation works to be carried out within the TPZ, which would require arborist supervision and techniques sensitive to tree roots to avoid damage. Tree protection measures outlined in the Arboricultural Report should be implemented through the construction phase and carried through into a Construction Management Plan.

6.1.5.2 Landscaping

A detailed Landscape Plan that demonstrates the proposed site planting, the location, species and heights and canopy cover is provided at **Appendix 6**. Site 2 will retain the existing landscaping along Gordon Street, and no outdoor playspace will be provided as it is solely contained in Site 1.

The proposed landscaping includes a total of 740 sqm of landscaped area, being 614 sqm of hard landscaping and 126 sqm of soft landscaping elements. The proposal is considered to increase soft landscaping across the site and reduce the heat island impacts through the upgrade of existing bitumen to concrete material. There will also be the use of endemic species that are suited to the location and further support increased biodiversity values on the site. Planting proposed includes a variety of endemic species of various heights, including groundcovers, shrubs, small trees and large trees. The trees range in height from 6m to 0m, with shrubs ranging from 2m to 5m. The total tree canopy cover is estimated to be 45 sqm.

The Landscape proposed on site aims to maximise the useable playspace for school children and includes a half basketball court, handball courts, seating areas and areas for a food truck should this be required. The landscaped space also includes flexible breakout space to allow for outdoor learning opportunities. The outdoor space includes both active and passive spaces. The planting along Victoria Road reduces visual and psychological impacts, with the overall space increasing sheltered space and shade through planting. The Landscape masterplan is shown in **Figure 10** in previous sections of this EIS.

It is noted that there will be additional fencing introduced along the site boundary of Gordon Street and Victoria Road. This fencing is proposed to be on top of the existing brick fencing of a light weight metal material, lasercut to provide additional detailing. The final design of the fencing will be done in consultation with relevant stakeholders and is proposed to be submitted to DPIE prior to its installation.





6.1.6 Ecologically Sustainable Development

This section of the EIS evaluates the ESD aspects of the proposed development, in relation to the SEARs. Integral have prepared an ESD Report to provide an overview of the ESD initiatives adopted for the proposed development (**Appendix 21**). The proposed development has chosen to implement a number of sustainable design principles and includes initiatives design to mitigate the environmental impact of the following:

- Energy – including improved energy efficiency across the buildings and its associated sources.
- Passive Design Principles – reducing the projects overall requirement for building services.
- Water Efficiency – including reduced potable water demand.
- Waste Management – including the incorporation of a waste treatment plant.
- Ecology – Maintaining ecology through landscaping where practical.

The principles of ESD as outlined in Schedule 2 Clause 7(4) of the EP&A Regulation have been carefully considered in the formulation of this proposal and are addressed as follows:

6.1.6.1 Precautionary Principle

The precautionary principle has been adopted and all potential impacts have been considered and mitigated where a risk is present, and the scope of works allows.

To mitigate the impact of urban heat island effect, the proposed upgrade incorporates introduction of additional soft landscaping. Hard landscaped areas that are currently bitumen will be replaced with lighter concrete material to further reduce the impacts of urban heat island. Areas to be landscaped will consider raingardens to help reduce stormwater discharge and the use of low water use species will provide better water efficiency. South Facing windows (away from the street) are currently openable, these will be maintained and made good where necessary. This will allow for the provision of outdoor air via natural ventilation for better indoor environment quality and to potentially reduce health risks. Furthermore, CO2 sensors and ambient temperature monitoring will be considered, linked to a simple display system to better inform occupants on the appropriate times to utilise these windows.

6.1.6.2 Inter-generational Equity

The project team and expert consultants have examined the overall effects of the proposed development, on both the natural environment and the existing built environment within the vicinity of the site.

The proposed upgrades have embraced Indoor Environmental Quality as a key focus for the project. The levers by which this can be accomplished are as follows:

- Operable windows to delivering fresh air (as noted above),
- Materials and finishes procured such as paints, adhesives, sealants, carpets and engineered wood products will have low Volatile Organic Compound (VOC) content, formaldehyde content
- Internal lighting design will utilise LED lighting throughout, which will be flicker-free, achieve a minimum Colour Rendering Index (CRI) of 80 and generally achieve best practice lighting levels for each task with each space
- Opportunities will be explored to improve the sealing of existing building fabric (e.g. window seals) to reduce infiltration and potentially improve the acoustic comfort of the spaces





Opportunities for increased energy and water efficiency have will also form part of the strategy, noting that a reduction in the consumption of these resources will benefit future generation. Energy efficient LED lighting will be installed, and new mechanical systems will also look to achieve energy efficiency that is above current code requirements. An all-electric approach to building services will be adopted to ensure the project is best placed to transition to a net zero project in the future by the procurement of certified sustainable energy and on-site generation (if feasible). Water efficient fixtures will be installed throughout, and the addition of small rainwater tanks will be considered for landscape irrigation.

6.1.6.3 Improved Valuation, Pricing and Incentive Mechanisms

The proposed development aims to reduce costs through installation of efficient water fittings and fixtures, as well as energy efficient lightings. Overall, the re-use of a building supports minimised construction costs.

The proposed landscape design will improve upon the existing poor ecological condition of the site. The design will seek opportunities (albeit limited) to enhance biodiversity through the use of endemic species and generate an improved biophilic response from occupants with additional planting. Outside of the site boundaries the project will address ecological integrity through procurement. Recycled materials will be considered for landscaping works. Furnitures and Fixtures will be responsibly sourced and certified schemes such as Environmental Product Declaration (EPD), Forest Stewardship Council (FSC) and other third-party certifications will be considered.

6.1.6.4 Environmental Management

The proposed development implements significant and elaborate measures that avoid, contain and address any possible air-quality, noise, waste and pollution impacts, through avoidance, better design and management. Such measures are proposed to be implemented throughout both the construction and operational phases of the proposed development.

The very nature of this project promotes circular economy principles by refurbishing existing buildings. Wherever possible existing materials and building services will be maintained. This will result in a reduction of waste directed to landfill providing both environmental and economic benefits.

