



**Conrad
Gargett**

Environmental Impact Statement

Alterations and Additions to Parramatta West Public School
Auburn & Young Streets, Parramatta

Our Ref: CC160183

September 2018

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Statement of Validity

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In respect of	State Significant Development Application (ref: SSD 8790) for alterations and additions to Parramatta West Public School and associated works as described in Section 4 of this Environmental Impact Statement (EIS).

Applicant and Land Details

Applicant	NSW Department of Education C/- Blue Visions Management Pty Ltd
Applicant Address	Level 14, 99 Mount Street, North Sydney, NSW 2060
Land to be developed	Auburn, Young, Railway and Crimea Streets, Parramatta NSW 2150 (Lot 2 DP 1113697, Lot 407 DP 729082 and Lot 406 DP 729083)

Declaration

I certify that the contents of this Environmental Impact Statement, to the best of my knowledge, has been prepared in accordance with:

- Schedule 2 and any other requirements of the Environmental Planning and Assessment Regulations 2000;
- The Secretary's Environmental Assessment Requirements;
- State Environmental Planning Policy (State and Regional Development) 2011; and
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.

The statement contains all available information that is relevant to the environmental assessment of the proposed development and to the best of my knowledge the information contained in this report is neither false nor misleading.



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Director, Barker Ryan Stewart



Lisa Wrightson
Senior Town Planner, Barker Ryan Stewart

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Note: All appendices are provided under separate cover for digital copies

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Appendix EE – Biodiversity Assessment Waiver
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1 Executive Summary

This Environmental Impact Statement (EIS) has been prepared on behalf of the NSW Department of Education and Conrad Gargett Architects (CG) to support an application for State Significant Development (SSD No 8790). It is in accordance with the Environmental Planning and Assessment Act 1979, Environmental Planning and Assessment Regulation 2000 and Secretary's Environmental Assessment Requirements (SEARs). The information included in this EIS is based on the architectural plans provided by Conrad Gargett Architects and supporting consultant documentation included with the relevant Appendices.

The site has been used as a public school since its construction in 1887 and opening in 1888. It was originally known as Pitt Row Public School and was changed to Parramatta West Public School in 1937. Over time the school has been expanded to cater for the needs of the local community. Parramatta West Public School (the School) currently accommodates approximately 854 students and 62 permanent staff spaces (including non-teaching staff). It is located off Railway and Auburn Streets, Parramatta and comprises three (3) lots described as Lot 2 DP 1113697, Lot 407 DP 729082 and Lot 406 DP 729083.

This SSD application and EIS proposes alterations to the existing school (South site) and additions/expansions to the school on the existing playground area on the Northern side of Railway Street (North site). The expansion of the school will provide permanent classroom space for the school and will ensure the school can cater for a total 961 students. The project will provide 16 new permanent teaching spaces, toilets, administration, canteen and hall in a new 2 storey building, and the existing hall and administration building will be refurbished to provide 4 teaching spaces. Total 20 new teaching spaces.

Pursuant to Schedule 1 (Clause 15(2)) of State Environmental Planning Policy (State and Regional Development) 2011 development for additions to an existing school with a capital investment value (CIV) or more than \$20 million is identified as a State Significant Development (SSD). As the CIV is over \$20 million the EIS will be submitted to the NSW Department of Planning and Environment for assessment and determination. The application is supported by a variety of supplementary studies and demonstrates rational, orderly, economic and sustainable use of the site and has been designed in accordance with the relevant planning and legislative requirements including all the items contained within the SEARs.

All relevant strategic planning policy and statutory planning controls have been considered in the assessment of the proposal and the proposal complies / satisfies all local and State policies.

Plans prepared by CG illustrate the proposal's consideration of the site, the history of the Parramatta West Public School, the location and the existing urban design of the area. The proposal will provide new quality facilities that will provide collaborative learning spaces, classrooms, open play spaces, and hall facilities for use by the school students, parents and local community.

The site is ideal for the proposal given the location adjacent to the existing open play area without overcrowding the existing school site. It ensures a formal link between the North and South sites and as such demonstrates high suitability of the site for the proposed development. There are no significant environmental constraints that would limit the proposal from being developed at the site.

This EIS demonstrates the proposal is in the public's best interest. The proposed development will allow for the expansion of Parramatta West Public School to provide additional, state of the art education. The proposal will enable the increase in student numbers which is greatly needed in the Parramatta area.

Our assessment confirms that the concept proposal warrants approval. The development will not result in any significant or adverse overshadowing, acoustic, privacy or amenity issues; the design and built form will complement the streetscape; and mitigation measures will manage potential environmental and construction impacts. The proposal has been assessed against all items contained within the Secretary's Environmental Assessment Requirements (SEARs) as detailed in Section 5 and further details of the proposal's compliance is detailed within the body of the EIS.

2 Introduction

2.1 Purpose of this Environmental Impact Statement

The proposed alterations and additions to Parramatta West Public School has a capital investment value of over \$20 million (\$23,494,034.00 excluding GST) and is therefore classified State Significant Development (SSD) pursuant to Schedule 1 (Clause 15(2)) of State Environmental Planning Policy (State and Regional Development) 2011. A copy of the CIV report is included in Appendix A.

This Environmental Impact Statement (EIS) has been prepared in accordance with the provisions of State Environmental Planning Policy (State and Regional Development) 2011, Schedule 2 of Environmental Planning and Assessment Regulation 2000 and the issues and matters for consideration outlined in the Secretary Environmental Assessment Requirements (ref: SSD 8790).

2.2 Project Team

The project team is included in Table 1 below.

Table 1: Project Team

Applicant	Blue Visions Management Pty Ltd
Architect	Conrad Gargett
Town Planner	Barker Ryan Stewart
Landscape Architect	Conrad Gargett
Surveyor	Craig and Rhodes
Quantity Surveyor	Turner & Townsend
Traffic Engineer	ARUP
Civil Engineer	Adams Consulting Engineers
Heritage Consultant	Conrad Gargett
Geotechnical Consultant	Douglas Partners
Flooding Consultant	Lyall and Associates
Arborist	Urban Arbor Pty Ltd
Contamination Consultant	Environmental Investigation Services
Ecologist / Biodiversity	Molino Stewart Environment & Natural Hazards
Acoustic	Wood and Grieve Engineers
Sustainability / ESD	Wood and Grieve Engineers
Accessibility	Morris Goding Accessibility Consulting
Waste	Barker Ryan Stewart
CPTED Consultant	Barker Ryan Stewart
Social Impact Consultant	Barker Ryan Stewart
BCA Consultant	Blackett Maguire & Goldsmith

2.3 Structure of this Environmental Impact Statement

Table 2 identifies the structure of this EIS including a brief description.

Table 2: Structure of Environmental Impact Statement

DOCUMENT SECTION		DESCRIPTION
Section 1	Executive Summary	Project summary
Section 2	Introduction	Purpose of the EIS and objectives of the proposed development
Section 3	Site Analysis	Overview, location and history of subject site
Section 4	Development Description	Overview of proposed concept development, CIV and analysis of alternatives
Section 5	Secretary Environmental Assessment Requirements	Overview of SEARs issued by Department of Planning & Environment – originally issued on 25 October 2017 and reissued on 24 January 2018
Section 6	Federal Legislative Framework	Consideration of relevant Federal legislation
Section 7	State Statutory Planning Framework	Consideration of relevant State and regional planning frameworks and strategies
Section 8	Non-Statutory Policies, Plans, and Guidelines	Consideration of non-statutory policies, plans, and guidelines
Section 9	Local Planning Framework	Consideration of the local planning framework
Section 10	Environmental Impact Assessment	Response to SEARs
Section 11	Consultation	Details of consultation and responses
Section 12	Justification for Proposed Development	Project justification and considerations
Section 13	Environmental Risk Assessment and Mitigation Measures	Environmental risk matrix
Section 14	Conclusion	Summary of concept proposal and recommendations

2.4 Objectives of the Development

The NSW Department of Education is dedicated to improving schools and the quality of public education in NSW.

In consultation with Parramatta West Public School, they have advised:

"Parramatta West Public School holds strong beliefs about the nature of learning. We believe that learning should be meaningful and relevant, challenging and rewarding, open ended, stimulating and a lifelong process. Through a balanced curriculum we provide programs that encourage students to strive to reach their full potential in all areas, including their academic, social, emotional and sporting endeavours."

The key objectives for the school expansion includes:

- To meet the educational planning principles
- To improve the performance of the school assets
- To improve the operation of Parramatta West Public School
- To achieve the best value for money to support the achievement of education outcomes

- Enrolment demand – meet future projected enrolment growth to 2031
- Long term demographic projections indicate significant projected enrolment growth in the cohort of primary schools in the Parramatta Centre primary school cluster over the next 14 years
- The projections are for an increase of approximately 1696 government primary school students to reach a total of 4505 student by 2031 in the Parramatta Centre primary school cluster
- The growth around the Parramatta West Public School catchment amounts to 10% of the overall student population growth within the cluster
- The project will see the replacement of demountable buildings with permanent home bases. The new building will enable the release of demountable teaching space resulting in the reduction of the overall building foot print and freeing up valuable outdoor space

3 Site Analysis

3.1 Site Location and Context

Parramatta West Public School is located in Parramatta on a site with access from Railway and Auburn Streets. The real property descriptions are Lot 2 DP 1113697 Lot 407 DP 729082 and Lot 406 DP 729083, as shown in Figure 1. (Refer to Detailed Survey in Appendix B.) The subject site is zoned R2 Low Density Residential under Holroyd Local Environmental Plan 2013.

The site is located over two sides of Railway Street, including the existing school or "South site" and the existing playground/oval space or "North site". The total site area is approximately 2.4 ha, 14,340m² on the South and 9,739m² on the North.

Pedestrian access is mainly from Railway Street, however secondary and service access points are also available from Auburn, Young and Franklin streets.

The North site is generally flat in nature with a gentle slope to the west. The South site slopes towards the north. Vegetation on both sites include a mix of native and introduced species. The site has been largely disturbed for the school buildings or playground area. The North site is the main location for new development and includes vegetation that forms a perimeter of the site and creates a landscape element for the locality.

The school has convenient access to public transport with bus stops located along Railway Street to the east of the site. Train stations at Parramatta and Harris Park are also within 1.5-2km walk/drive from the site.



Figure 1: Aerial Photo of Site

3.2 Surrounding Development

Parramatta West Public School is characterised by a mix of residential, community (ambulance station and church) and recreation (council park) developments, as shown in Figure 2 below. Developments and land surrounding the subject site, include the following:

- North: Low and high density residential development, Parramatta Park and Pirtek Stadium, Westfield Parramatta 2 kilometres from the site, Westmead train station and Westmead and Cumberland Hospitals;
- East: Low, medium and high density residential development, commercial and business development and Harris Park train station 2 kilometres from the site;
- South: Low, medium and high density residential development, Holroyd Gardens, Stockland Merrylands and Merrylands train station 1.5 kilometres from the site; and
- West: Western Motorway, low and medium density residential development.



Figure 2: Aerial Photo of Locality

3.3 Site History

Paramatta West Public School has been used as a school since 1888 and was originally known as Pitt Row Public School. It was changed to Parramatta West Public School in 1937.

As the school population grew, so did the school buildings and to cater for the relatively recent increase a number of demountable classrooms have been placed within the playground areas.

3.4 Land Ownership

Parramatta West Public School has been owned and operated by the NSW Department of Education (or its equivalent) in some form since 1887.

3.5 Existing Access, Infrastructure and Buildings

The site is currently serviced by water, sewer, telecommunication and power services. These may require some augmentation to provide for the new buildings. Details of the augmentation are included in Sections 4.3.9 and 10.10 below.

The South site includes all the current school buildings and administrative functions, including some playground space. Currently students regularly use the North site as a playground during lunch and recess.

Currently all car parking is on street as all formerly available parking spaces on the site are used by demountable classrooms. There is sufficient on-street car parking and access to public transport.

Pedestrian access is from Railway street with secondary access from Auburn and Franklin Streets. Vehicular access for general waste and deliveries is from Franklin Street, via a small extension of Young Street. Refer to Figure 3 below for details.



Figure 3: Existing Site Plan

The school is located close to several bus stops. The buses are operated by Transit Systems for NSW State Transit. The Services include:

- Route 810 – Parramatta to Merrylands via Pemulwuy
- Route 811 – Parramatta to Pemulwuy via Hilltop Road
- Route 802 – Parramatta to Liverpool via Green Valley
- Route 804 – Parramatta to Liverpool via Hinchinbrook
- Route 806 – Parramatta to Liverpool via Abbotsbury

These stops are shown on Figure 4 below. These buses also link the Parramatta Station to the area which is about 2km from the school. Harris Park Station is also nearby (less than 2km away) but does not have direct bus links to the site.

A number of school buses operate directly from the site to the surrounding area, these are over and above the services mentioned above.

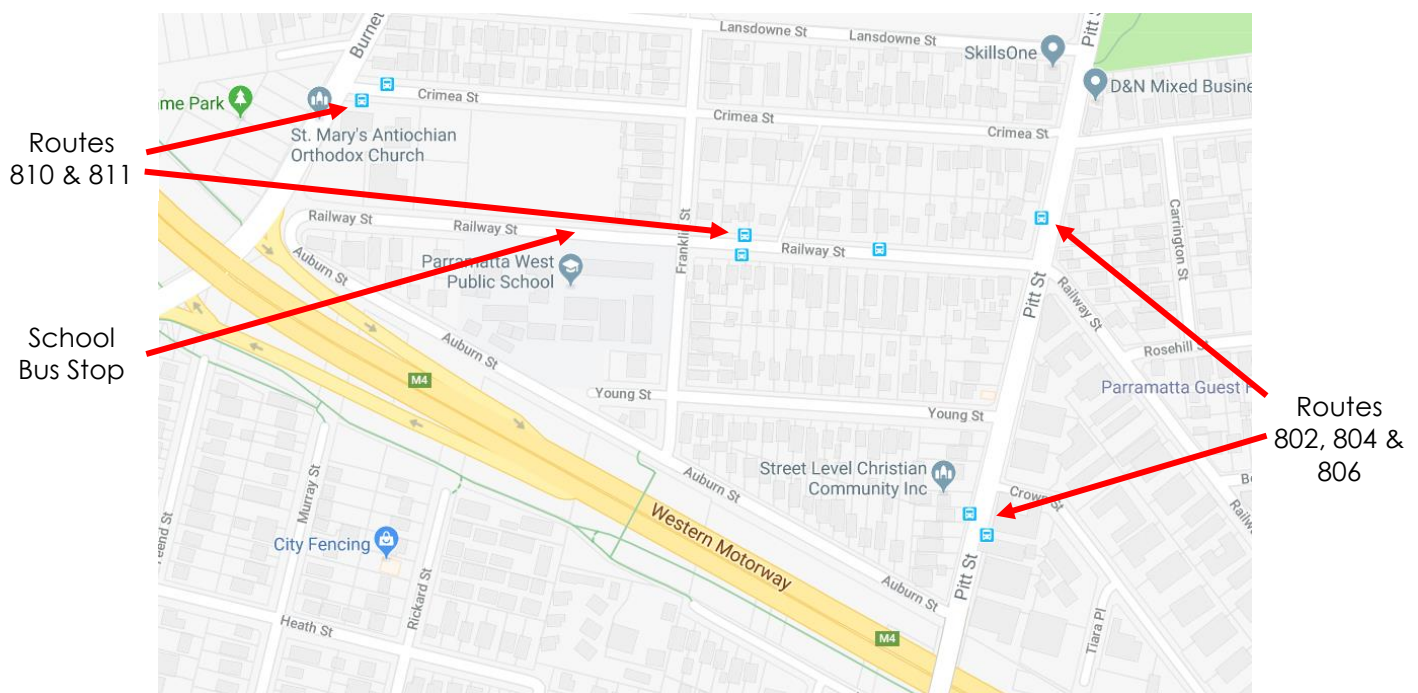


Figure 4: Extract from Google Maps showing location of bus stops near to Parramatta West Public School

Parramatta Council also has several existing and future cycleways in the area which are close to the school. Figure 5 below shows the current and future cycleways in the vicinity of Parramatta West Public School.



