

Our ref: Newington College Redevelopment (Concept and Stage 1) (SSD-78268465)

Mr Ross Xenos
Chief Operating Officer
Council of Newington College
200 Stanmore Road
Stanmore New South Wales 2048
28 July 2026

Subject: Response to Submissions

Dear Mr Xenos

I refer to the State Significant development application for the Newington College Redevelopment (Concept and Stage 1) (SSD-78268465) and the Department's Response to Submissions (RtS) letter dated 15 July 2026.

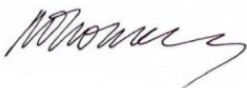
The Department has reviewed the public submissions, Council's submission and agency advice and requests these to be addressed in detail as part of the Submissions Report.

In addition to the issues raised in the public submissions and agency advice, the Department requires you to address the matters raised in **Attachment 1** in the Submissions Report.

Additionally, the Department is awaiting advice from the Heritage NSW, Civil Aviation Safety Authority, Airservices Australia and Sydney Airport Corporation and will forward any pending advice as separate correspondence upon receipt. Please ensure that the Submissions Report addresses the issues raised in any forthcoming additional agency advice.

Please lodge your submissions report via the NSW Planning Portal at <https://majorprojects.planningportal.nsw.gov.au/>. If you have any questions, please contact Ingrid Zhu, on 02 9585 6995 or via email at ingrid.zhu@dphi.nsw.gov.au.

Yours sincerely,



Madeline Thomas
Team Leader
Social Infrastructure Assessments

as delegate for the Planning Secretary

ATTACHMENT 1 KEY ISSUES / FURTHER INFORMATION REQUIRED

1. General

- The Department has identified a number of inconsistencies across the submitted Environmental Impact Statement (EIS), architectural plans, landscape plans, design reports, visual impact assessment, traffic reports, arboricultural reports and supporting documentation. The Department requests a **comprehensive review** be undertaken of all submitted documentation and provide a coordinated and internally consistent package of plans and reports. Clarification is required regarding, but not limited to, the following:
 - the existing height, Gross Floor Area (GFA) and footprint of the Concordia Building
 - the proposed footprint of the Stage 6 Concordia Building envelope, noting inconsistencies between the architectural drawings and the overall concept site plan/staging plan
 - the SSD site boundaries across all plans and supporting documents, noting that site boundaries are omitted from some drawings and parts of the Concordia site appear to be excluded across various documents
 - the proposed site coverage and building footprint of each building envelopes
 - discrepancies between the architectural and landscape plans associated with the Stage 6 basement access ramps and landscaping
 - the depiction of design elements, detailing and materiality, including physical mitigation measures such as acoustic walls, wind screens, handrails and fencing, across the architectural plans, design reports, visual impact assessments and other supporting documentation
 - the number of proposed parking spaces at each development stage
 - tree removal numbers identified throughout the EIS, landscape and arboricultural documentation, noting errors in the total removal numbers identified in the Stage 1 and Concept Proposal arboricultural reports
 - building height and RL discrepancies associated with the Sevington Building and rooftop structures.
- The staging approach and scope of works for each stage are unclear. Provide staged demolition plans, including the sequencing of tree and landscaping removal, and a site plan illustrating the completed site outcome at the conclusion of each stage, including landscaping works. In particular, Stage 5 comprises the demolition of demountable buildings

only; however, no plans have been provided demonstrating post-demolition conditions within the Stage 5 area, including reinstated landscaping, circulation arrangements and site access.

- Clarify the sequencing of proposed tree planting and landscaping works across each stage of the development. To ensure adequate landscaping and planting are delivered progressively and that appropriate amenity is provided around buildings at each stage, further justification is required for the proposed standalone landscaping stage (Stage 4), noting that the indicative timing of Stage 5 (demolition of demountable buildings) appears to overlap with Stage 4. Clearly demonstrate the site conditions and landscaping outcomes that will exist upon completion of each stage.
- Provide a consolidated schedule identifying the maximum building height (RL and metres above ground level), maximum GFA, site coverage and building footprint proposed for each development stage and building envelope, noting these parameters may form part of the development consent if approved and must be clearly reflected and accurately annotated on all accompanying plans and drawings.
- Provide a schedule of all relevant development consents applying to the site, including DA201400369 and DA201100141 identified by Council and any other relevant consents, and explain their relationship to the current proposal. The schedule should be accompanied by the relevant consent conditions and approved plans, where necessary.
 - identify any conflicts between the SSD proposal and existing development consents that would require modification, including details of any required amendments to conditions or approved plans.
 - confirm the status and intended implementation of all existing consents. If any of the development consents are to be activated (and not surrendered), then their associated built form/landscaping should be included on a site context plan identifying all approved development that is yet to be constructed to ensure an accurate representation of the ultimate site outcome. Clearly identify all approved vehicular access points that will remain, including access arrangements from Stanmore Road and the surrounding local road network.
- The survey plan submitted is outdated (September 2020) and does not accurately depict current site or surrounding conditions. Several adjoining buildings have not been surveyed or are omitted from the survey, particularly surrounding the Concordia Site and properties opposite Stanmore Road near the Stage 1 Sevington Building. Additionally, some demolished structures remain shown as existing, while other existing structures are not consistent with the scale shown on the architectural plans or aerial maps. This raises concerns regarding the

accuracy of the site and context information relied upon in the architectural plans and supporting technical reports. Provide an updated survey and confirm all plans and technical assessments have been prepared using accurate and current site and surrounding conditions.