Energy and water efficiency measures will deliver economic benefits through reduced consumption. Increased soft landscaping and the potential inclusion of raingardens will ensure the rate of stormwater discharge is not increased and place no greater strain on existing infrastructure. The cost of which ultimately gets passed onto the rate payer in the medium to long term.

The proposed development minimises the consumption of resources and water through the following:

- Adoption of circular economy principles
 - Refurbishment of existing building
 - Use of recycled material
- Urban heat island mitigation, resulting in reduced cooling loads during prolong periods of heat
- Energy efficiency measures
 - LED lighting throughout with control strategies (motion sensors etc)
 - HVAC systems (if replaced) to meet above minimum code requirements
 - CO2 sensors and consider ambient temperature monitoring link to simple display to encourage the use of natural ventilation
 - Building sealing improvements to reduce infiltration
 - All electric building services
- Water efficiency measures
 - Water efficient fixtures and fittings
 - Low water use species in landscape design
 - Potential inclusion of small rainwater tanks for landscape irrigation





6.1.7 Traffic and Transport

This section of the EIS evaluates the traffic and transport aspects of the proposed development, in relation to the SEARs and addresses the following specific matters:

- *an analysis of the existing transport network, including the road hierarchy and any pedestrian, bicycle or public transport infrastructure, current daily and peak hour vehicle movements, and existing performance levels of nearby intersections.*
- *details of the proposed development, including pedestrian and vehicular access arrangements (including swept path analysis of the largest vehicle and height clearances), parking arrangements and rates (including bicycle and end-of-trip facilities), drop-off/pick-up-zone(s) and bus bays (if applicable), and provisions for servicing and loading/unloading.*
- *analysis of the impacts of the proposed development (including justification for the methodology used), including predicted modal split, a forecast of additional daily and peak hour multimodal network flows as a result of the development (using industry standard modelling), potential queuing in drop-off/pick-up zones and bus bays during peak periods, identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cyclist conflict), and any cumulative impact from surrounding approved developments.*
- *measures to mitigate any traffic impacts, including details of any new or upgraded infrastructure to achieve acceptable performance and safety, and the timing, viability and mechanisms (including proposed arrangements with local councils or government agencies) of delivery of any infrastructure improvements in accordance with relevant standards.*
- *measures to promote sustainable travel choices for employees, students and visitors, such as connections into existing walking and cycling networks, minimising car parking provision, encouraging car share and public transport, providing adequate bicycle parking and high quality end-of-trip facilities, and implementing a Green Travel Plan.*
- *a preliminary operational traffic and access management plan for the development, including drop-off/pick-up zones, bus bays and their operations.*

A robust Transport Assessment has been prepared by Traffix, which includes a full assessment of all traffic and transport related impacts that may arise from the development proposed under this SSD Application. The Transport Assessment forms **Appendix 16** of this EIS.

6.1.6.1 Site Access

The site is proposed to be accessed to and from Gordon Street, through the existing vehicle crossovers. The following access arrangements include:

- Site 1: A full movement crossover for service vehicles; and
- Site 2: A full movement crossover for cars to access the four car parking spaces provided.

The site has good pedestrian facilities, with footpaths along both sides of Victoria Road, Gordon Street, Prince Street, Quirk Street and Maney Street. A shared path is provided along the northern side of Victoria Road in close proximity to the site to facilitate cycling/walking. Low traffic on-road cycling routes are also available within the locality, as shown in **Figure 17** below.

Signalised crossings are present at Victoria Road and Gordon street to facilitate safe and efficient connections.





A staff member is proposed to be present at the intersection of Victoria Street and Gordon Street in the morning and afternoon to monitor students that may use public transport and cross Victoria Road.

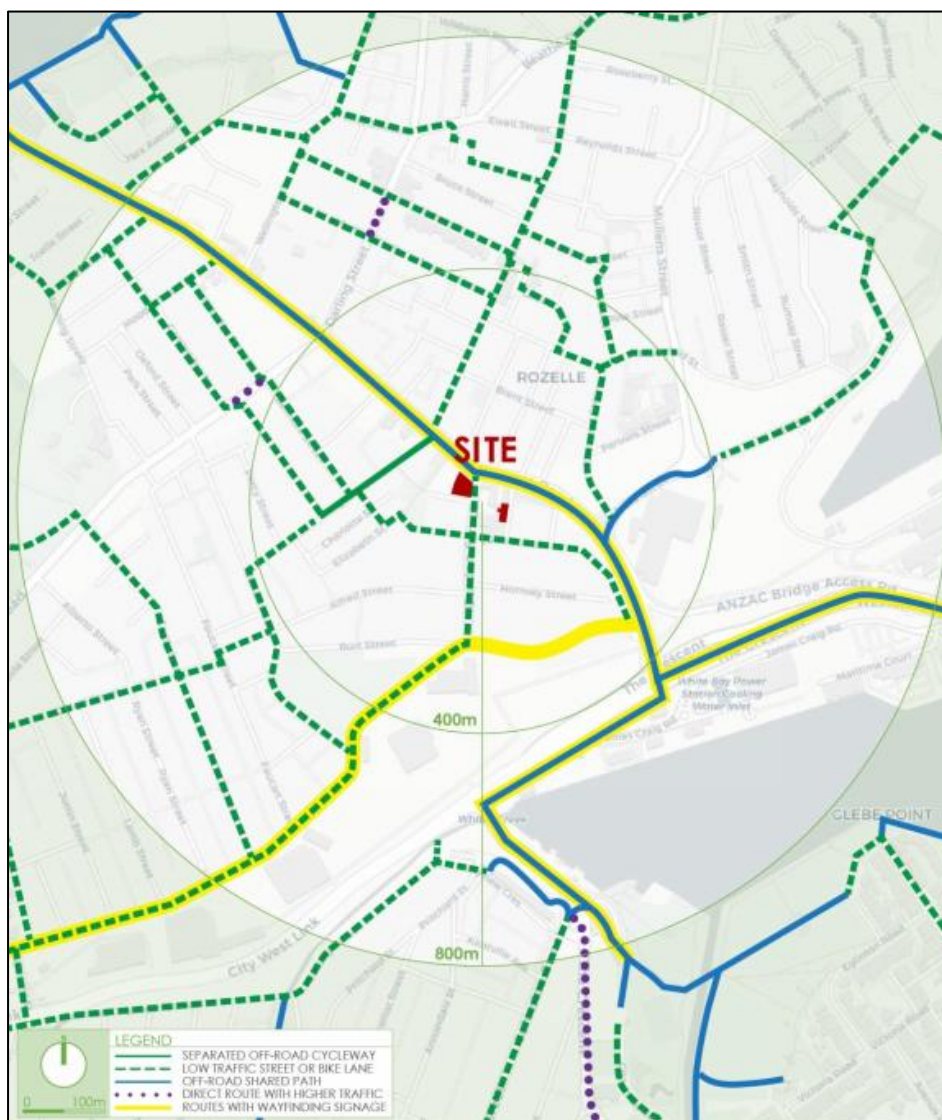


Figure 17 Cycleways and Shared Paths (Traffix, 2021)

