

CP/DW
16734
24 July 2017

Caroline McNally
Secretary
Department of Planning and Environment
320 Pitt Street
SYDNEY

Dear Ms McNally

REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS PICTON HIGH SCHOOL REDEVELOPMENT

We are writing on behalf of the NSW Department of Education, the proponent for the redevelopment of Picton High School at 480 Argyle Street, Picton. As the proposal is for the purposes of development of an educational establishment that has a Capital Investment Value in excess of \$30 million (see cost estimate at **Attachment A**) it is State Significant Development (SSD) for the purposes of the *Environmental Planning and Assessment Act 1979* (the Act).

In accordance with Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), the purpose of this letter is therefore to request the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the proposed development. To support the request for the SEARs this letter provides an overview of the proposed development, sets out the statutory context, and identifies the key likely environmental and planning issues associated with the proposal. This letter is accompanied by the following:

- Cost Estimate prepared by Wilde and Woollard (**Attachment A**); and
- Indicative Concept Scheme prepared by Billard Leece Partnership (**Attachment B**).

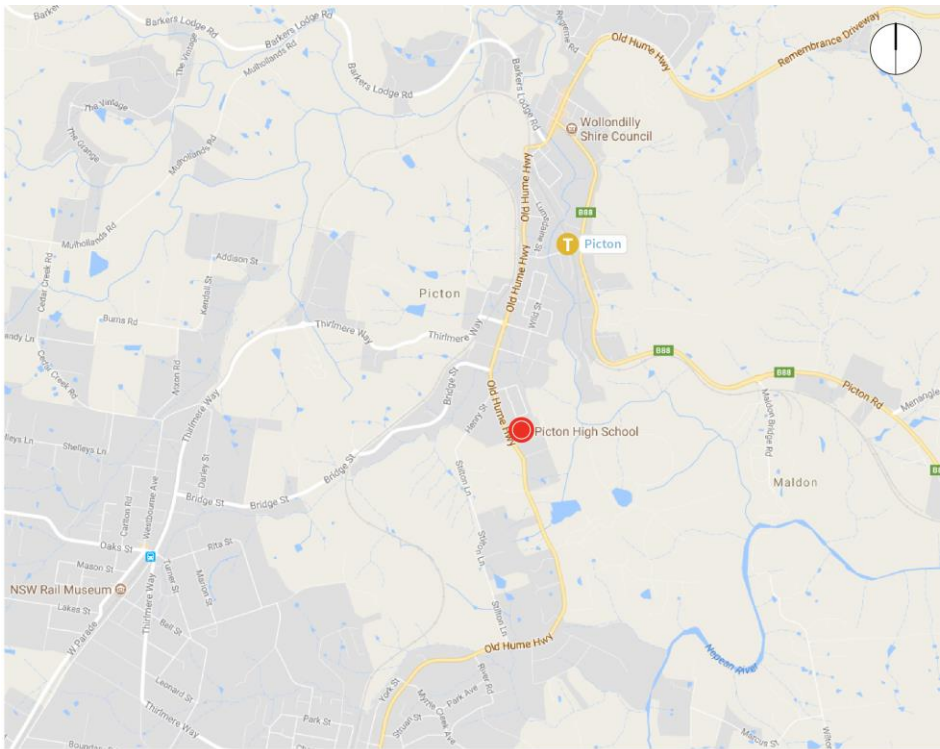
1.0 THE SITE

1.1 Site Location and Description

Picton High School is located at 480 Argyle Street (aka Old Hume Highway), Picton, in the Macarthur Region of south-west Sydney and is approximately 80km south-west of the Sydney CBD and within the Wollondilly Shire LGA. The site is approximately 3km from the Picton Town Centre.

The existing co-educational comprehensive high school was established in 1958, with further upgrades and additions added to the growing school in 1960's, 1980's and the latest Trade Training Centre in 2011. It is the only public high school in the LGA. The school has grown incrementally since its inception and there are currently more than 1,000 students enrolled in between years 7-12.

Picton High School is contained within a single lot legally described as Lot 2 in DP520158 which is 5.691 hectares in area. It is noted that a small portion of the bus bay area is RMS Land. The site is surrounded by residential development to the north, slopes down to Redbank Creek to the east, adjoins a small light-industrial precinct to the south and agricultural land lies to the west. Refer to **Figure 1** for Locational Context and **Figure 2** for a site plan.