- Confirm that the proposed increase in student and staff number is limited to Stage 1 and that no further increase in school capacity is proposed as part of the remaining stages of the Concept Proposal.

2. Community use, event and operational management

- The extent of existing and proposed community use of the College facilities is unclear. Demonstrate a clear commitment to community use and that community uses, school events and out-of-hours activities can occur without resulting in adverse environmental impacts. Provide a revised Plan of Management to include:
 - a summary of all facilities proposed to be available for community use, including the location and type of facilities, the nature of proposed use, the expected number of users and visitors, hours of operation, frequency and scale of use and operational management measures proposed to mitigate potential traffic, parking, noise and amenity impacts
 - further details regarding school-related functions, activities and events occurring outside standard operating hours, including before and after school activities, weekend use and occasional larger-scale events.

3. Design excellence, built form and visual impacts

The proposal is subject to the Design Excellence provisions of the Inner West Local Environmental Plan. Council and the Government Architect NSW have raised concerns regarding the bulk, scale and visual prominence of both the Stage 1 Sevington Building and the Stage 6 Concordia Building. The Department are not satisfied that the proposal achieves design excellence and therefore satisfy Clause 6.9 of the Inner West Local Environmental Plan (IWLEP) 2012, having regard to built form, architectural quality, urban design outcomes, heritage context and contribution to local character.

Urban response, massing and bulk

- The proposal does not adequately demonstrate how the scale, massing and length of the proposed buildings respond to the surrounding low-rise residential and heritage context. Additionally, the rooftop courts and associated fencing and net enclosure are visually significant and contribute substantially to its visual prominence. Further design development is required to:

- reduce the perceived bulk, scale and visual dominance of the development
- demonstrate a more compatible response to the surrounding residential and heritage character.

Façade modulation and architectural expression

- With particular emphasis on the extensive Stanmore Road frontage and the eastern elevation of the Sevington Building, large areas of façade are visually inactive and lack articulation and detailing at a pedestrian scale. Further development of the material palette and façade detailing is required to:
 - provide further façade articulation and a more deliberate balance of solid and transparent elements to reduce the perception of a long and continuous built form
 - improved fine-grain presentation to Stanmore Road
 - establish a clearer hierarchy, differentiation and variation of façade elements to break down the overall building length and better respond to the finer grain of the streetscape
 - improve the integration of architectural and landscape design measures.
 - strengthen built form relationship with the surrounding streetscape character.

Activation, arrival and civic engagement

- The ground floor interface provides limited opportunities for activation, visual permeability and engagement with the public domain, resulting in a streetscape presentation that is inward-looking and makes a limited contribution to the public domain. Further design development is required to:
 - establish a clearer campus address and strengthen the civic role of the forecourt as the campus main entry through a more defined arrival sequence
 - increase visual permeability to improve passive surveillance, activation and engagement with the street, particularly at ground level.

Rooftop structures

- Provide further information regarding the visual impacts of the rooftop courts, net structure and rooftop screening, including:
 - additional visual impact assessment from locations west of Stanmore Road and in the vicinity of the Concordia Site.
 - details of the proposed materials, colours and finishes
 - clarification of inconsistencies relating to rooftop netting and building heights
 - justification for the height and extent of the rooftop plant room screening.

An updated visual impact assessment of the refined design is also required to enable further assessment of the visual and built form impacts of the Stage 1 Sevington building and Stage 6 building envelope.

4. Pedestrian Footbridge

- As currently presented, the proposed pedestrian footbridge reads primarily as infrastructure associated with the College rather than an integrated component of the public domain. To ensure that the footbridge functions as an integrated part of the public pedestrian network, further design development and justification are required demonstrating:
 - the intended public accessibility of the bridge
 - how pedestrian approaching from either side of Stanmore Road will identify and access the bridge
 - how the lift, stair and landscaping structures contribute positively to the public domain and supports broader pedestrian movement outcomes beyond the College
- Provide a pedestrian circulation plan demonstrating public access routes and pedestrian movements between the bridge and surrounding footpath network. Indicate the RL, setbacks and dimensions of the bridge on the architectural drawings.
- In light of Council's comments and TfNSW's latest advice, clarify the footbridge's ownership arrangements, maintenance responsibilities, easement requirements and safety measures, including security, lighting and fire safety arrangements.
- Confirm the proposed pedestrian footbridge will comply with all relevant design specifications, standards and guidelines, and demonstrate that the proposed building envelope is capable of accommodating these requirements.