6.1.6.2 Parking

The proposed development requires a maximum of 8 car parking spaces and a minimum of 4 parking spaces. The development provides 4 spaces which is considered appropriate for the site. One of these spaces will be an accessible space.

The current public transport usage of school students for SAC is around 75%, with a shuttle service being provided to and from the main campus to the Rozelle site. Pick up and drop off is anticipated to require 3 spaces, and it is expected that this could be accommodated within surrounding on-street parking. These spaces would only be used for a minimal period, approximately 30 minutes on average in the morning and afternoons.

Bicycle parking is proposed to include 10 spaces on site for both staff and students.





6.1.6.3 Shuttle/ Coaches

A shuttlebus will be required to transfer students between the existing Kirribilli campus and the proposed Rozelle campus. It is expected 49 students in the morning and 39 students in the afternoon would utilise this single private coach service. It is proposed that pick up and drop off could be facilitated by the existing bus stop location along Victoria Road monitored by staff, as shown in **Figure 18** below. Given this would only occur once before school and once after school it is considered to have minimal impact and a preferable option to facilitating buses along Gordon Street.

A staff member will be present on the bus to monitor students and will be responsible for marshalling students between campuses. It is intended that students would be marshalled onsite and walked to the coach area.

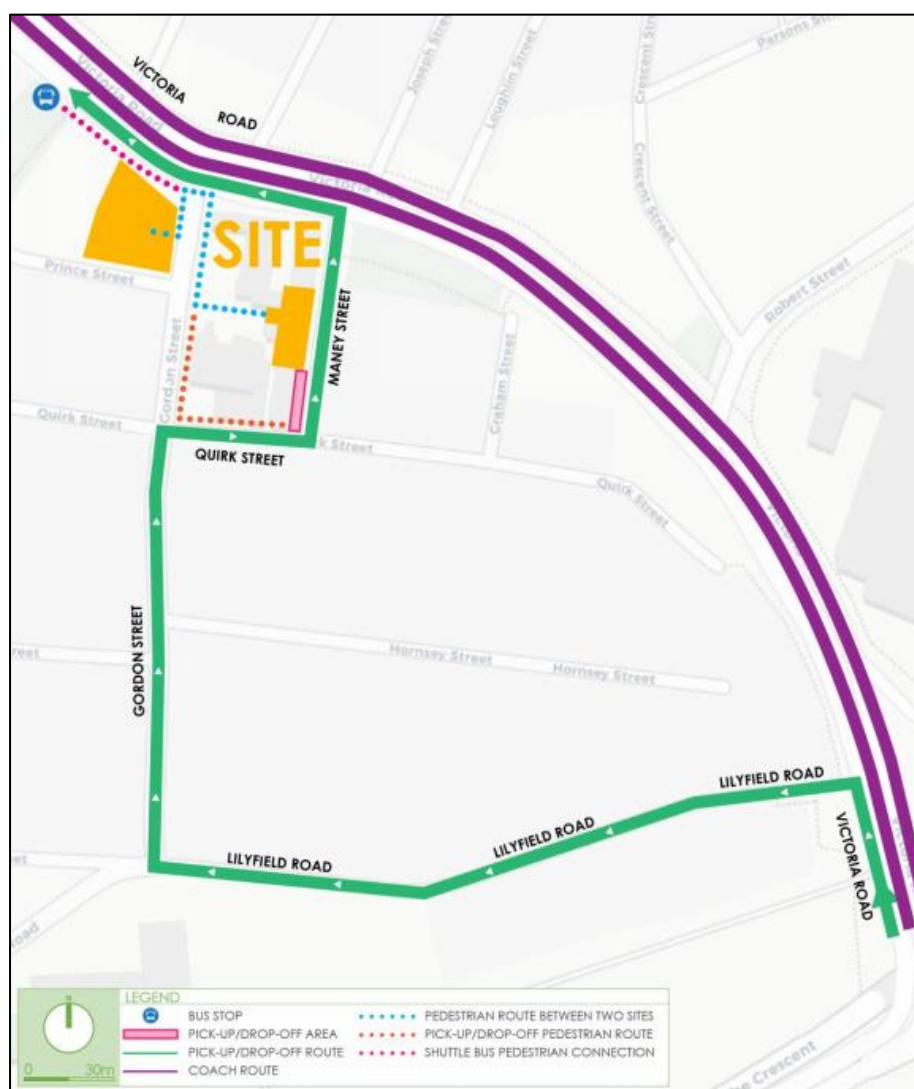


Figure 18 Pick Up an Drop Off Location (Source: Traffix, 2021)

6.1.6.4 Traffic impact

The impacts of the proposed development on the external road network have been considered based on the 4 staff parking spaces and 180 students. It is assumed that staff may also utilise ride share/taxi's,





or the shuttle bus between the campuses. It is assumed staff travelling to school would generate approximately 6 additional vehicle trips per hour during the morning and afternoon peak periods.

Trip estimations for school students is based on existing enrolment and travel data for students, with a high proportion utilising public transport and the private coach between campuses these are estimated at 16 vehicle trips an hour in morning and afternoon peaks. The total trips would be 22 vehicle trips and hour in morning and evening peak periods for the proposed development.

The impact of the proposed development on surrounding intersections is considered within the Transport Assessment, and it is noted that additional development volumes would cause a minor increase in average delays at all intersections, maintaining a LoS (operating performance measure of an intersection) of 'A' during both morning and evening peak periods.

