



File Ref: EXT/2024/0023

23 December 2024

Department of Planning, Housing & Infrastructure
Locked Bag 5022
Parramatta
NSW 2124

ATTENTION: Navdeep Singh Shergill

Dear Mr Shergill,

Inner West Council Response: SSD-78268465 – Concept and Stage 1 – Newington College

Properties: 200-244 Stanmore Road and 221-235 Stanmore Road, Stanmore

Thank you for providing Council with the opportunity to comment on the draft SEARs for the Concept and Stage 1 – Newington College State Significant Development Application (SSDA). Council has reviewed the submitted draft SEARs and the preliminary documentation provided by the applicant.

In addition to the matters listed in the draft SEARs, further information is sought regarding the following items:

- Statutory Context – Item 1 (Concept) and Item 1 (Stage 1)
- Traffic, Transport and Accessibility – Item 9 (Concept) and Item 7 (Stage 1)
- Trees and Landscaping – Item 7 (Concept) and Item 13 (Stage 1)
- Aircraft Noise Assessment – Item 17 (Concept) and Item 12 (Stage 1)
- Waste Management – Item 19 (Concept) and Item 20 (Stage 1)
- Environmental Heritage – Item 21 (Concept) and Item 22 (Stage 1)
- Infrastructure Requirements and Utilities – Item 25 (Stage 1)
- Contributions and Public Benefit – Item 26 (Concept) and Item 26 (Stage 1)

In addition to the above, the following additional items are requested to be added to the SEARs:

- Plan of Management

Each of these items is addressed in further detail in the following sections.



Matters where further information should be provided to complement existing issues and assessment requirements

Statutory Context

In addition to the draft SEARs requirements, Council requests the following information be provided:

- It is noted that there have been a number of approvals granted for the site with some if not all consents activated in some way. Any proposal shall identify any active consents applying to the site/s to ensure they are consistent with and considered in the concept DA and any potential cumulative impacts if all works are completed. On this point, the applicant is encouraged to lodge a formal request for access to information via Council's website.

This matter is to complement the requirements noted under Item 1 (Concept) and Item 1 (Stage 1) of the draft SEARs.

Traffic, Transport and Accessibility

In addition to the draft SEARs requirements, Council requests the following information be provided:

- Justification should be provided for a second pedestrian bridge for Newington College given the close proximity of the existing bridge.
- Given the close proximity of the two pedestrian bridges (new and proposed) the proponent should investigate consolidation of the bridges into 1 bridge.
- Any new pedestrian bridge will require a S138 Roads Act approval from both Council and TfNSW including the lease of the airspace above the road reserve under section S149 of the Roads Act.
- Clearly state the final number of students and teachers at the school during full co-ed operations.
- Detail any changes to off street parking arrangements.

This matter is to complement the requirements noted under Item 9 (concept) and Item 7 (Stage 1) of the draft SEARs.

Trees and Landscaping

In addition to the draft SEARs requirements, Council requests the following information be provided;

- A site specific Tree Protection Plan that is prepared in accordance with Council's Development Fact Sheet – Trees on Development Site.
- Demonstration that there is no net loss of canopy. In this regard, proposed removal and replacements must be shown on all plans. The applicant should be encouraged to provide a mix of species of varying canopy heights and spread. There must be sufficient above and below ground space to allow the trees to reach their full potential.



- In relation to the detailed stage one, the applicant should be encouraged to relocate the building footprint back from the road to enable large trees to be planted between the building and the front boundary.
- The existing overhead electrical infrastructure located on Stanmore Road frontages should be directed underground. Council would support the removal of existing small street trees located along this frontage and replaced with semi advanced medium sized trees that would then grow in tandem with the above.

This matter is to complement the requirements noted under Item 7 (Concept) and item 13 (Stage 1) of the draft SEARs.

Aircraft Noise Assessment

The property is located within the 25-30 and 30-35 Australian Noise Exposure Forecast (2039) Contour (ANEF). Under the Section 6.8 of *IWLEP 2022*, the Consent Authority must be satisfied that the development will meet the interior noise levels specified in Australian Standard AS2021-2015.