● The Site

Figure 1 – Locational Context
Source: JBA



□ The Site

Figure 2 – Site Plan
Source: JBA

1.2 Existing Development

The sixteen individual buildings across the campus are a mix of single and double storey teaching and learning facilities. This includes a multi-purpose hall, modern science laboratories, kitchens and library. In addition to the buildings, there are two basketball courts, two sports fields and an agricultural learning facility on site. The age and purpose of each of the respective buildings is shown in **Figure 3** below.



Figure 3 – Picton High School
Source: Billard Leece Partnership

2.0 DESCRIPTION OF PROPOSED DEVELOPMENT

2.1 Objectives of the Proposed Development

The primary objective of the proposed development is to increase the capacity of Picton High School in order to meet the growing demand for public education in South West Sydney. The development will see a major upgrade of the existing school to accommodate 1,500 students. This will also replace many older buildings nearing the end of their economic life and usefulness with modern educational buildings that will meet the learning needs of the students and be a comfortable working environment for staff.

Supplementary objectives of the proposed development include:

- Create a welcoming atmosphere and pleasant school environment both internally and externally;
- Improve intuitive wayfinding throughout the school grounds; and
- Improve pedestrian safety at school pick up/drop off points.

2.2 Proposed Development

An overview of the proposed development is provided below. A Concept Design Option Report prepared by Billard Leece Partnership has been provided for information purposes (see **Attachment B**). The works include the following:

- Necessary early works including demolition of Buildings A-H and associated excavation;
- Retention, repurposing or refurbishment of Buildings I, J, K, L, M and N;
- Reconfiguration of car and bus drop off / pick up areas;
- Increasing floor space incorporating permanent teaching spaces to accommodate 1,500 students; and
- Construction of a two to three storey building located along the central spine of the site connecting with existing retained buildings.

3.0 PLANNING CONTEXT

3.1 Environmental Planning and Assessment Act 1979

The EP&A Act establishes the assessment framework for SSD. Under Section 89D of the Act the Minister for Planning is the consent authority for SSD. Section 78A(8A) requires that a development application for SSD is to be accompanied by an EIS in the form prescribed by the Regulations.

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

The State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD) identifies development which is declared to be State Significant. Clause 14 of Schedule 1 of the Policy provides that the proposed development as described herein is SSD, as follows:

Development for the purpose of an educational establishment (including associated research facilities) that has a capital investment value of more than \$30 million.

As the proposal is for the purposes of an educational establishment and has an estimated Capital Investment Value of over \$30 million, it is considered to be a SSD (see cost estimate prepared by Wilde and Woollard at **Attachment A**).

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

The Draft SEPP (Educational Establishments and Child Care Facilities) 2017 has concluded public exhibition as of April 2017. It is therefore a relevant matter for consideration for the State Significant Development Application.

Key changes in the proposed legislation of relevance to the Picton High School redevelopment include the following:

- Further flexibility is provided under Clause 36 to accommodate the built form requirements of schools in the event of non-compliance with development standards contained in LEPs; and
- Seven design quality principles are listed in Schedule 4 that apply to schools to ensure that school infrastructure is well designed and responsive to its purpose and location.

Whilst the instrument is still in draft form, its provisions are only a matter for consideration rather than an applicable in force instrument at this stage. Notwithstanding this, the EIS will make an assessment against the seven design principles listed in Schedule 4.

3.4 Current Zoning and Development Controls

Wollondilly Local Environmental Plan 2011

The Wollondilly Local Environmental Plan WLEP 2011 is the applicable local planning instrument for the proposed development and establishes the relevant land uses and other development standards for the site. Specifically:

- The proposed school redevelopment (educational establishment) is permissible in the R2 Low Density Residential zone.
- The proposal is consistent with the zone objectives as it enables a land use that provides facilities or services to meet the day to day needs of residents.
- WLEP 2011 sets a maximum height limit of 9m. The works are largely contained within this height limit; however some new additions centrally located within the school are proposed to be three storeys in height and therefore will modestly exceed the 9m height limit. A clause 4.6 Exemption Request Statement will be required to be lodged to seek a variation to the height development standard.
- There is no FSR standard for the site under WLEP 2011.
- The site is not a heritage item under WLEP 2011.