6.1.6.5 Operational vehicle movements:

It is proposed waste collection would occur from Site 2, within the 4 car parking spaces. Waste collection can occur outside of hours of operation, when the parking spaces are unoccupied and would allow a small rigid vehicle to enter and exit in a forward direction. Site 1 allows occasional access for service vehicles (up to B99) to cater for maintenance and potential food trucks for students.

6.1.6.6 Green Travel Plan

A Green Travel Plan is intended to be formalised prior to the construction certificate stage. The Green Travel Plan will comprise:

- Targets – generally includes the reduction of single occupant car trips to and/or from the proposed development for journey to work.
- Travel Data – a prior estimate of the amount and types of trips to the proposed development is required, as well as an annual travel survey and review in order to estimate the change in travel behaviour.
- Measures – an outline of specified tools and methods to achieve goals.

As part of the Green Travel Plan a TAG will be produced to distribute students and staff and form as educational material, ensuring that they are aware of public and active transport modes to access the site.

To encourage cycling and active transport given the existing pedestrian paths and shared paths around the site, end of trip facilities will be made available along with bicycle racks.

6.1.6.7 Construction Traffic Management Plan

A detailed Construction Traffic Management Plan (CTMP) will be prepared prior to any construction commencing on site. It is anticipated that the general requirements of the CTMP would include;

- Hours of Operation: Monday to Friday 8am-6pm; Saturday 8am-1pm.
- Vehicle access from Gordon Street utilising existing access and hardstand areas.
- Truck routes along Lilyfield Road to Gordon Street and out through Victoria Road.
- All trucks to be linked via CB radio/ handsfree mobile to ensure capacity is available on site.
- Fitout works would utilise existing car parking on site.
- Employees would be encouraged to utilise public transport to and from site.
- Small vehicles can adequately access the site, however specific traffic management arrangements would be required for any larger vehicles.

6.1.8 Biodiversity





The proposed development site is largely clear of vegetation and does not contain any areas of biodiversity value, as such a BDAR waiver was sought. This BDAR Waiver request and relevant site studies is provided at **Appendix 9**.

The site inspection undertaken as part of the BDAR details that Site 1 contains some medium and large trees that may have potential to provide habitat and feeding resources to locally common mammals and bird species, with shrubbery providing habitat for a range of common reptile species. Minor habitat features across the site include leaf litter, shrubby vegetation, flaking bark, tree hollows and buildings. It is recommended that given there is some removal of vegetation proposed, that a fauna spotter should be present during these works.

Site 2 does not contain any vegetation that would be impacted due to works, with no signs of fauna activity within the building.

The BDAR Waiver was accepted by EES and is provided at **Appendix 8**.

6.1.9 Noise and Vibration

This section of the EIS evaluates the noise and vibration aspects of the proposed development, in relation to the SEARs. An Acoustic Report is provided at **Appendix 20**.

6.1.9.1 Internal Noise Levels

The proximity to Victoria Road, and the impacts that could occur from traffic noise on the proposed education facility have been assessed. To achieve the relevant noise levels internally in classrooms, doors would need to be closed. The Music practise room 2 would not achieve the required level of 35dB with existing 4mm glazing, however would be compliant with 10mm glazing. It is expected that some glazing may require upgrading to ensure internal noise amenity can be achieved.

6.1.9.2 Operational Noise Levels

It is considered that outdoor play spaces may have predicted noise levels of 61dB to adjoining residential receivers that would be considered unacceptable, however if they were restricted to a maximum of 2 hours a day this would be considered appropriate. It is recommended that outdoor recreation would be limited to 2 hours a day to ensure appropriate noise amenity for adjoining receivers.

School bell and PA systems should be installed as to reduce noise spill through utilising the existing L-shape of the building, directing the speakers downward and away from residential receivers and using a greater number of low powered speakers.

Traffic noise generated by the proposed development is not considered to increase noise by 2dB given this would require a 60% increase in the number of cars. It is considered that the noise levels for waste collection trucks would also comply assuming a noise level of 45dB to be generated by these trucks. To ensure minimal disturbance waste collection should be conducted between 7am and 10pm.

Mechanical plant noise is not expected to impact the surrounding community, assuming plant is positioned away from residential receivers, utilises low sound level condenser units and is not operational between 10pm and 7am.





Any out of hours school activities or events are considered to have negligible noise impacts given they would be infrequent and unlikely to involve amplified music or speech.

6.1.9.3 Construction Noise and Vibration Assessment

The noise sources associated with construction work would be for the new brick lift and playground areas. These sources are largely from vehicles and tools required and would impact on the adjoining residential neighbour at 66 Victoria Road.

Construction noise

Construction noise is considered to be able to be mitigated through a Construction Management Plan to be prepared prior to construction commencing. While the worst case and average case scenario show noise levels up to 75dB, subject to consultation and appropriate mitigation and management during construction, the impact of the works can be minimised. Given the construction timeframe is short (approximately 16-18 weeks), it is considered that with mitigation and management as outlined in the Acoustic Report, the impacts would be acceptable on merit. The measures outlined in the Acoustic Report should be taken through into a Construction Management Plan.

6.1.9.4 Vibration assessment

Vibration impacts to the adjoining residence at 66 Victoria Road from construction have the potential to exceed the safe working distance, and as such equipment selection should be such that distances are complied with and vibration measures have been provided as preventative measures as outlined in the Acoustic Report (**Appendix 17**).

6.1.10 Stormwater and Wastewater

This section of the EIS evaluates the impacts to Stormwater and if drainage infrastructure works are required. A Stormwater Management Report is provided at **Appendix 13**.

6.1.10.1 Details of stormwater/wastewater management system

The site is surrounded by development and roads, so it is noted that no external catchments impact the development site.

The existing building at Site 1 consists of a gutter and downpipe system, with the southern roof portion discharging onto Prince Street and the northern portion discharging into the existing stormwater pit and pipe system in the courtyard. Site 2 building drainage consists of a gutter and downpipe system which discharges into the kerb on Maney Street. Existing stormwater services are assumed to be in good working condition.

On site detention is not proposed for the site, as the works are largely internal, with additional pervious surfaces being added to Site 1.