Figure 5: Extract from City of Parramatta Bike Plan 2017 showing current and future bike routes

3.6 Heritage

3.6.1 Aboriginal Heritage

A search of the NSW Aboriginal Heritage Information Management System (AHIMS) was undertaken to identify any Aboriginal sites or places within 200m of the Parramatta West Public School site. No Aboriginal places were identified and due to the disturbed nature of the site it is unlikely any Aboriginal heritage will be impacted. No assessment was required by the NSW Office of Environment and Heritage.

3.6.2 Non-Aboriginal Heritage

The South site is listed as an item of environmental heritage within Holroyd Local Environmental Plan (LEP) 2013. The North site is not listed, however to ensure there were no adverse impacts on the buildings on the South site, a Heritage Impact Assessment was undertaken by Conrad Gargett and is included in Appendix C.

3.7 Photographs of the Site

Photographs 1-5 below show the site and surrounding development.



Photograph 1: View west from North Site along Railway Street



Photograph 2: Main school entrance from Railway Street



Photograph 3: View east along Railway street from North site – approximate new entrance location.



Photograph 4: Proposed site of new buildings - North site



Photograph 5: Area to west of proposed new buildings on North site – location of construction compound

4 Development Description

4.1 Overview

Development approval is being sought for alterations and additions to Parramatta West Public School including alterations to existing buildings and new facilities providing additional home bases, administration and a hall. The school has been operating on the site (South) since 1888 and provides schooling for primary aged children from Kindergarten to Year 6. The proposed development has been designed to replace demountable buildings with a purpose designed building on the North site.

Figure 6 below provides a good overview of the proposed works on the sites including the following:

- Construct a new single storey hall on North site to replace older and under-sized hall (currently on South site);
- Alter the existing hall on South site to create two new home-bases;
- Construct a new building including ten new home-bases on the North site;
- Construct a new building including administration, staff areas and six new home-bases on the North site;
- Alter the existing administration / staff area on the South site to create two new home-bases and satellite administration areas; and
- Create outdoor learning and landscaped areas on the North site.

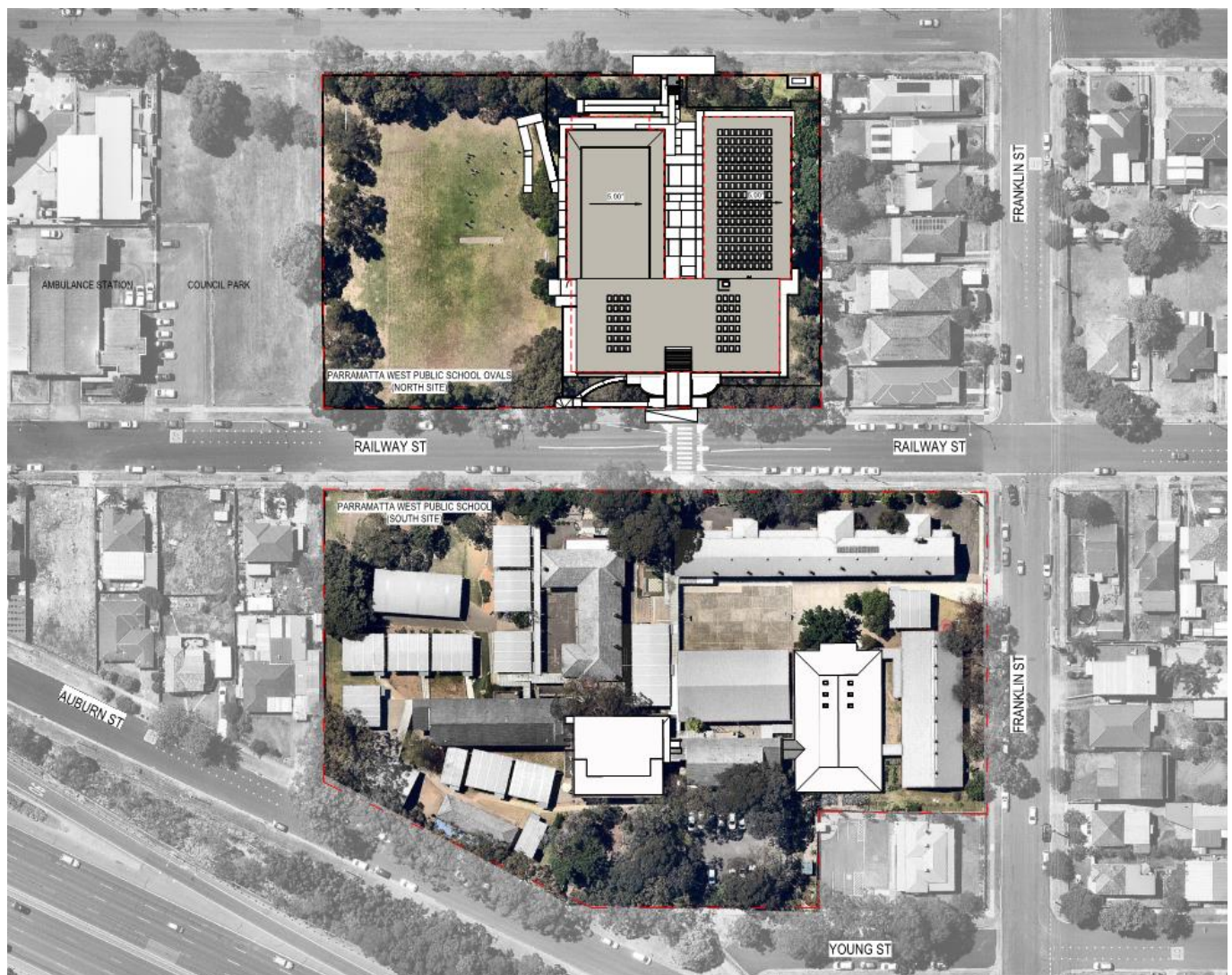


Figure 6: Extract from Proposed Site Plan

Detailed plans of the proposed development are included with the Architectural plans in Appendix D.

4.2 Site Preparation

This section details the proposed site preparation works including demolition and tree retention and protection works.

4.2.1 Demolition Details

The proposed alterations and additions to Parramatta West Public School will involve the removal / demolition works, as shown in Figure 7 for South site only, and includes.

- Demolition associated with internal refurbishments of buildings on the South site; and
- Removal of small scale landscaping / open space elements from the North site.

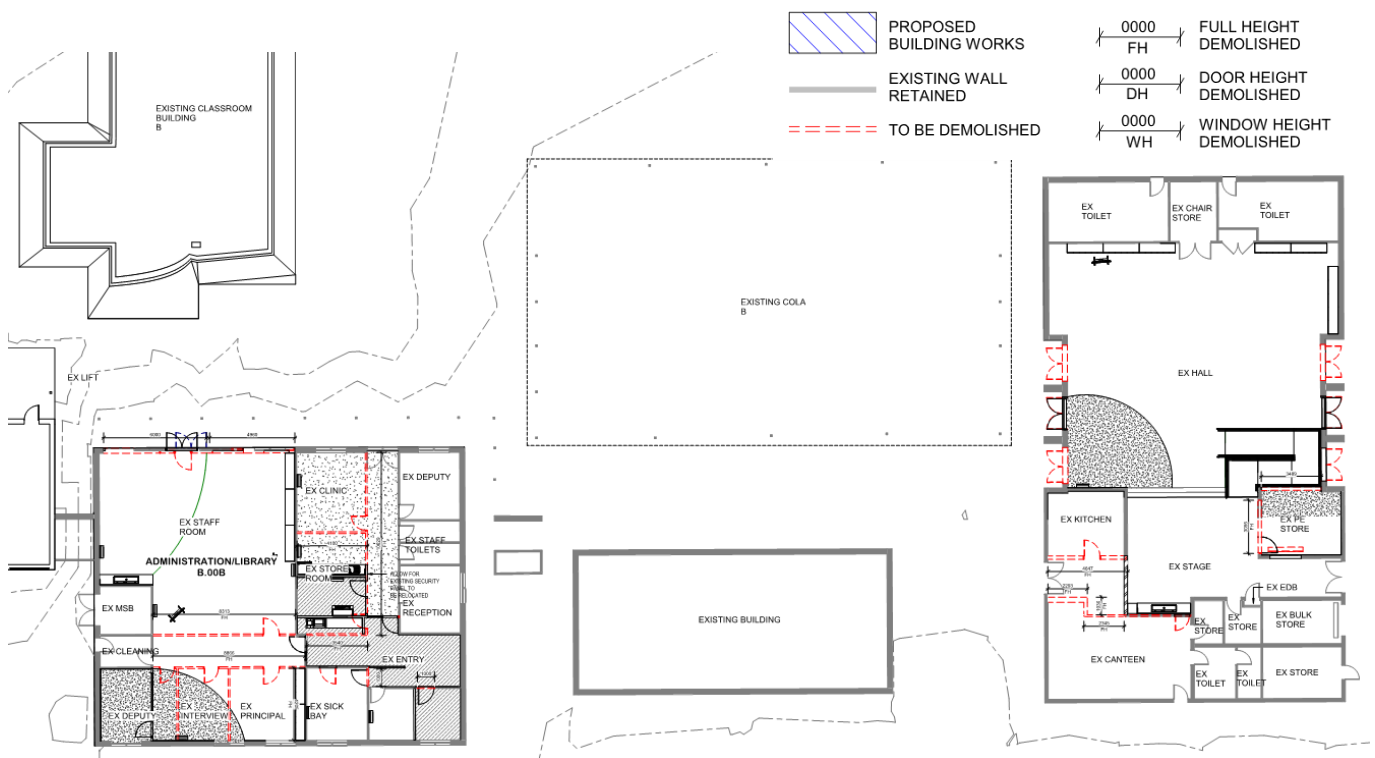


Figure 7: Extract from demolition plan

Where possible, materials will be salvaged for recycling and reuse during the demolition process. The remaining waste will be transported to a recognised waste facility. Details of waste disposal are included in the Waste Management Plan in Appendix E.

It should be noted that the removal of the existing demountable buildings on the South site have not been included as part of this application.

4.2.2 Tree Retention and Removal

The North site is currently used as a play area for the school and is surrounded by trees and vegetation to the external boundaries. To enable the development of a new building on the North site a number of these trees will need to be removed.

Figure 8 is an extract from the arborist report (refer to Appendix F) that shows the trees to be removed, those to be protected and retained and those not impacted.

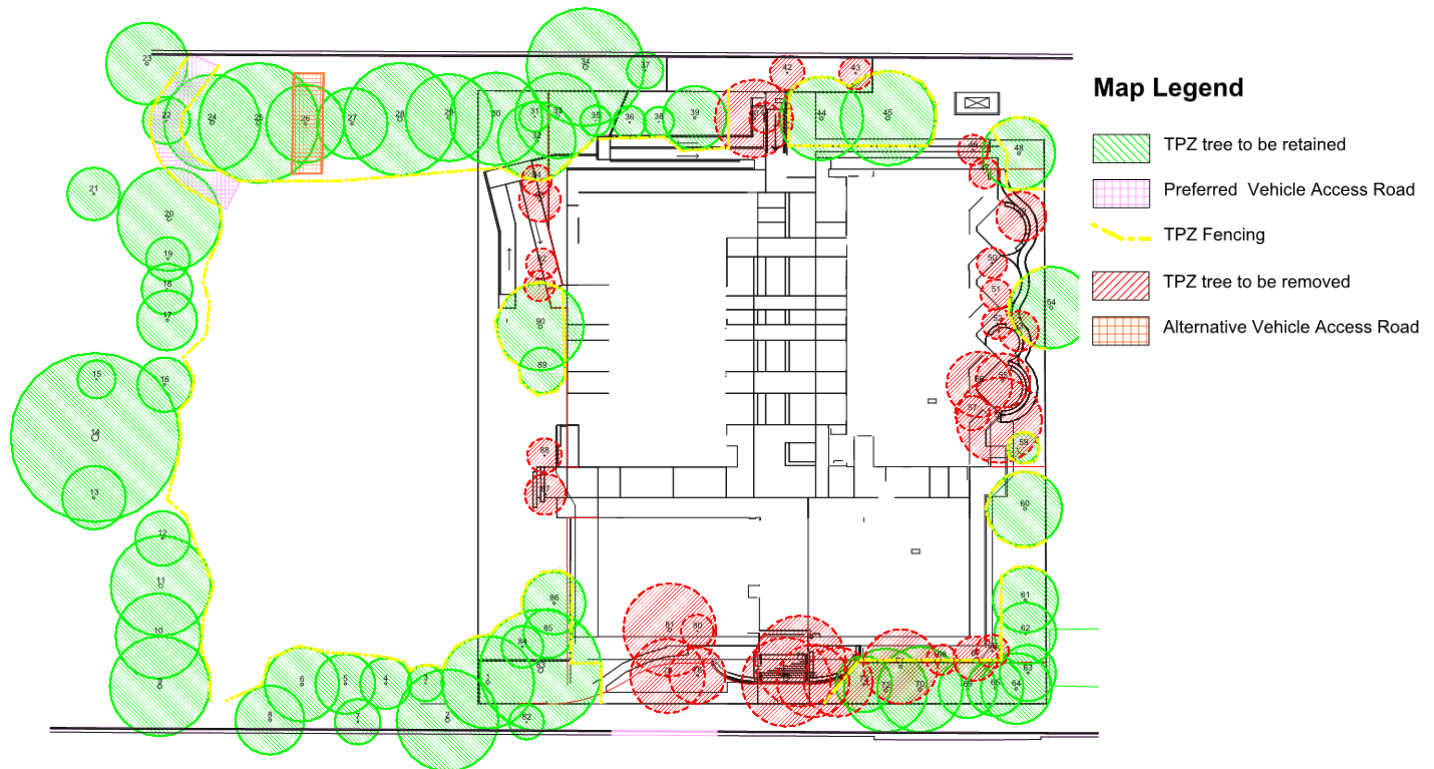


Figure 8: Extract from Arborist report showing tree removal / retention

To ensure the amenity of the area has been retained, a landscape plan has been prepared which shows replacement vegetation for the trees to be removed. Refer to Appendix G.