The development should be noise attenuated in accordance with Australian Standard AS2021-2015 - Acoustics - Aircraft Noise Intrusion-Building Siting and Construction. A suitably qualified Acoustic Consultant is to carry out an assessment of the proposal and prepare an Acoustic Report based on the requirements of AS2021-2015 which should accompany any application lodged for the proposal.

This matter is to complement the requirements noted under Item 17 (Concept) and Item 12 (Stage 1) of the draft SEARs.

Waste Management

In addition to the draft SEARs requirements, Council requests the following information be provided;

- The proposal considers the ongoing management of waste from the proposed uses, including how alternative waste streams can be introduced and promoted on campus (i.e. food organics recycling, general recycling, reuse and repair). Please note that the NSW Government have instructed schools to provide an organics service by 2030, outlined in the NSW Waste and Sustainable Materials Strategy 2041.

This matter is to complement the requirements noted under Item 19 (Concept) and item 20 (Detailed) of the draft SEARs.

Environmental Heritage

The site contains the following locally listed Heritage Items as per schedule 5 of the *IWLEP 2022*:

- I1531 Newington College—Grounds and Founder's Building, including interiors
- I1532 Newington College—Gate House, including interiors
- I1533 Former Methodist Church—Newington College, including interiors
- A34 Newington Archaeological site



In addition to the draft SEARs requirements, Council requests the following information be provided;

- A Conservation Management Plan (CMP) be provided/updated and Inventory Sheets be required for all areas, buildings, landscaping, bridges to which demonstrate appropriate curtilage and cultural landscape analysis.
- A view analysis and a view loss assessment should be provided as the heritage items are on or at the ridge and views should be protected.

This matter is to complement the requirements noted under Item 21 (Concept) and item 22 (Stage 1) of the draft SEARs.

Infrastructure Requirements and Utilities

In relation to the infrastructure requirements and utilities, Council requests the following:

- All overhead power lines to be relocated underground, and all power poles to be upgraded to steel-standard poles.

This matter is to complement the requirements noted under Item 25 (Stage 1) of the draft SEARs.

Contributions and Public Benefit

Section 3.1 of the *State Environmental Planning Policy (Transport and Infrastructure) 2022* includes the following aim under Chapter 3 relating to educational establishments and childcare centres:

The aim of this Chapter is to facilitate the effective delivery of educational establishments and early education and care facilities across the State by—

(h) encouraging proponents of new developments or modified premises and consent authorities to facilitate the joint and shared use of the facilities of educational establishments with the community through appropriate design.

Schedule 8 of the *Transport and Infrastructure SEPP* includes the following design quality principle in schools:

Schools should be designed to enable sharing of facilities with the community and to cater for activities outside of school hours.

In addition to the draft SEARs requirements, Council requests the following information be provided;

- The school be designed to enable sharing of facilities with the community and to cater for activities outside of school hours.

This matter is to complement the requirements noted under Item 26 (Concept) and Item 26 (Stage 1) of the draft SEARs.



Matters where there are further issues and assessment requirements that should be included

Plan of Management

Given that the site is located along several residential interfaces, a Plan of Management should be required to demonstrate how the amenity of the proposed new buildings and surrounding residential properties are maintained as a result of the development. Information within the plan of management should include the following:

- Operational details to manage the educational establishment, including objectives, specific details about proposed uses, hours of operation, lighting strategy, the number of on-site staff, incidents and complaints register, rules, safety and security measures, access to parking facilities (including who this is limited to), pedestrian access points, the frequency of any events and emergency and evacuation plans.
- Deliveries and loading/unloading details, including traffic movements, hours of deliveries, use of parking areas and garbage collection.
- Any recommendations that maintain the health and amenity of on-site staff and students and surrounding residential properties from the Transport and Accessibility Impact Assessment, Flood Impact Risk Assessment, Waste Management Plan and Noise and Vibration Impact Assessment.

This matter is to be addressed by a Plan of Management prepared by the applicant and should be included in the Industry Specific SEARs as Item 28.

Contact Information

Council invites the applicant and the DPIE Team to meet with us to discuss this proposal and future proposals that may be considered.

If you need any further information in relation to the above matters, please contact Annalise Ifield on 02 9392 5127 or email annalise.ifield@innerwest.nsw.gov.au

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Ruba Osman'.

Ruba Osman
Manager Development Assessment