The existing roof drainage of both sites will be maintained after development. Surface areas of Site 1 will be drained through in-ground drainage directed into stormwater inlets, and utilize gravity pipe systems to discharge into Prince Street (from Site 1). Site 2 will maintain the existing drainage and discharge points.





6.1.10.2 Measures to minimise water use

Water usage reduction within the development is proposed to include installation of water efficient fittings, increased pervious areas to reduce runoff, and potential to utilise rainwater tanks to water the landscaping.

6.1.10.3 Erosion and sediment controls

A Soil and Water Management Plan has been prepared as part of the Stormwater Management Plan (**Appendix 13**). It is recommended that sandbag protection measures are used around stormwater inlets and a shaker grid and wash down facility be installed at the exit of the construction zone to remove any spoil. Sediment fences on downstream boundaries should also be installed to protect downstream properties and waterbodies.

It is considered that erosion and sediment control measures as recommended should be taken through into a Construction Management Plan.

6.1.10.4 Water quality

The proposal will aim to reduce pollution entering the water system through reduction in pollutants, suspended solids and other chemicals in line with those outlined in the Stormwater Management Plan (**Appendix 13**). Stormwater quality improvement devices are to be implemented and are assumed to reduce a wide range of pollutants, which includes three storm filter cartridges into the stormwater filter chamber, and two ocean protect enviropods within the stormwater inlet pits. It is considered that the proposed design would meet Councils reduction targets as shown in **Figure 19**.

Pollutant/Issue	Target	Reduction	Target Achieved
TSS	85%	90.1%	YES
Phosphorus	65%	82.9%	YES
Nitrogen	45%	54.3%	YES
Gross Pollutants	90%	100%	YES

Figure 19 Water Quality Reduction Rates (Source: Stantec, 2021)

6.1.11 Flooding Risk

This section of the EIS evaluates the matters of flooding associated with the proposed development, as per the SEARs. A Flooding Impact Assessment is provided at **Appendix 13**. The site is not located within a flood-controlled lot and as such no further flooding assessment has been undertaken.

6.1.12 Hazards and Risk

This section of the EIS evaluates the matters of hazard and risk associated with the proposed development, as per the SEARs. It is considered that *State Environmental Planning Policy No. 33* (SEPP 33) does not apply to the proposed development. There would be no hazardous materials stored on site.





6.1.13 Contamination and Remediation

This section of the EIS evaluates the potential for contamination on site. A Preliminary Site Investigation (22 October 2021) has been prepared by EI Australia (**Appendix 11**) to investigate and document the potential contamination of the subject site, assess the suitability of the site for the proposed use (or make recommendations to enable such a use to occur). It is noted that no investigation was undertaken for Site 2 given there are no groundworks proposed.

Based on the findings of their investigations, EI Australia have concluded the following:

- The site has historically been used for a commercial building and car parking with low density residential purposes surrounding.
- The site was not subject to any regulatory notices and surrounding sites have not been notified as contaminated to the EPA.
- Soil sampling and analysis were conducted and contaminant concentrations in the soils were found to be below the adopted human health-based criteria and ecological criteria for site land use settings.
- Copper, nickel and zinc were reported in groundwater at slightly higher levels than the adopted ecological criteria, however the concentrations are low and typical of background quality in urban settings and present a low human health and environmental risk.
- It is considered the site is suitable for educational purposes.

The Preliminary Site Investigation recommends that the recommendations of the Hazardous Materials Survey (**Appendix 17**) be carried out during refurbishment. Surplus soil material should be classified prior to off-site disposal, and any unexpected contamination be identified during redevelopment an environmental consultant must be engaged to provide guidance for remediation or management.

A Geotechnical Report has been provided at **Appendix 12** and has concluded that the soils conditions are appropriate for the development, and are non-saline and slightly saline soils. The site has been classified as a problem site due to the abnormal moisture conditions and fill greater than 400mm. The foundation design and construction should be consistent and adopted in accordance with the relevant engineering specifications.

6.1.14 Waste Management

This section of the EIS evaluates the matters of waste associated with the proposed development, as per the SEARs, in particular:

- *Identify, quantify and classify the likely waste streams to be generated during construction and operation.*
- *Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste.*
- *Identify appropriate servicing arrangements for the site.*
- *If buildings are proposed to be demolished or altered, provide a hazardous materials survey.*

6.1.14.1 Operational Waste

An Operational Waste Management Plan is included within the Plan of Management (**Appendix 22**) to identify potential wastes to be generated by the proposed development during operation. It is anticipated 10 tonnes of general waste would be generated annually. SAC will follow key principles including prevention through deterring single use items, reduction through stock inventory control, recycling through multiple colour coded bins on site and recovery through re-purposing or reusing items.





6.1.14.2 Hazardous Materials

A Hazardous Materials Survey has been provided at **Appendix 17**. It was found that asbestos and some other hazardous materials were present within the buildings. These materials were ranked Priority 4, meaning stable and posing negligible health risk under present conditions. The drainage putty on the laboratory pipework and the gatic on the external pipework were ranked Priority 2 representing an elevated health risk under their current condition and accessibility. Should any demolition that may disturb asbestos be undertaken, the asbestos should be removed in line with the relevant regulations. All hazardous material removal should be undertaken in line with the recommendations of the Hazardous Materials Survey to ensure there

6.1.14.3 Construction Waste

It is anticipated the proposed development will involve the generation of minimal waste during construction, given most works are small scale and internal.

The Construction Site Manager will need to specify the types and quantities of waste produced during construction and on this basis, the numbers and capacity of bins can be determined.

It is anticipated that the Project will provide enough space on-site for separate storage, for example, separate skip bins or appropriately managed stockpiles, of the following waste types:

- Bricks, concrete and scrap metal
- Metal and steel, in a condition suitable for recycling at metal recycling facilities
- Timber
- Glass
- Hardstand rubble
- Uncontaminated excavation spoil, if present
- Contaminated excavation spoil, if present
- Hazardous waste, if present
- Paper and cardboard
- General co-mingled recycling waste, and
- Non-recyclable general waste.

If there is insufficient space on-site for full segregation of waste types, the Site Manager, or equivalent role, should consult with the waste and recycling collection contractor to confirm which waste types may be co-mingled prior to removal from the site.