4.3 Proposed Alterations and Additions to School

The proposed development will involve alterations and additions to Parramatta West Public School, the proposal seeks development for new learning facilities to occupy the North site and internal refurbishments to existing buildings and classrooms on the South site. Figure 6 above shows the location of the proposed changes on the site plan extract.

4.3.1 Design Philosophy

Architects Conrad Gargett have been engaged by the NSW Department of Education to provide the design for the alterations and additions to Parramatta West Public School. The design philosophy has been provided by Conrad Gargett and is outlined below.

The Parramatta West Public School currently occupies the South site with a collection of school buildings that include the original heritage school building and infants building and a collection of 1970's, 1990's and BER (Building the Education Revolution) buildings that are loosely arranged around two play areas. The increase in population due to urban densification has resulted in additional demountables located on the site restricting movement and the open play areas that are immediately available to the children. With the expected continued growth in the region, a scope of work to replace demountable classrooms with permanent teaching spaces has been implemented, to meet projected population requirements and upgrade core facilities such as toilets, administration, staff areas and the hall to meet these demands.

Many siting options were considered for the South and North site, which is currently used by the school as open recreation space during recess and lunch time. Refer to Section 4.6 for details.

The design, which is submitted as part of this EIS provides for a campus style arrangement over the South (existing) site and extends the built form across to the North site. Key drivers for this approach included:

- Establishing a new entry address for the school with suitable forecourt and co-located staff and administration facilities for the school. The current administration is set deep into the South site, is difficult to navigate and has limited opportunities for expansion. A satellite administration office will manage day to day concerns for the South site as part of the operational management of the school with the main administration relocating to the North site.
- Providing a new community hall facility that can adequately accommodate the school community and extend its useful life as a community facility with suitable public access. The existing hall has no potential for expansion within the southern site without impacting upon open play areas for the children.
- Providing 20 new home bases with flexibility to enable collaboration and future focused learning environments. The approach of the team was to adaptively reuse the existing administration area and hall on the South site to provide four (4) teaching spaces. 16 new teaching spaces were then proposed as a part of the North campus to engage with the site and offer the school an enhanced teaching environment for their students. The South site with its restructure free area did not provide the same opportunities for connection with the landscape, a key area of concern for the school with students generally learning in units, or quality of learning spaces. By developing the North site, it also retained key play areas adjacent to existing classrooms and enhanced the existing learning opportunities on the South site.
- Opportunity to enhance the narrative of the school around the first people and the continued migrant population in the area. Their first touch point into Australia experiencing the landscape, concept of 'welcome', indigenous garden, and history of the Aboriginal Peoples.

Figures 9, 10, 11 and 12 below show sketches of the proposal in the development stage, highlighting important elements of the design.

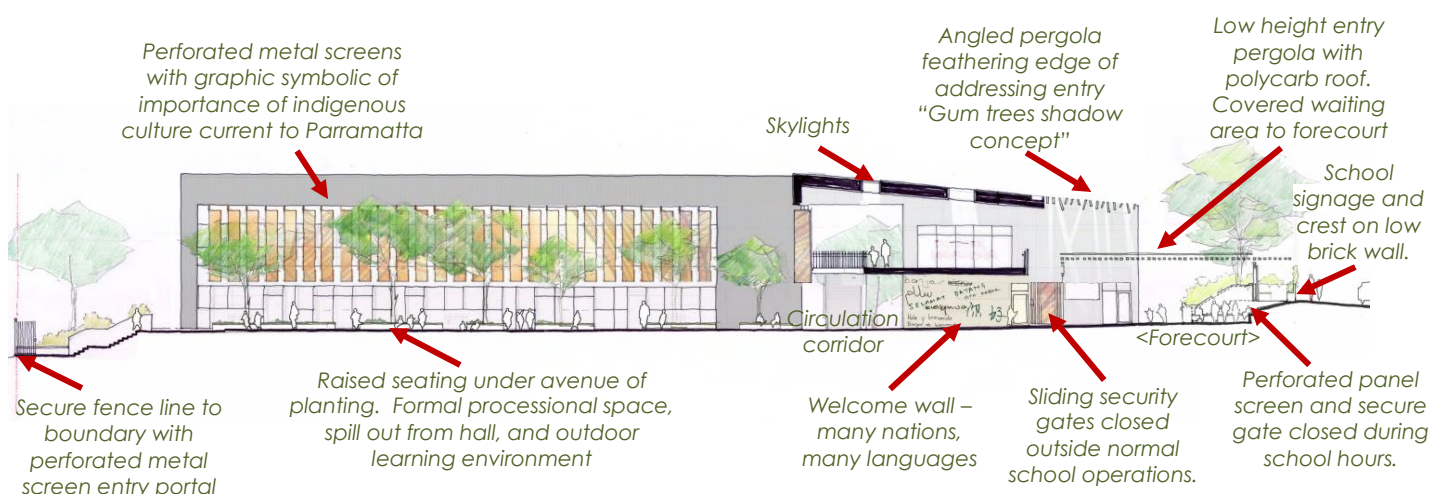


Figure 9: Building Section A – view from internal courtyard

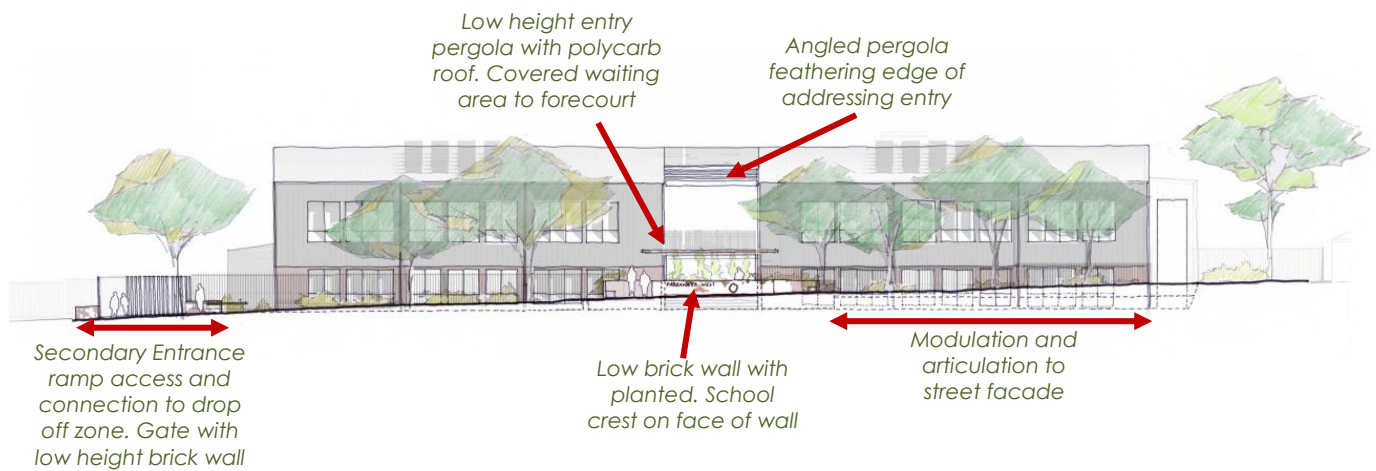


Figure 10: Railway Street elevation

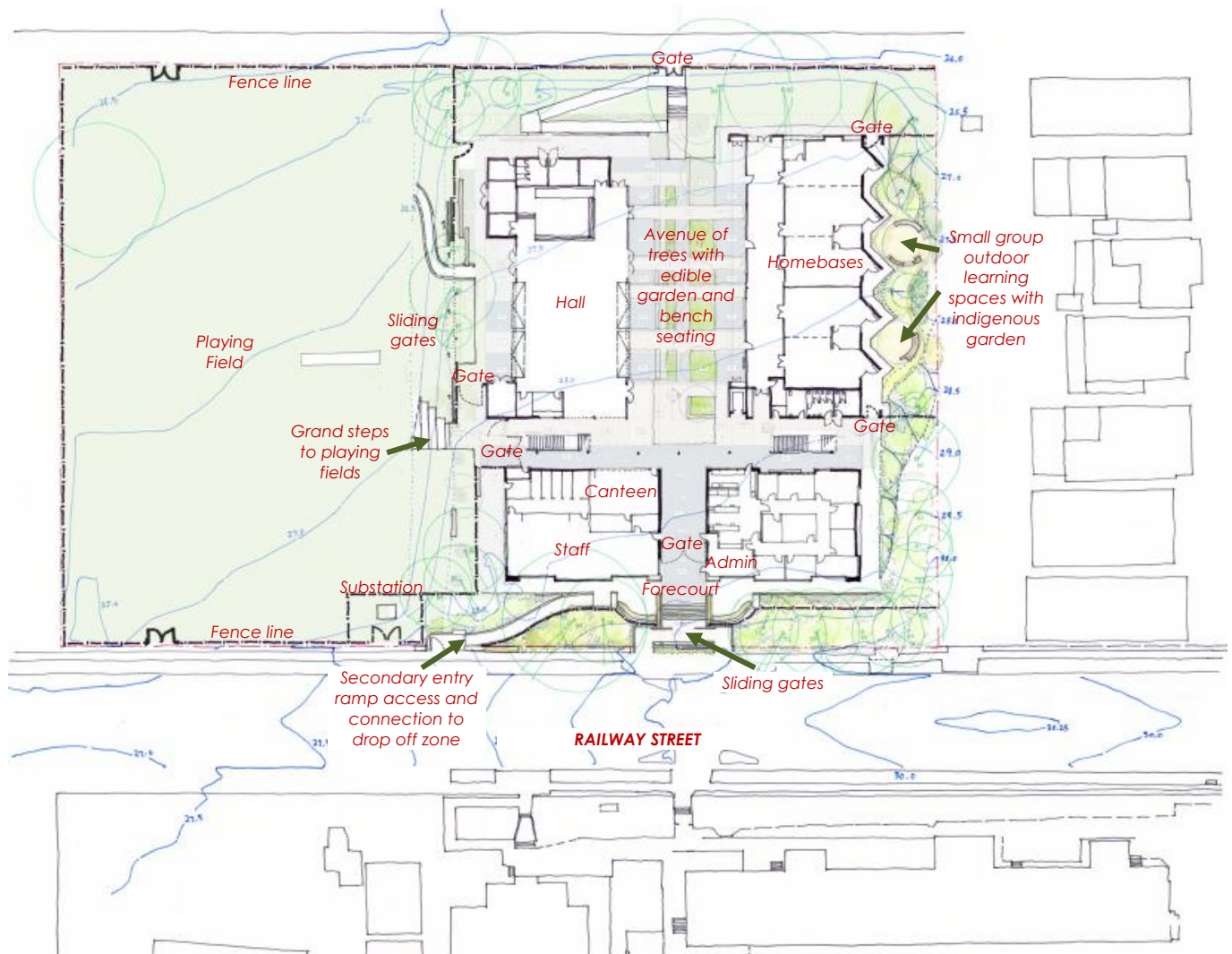


Figure 11: North Site Plan sketch

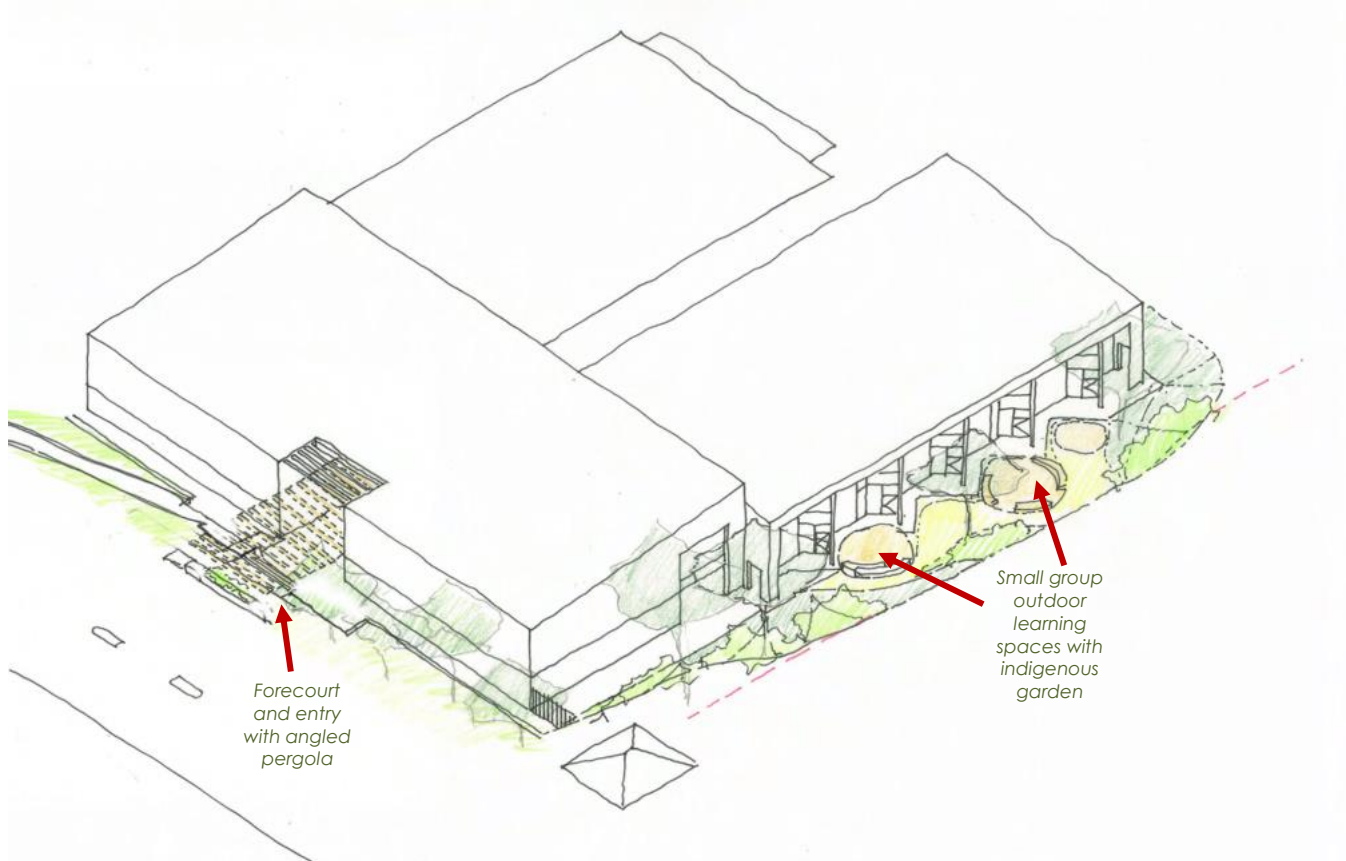


Figure 12: Axonometric sketch

Figure 12 shows yarning circles on the eastern façade of the North Site building. The Design Statement prepared by Conrad Gargett (refer Appendix P) states that the landscaped yarning circles reference the indigenous culture. These spaces are surrounded by trees and gardens and include planting types to activate a sense of memory and connection to the land and the Parramatta region.