Wollondilly Development Control Plan 2016

The Wollondilly Development Control Plan 2016 (WDCP 2016) contains detailed built form and other development controls. Section 3.10 of WDCP 2016 relates directly to educational establishments and includes controls in relation to access and transport including storage for bicycles, skateboards, scooters and the like as well as bus stops and footpath/cycle way/share way access.

Whilst it is proposed that the project will have regard to the key controls as outlined above, it is noted that WDCP 2016 will carry no weight in the assessment due to the status of the application as a State Significant Development Application.

3.5 Other Planning Policies

In addition to the above, the following policies apply to the site and will need to be considered as part of the SSD application:

- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55);
- State Environmental Planning Policy (Infrastructure) 2007;
- State Regional Environmental Planning Policy 20 – Hawkesbury – Nepean River; and
- Mine Subsidence Compensation Act 1961.

4.0 OVERVIEW OF LIKELY ENVIRONMENTAL AND PLANNING ISSUES

The impacts and risks associated with the proposal are summarised below and will be addressed in detail in the EIS. Overall, the risks from the proposal are considered to be low as the development will not generate any environmental impacts that cannot be managed appropriately.

4.1 Traffic and Parking

As there will be an increase in student and staff numbers on the site, there will be an increase in traffic volumes and parking demand in the locality in addition to changes to the drop-off/pick-up arrangement and vehicular access/egress to the site.

The proposed development is also considered 'traffic generating development' that will require referral to the RMS. A traffic and parking study will accompany the EIS to address these matters in addition to ongoing liaison with the RMS due to the impact on land ownership, and Argyle Street's designation as a Classified Road.

4.2 Mine Subsidence

The land is within a proclaimed Mine Subsidence District under the Mine Subsidence Compensation Act 1961. The approval of the Mine Subsidence Board (MSB) is required for all major developments.

Surface development controls are in place to prevent damage from old, current or future mining. The Mine Subsidence Board has been contacted by the project team and has provided surface development guidelines to inform the design. MSB has confirmed that the site is not currently undermined however mining operations are within 460m of the site.

The impact of nearby mining operations will be further considered during detailed design development, with further referral to the Mine Subsidence Board to be required upon the submission of the State Significant Development Application.

4.3 Bushfire

The land is partially bush fire prone land as shown in Council's records, with a minor segment of the site on the eastern edge being identified as a bushfire buffer zone. A buffer zone is identified as being 100m from Category 1 (e.g. forest, woodlands, heath, wetlands etc.) and 30m from Category 2 (e.g. grassland) areas. A bushfire statement will accompany the EIS to address this matter.

4.4 Flooding

The site is more than 300m from Redbank Creek, which has historically been susceptible to flooding. However, the site itself is not identified as flood prone land or sensitive land under WLEP 2011. A drainage path also flows through the site. The EIS will address these matters in detail.

4.5 Construction and Operational Impacts

The EIS will address and consider the construction and operational impacts of, or on:

- Noise and vibration;
- Construction and operational traffic; and
- Water and air quality impacts.

5.0 CONSULTATION

A formal meeting was held with Wollondilly Shire Council in May 2017 to provide an introduction to the proposed Picton High School Masterplan.

Picton High School has been consulted during the formation of the concept designs for the proposal. In addition, the project team intends to be discussing the project with community stakeholders including the aboriginal community, fire & rescue, the neighbouring church group, bus company, Picton High School P&C and the like. In addition to this, information booths will be held at the school and library throughout the project.

6.0 CONCLUSION

The CIV of the project is over \$30 million and in excess of the requisite threshold of \$30 million for educational establishment projects.

A Quantity Surveyors Statement prepared by Wilde and Woollard is attached for reference (**Attachment A**). On the basis that the project falls within the requirements of Clause 15 of Schedule 1 of the SRD SEPP being *development for the purpose of educational establishments (including associated research facilities) that has a capital investment value of more than \$30 million*, the NSW Department of Education formally requests that the Secretary issue her Environmental Assessment Requirements for the project to facilitate the preparation of the EIS to accompany the DA for the project.

Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or DWest@jbaurban.com.au.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'D West', with a long horizontal stroke extending to the right.

Daniel West
Principal Planner