Reduction of waste through specification of project requirements and forward planning to reduce over-consumption of products and materials and ensuring safe and secure storage of materials will be incorporated throughout construction. Waste will be processed and reused or recycled on site during construction works where possible and practicable. Any other waste will be removed from site by the contractor and disposed of in accordance with relevant legislation and guidance such as the *EPAs Waste Classification Guidelines*, *Waste Avoidance and Resource Recovery Act 2001* and the *Protection of the Environment Operations Act 1997*. Further detail of construction waste management can be detailed within the Construction Management Plan.





6.1.15 Environmental Heritage

This section of the EIS evaluates the impact of the proposed development on the Environmental Heritage on site, in particular to the existing Heritage building on Site 2 and the Hornsey Street Conservation Area.

A Heritage Impact Statement has been provided at **Appendix 10**. It is considered the minor external works to Site 1 through the external lift and landscaping would not have any negative impact on the adjoining Hornsey Street Conservation Area.

The proposed internal alterations to Site 2, given they are within a heritage listed building have been considered. The building was originally utilised for classroom facilities, with little intervention proposed internally. These works are able to be reversed in the future and as such are not considered detrimental to the heritage item.

6.1.16 Social Impact

This section of the EIS evaluates the social impacts of the proposed development, as per the SEARs. A Social Impact Statement is provided at **Appendix 23**.

The proposed development is unlikely to generate any long term or significantly negative social impacts that require mitigation. While it is acknowledged that the proposed development represents intensification of use of the site, that intensification of use is not out of character with the existing character of the area, and it is not unexpected given the historic use of the sites for education purposes.

Any impacts generated by the intensification of use of the sites are likely to be associated with noise and traffic, which have been adequately addressed through the Transport Assessment and Acoustic Report (**Appendix 16 and 20**).

Negative short-term impacts that may be generated are likely to arise with the construction and fitout of the school buildings, should the application be approved. Any potentially negative impacts associated with construction can be mitigated through conditions of development consent.

SAC contact details will be available on the school website, should any neighbours or members of the wider community wish to raise issues or concerns about the operation of the school, and an ongoing complaints approach is detailed in the Plan of Management (**Appendix 22**).

The potential positive social impacts generated by the proposed school will only be realised if consent for the application is granted.

6.1.17 Infrastructure requirements

This section of the EIS evaluates the infrastructure requirements of the proposed development, as per the SEARs.

A Services and Infrastructure Report has been prepared and provided at **Appendix 14**.





Electrical Services:

The existing main switchboard is located at the western end of the ground floor beneath the staircase at Site 1 and is in a poor condition in an unsuitable location. The main switchboard is proposed to be replaced and situated in a more suitable location, within a 2hr fire rate cupboard or room. The existing electricity supply is sufficient for the proposed development.

Telecommunications:

An existing Telstra ADSL line is expected to be redundant and replaced by a new fibre connection to support the bandwidth requirements of the school.

Sewer Drainage:

The existing sewer connects to Sydney Water on the western boundary of the site. The capacity of the existing sewer is suitable for the proposed development.

Potable Water:

The existing water meter is suitable for the proposed development, however the addition of a backflow assembly will be required to meet Sydney Water requirements.

Fire Hydrant System:

Existing hydrant coverage is located on Victoria Road and Gordon Street and are considered sufficient for the proposed development.

Stormwater:

Existing stormwater drainage systems will be utilised on site, with additional inground drainage provided within the courtyard of Site 1. It is considered that the existing services have capacity and do not require upgrades.

6.1.18 Aviation

The proposed development does not include any helicopter landing sites and as such no information has been provided regarding aviation.

6.1.19 Construction, Operation and Staging

This section of the EIS evaluates the construction, operation and staging of the proposed development, as per the SEARs.

The proposal would not see any construction staging proposed, and it is assumed that works on site would be undertaken over a period of approximately 16-18 weeks. The works are anticipated to commence in the second half of 2022 to allow for operation of the school to commence in January 2023.

Prior to construction a Construction Management Plan should be prepared and incorporate the relevant measures outlined in this EIS as well as any additional requirements to reduce any impacts from construction.

6.1.20 Contributions and Public Benefit

This section of the EIS evaluates the relevant development contributions and public benefit associated with the proposed development, as required by the SEAR.





The *Former Leichardt Local Government Area Section 7.12 Development Contributions Plan 2020* would apply to the site. Under the contributions plan:

The levy will not be imposed in respect of development relating to:

- 1. Where the proposed cost of carrying out the development is \$100,000 or less;*
- 2. For the purpose of disabled access;*
- 3. For the sole purpose of providing affordable housing, which is undertaken by a 'social housing provider';*
- 4. For the purpose of reducing the consumption of mains supplied potable water, or reducing the energy consumption of a building;*
- 5. For the sole purpose of the adaptive re-use of an item of environmental heritage;**
- 6. For the purpose of 'seniors housing' as defined in State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, which is undertaken by a 'social housing provider';*
- 7. That has been the subject of a condition under section 7.11 (or its predecessor – section 94) under a previous development consent, relating to the subdivision of the land on which the development is to be carried out; and*
- 8. Applications submitted by or on behalf of Inner West Council.*

It is considered that the proposal falls partly within development that would not be subject to contributions and as such no contributions would be anticipated due to work or use of Site 2. Any contributions for Site 1 would be subject to the requirements of the Contributions plan.

6.1.21 Engagement

This section of the EIS evaluates the community and stakeholder engagement for the proposed development, in relation to the SEARs. A Community and Stakeholder Participation Strategy is provided at **Appendix 15**.

As recommended under the SEARs, the following stakeholder consultation has been undertaken. Stakeholders that have been consulted include:

- Inner West Council
- Transport for NSW
- Local residents and stakeholders
- St Josephs Church
- Sydney Community College
- Genesian Theatre
- Guniwarra
- SAC Community

A comprehensive level of community and stakeholder engagement has been undertaken for the proposed development. This has included meetings and notification letters to both agencies and all potentially-impacted residents and community.