4.3.2 Development – South Site

As detailed above the South site is the original site of the school and includes a mix of buildings, including the original locally heritage listed buildings, 1970s and 1990s school buildings, and more recently placed demountables to cater for the increase in student numbers. The proposed development on this site includes the following:

- Internal alterations to part of the existing hall to create two home-bases; and
- Internal alterations to part of the existing administration areas to create a satellite administration area and two new home-bases.

The detail of these works is shown on the extract of the plan below in Figure 13 and within the detailed architectural plans in Appendix D.

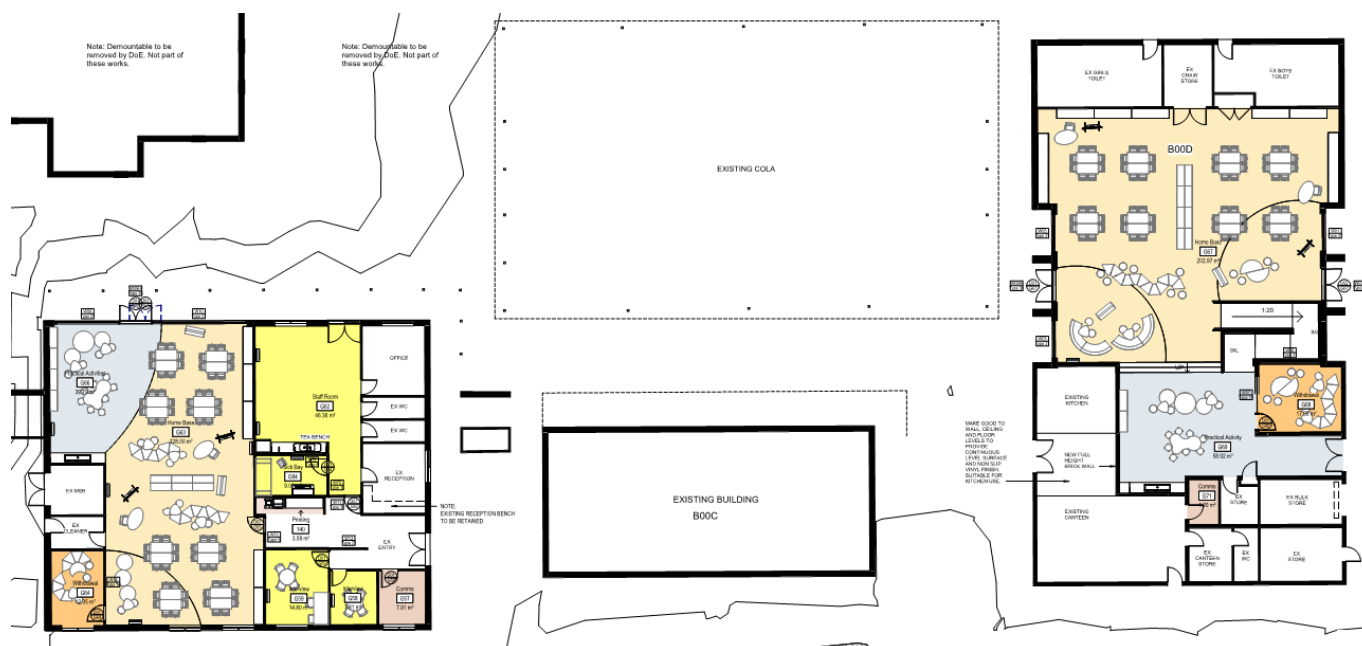


Figure 13: Extract of architectural plans for South site

4.3.3 Development – North Site

The South site has been developed to its full extent and whilst the building stock is aging, it is functional and operational. There are two discrete play areas that cater for infants and the general school. To maintain sufficient play area on the South site and construct suitable new facilities on the North site that will enhance the learning environment for the students, the proposed additions to the school on the North site will include the following.

- Construction of new school entry, forecourt, administration and staff areas;
- Construction of a new canteen and community hall to replace the outdated and under-sized hall currently located on the South site;
- Construction of sixteen (16) new home-bases that enable flexible future focussed learning environments;
- Outdoor learning spaces including an indigenous garden; and
- Appropriate landscaping, paving and play areas.

Figures 14 and 15 below are extracts from the plans showing ground and first floor plans respectively.

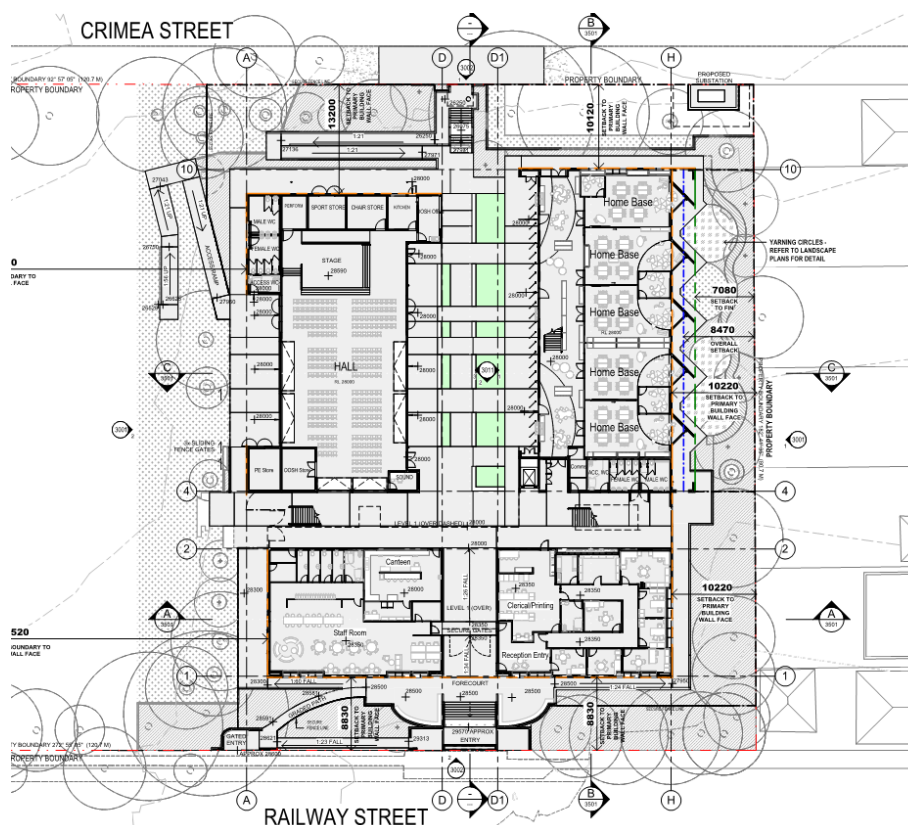


Figure 14: Extract of architectural plans for North site – ground floor

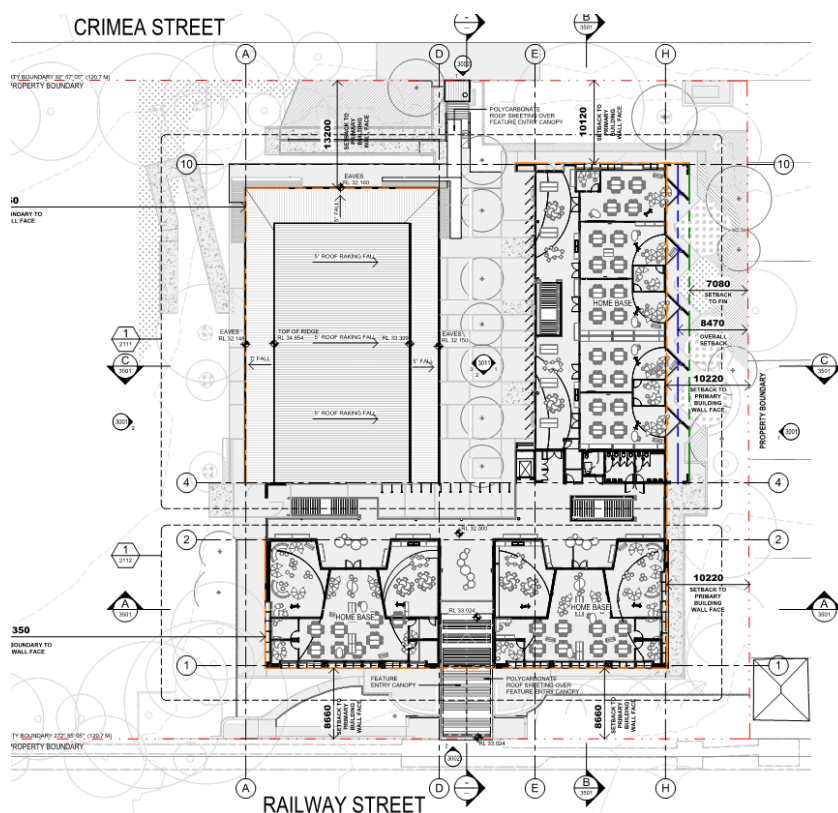


Figure 15: Extract of architectural plans for North site – first floor

Figure 16 shows a 3D image of the proposal and its view from Railway Street looking north east. Also refer to Section 10.3.4 that shows another 3D image from Crimea Street.



Figure 16: Extract from architectural plans showing 3D view from Railway Street

Full architectural plans and images including elevations are included in Appendix D.

4.3.4 External Materials and Finishes

The proposed School alterations and additions have been appropriately designed with external materials and finishes that complement the surrounding natural and built environment. The external building materials for the new buildings on the North site are durable, hardwearing, low maintenance and are of good building design. Materials included in the external finishes are shown in the architectural plans in Appendix D and on the finishes board extract below in Figure 17. Refer to the elevations in the architectural plans that show where the finishes will be placed.



Figure 17: Extract of finishes board

4.3.5 Landscaping

Landscaping of the North site is proposed to accompany the new building works. This will include buffer landscaping to the east and playground and integrated outdoor learning areas to the west and the centre of the site. Appropriate fencing will be placed around the new building. Detailed landscaping plans are included in Appendix G with an extract below in Figure 18 showing the North site works along the elevation of Railway Street.

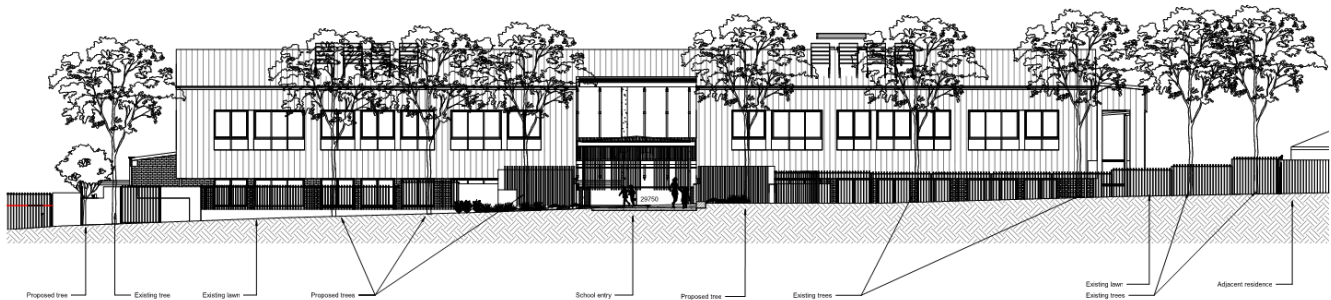


Figure 18: Extract of landscape plans for North site

Following removal of the demountable classrooms on the South site appropriate landscaping and restorative works should be undertaken to ensure the play spaces are appropriate. However, these are not proposed as part of this application.

4.3.6 Access, Car Parking and On-site Circulation

The original school site included some limited on-site car parking off Young Street which has since been used for a demountable classroom. The area surrounding the school is limited mainly to local resident access and access to the school. No additional or replacement car parking has been proposed as part of this development which is justified in the Transport Assessment report included in Appendix H.

The main pedestrian access to the school sites both North and South is from Railway Street near to a raised pedestrian crossing. It is not recommended that this access change significantly as it is a good through street for drop-off and pick-up and it is relatively quiet for supervised crossing during school hours. The pedestrian crossing is proposed however to be upgraded to provide a safer crossing environment for students, teachers and parents / carers and the details from the Transport Assessment includes:

- Statutory No Stopping zones of 20m on the approach side and 10m on the departure side of the pedestrian crossing will be installed.
- Pedestrian fencing will also be installed to extend from the crossing along the edge of the kerb to match the length of No Stopping zone. On the southern side the fence will be extended to approximately 20m to extend beyond the school entry point.

An important part of this proposal is the joining of the new North development to the South site and to ensure appropriate and safe circulation by staff and students. The traffic assessment included in Appendix H includes details of these safety measures and proposal for operational management before and after school and during school hours.

4.3.7 Signage

A new sign for the school is proposed on the southern façade of the North site which includes the school name and school crest. Figure 19 shows an extract of the signage plans and details for the site.