5. Traffic, Access, Parking and Active Transport

- Provide a revised traffic assessment clarifying:
 - whether the traffic modelling results represents the scenario at the completion of Stage 1 works or the full Concept Proposal
 - the traffic redistribution impacts associated with all proposed stages, including impacts arising from the Stage 6 Concordia parking and access arrangements.
- The parking survey indicates high levels of occupancy and appears to be based on a limited survey area. Undertake an expanded parking survey in accordance with Council's recommendations to better establish the existing parking conditions and available capacity within the surrounding road network.

- To demonstrate that the proposal will not result in unacceptable parking overflow onto surrounding residential streets, provide further information regarding:
 - staff parking demand and management arrangements, noting only 23% of the staff who drives to school utilise the parking spaces within school grounds
 - student parking demand, noting that approximately 5% of students drive themselves to school and are not provided with on-site parking, while the Green Travel Plan does not aim for a reduction in school vehicle use
 - parking demand and management arrangements for visitors, community users and events.
- Assess and address potential conflicts between construction traffic and the operation of existing school bus bays, drop-off/pick-up activities, parking areas and pedestrian movements that utilise the same access points from Stanmore Road as that of construction activities and are proposed to remain operational during construction.
- Provide revised swept path analysis for
 - proposed construction vehicles (12.5m heavy rigid vehicles) associated with Stage 1
 - waste collection and servicing vehicles accessing Stage 6 Concordia building
 - temporary car park access arrangements.
- The Green Travel Plan does not demonstrate a genuine commitment to increase active transport mode share. In particular, it does not target a reduction in student vehicle use or an increase in cycling uptake amongst students and staff. Provide additional information regarding the existing bicycle parking provisions on site and identify measures to encourage walking, cycling and public transport use while reducing reliance on private vehicles.

6. Heritage

- Provide further assessment of potential visual impacts on nearby Heritage Conservation Areas and heritage items.
- Clarify the extent of removal and retention of the sandstone fencing along Stanmore Road and identify any elements of heritage significance proposed to be impacted during the various development stages, noting inconsistencies and ambiguities within the visual impact assessment, architectural plans and heritage impact assessment.
- Provide further details regarding the proposed Stage 2 works to Centenary Hall and assess the impacts of the proposed works on the heritage significance of the building.
- Further information may be requested regarding heritage upon receipt of Heritage NSW agency comments.

7. Residential amenity

- The submitted shadow diagrams do not accurately represent surrounding built form. Provide revised shadow analysis based on up-to-date survey-based information and accurately depicts surrounding development.
- Provide a revised noise impact assessment to address the following:
 - details of any amendments to, or extension of, the bell and public address system and an assessment of the impacts associated with the revised arrangements
 - revised noise emission criteria in accordance with Council's advice and an updated assessment of the proposal's noise impacts
 - an assessment of the increased noise impacts associated with the proposed increase in student numbers and intensified campus uses on the surrounding residential receivers
 - an assessment of noise impacts associated with proposed community use and events
 - operational noise emission criteria for the future Stages 2 to 6.
- Confirm and justify the proposed strategies regarding the enclosure of the Concordia basement access driveway, as recommended in the noise impact assessment, in order to mitigate noise impacts from vehicle access onto the adjoining residential dwellings.
- Provide further details regarding the proposed illuminated signage along the Stanmore Road frontage, including luminance levels, hours of operation, any curfew arrangements and compliance with relevant standards and guidelines. The lighting advice note should assess the impacts associated with the proposed illuminated business identification signage.

8. Landscaping and tree management

- Reconcile inconsistencies relating to tree removal numbers and provide a definitive tree removal schedule for each stage of the development.
- Investigate the opportunities to reduce tree removal associated with the temporary access arrangements, including by aligning these arrangements with access arrangements already approved under existing development consents.
- Proposed tree planting above basement structures and basement access ramps does not appear capable of supporting long-term tree health and survival. Provide further justification for this approach or revise the design accordingly.
- Confirm that the proposed deep soil zones adjacent to the Stage 6 Concordia Building (above basement) satisfy applicable deep soil requirements and provide adequate soil depth and volume to support mature canopy tree growth.

- Provide landscape plans demonstrating the reinstatement of the tennis courts, landscaping and associated works following the decommissioning of the temporary carpark.

9. Flooding

- Address concerns raised by NSW State Emergency Service regarding the reliance on flood gates and clarify any alternative flood mitigation measures that have been considered for the site.
- Should the removal of additional fencing or stone walls along Stanmore Road be proposed, provide clarification and an assessment of the associated flood impacts.

10. Sustainability

- Provide details of the sustainability initiatives proposed as part of the development and demonstrate how the proposal will achieve a Green Star equivalent or benchmarked sustainability outcome.

11. Wind impact

- Confirm the recommended wind mitigation measures identified in the wind impact assessment have been consistently incorporated into the proposed landscape planting and architectural design for Stage 1 and the Concept Proposal.

12. Social impact assessment

- The Social Impact Assessment must address the Department's Social Impact Assessment Guidelines, as updated in March 2026.

13. Airspace operations

- Pursuant to Clause 6.7 of the IWLEP 2012, development consent cannot be granted for development that is a controlled activity within the meaning of the *Airports Act 1996* unless the relevant approval has been obtained. Address the relevant provisions and confirm that the required approval has been secured.