A Community and Stakeholder Participation Strategy (located in **Appendix 15** of this EIS) has been prepared in support of this SSD Application, offering a summary and analysis of all community and stakeholder consultations, distilling into themes, and those items identified in the consultation process, as significant.





Engagement and consultation activities undertaken to date, during the planning stage of the project's development have been outlined in **Section 5.2** above.

6.1.21.1 Consultation feedback

Feedback from consultation was received during the two consultation meetings, no further consultation responses were received. The feedback from the community focused on the existing uses and operational aspects of the school and traffic concerns. The proposed development has ensured that existing uses can continue operations, and that the school would operate outside of most of the existing use operational hours and as such have minimal cumulative impacts.

Traffic impacts have been considered in the Transport Assessment (**Appendix 16**), and are considered to have minimal additional traffic impacts to the local area. A draft Construction Traffic Management Plan has been included (**Appendix 16**), which considers that the traffic impacts from construction would be relatively small and for a short period of time.

The impacts on neighbouring amenity has also been considered in detail within this EIS.

Overall, it is considered that the consultation undertaken was genuine and the issues raised have been appropriately responded to and considered within this EIS and the Technical Reports supporting it.

6.1.21.2 Ongoing and future engagement

Ongoing consultation and engagement shall be undertaken through all future stages of the project. Formal notification of the proposed development will be undertaken by DPIE during the assessment period for the SSD Project, with SAC committed to responding to all relevant issues and queries arising during this period through DPIE's formal response to submissions process.

During construction, consultation and engagement shall be undertaken with relevant parties

It is noted that the Plan of Management (**Appendix 22**) details that ongoing consultation with the community would be provided in the future, should the development obtain approval.





PART G PLANNED MANAGEMENT AND MITIGATION MEASURES FOR THE PROPOSED DEVELOPMENT

By:	St Aloysius' College
In relation to:	State Significant Development Application (SSD-27208140) For proposed off-site campus
Site:	48 Victoria Road and 2A-2B Gordon Road, Rozelle Lot 1 DP 82780, Lot 2 DP 656961 and Lot 1 DP 169780

St Aloysius' College plans to undertake the construction and operation of the proposed off-site campus, in accordance with the following subsections.

Below prescribes some of the terms and abbreviations used in this statement, including:

Approval	The Minister's approval of the project
BCA	Building Code of Australia
Council	Inner West Council
DPIE	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
NCC	National Construction Code
Project	The proposed development as described in PART C of the EIS
Secretary	Secretary-General of the Department (or delegate)
Subject site	Land to which the project application applies
WorkCover	NSW WorkCover

7.1 ADMINISTRATIVE COMMITMENTS

7.1.1 Commitment to Minimise Harm to the Environment

1. St Aloysius' College will commit to implement all reasonable and feasible measures, to prevent and/or minimise any harm to the environment, that may result from the construction or operation of the proposed development.

7.1.2 Terms of Approval

2. St Aloysius' College would carry out the project generally in accordance with the:
 - (a) Environmental Impact Statement;
 - (b) Drawings;
 - (c) Management and Mitigation Measures;
 - (d) Any Conditions of Approval.

7.1.3 Occupation Certificate

3. St Aloysius' College would ensure that Occupation Certificates are obtained prior to the occupation of the facilities.
4. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.





5. St Aloysius' College would ensure compliance with any reasonable requirement(s) of the Secretary of the DPIE arising from the assessment of:
 - (a) Any reports, plans, programs, strategies or correspondence that are submitted in relation to this Approval; and
 - (b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.

7.1.4 Structural Adequacy

6. St Aloysius' College would ensure that all new buildings and structures on the site are constructed in accordance with the relevant requirements of the NCC.

7.1.5 Operation of Plant and Equipment

7. St Aloysius' College would ensure that all plant and equipment used on-site, is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.

7.1.6 Construction Environmental Management Plan

8. Prior to the commencement of construction, St Aloysius' College would prepare a Construction Environmental Management Plan (CEMP) that addresses the following:
 - (a) Air Quality;
 - (b) Noise;
 - (c) Waste Classification;
 - (d) Erosion and Sediment Control;
 - (e) Materials Management Plan; and
 - (f) Community Consultation and Complaints Handling.

7.1.7 Monitoring of State of Roadways

9. St Aloysius' College would monitor the state of roadways leading to and from the subject site, during construction, and will take all necessary steps to clean up any adversely impacted road pavements as directed by Council.

7.1.8 Waste Receipts

10. St Aloysius' College would ensure that a permanent record of receipts, for the removal of both liquid and solid waste from the subject site, be kept and maintained up to date at all times. Such records would be made available to authorised person upon request.

7.1.9 Complaints Handling

11. St Aloysius' College is committed to dealing with complaints as outlined in the Operational Plan of Management.





7.2 SPECIFIC ENVIRONMENTAL COMMITMENTS

7.2.1 Air

12. Prior to commencement of works, St Aloysius' College would develop and implement a Dust Management Plan (DMP) as part of the Construction Management Plan, which may include measures to control other emissions, approved by the relevant regulatory bodies.

7.2.2 Noise

13. During the construction phase, St Aloysius' College would ensure that all recommendations of the Acoustic Report are adopted and implemented through a Construction Management Plan.

7.2.3 Hazardous Materials

14. During the construction phase, all hazardous material removal should be undertaken in line with the recommendations of the Hazardous Materials Survey.

7.2.4 Traffic and Transport

13. St Aloysius' College would ensure that a Construction Traffic Management Plan is prepared and submitted to DPIE. This plan would:
 - (a) be submitted to the Secretary for approval prior to the commencement of construction;
 - (b) describe the traffic volumes and movements to occur during construction;
 - (c) detail proposed measures to minimise the impact of construction traffic on the surrounding network, including driver behaviour and vehicle maintenance; and,
 - (d) detail the procedures to be implemented in the event of a complaint from the public regarding construction traffic.
14. The Construction Traffic Management Plan would be implemented throughout the construction cycle.
15. St Aloysius' College would prepare a Workplace Travel Plan.

7.2.5 Aboriginal Cultural Heritage

16. All contractors undertaking earthworks on site would be briefed on the protection of Aboriginal heritage objects under the *National Parks and Wildlife Act 1974* and the penalties for damage to these items.
17. If unforeseen Aboriginal objects are uncovered during construction the unexpected finds protocol will be followed. Work will cease in the area, and the NSW Office of Environment and Heritage will be informed.