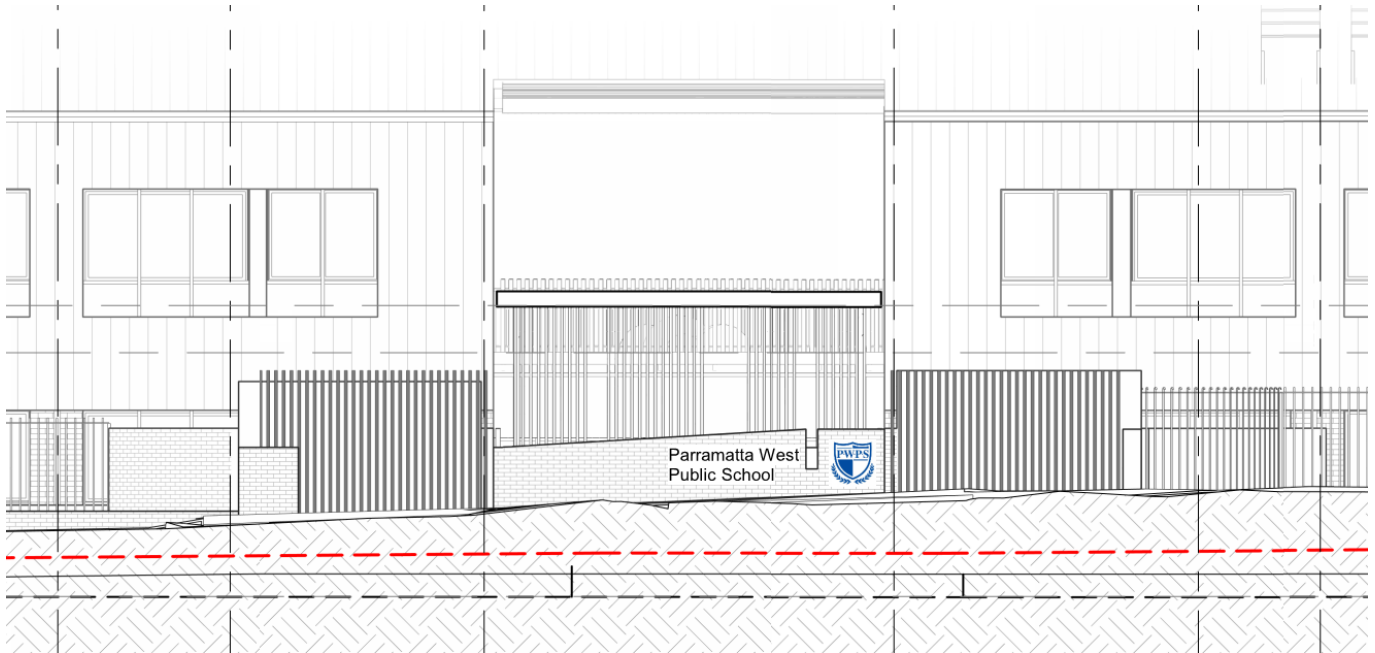


Figure 19: Signage Details for the site

4.3.8 Operational Details

The school has 854 students currently enrolled, and a total of 62 permanent staff spaces (including non-teaching staff). Approximately 10 additional staff also work in learning support and teacher roles to support various initiatives run by the school. The proposed upgrades provide new learning areas to cater for an additional 107 students and associated additional staff.

Currently some students use the North site for play space at recess and lunch, however access is limited with supervised crossings of Railway Street. It is proposed for each site to operate relatively independently to ensure that the need to cross Railway street is limited. Each site will have its own play space and although the main administration is proposed to be located on the North site, the South site will have a satellite administration area.

Supervised crossing will be required for use of the North site hall and other facilities as required. Proposed details for the operational management are included in the traffic impacts assessment, an extract of which is included in Figure 20 below.

Time period	Time	Management
Before School		Unattended/parent
Drop-off period	8.00am – 8.55am	Crossing attendant
Morning session 1	8.55am – 10.55am	Locked gates/ Individual supervision
Morning recess	10.55am – 11.15am	Staff supervised
Morning session 2	11.15am – 1.00pm	Locked gates/ Individual supervision
Lunch	1.00pm – 1.50pm	Staff supervised
Afternoon session	1.50pm – 2.55pm	Locked gates/ Individual supervision
Pick-up period	2.55pm – 3.20pm	Crossing attendant
After school		Unattended/parent

Figure 20: Management Periods for Pedestrian Crossing – recommended in Traffic Assessment (Appendix H)

The school currently operates from 9.00am to 3.00pm with supervision for students starting at 8.30am. In addition, out of school hours care operations from 6.30am to 9.00am and 3.00pm to 6.00pm. These hours are not expected to change.

The existing hall is currently booked by community user groups each weekday evening (except Tuesday), Saturday evening and Sunday morning. In addition, a number of classrooms are booked by community user groups, including a language school. These uses are expected to continue, and any changes will be determined by further requests for use in the future.

Table 3 includes the specific details of activities undertaken at the school, days, hours of operation and some commentary.

Table 3: Parramatta West Public School Operational Details

ACTIVITY	HOURS OF OPERATION	DAYS OF THE WEEK	COMMENTARY
School operation	8.30am – 3.00pm	Monday – Friday inclusive	Standard school operation during term
Out of school hours (OOSH) care	7.00am – 9.00am and 3.00pm – 6.00pm	Monday – Friday inclusive	Standard before and after school operation during term
OOSH Holiday Program	7.00am – 6.00pm	Monday – Friday inclusive – School holidays	Operational during school term holidays and over summer / Christmas break
Community Hall	Monday 5.30pm – 7.45pm Wednesday 7.00pm – 8.00pm Thursday 5.30pm – 8.30pm Friday 6.00pm – 8.00pm Saturday 6.00pm – 7.00pm Sunday 9.00am – 1.00pm	Evenings / weekends outside of school operation hours	Include external clubs / community use
Library		Evenings / weekends outside of school operation hours	Include external clubs / community use

ACTIVITY	HOURS OF OPERATION	DAYS OF THE WEEK	COMMENTARY
Community Classes	Monday 3.00pm – 4.30pm and 4.00pm – 7.00pm Friday 8.00am – 8.45am Saturday 9.00am – 1.30pm	Evenings / weekends outside of school operation hours	Include external clubs / community use
Oval		Evenings / weekends outside of school operation hours	Include external clubs / community use

During construction of the new facility changes to play times and use of school spaces will be investigated and altered as required, including the potential to use the Council park (Burra Reserve) adjacent to the North site (refer to Figure 2 for location and Photograph 6).

The traffic impact assessment in Appendix H has considered the issue of drop-off and pick-up (by both buses and private vehicles) and how these can be managed before and after construction.

4.3.9 Servicing

The sites are serviced by water, electricity, sewer, communications, waste services and stormwater is available. Various consultants have prepared documents that identify what services are available and that they have the capacity to take the additional loads from the new school buildings.

Waterman AHW Pty Ltd have prepared a report in relation to water and sewer capacity which confirms there is capacity within the existing systems to take the additional load from the new school buildings. Refer to Appendix I for the management plan.

Adams Consulting Engineers have prepared a management plan that considers the stormwater disposal for the site and how it can be managed for recycling on site in rainwater tanks or disposal into the Council system. Details are included with the civil plans and report within Appendix J.

WSP have prepared a report in relation to electricity and communications infrastructure which confirms the augmentation required for both services. Refer to the Power and Communications Infrastructure Report in Appendix Z.

Fire services have been considered in an Integrated Fire Services Management Plan prepared by Waterman AHW Pty Ltd and included in Appendix Y. The report confirms the hydrant and associated infrastructure required for the proposed school expansion.

The site is serviced by both Council and private waste contractors, a private contractor for general waste and Council for recycling. A waste management plan has been prepared by Barker Ryan Stewart and is included in Appendix E which details the waste requirements for demolition, construction and ongoing operation.

The school has been designed as a naturally ventilated building. With the announcement of the Cooler Classrooms Program in June 2018 the NSW State Government has committed \$500 million in funding to provide air-conditioning to improve learning spaces around the State. Under that commitment, all new schools and school upgrades will receive air-conditioning in teaching spaces. As a result, provisions for the inclusion of air-conditioning to the new school building are currently under consideration. The extent of service and impact on the design are currently being explored and will be developed further as the detailed design of the new facilities progresses.

4.3.10 Heritage

The South site is listed as a local heritage item within Holroyd LEP 2013, specifically the original buildings from 1888 and following buildings from the early 20th Century. Figure 21 is an extract from the heritage impact assessment which shows the important buildings on the South site. The changes to the existing school will not have any adverse heritage impacts as the changes are mainly internal. The proposed new buildings on the North site have been designed with the historic buildings in mind and reflect the main elements in the design.



Figure 21: Extract from heritage study showing historic parts of the South site

4.4 Construction Management

The proposed development will be constructed in accordance with a Construction Management Plan, a preliminary version of which is included in Appendix K. The final Construction Management Plan will seek to minimise disturbances to surrounding developments and the amenity of the area during the demolition, excavation and construction phases.

The proposed development will be managed during construction to ensure that the school can continue to be used. As the new building on the Northern site will be built over part of the playground, the school will need to manage time and use of the playground areas on the South site which may mean staggering of recess and lunch breaks.

4.5 Capital Investment Value

The estimated capital investment value for the proposed development is \$23,494,034.00 as outlined in a detailed cost report which has been prepared by Turner & Townsend and is included in Appendix A.

4.6 Analysis of Feasible Alternatives

Schedule 2 Clause 7(c) of the Environmental Planning and Assessment Regulation 2000 requires that the EIS considers feasible alternatives and consequences of not carrying out the development. Table 4 below considers each of the options considered in the business case for the Parramatta West Public School.

Table 4: Analysis of options for the development of the school to permit additional students

OPTION	DISCUSSION	COMMENT / RECOMMENDATION
1	Base Case Option – this is the minimum required to meet the demand for school places which would include: - Placing demountable classrooms to provide for the additional teaching spaces; and - Expand administration space to provide the additional facilities.	This option has a relatively low capital cost but is not preferred as it doesn't provide options for the further expansion of student numbers in a permanent way.
2	This option considers development of new home-bases on the existing school site to the south of the existing school. This option would include: - Expansion of existing administration areas; - Replacement of the hall; and - Construction of home-bases within a two-three level building.	This option is close to the existing school infrastructure and was considered as the land is currently undeveloped apart from a COLA structure and some demountable buildings. However, this option was not preferred with as it would have reduced the available play space on the South site, which is not preferable.
3	This option includes new buildings located on the playing fields on the northern side of Railway Street. This option was to include: - Construction of new administration areas; - Replacement of the hall; and - Construction of home-bases within a two-three level courtyard building.	This option was chosen as the preferred option, as it was a clear site construction that could occur with minimal disruption to the existing school activities. This option does have the potential for some operational management issues based on the separation of the sites by Railway Street. However, these can be managed by appropriate school management of the crossing and providing satellite administration as required.
4	This option is the do nothing option on Parramatta West Public School in favour of another school within the Parramatta centre cluster of primary school.	This is not the preferred option as it defers expansion of any school until another option can be found.

Option 3 over two storeys was chosen as the preferred option which included:

- A new hall building on the North site;
- New administration and staff areas on the North site;
- 16 new home-bases on the North site; and
- Alteration of the existing hall and administration areas to create 4 new home-bases on the existing South site.

This option was chosen for the following reasons:

- Both the North and South sites will have suitable and adequate play space when construction is complete and existing demountable buildings are removed;
- Allows for the construction of a new entrance and easily accessible administration and office facilities;
- The new building will provide separation from the existing buildings and those with heritage value;
- Provide a construction compound that is separate from the existing school on the South site to avoid any potential conflicts; and
- Permits separation of the senior and junior classes if required.

5 Secretary Environmental Assessment Requirements

5.1 Secretary Environmental Assessment Requirements

In accordance with Section 4.39 of the Environmental Planning & Assessment Act 1979, the Department of Planning and Environment has issued the SEARs for consideration and preparation of this EIS. A copy of the SEARs is included in Appendix L.

Table 5 provides a detailed summary of the specific issues identified in the SEARs and where each of these requirements are addressed in this report and in accompanying consultant studies.

Table 5: Secretary Environmental Assessment Requirements

SECRETARY'S REQUIREMENTS	EIS REFERENCE
General Requirements	
Include an environmental risk assessment to identify the potential environmental impacts associated with the development.	Section 13
Provide a report from a qualified quantity surveyor detailing the capital investment value (CIV), including the applicable GST component and estimate of jobs that will be created during the construction and operational phases of the development.	Section 4.5 Appendix A
Key Issues	
1. Statutory and Strategic Context - Detail the statutory provisions applying to the proposal contained in all relevant environmental planning instruments - Permissibility: Detail the nature and extent of any prohibitions that apply to the development - Development Standards: Identify compliance with the development standards applying to the site and provide justification for any contravention of the standards	Sections 7, 8 and 9
2. Policies Address the relevant planning provisions, goals and strategic planning objectives in the following: <i>NSW State Priorities, A Plan for Growing Sydney, NSW Long Term Transport Master Plan, Sydney's Cycling Future 2013, Sydney's Walking Future 2013, Sydney's Bus Future 2013, Crime Prevention Through Environmental Design (CPTED) Principles, Healthy Urban Development Checklist, Greater Sydney Commission's Draft Central District Plan, Holroyd Development Control Plan 2013, and City of Parramatta Council's Disability Inclusion Action Plan.</i>	Sections 7.3 and 8
3. Operation - Provide details of the existing and proposed school operations, including staff and student numbers (existing and proposed), school hours of operation, and operational details of any proposed before/after school care services and/or community use of school facilities. - Provide a detailed justification of suitability of the site to accommodate the proposal and increase in student and staff capacity. - Where relevant, detail how Parramatta West Public School will continue to operate during construction activities, including proposed mitigation measures.	Sections 4.3.8, 4.4, 4.6 and 13

SECRETARY'S REQUIREMENTS	EIS REFERENCE
4. Built Form and Urban Design • Address the height, density, bulk and scale, setbacks of the proposal in relation to the surrounding developments, topography, streetscape and any public open spaces. • Address the impact of the development on the existing open space to the North of Railway Street. • Address design quality, with specific consideration of the overall site layout, streetscape, open spaces, façade, rooftop, massing, setbacks, building articulation, heritage significance, materials, colours and Crime Prevention Through Environmental Design Principles. • Provide details of any digital signage boards, including size, location and finishes. • Demonstrate in consultation with and to the satisfaction of the Government Architect NSW that design excellence will be achieved in accordance with Schedule 4 Schools – design quality principles of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017. • Detail how services, including but not limited to waste management, loading zones, and mechanical plant are integrated into the design of the development. • Detail how the existing mature trees along the peripheries and the street frontages can be retained and integrated with the landscape design.	Section 10.1
5. Heritage Address the impact of the proposal on the heritage significance of the site and the surrounding heritage items.	Section 10.2 Appendix C
6. Environmental Amenity • Detail amenity impacts including solar access, acoustic impacts, visual privacy (especially on the eastern side), view loss, overshadowing and wind impacts. A high level of environmental amenity for any surrounding residential land uses must be demonstrated • Detail any proposed use of the school grounds out of school hours (including weekends) and any resultant amenity impacts on the immediate locality and proposed mitigation measures	Section 10.3
7. Transport and Accessibility Include a transport and accessibility impact assessment, which details, but not limited to the following: • accurate details of the current daily and peak hour vehicle, public transport, pedestrian and cycle movement and existing traffic and transport facilities provided on the road network located adjacent to the proposed development; • an assessment of the operation of existing and future transport networks including public transport networks, and their ability to accommodate existing trips and the forecast number of trips to and from the development; • details of estimated total daily and peak hour trips generated by the proposal, including vehicle, public transport, pedestrian and bicycle trips based on surveys of the existing and similar schools within the local area; • the adequacy of public transport, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand of the proposed development;	Section 10.4 Appendices H, V, R and K.

SECRETARY'S REQUIREMENTS	EIS REFERENCE
- the impact of the proposed development on existing and future public transport infrastructure within the vicinity of the site in consultation with Council, Roads and Maritime Services and Transport for NSW and identify measures to integrate the development with the transport network; - the identification of infrastructure required to ameliorate any impacts on traffic efficiency and road safety impacts associated with the proposed development, including details on improvements required to affected intersections; - details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan and the provision of facilities to increase the non-car mode share for travel to and from the site; - the impact of trips generated by the development on nearby intersections, with consideration of the cumulative impacts from other approved developments in the vicinity, and the need/associated funding for, and details of, upgrades or road improvement works, if required. Traffic modelling is to be undertaken using SIDRA network modelling for current and future years; - the proposed walking and cycling access arrangements and connections to public transport services; - details of any proposed school bus routes along bus capable roads (i.e. travel lanes of 3.5 m minimum) and infrastructure (bus stops, bus layovers etc.); - the proposed access arrangements, including car and bus pick-up/drop-off facilities, and measures to mitigate any associated traffic impacts and impacts on public transport, pedestrian and bicycle networks, including pedestrian crossings and refuges and speed control devices and zones; - measures to maintain road and personal safety in line with CPTED principles; - proposed bicycle parking provision, including end of trip facilities, in secure, convenient, accessible areas close to main entries incorporating lighting and passive surveillance; - proposed number of on-site car parking spaces for teaching staff and visitors and corresponding compliance with existing parking codes and justification for the level of car parking provided on-site; - an assessment of the cumulative on-street parking impacts of cars and bus pick-up/drop-off, staff parking and any other parking demands associated with the existing and proposed development; - details of emergency vehicle access arrangements; - an assessment of road and pedestrian safety adjacent to the proposed development and the details of required road safety measures to minimise the risk of vehicle-pedestrian crashes; - details of measures to prevent or minimise the need for students to cross Railway Street throughout the school day; - service vehicle access, delivery and loading arrangements and estimated service vehicle movements (including vehicle type and the likely arrival and departure times); - proposed management of construction traffic impacts, detailed within a draft Construction Traffic Management Plan, including: - assessment of cumulative impacts associated with other construction activities (if any); - an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity;	

SECRETARY'S REQUIREMENTS	EIS REFERENCE
○ details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process; ○ details of anticipated peak hour and daily construction vehicle movements to and from the site; ○ details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle; ○ details of temporary cycling and pedestrian access during construction; and ○ traffic and transport impacts during construction, including cumulative impacts associated with other construction activities, and how these impacts will be mitigated for any associated traffic, pedestrian, cyclists, parking and public transport. Relevant policies and guidelines applicable are: <i>Guide to Traffic Generating Developments</i> (Roads and Maritime Services); <i>EIS Guidelines – Road and Related Facilities</i> (DoPI); <i>Cycling Aspects of Austroads Guides</i>; <i>NSW Planning Guidelines for Walking and Cycling</i>; <i>Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development</i>; and <i>Standards Australia AS2890.3</i> (Bicycle Parking Facilities).	
8. Ecologically Sustainable Development (ESD) • Detail how ESD principles will be incorporated in the design and ongoing operation phases of the development. • Demonstrate that the development has been assessed against a suitably accredited rating scheme to meet industry best practice. • Detail measures to implement water sensitive urban design (WSUD) principles, including stormwater harvesting, storage and re-use. • Detail measures to minimise consumption of energy generated from non-renewable sources and to implement effective energy efficiency measures.	Sections 10.5 and 12.5 Appendix N
9. Social Impacts Include an assessment of the social consequences of the schools' relative location and decanting activities if proposed	Section 10.6 Appendix W
10. Noise and Vibration • Identify and provide a quantitative assessment of the impacts of the main noise and vibration generating sources on the sensitive receivers (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) during demolition, site preparation, bulk excavation, construction and operation, including consideration of any public address system, school bell, mechanical services (e.g. air conditioning plant), waste storage facility locations, time restrictions on grounds maintenance powered equipment, time restrictions on waste collection services, use of any school hall for concerts etc. (both during and outside school hours) and any out of hours community use of school facilities. • Outline feasible and reasonable measures to minimise and mitigate the potential construction and operational noise impacts (including explicit evaluation of the need to install physical noise barriers and impose time restrictions on the use of the facilities proposed to be available for community use) on surrounding occupiers of land, the users of the site and the nearby Orthodox Church.	Section 10.7 Appendix U

SECRETARY'S REQUIREMENTS	EIS REFERENCE
Relevant policies and guidelines applicable are: <i>NSW Industrial Noise Policy</i> (EPA); <i>Interim Construction Noise Guideline</i> (DECC); <i>Assessing Vibration: A Technical Guideline 2006</i>; and <i>Development Near Rail Corridors and Busy Roads – Interim Guideline</i> (Department of Planning 2008).	
11. Sediment, Erosion and Dust Controls Detail measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles and impact on air quality. Relevant policies and guidelines applicable are: <i>Managing Urban Stormwater – Soils & Construction Volume 1 2004</i> (Landcom); <i>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> (EPA); and <i>Guidelines for development adjoining land and water managed by DECCW</i> (OEH, 2013).	Section 10.8 Appendices J and K
12. Contamination - Assess and quantify any soil and groundwater contamination including potential fill material underlying the existing sports fields (i.e. section of the development site North of Railway Street) and demonstrate that the site is suitable for the proposed use in accordance with SEPP 55. - Undertake a hazardous materials survey of all existing structures and infrastructure prior to any demolition or site preparation works. Relevant policies and guidelines applicable are: <i>Managing Land Contamination: Planning Guidelines - SEPP 55 Remediation of Land</i> (DUAP)	Sections 7.1.6, 7.2.4 and 10.9 Appendices Q and T
13. Utilities - Prepare an Infrastructure Management Plan in consultation with relevant agencies, detailing information on the existing capacity and any augmentation, protection of stormwater assets and easement requirements of the development for the provision of utilities including staging of infrastructure. - Provide details of demands and satisfactory servicing arrangements for drinking water, waste water and recycled water. - Prepare an Integrated Water Cycle Management Plan detailing any proposed alternative water supplies, proposed end uses of potable and non-potable water, water sensitive urban design and water conservation measures.	Sections 3.5, 4.3.9 and 10.10 Appendices I, J, Y and Z
14. Contributions Address Council's Section 94 Contribution Plan and/or details of any Voluntary Planning Agreement, which may be required to be amended because of the proposed development.	Sections 9.4 and 10.11
15. Drainage and Water Quality Detail drainage associated with the proposal, including stormwater and drainage infrastructure, measures to minimise operational water quality impacts on surface waters and groundwater including the following: - On-site detention (OSD) or above ground OSD designed in accordance with the Upper Parramatta River Catchment Trust Handbook – Editions 3 or 4; and - WSUD elements designed in conjunction with OSD and/or OSR (On Site Retention) systems and integrated with the landscape design in the form of bio-swales, bioretention and similar landscape elements (in lieu of the end of pipe' proprietary treatment devices).	Section 10.12 Appendix J

SECRETARY'S REQUIREMENTS	EIS REFERENCE
16. Flooding Conduct a stormwater overland flow study determining the extent of the flow path and flood characteristics for the overland flow path affecting a 1050mm drainage line adjoining the western boundary of the site and associated former natural watercourse.	Section 10.13 Appendix S
17. Waste Identify, quantify and classify the likely waste streams to be generated during construction and operation and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site.	Sections 4.2.1, 4.3.9, 4.4 and 10.14 Appendices E and K
18. Construction Hours Identify proposed construction hours and provide details of the instances where it is expected that works will be required to be carried out outside the standard construction hours.	Sections 4.4 and 10.15 Appendix K
19. Biodiversity Biodiversity impacts related to the proposal and the preparation of a Biodiversity Assessment are to be addressed in accordance with the requirements of the Biodiversity Conservation Act 2016.	Section 10.16 Appendices M & FF
Plans and Documents	
The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Provide these as part of the EIS rather than as separate documents. In addition, the EIS must include the following: - Architectural drawings (dimensioned and including RLs, scale 1:200 showing furniture layouts and program); (Appendix D) - Detailed sections at 1:20 scale that demonstrate typical cladding, window or door details and construction quality; (Appendix D) - Site Survey Plan, showing existing levels, location and height of existing and adjacent structures / buildings and boundaries; (Appendices D and B) - Site Analysis Plan; (Appendix D) - Stormwater Concept Plan; (Appendix J) - Sediment and Erosion Control Plan; (Appendices J and K) - Shadow Diagrams; (Appendix D) - View Analysis / Photomontages, including from public vantage points; (Appendix D) - Landscape Plan (scaled and dimensioned with RLs identifying any trees to be removed and trees to be retained or transplanted); (Appendix G) - Preliminary Construction Management Plan, inclusive of a Preliminary Construction Traffic Management Plan detailing vehicle routes, number of trucks, hours of operation, access arrangements and traffic control measures; (Appendix K) - Heritage Impact Assessment Report; (Appendix C) - Geotechnical and Structural Report; (Appendix T) - Accessibility Report; (Appendix V) - Arborist Report; (Appendix F)	Refer to Appendices (Those relevant are in brackets following dot point.)

SECRETARY'S REQUIREMENTS	EIS REFERENCE
• Salinity Investigation Report (if required); (Appendix T) • Acid Sulphate Soils Management Plan (if required); and (Not applicable) • Schedule of materials and finishes (physical samples board no larger than A3, with correct proportional representation of materials). (Appendix D)	
Consultation	
During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, school and other relevant community groups, special interest groups and affected landowners. In particular, you must consult with: • City of Parramatta Council; • Government Architect NSW • Transport for NSW; and • Roads and Maritime Services Consultation with TfNSW and RMS should commence as soon as practicable to agree the scope of investigation. The EIS must describe the consultation process and the issues raised and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.	Section 11 Appendix AA

6 Federal Legislative Framework

The following section provides an overview of Federal legislative requirements applicable to the proposed development.

6.1 Federal Legislation

The only applicable Federal legislation is the Environment Protection and Biodiversity Conservation Act 1999 as detailed below.

6.1.1 Environment Protection and Biodiversity Conservation Act 1999

The Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) *“is the Australian Government’s central piece of environmental legislation. The EPBC Act provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places”*.

The EPBC Act requires concurrence with the Australian Government Environment Minister when a proposed development has the potential to significantly impact on a matter of national environmental significance. Approval from the minister is in addition to any relevant approvals sought under NSW legislation.

The EPBC Act identifies the following nine (9) matters of national environmental significance. A summary of impacts is provided below in Table 6 and the relevant subconsultant appendices.

- World Heritage;
- National Heritage;
- Wetlands of International Importance;
- Listed Threatened Species and Communities;
- Listed Migratory Species;
- Protection of the Environment for Nuclear Actions;
- Marine Environment;
- Great Barrier Reef Marine Park; and
- Protection of water resources from coal seam gas development and large coal mining development.

Table 6: Requirements relating to matters of national environmental significance.

EPBC ACT REQUIREMENTS	COMMENT
Subdivision A – World Heritage	Not Applicable. The subject site is not listed as or located in proximity to a world heritage item.
Subdivision AA – National Heritage	Not Applicable. The subject site is not listed as or located in proximity to a national heritage item.
Subdivision B – Wetlands of International Importance	Not Applicable. There are no RAMSAR listed wetlands located in proximity to the site.
Subdivision C – Listed Threatened Species and Communities	A biodiversity assessment has been prepared by Molino Stewart Environmental and Natural Hazards to address the potential for threatened species and communities in proximity to the subject site. In accordance with this report, threatened species have been assessed and no adverse impacts identified. Further a waiver to the requirement for a formal Biodiversity Development Assessment Report (BDAR) has been provided by the NSW Office of Environment and Heritage (OEH). Refer to Appendices M and EE for details.

EPBC ACT REQUIREMENTS	COMMENT
Subdivision D – Listed Migratory Species	The Molino Stewart report confirms that the proposed development will not result in any impacts on migratory species.
Subdivision E – Protection of the Environment for Nuclear Actions	Not Applicable. The proposed development will not involve any nuclear actions as defined under Clause 22 of the EPBC Act.
Subdivision F - Marine Environment	Not Applicable. The proposal development will not result in any impacts or interactions with a Commonwealth Marine Area as defined under Clause 24 of the EPBC Act.
Subdivision FA – Great Barrier Reef Marine Park	Not Applicable. The proposed development is not located within proximity to the Great Barrier Reef Marine Park.
Subdivision FB - Protection of water resources from coal seam gas development and large coal mining development.	Not Applicable. The proposed development is not for a coal seam gas or large coal mining development.
Subdivision G – Additional Matters of National Environmental Significance	No additional matters of national environmental significance as defined under Subdivision G are applicable.

7 State Statutory Planning Framework

The following section provides an overview of State legislative requirements applicable to the proposed development.

7.1 State Legislation

There are a number of applicable Acts relevant to the site and the proposed development which are outlined below.

7.1.1 Environmental Planning and Assessment Act 1979

The Environmental Planning and Assessment Act 1979 (EP&A Act) and accompanying regulation provides the statutory framework for planning in New South Wales. The proposal, as outlined in Section 4.3, is generally consistent with the objects of the act. An assessment of the proposal against the objects is provided in Table 7 below.

Table 7: Assessment against objects of the EP&A Act

OBJECT OF THE ACT	COMMENT
<i>(a) 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>	The proposed development will provide additional educational facilities for the community of Parramatta West and will promote their social wellbeing. Further the alterations and additions to the school will increase not only student places but also staff, which is an improvement to the economic wellbeing of the community. The proposal will not result in any adverse impacts to the State's natural or other resources.
<i>(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment</i>	The proposed development has been designed in accordance with relevant ecologically sustainable development (ESD) principles and has regard for economic, environmental and social considerations. Refer to Sustainability report in Appendix N and Sections 10.5 and 12.5 below.
<i>(c) to promote the orderly and economic use and development of land</i>	The proposed development will result in significant local and regional economic benefits through the provision of additional and improved educational facilities and additional employment opportunities during and after construction.
<i>(d) to promote the delivery and maintenance of affordable housing</i>	The alterations and additions to the school will not increase or decrease the supply of affordable housing.
<i>(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats</i>	A biodiversity assessment has been prepared by Molino Stewart Environmental and Natural Hazards to consider biodiversity matters and identify protective measures to minimise the likely impacts of the proposed development. Refer to the impact assessment included in Appendix M for further details.