7.2.6 Waste Management

16. During construction, St Aloysius' College would implement the measures contained within **Section 6.1.14** of the EIS. Further waste management measures would be incorporated into the CEMP to be issued prior to commencement of construction.





17. St Aloysius' College would ensure that all waste generated on-site during construction and operation is classified in accordance with the *Waste Classification Guidelines: Part 1 Classifying Waste* and disposed of at facility that may lawfully accept the waste.





PART H PROPOSED DEVELOPMENT JUSTIFICATION

8.1 JUSTIFICATION

The proposed development is justified on environmental, social and economic grounds and is compatible with the locality in which it is proposed. The proposed development would enhance the subject site from an otherwise vacant landholding to a productive employment generating facility.

This EIS is submitted on the following basis.

8.1.1 Supports State, Regional and Local Planning Objectives

The proposed development is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan*; the *Eastern City District Plan*; and LLEP 2013. The proposal would contribute to provision of social infrastructure through education facilities that would support the growing population.

8.1.2 Demonstrates an Appropriate Use of a Permissible Development

The proposed development would retain and contribute to the provision of education facilities in the Inner West, and support the adaptive reuse of a heritage building. Furthermore, under the existing zoning of the site education establishments would be permissible with consent. The proposed development would be a highly appropriate and compatible (given the previous use of the site for education purposes), and its response to the strategic goals and objectives of the whole region as set out in *A Metropolis of Three Cities – Greater Sydney Region Plan* and the *Eastern City District Plan*. These documents all promote the need for social infrastructure provision throughout Sydney to support the rapidly growing population.

8.1.3 Minimises Environmental Impacts

Specialist consultants (as identified in **TABLE 1**) have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports (as listed in **TABLE 7**) have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully-developed strategies are set out in detail for mitigation. These measures are described in **PART F** of this EIS.

8.1.4 Creates Compatibility with Surrounding Development

The proposed development is compatible with existing land uses on site and on adjacent lands, all of which provide very similar educational, community and residential uses. Detailed investigations undertaken, as part of this application, conclude that no significant environmental cumulative impacts, would occur from the proposed development.





8.1.5 Delivers Ecologically Sustainable Development

The principles of ESD as outlined in Schedule 2 Clause 7(4) of the EP&A Regulation have been carefully considered in the formulation of this proposal and are addressed as follows:

Precautionary Principle

After careful assessment by both the project team and expert consultants, it is concluded that no unmanageable threat or irreversible damage to the environment, would result from the proposed development.

Inter-generational Equity

The project team and expert consultants have examined the overall effects of the proposed development, on both the natural environment and the existing built environment within the vicinity of the site.

This detailed assessment has concluded that no unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations would occur from the proposed development. The proposed development would support the ongoing use of the existing buildings and contribute to the social infrastructure provision of the locality, thereby improving the inter-generational equity.

Improved Valuation, Pricing and Incentive Mechanisms

The proposed development aims to reduce costs through installation of efficient water fittings and fixtures, as well as energy efficient lightings. Overall, the re-use of a building supports minimised construction costs.

Environmental Management

The proposed development implements significant and elaborate measures that avoid, contain and address any possible air-quality, noise, waste and pollution impacts, through avoidance, better design and management. This is exemplified through the following measures, which would be implemented throughout both the construction and operational phases of the proposed development:

- water use reduction;
- waste management control practices; and
- erosion-and-sediment control.





PART I CONCLUSION

This proposed development is deemed to SSD pursuant to Schedule 1, Part 15 of SRD SEPP. This EIS has been prepared in accordance with the SEARs and accords with Schedule 2 of the EP&A Regulation with regards to consideration of relevant EPI's, built form, social and environmental impacts.

The proposed development is considered to be entirely consistent with the Objects of the EP&A Act under Section 1.3. The proposed development is considered to positively contribute to the locality through provision of additional educational facilities, while reusing existing development so as to have minimal environmental impacts.

Based on the specialist studies and extensive investigations carried out for the proposed development, the following conclusions are made:

- It has been prepared having regard to the relevant Planning legislation and is permissible with consent. The site is zoned for the purpose of a school and has historically operated as a school;
- The proposal has been prepared with regard to the relevant state, regional and local planning policies and strategies, and demonstrates consistency and compliance with the objectives of the strategic documents;
- It has been prepared having regard to Council's planning policies and generally complies with the relevant objectives and controls pursuant to LLEP 2013 and LDGP 2013;
- The proposal is suitable for the site as evidenced by the site analysis and various site investigations;
- The proposal does not have any unacceptable off-site impacts on adjoining or surrounding properties or the public domain, in terms of amenity, traffic, social and environmental impacts;
- The proposed development would primarily support facilitation of continued learning during the main campus re-development;
- The site is serviced by existing services and infrastructure that are capable of supporting the proposed development;
- The proposed built form addition is for one lift which is of an appropriate scale, and design to be in keeping with the existing building and surrounding locality. The proposal will integrate with, and positively contribute to, the established uses already existing on site;
- The proposal provides high quality landscaping, innovatively-designed open space, and vegetation planting prioritising native endemic species;
- The proposal has addressed the concerns raised during consultation with key government agencies, the community and other stakeholders;
- The proposed development will result in an enhanced educational environment for SAC through allowing a tailored learning approach for one year level;
- The proposed development will contribute positively to energy efficiency and environmental sustainability. The proposed development has adopted and incorporated many ESD features to reduce energy and water consumption during the life of the proposed development.





Based on the findings of this EIS, it is concluded that the proposed development is appropriate for the site and would contribute to the provision of social infrastructure in the Inner West LGA. The proposal would contribute to the retention and reuse of a heritage item and complement the existing established uses on the site. The proposed development is therefore considered suitable from both a local and regional context and is considered orderly and appropriate, based on social, cultural, economic and environmental matters.

Given the above reasons and the satisfaction of both of the Objects of the EP&A Act and the aims of LLEP 2013, it is recommended that the proposed development, for the purposes of an educational establishment, be supported subject to relevant and reasonable condition.