OBJECT OF THE ACT	COMMENT
	Further a waiver to the requirement for BDAR has been provided by OEH. Refer to Appendix EE for details.
<i>(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)</i>	The North school site has been considerably disturbed, and it is unlikely there is any Aboriginal or non-Aboriginal heritage on the site. The South school site is however listed as a non-Aboriginal heritage item. A heritage assessment has been prepared by Conrad Gargett and is included in Appendix C. The recommendations from this report have been included in the design of the proposed alterations and additions to the school on both the North and South sites.
<i>(g) to promote good design and amenity of the built environment</i>	The proposed development is appropriately located and proportioned and will assist in creating visual interest and contribute to public amenity.
<i>(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants</i>	A preliminary construction management plan has been prepared and is included in Appendix K.
<i>(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State</i>	Noted. This proposal is being assessed as State Significant Development. The City of Parramatta Council and relevant State agencies have been consulted as part of the EIS process and SEARs requirements.
<i>(j) to provide increased opportunity for community participation in environmental planning and assessment</i>	Community consultation was undertaken in accordance with the SEARs. Refer to Section 11.3 for details.

Section 4.38 of the EP&A Act enables State Environmental Planning Policies to declare certain developments to be State Significant Development (SSD). The proposed development is classified State Significant pursuant to Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 due to the Capital Investment Value (CIV) exceeding the minimum threshold of \$20 Million for alterations and additions to existing schools.

In accordance with Section 4.40 of the EP&A Act, the proposal has regard for the requirements of Section 4.15 which details the required evaluation criteria and satisfies all relevant planning legislative requirements. Refer to Table 8 below.

Table 8: Section 4.15 Evaluation

SECTION 4.15 PROVISION	COMMENT
<i>(a) the provisions of:</i>	
<i>(i) any environmental planning instrument</i>	Relevant environmental planning instruments are addressed in Sections 7.2 and 9.1.
<i>(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed</i>	Not Applicable.

SECTION 4.15 PROVISION	COMMENT
<i>instrument has been deferred indefinitely or has not been approved)</i>	
<i>(iii) any development control plan</i>	Clause 11(a) of State Environmental Planning Policy (State and Regional Development) 2011 excludes the application of development control plans. However, the SEAR's requested consideration of the Holroyd Development Control Plan (DCP) 2013 and a discussion is included in section 9.2.
<i>(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4</i>	Not Applicable.
<i>(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph)</i>	The Environmental Planning and Assessment Regulation 2000 and provisions of Schedule 2 are outlined in Section 7.1.2 and Table 9 below.
<i>(v) any coastal zone management plan (within the meaning of the Coastal Protection Act 1979), that apply to the land to which the development application relates</i>	Not Applicable.
<i>(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality</i>	The proposed development will have positive impacts on the environment in which it is located. The school has been architecturally designed to fit with the character of the area. It will provide employment and economic benefits both during and after construction. In addition, the positive social benefits of improved educational facilities and the potential for the community to use the site after hours. Although there are some trees proposed to be removed for the development on the North site, they are not of ecological significance and will be replaced with appropriate vegetation and landscaping.
<i>(c) the suitability of the site for the development</i>	The proposed development is consistent with the desired future character of the area and has been designed with regard for the amenity of surrounding developments.
<i>(d) any submissions made in accordance with this Act or the regulations</i>	Any submissions made in accordance with the Act or regulations will be addressed in the Response to Submissions following public exhibition.
<i>(e) the public interest</i>	The public interest is best served by promoting sustainable development that is rational, orderly and economic. The proposal will generate positive social, environmental and economic benefits.

As the site is a public school Division 4.6 Crown Development applies. This identifies that the consent authority is unable to refuse the application without the approval of the Minister, must not apply a condition without the approval of the applicant or the Minister and must be considered by the appropriate regional panel or in some circumstances the Minister.

The NSW Department of Education has provided a letter of commentary prepared by Hunt & Hunt Lawyers (Appendix O) in relation to Part 4 Division 4.6 of the EP&A Act, and the determination of Crown development applications. This letter is provided in support of this SSD application to make clear the relevant considerations of the Minister for Planning and Environment in the determination of the Crown development application.

7.1.2 Environmental Planning & Assessment Regulation 2000

Schedule 2 of the Environmental Planning and Assessment Regulation 2000 outlines requirements for preparing an environmental impact statement. This environmental impact statement has been prepared in accordance with the provisions outlined in Schedule 2 Section 7, the requirements have been addressed in Table 9 below.

Table 9: Schedule 2 - Environmental Planning and Assessment Act 1979

SCHEDULE 2 CLAUSE	COMMENT
(1) An environmental impact statement must include the following:	
(a) A summary of the environmental impact statement	Sections 1 and 2.3
(b) a statement of the objectives of the development, activity or infrastructure	Section 2.4
(c) 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	Section 4.6
(d) An analysis of the development, activity or infrastructure, including: (i) a full description of the development, activity or infrastructure, and (ii) 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 (iii) the likely impact on the environment of the development, activity or infrastructure, and (iv) a full description of the measures proposed to mitigate any adverse effects of the development, activity or infrastructure on the environment, and (v) 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	Sections 4, 10 and 13
(e) a compilation (in a single section of the environmental impact statement) of the measures referred to in item (d) (iv),	Section 13
(f) the reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to	Section 12

SCHEDULE 2 CLAUSE	COMMENT
biophysical, economic and social considerations, including the principles of ecologically sustainable development set out in subclause (4).	

7.1.3 Protection of the Environment Operations (PoEO) Act 1997

The Protection of the Environment Operations Act 1997 is a key piece of environmental protection legislation that sets out explicit protection policies to manage, restore and enhance the quality of the NSW environment.

There are no listed activities in Schedule 1 of the Act that would be triggered by the alterations and additions to Parramatta West Public School, therefore there is no requirement for obtaining an Environment Protection Licence.

7.1.4 Biodiversity Conservation Act 2016

The Biodiversity Conservation Act 2016, together with the Biodiversity Conservation Regulation 2017 establish a framework to avoid, minimise and offset impacts on biodiversity from development through the implementation of the Biodiversity Offset Scheme.

An impact assessment has been prepared by Molino Stewart Environmental and Natural Hazards in accordance with the Biodiversity Conservation Act 2016 to assess the likely impacts of the proposed development upon important biodiversity matters. This assessment is included in Appendix M and concludes as follows:

In conclusion the proposed school alterations and additions would not have a significant impact on the biodiversity values of the site, and provided the mitigation measures above are implemented, ecological impacts are likely to be minimal.

Overall, the removal of 38 planted native and exotic trees from the site is not likely to have a significant impact on the biodiversity values of the site considering the highly modified nature of the site with substantial areas of open space and surrounding planted trees. There is no evidence of remnant vegetation present on the site, with all trees and shrubs comprising native and exotic planted vegetation. There will be retention and protection of canopy on the west of the site and the remaining trees will be protected during site works. No work will be undertaken at night thereby not disturbing any native fauna that may use the site for foraging.

The biodiversity impacts are not significant based on the Biodiversity Assessment and a BDAR is not required due to the following:

- *The proposed development activity is unlikely to have a 'significant impact' on any threatened species, threatened populations or endangered ecological communities listed under the tests under Section 7.3 of the NSW Biodiversity Conservation Act 2016 or the Commonwealth Environment Protection and Biodiversity Conservation Act 1999.*
- *It does not exceed the biodiversity offsets scheme threshold as*
 - *no areas within the site are mapped as having 'high biodiversity value' as identified on the NSW Biodiversity Values Map. (Attachment D); and*
 - *vegetation clearing on the site will not exceed the native vegetation clearing thresholds identified in the Biodiversity Assessment Method as the site is not remnant vegetation and the clearing is less than 0.25ha for the minimum lot size of less than 1 ha.*
- *The development is not being carried out in a declared area of outstanding biodiversity value.*

Under the legislation a formal Biodiversity Development Assessment Report (BDAR) was also required. Due to the lack of biodiversity values on the site, a waiver to the requirement for BDAR was requested and has been provided by OEH. Refer to Appendix EE for details.

7.1.5 Rural Bushfire Act 1997 & Planning for Bushfire Protection

The subject site is not located within a designated bushfire prone area. The application will therefore not require referral to the NSW RFS for concurrence.

7.1.6 Contaminated Land Management Act 1997

The general object of this Act is to establish a process for investigating and (where appropriate) remediating land that the EPA considers to be contaminated significantly enough to require regulation under Division 2 of Part 3. Land contamination that is not deemed significant enough to be regulated by the EPA can be handled under the planning and development framework, including State Environmental Planning Policy No. 55 - Remediation of Land and the Managing Land Contamination - Planning Guidelines.

A Detailed Site Investigation was undertaken by Environmental Investigation Services (EIS) (included in Appendix Q) that concluded:

The DSI included a review of existing reports, a supplementary site history assessment, soil sampling from 42 locations and groundwater sampling from one monitoring well. The historical assessment identified that the site has most likely been vacant and utilised as a recreational area for a school from around the 1930s. Re-contouring and levelling of the site occurred around the 1970s and it appears that fill was imported from off-site areas to facilitate this.

The investigation identified fill across the site that was impacted by building and demolition waste, including brick, concrete and glass fragments. Slag and ash were also identified in fill. The deepest fill (>1.0m) was typically in the western area of the site near the sewer alignment, and in the northern areas. This was expected based on the topography, however it is noted that the fill depths encountered by EIS were significantly less than those logged by the previous consultant who investigated the eastern area of the site.

The DSI indicated that potential risks associated with BTEX, pesticides, heavy metals (other than lead) and PCBs are unlikely to be significant as these CoPC were not identified at concentrations above the SAC or at concentrations that would warrant further consideration and assessment of risk. Lead, asbestos (as bonded ACM), carcinogenic PAHs and TRH (F3) were identified during the DSI at concentrations above the SAC. Further risk assessment of these compounds indicated that remediation is required to address risks associated with carcinogenic PAHs at one location (TP32) and asbestos (as bonded ACM) in fill across the entire site. A remediation action plan (RAP) should be prepared and submitted to facilitate the remediation.

Following this recommendation, a Remediation Action Plan will be prepared and implemented by suitably qualified contractors prior to any construction commencing on the site.

Environmental Investigation Services also included recommendations to mitigate risks associated with the findings until remediation could be undertaken of the site. They also concluded that:

EIS are of the opinion that notification of site contamination to the EPA under the NSW EPA Guidelines on the Duty to Report Contamination under Section 60 of the CLM Act 1997 (2015) is not currently required based on the findings of this DSI.

7.1.7 Waste Avoidance and Resource Recovery Act 2001 (NSW)

The objectives of the Waste Avoidance and Resource Recovery Act 2001 (WARR Act) are:

- (a) *to encourage the most efficient use of resources and to reduce environmental harm in accordance with the principles of ecologically sustainable development,*
- (b) *to ensure that resource management options are considered against a hierarchy of the following order:*
 - (i) *avoidance of unnecessary resource consumption,*
 - (ii) *resource recovery (including reuse, reprocessing, recycling and energy recovery),*
 - (iii) *disposal,*
- (c) *to provide for the continual reduction in waste generation,*
- (d) *to minimise the consumption of natural resources and the final disposal of waste by encouraging the avoidance of waste and the reuse and recycling of waste,*
- (e) *to ensure that industry shares with the community the responsibility for reducing and dealing with waste,*
- (f) *to ensure the efficient funding of waste and resource management planning, programs and service delivery,*
- (g) *to achieve integrated waste and resource management planning, programs and service delivery on a State-wide basis,*
- (h) *to assist in the achievement of the objectives of the [Protection of the Environment Operations Act 1997](#).*

A waste management plan has been prepared and is included in Appendix E.

7.1.8 Water Management Act 2000

Under Part 3 of Chapter 3 a person must obtain a permit for water use approval, water management work approval or activity approval.

No building works are proposed in close proximity to a water course and the integrated approval of Office of Water is not required in this instance.

7.1.9 Heritage Act 1977

The Heritage Act 1977 contains provisions relating to the protection of items of heritage significance or items of potential significance. The integrated development provisions are triggered by development of items listed in the State Heritage Register or to which an interim heritage order applies. As no such items are located on the school site.

Section 139 of the Act requires that an Excavation Permit is required prior to undertaking any development which involves excavation of land where there is reasonable cause to expect that a relic will be discovered or disturbed. There is no reasonable cause on this site to expect that a relic would be discovered.

A local heritage item does exist on the South site of the school and a heritage impact assessment has been prepared which is included as Appendix C.

7.1.10 Roads Act 1993

Section 138 of the NSW Roads Act 1993 requires the consent of the appropriate roads authority for any works or activities in a public road reserve. Should works be required to upgrade the crossing between the North and South sites, an application under the Roads Act may be required.

7.2 State Environmental Planning Policies

The relevant State Environmental Planning Policies (SEPPs) are outlined below.

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

In accordance with schedule 1 clause 15 of the State and Regional Development SEPP the proposed development is classified as State significant development because:

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 proposed development meets the Capital Investment Value (CIV) threshold of \$20 Million for the purpose of alterations and additions to an existing school and is therefore classified as a State Significant project, under clause 15 of Schedule 1.

The CIV of the proposed development is outlined in a report from Turner & Townsend, refer Appendix A. The breakdown of costs is summarised in the report.

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

State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 includes requirements for alterations and additions to schools, including public schools and their potential. Table 10 details compliance with the requirement of this SEPP.

Table 10: Compliance with SEPP (Educational Establishments and Child Care Facilities) 2017

SEPP REQUIREMENT	COMMENT
PART 1 PRELIMINARY	
Sections 1-9	Noted.
PART 2 GENERAL	
Division 1 Consultation and notification	Consultation has been undertaken with Council and relevant government agencies. Details are included in Section 11 below.
Division 2 Site compatibility certificates	Not applicable
Division 3 Additional uses of State land	Not applicable
Division 4 Exempt development	Not applicable
Division 5 Complying development	Not applicable
PART 3 EARLY EDUCATION AND CARE FACILITIES – SPECIFIC DEVELOPMENT CONTROLS	
Sections 22-32	Not applicable
PART 4 SCHOOLS – SPECIFIC DEVELOPMENT CONTROLS	
33 Definition of “prescribed zone”	The site is zoned R2 low density residential, which is identified as a prescribed zone within the definition.
34 Development for the purpose of student accommodation	Not applicable.

SEPP REQUIREMENT	COMMENT
35 Schools – Development permitted with consent	Schools are permissible with consent in any prescribed zone (including R2). Should the local environmental plan (LEP) prohibit schools or educational establishments, then the SEPP will over-ride the LEP. The design quality principles detailed in Schedule 4 of the SEPP have been considered by the architects and a Design Statement detailing compliance is included in Appendix P. Reference to the applicable development control plan (DCP) is detailed below. However, Section 35 subclause (9) advises that any requirement, standard or control included in a DCP is of no effect when related to a school.
36 Schools – Development permitted without consent	The proposal does not comply with these provisions, therefore needs development consent.
37 Notification of carrying out of certain development without consent	Not applicable.
38 Existing schools – exempt development	The proposal is not considered to be exempt development.
39 Existing schools – complying development	Not applicable.
40 School-based child care – complying development	Not applicable.
41 Complying development certificates – additional conditions	Not applicable.
42 State significant development for the purpose of schools – application of development standards in environmental planning instruments	This clause allows for development consent to be granted for development for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which consent is granted. Therefore, as this proposal is State significant, if this proposal does not comply with any development standard within a SEPP or Holroyd LEP, then consent can still be granted under this provision.
PART 5 UNIVERSITIES – SPECIFIC DEVELOPMENT CONTROLS	
Sections 43-49	Not applicable.
PART 6 TAFE ESTABLISHMENTS – SPECIFIC DEVELOPMENT CONTROLS	
Sections 50-56	Not applicable.
PART 7 GENERAL DEVELOPMENT CONTROLS	
57 Traffic-generating development	Noted. A traffic impact assessment report is included in Appendix H.

7.2.3 State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) aims to facilitate the effective delivery of infrastructure across the State. The ISEPP is no longer applicable to educational facilities.

7.2.4 State Environmental Planning Policy No 55 – Remediation of Land

Clause 7 of State Environmental Planning Policy No.55 – Remediation of Land requires the consent authority to consider whether land is contaminated during the development application process. A Detailed Site Investigation was undertaken by Environmental Investigation Services (EIS) (included in Appendix Q) that concluded:

The DSI included a review of existing reports, a supplementary site history assessment, soil sampling from 42 locations and groundwater sampling from one monitoring well. The historical assessment identified that the site has most likely been vacant and utilised as a recreational area for a school from around the 1930s. Re-contouring and levelling of the site occurred around the 1970s and it appears that fill was imported from off-site areas to facilitate this.

The investigation identified fill across the site that was impacted by building and demolition waste, including brick, concrete and glass fragments. Slag and ash were also identified in fill. The deepest fill (>1.0m) was typically in the western area of the site near the sewer alignment, and in the northern areas. This was expected based on the topography, however it is noted that the fill depths encountered by EIS were significantly less than those logged by the previous consultant who investigated the eastern area of the site.

The DSI indicated that potential risks associated with BTEX, pesticides, heavy metals (other than lead) and PCBs are unlikely to be significant as these CoPC were not identified at concentrations above the SAC or at concentrations that would warrant further consideration and assessment of risk. Lead, asbestos (as bonded ACM), carcinogenic PAHs and TRH (F3) were identified during the DSI at concentrations above the SAC. Further risk assessment of these compounds indicated that remediation is required to address risks associated with carcinogenic PAHs at one location (TP32) and asbestos (as bonded ACM) in fill across the entire site. A remediation action plan (RAP) should be prepared and submitted to facilitate the remediation.

Following this recommendation, a Remediation Action Plan will be prepared and implemented prior to any construction commencing on the site.

Environmental Investigation Services also included recommendations to mitigate risks associated with the findings until remediation could be undertaken of the site. They also concluded that:

EIS are of the opinion that notification of site contamination to the EPA under the NSW EPA Guidelines on the Duty to Report Contamination under Section 60 of the CLM Act 1997 (2015) is not currently required based on the findings of this DSI.

7.2.5 Sydney Regional Environmental Plan (SREP) (Sydney Harbour Catchment) 2005 (Deemed SEPP)

SREP Sydney Harbour Catchment 2005 covers the area of Sydney Harbour, including Parramatta River and its tributaries and includes planning principles and controls for the catchment area.

Aims of the SREP include:

- (a) to ensure that the catchment, foreshores, waterways and islands of Sydney Harbour are recognised, protected, enhanced and maintained:
 - (i) as an outstanding natural asset, and
 - (ii) as a public asset of national and heritage significance, for existing and future generations,
- (b) to ensure a healthy, sustainable environment on land and water,
- (c) to achieve a high quality and ecologically sustainable urban environment

Although the SREP applies to a large area, there are specific controls for foreshore areas, strategic foreshore sites and heritage provisions. Parramatta West Public School is not located within these specific areas, however the overall planning principles outlines in Part 2 of the REP SHC need to be considered.

The planning principles include:

- (a) development is to protect and, where practicable, improve the hydrological, ecological and geomorphological processes on which the health of the catchment depends,
- (b) the natural assets of the catchment are to be maintained and, where feasible, restored for their scenic and cultural values and their biodiversity and geodiversity,
- (c) decisions with respect to the development of land are to take account of the cumulative environmental impact of development within the catchment,
- (d) action is to be taken to achieve the targets set out in Water Quality and River Flow Interim Environmental Objectives: Guidelines for Water Management: Sydney Harbour and Parramatta River Catchment (published in October 1999 by the Environment Protection Authority), such action to be consistent with the guidelines set out in Australian Water Quality Guidelines for Fresh and Marine Waters (published in November 2000 by the Australian and New Zealand Environment and Conservation Council),
- (e) development in the Sydney Harbour Catchment is to protect the functioning of natural drainage systems on floodplains and comply with the guidelines set out in the document titled Floodplain Development Manual 2005 (published in April 2005 by the Department),
- (f) development that is visible from the waterways or foreshores is to maintain, protect and enhance the unique visual qualities of Sydney Harbour,
- (g) the number of publicly accessible vantage points for viewing Sydney Harbour should be increased,
- (h) development is to improve the water quality of urban run-off, reduce the quantity and frequency of urban run-off, prevent the risk of increased flooding and conserve water,
- (i) action is to be taken to achieve the objectives and targets set out in the Sydney Harbour Catchment Blueprint, as published in February 2003 by the then Department of Land and Water Conservation,
- (j) development is to protect and, if practicable, rehabilitate watercourses, wetlands, riparian corridors, remnant native vegetation and ecological connectivity within the catchment,
- (k) development is to protect and, if practicable, rehabilitate land from current and future urban salinity processes, and prevent or restore land degradation and reduced water quality resulting from urban salinity,
- (l) development is to avoid or minimise disturbance of acid sulfate soils in accordance with the Acid Sulfate Soil Manual, as published in 1988 by the Acid Sulfate Soils Management Advisory Committee.

The subject property is located within the Sydney Harbour Catchment therefore the provisions of this plan apply to this development. An assessment of the proposal against relevant matters for consideration is provided below in Table 11.

Table 11: Assessment of Matters for Consideration for Sydney Harbour Catchment

MATTERS FOR CONSIDERATION	ASSESSMENT
21 Biodiversity, ecological and Environmental protection	As the site is already mainly developed, the potential for impact on the catchment is low. The preliminary stormwater management plan included as Appendix J recommends a number of stormwater controls to maintain discharge rates and maintain water quality. These measures include: • On-site detention; • Rainwater tanks; and • Water quality management.

MATTERS FOR CONSIDERATION	ASSESSMENT
22 Public Access to, and use of, Foreshore and waterways	The subject site is not adjacent to the foreshore or waterways, as such it will not impact access to the foreshore. This clause is not applicable to the development.
23 Maintenance of a working harbour	The subject site is not adjacent to the foreshore, commercial or industrial lands or the working harbour. As such it will not impact the working harbour. This clause is not applicable to the development.
24 Interrelationship of waterway and foreshore uses	The subject site is not adjacent to the foreshore or waterways, as such it will not impact access to the foreshore. This clause is not applicable to the development.
25 Foreshore and waterways scenic quality	The proposal is not visible from the Sydney Harbour foreshore and waterways will not impact on the scenic qualities of Sydney Harbour.
26 Maintenance, protection and enhancement of views	The development will not adversely impact views to or from the waterfront, any public places, and landmarks. The site is opposite a heritage item, however the proposal has been designed to ensure there will be no adverse impacts and views of the site will be maintained from public areas.
27 Boat storage facilities	The proposed development is not on the waterfront and does not propose a boatshed. This clause is not applicable to the development.

Foreshores and Waterways Development Control Plan (DCP) is the associated non-statutory document in support of the SREP. Criteria in relation to landscape character, design guidelines for land-based development have been reviewed. It is considered that the proposal supports these criteria as it is not located on any cliff lines or shorelines, will not be visible from the water, has generally been cleared of remnant vegetation and is an appropriate scale, built form and design.

7.2.6 State Environmental Planning Policy No.19 – Bushland in Urban Areas

State Environmental Planning Policy No.19 – Bushland in Urban Areas relates to the protection and preservation of bushland in urban areas that is considered of value. Section 9 of the SEPP includes a list of issues that Council must consider before granting approval for development adjoining bushland zoned or reserved for public open space.

Under Section 4 of the SEPP bushland is defined as follows:

bushland means land on which there is vegetation which is either a remainder of the natural vegetation of the land or, if altered, is still representative of the structure and floristics of the natural vegetation.

Based on the biodiversity assessment, below is an extract relating to the vegetation on the site.

Vegetation on the site has been identified as Urban Native and Exotic Cover (refer to Attachment A) in the broad-scale vegetation mapping for the Sydney Metropolitan Area undertaken by the NSW Office of Environment and Heritage (OEH 2016). This vegetation type identified on site (OEH 2016) is not a recognised plant community type (PCT) and on this basis, is not likely to provide any important biodiversity values or ecological constraints.

Therefore, it is unlikely that the vegetation on the site could be considered bushland, however Table 12 includes an assessment of the relevant criteria from Section 9 of the SEPP and concludes that there will be no adverse impacts on the adjoining reserve and any vegetation contained within it.

Table 12: Assessment of SEPP No 19 Assessment Criteria

ASSESSMENT CRITERIA	RESPONSE
(c) the need to retain any bushland on the land,	Trees and vegetation have been retained where possible on the site and additional plantings have been identified in the landscape plans in Appendix G.
(d) the effect of the proposed development on bushland zoned or reserved for public open space purposes and, in particular, on the erosion of soils, the siltation of streams and waterways and the spread of weeds and exotic plants within the bushland, and	No adverse impacts have been identified on the adjoining public open space area as a result of the development. The proposal is setback between 59 and 62 metres from the western boundary with the adjoining reserve. In addition, appropriate erosion and sediment control measures will be in place during construction and stormwater infrastructure installed for the development.
(e) any other matters which, in the opinion of the approving or consent authority, are relevant to the protection and preservation of bushland zoned or reserved for public open space purposes	The proposal has considered Council policies and issues raised and there will be no adverse impacts on the adjoining reserve as a result of the proposed school building works.

7.2.7 State Environmental Planning Policy No. 64 – Advertising and Signage

Clause 8 of SEPP 64 states:

“A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied:

- (a) that the signage is consistent with the objectives of this Policy as set out in clause 3 (1) (a), and
- (b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 1.”

Table 13 below, details the compliance of the signage with the assessment criteria specified in Schedule 1.

Table 13: SEPP 64 Schedule 1 Assessment Table

SCHEDULE 1 ASSESSMENT CRITERIA	COMMENTS
1 Character of the area	
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	The signage will assist the general public with identifying the use of the development in an unobtrusive manner. The signage is considered to be compatible with the existing and desired future character of the area.
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	The signage will identify the occupant of the site and will not include unrelated advertising. The advertising signage is considered to be consistent with the residential nature of the area.
2 Special areas	
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas,	The site is opposite a heritage item, however the proposed signage is integrated into the building design and will not have an adverse impact on the heritage item or the amenity of the area.

SCHEDULE 1 ASSESSMENT CRITERIA		COMMENTS
waterways, rural landscapes or residential areas?		
3 Views and vistas		
• Does the proposal obscure or compromise important views?		The proposal will not obscure or compromise important views.
• Does the proposal dominate the skyline and reduce the quality of vistas?		The proposal will not impact on the skyline.
• Does the proposal respect the viewing rights of other advertisers?		The proposal will not detract, obscure or impact on the viewing rights of other advertisers.
4 Streetscape, setting or landscape		
• Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?		The combination of signage proposed is compatible with the building design and streetscape.
• Does the proposal contribute to the visual interest of the streetscape, setting or landscape?		The signage provides additional visual interest to the streetscape.
• Does the proposal reduce clutter by rationalising and simplifying existing advertising?		The signage is well spaced and not cluttered. The signage is easily intelligible and will identify the school without compromising road safety.
• Does the proposal screen unsightliness?		Not applicable.
• Does the proposal protrude above buildings, structures or tree canopies in the area or locality?		No.
5 Site and building		
• Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?		As stated above, the complementary colour scheme and spatially separated identification signage is compatible with the scale, proportion and design of the building.
• Does the proposal respect important features of the site or building, or both?		As above.
• Does the proposal show innovation and imagination in its relationship to the site or building, or both?		The signage integrates with the building design in an attractive and complementary manner.
6 Associated devices and logos with advertisements and advertising structures		
• Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?		The sign on the façade of the new building on the North site will be back lit. The lighting will be on a timer so as to ensure there will be no adverse impacts on the nearby residential area.
7 Illumination		
• Would illumination result in unacceptable glare?		No
• Would illumination affect safety for pedestrians, vehicles or aircraft?		No
• Would illumination detract from the amenity of any residence or other form of accommodation?		No

SCHEDULE 1 ASSESSMENT CRITERIA	COMMENTS
Can the intensity of the illumination be adjusted, if necessary?	Not necessary.
Is the illumination subject to a curfew?	Yes, so there will not be any adverse impacts on the surrounding residential area.
8 Safety	
Would the proposal reduce the safety for any public road?	Nil impact. The signage is relatively unobtrusive and will not cause confusion, restricted sight lines or disruption for motorists.
Would the proposal reduce the safety for pedestrians or bicyclists?	Nil impact. As above.
Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?	Nil impact. As above.

7.2.8 State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017

The aims of this SEPP are:

- (a) to protect the biodiversity values of trees and other vegetation in non-rural areas of the State, and
- (b) to preserve the amenity of non-rural areas of the State through the preservation of trees and other vegetation.

As the vegetation identified for clearing is ancillary to the proposed development and will be approved as part of the application, separate consent is not required for its removal.

7.3 State and Regional Plans and Strategies

The following regional plans and strategies are applicable to the proposal.

7.3.1 Greater Sydney Region Plan – A Metropolis of Three Cities

'Greater Sydney Region Plan – A Metropolis of Three Cities' was prepared by the Greater Sydney Commission and supersedes the previous regional strategy, 'A Plan for Growing Sydney'. The SEARs required the consideration of the latter document, however considering it is no longer the regional strategy, this EIS has considered the new document, dated March 2018.

The 'Greater Sydney Region Plan – Metropolis of Three Cities' (the Plan) sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic and environmental matters. It will integrate land use, transport and infrastructure planning between the three tiers of government and across State agencies.

The Plan identifies three key cities within the Greater Sydney Region:

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

The site is located within the Central River City area as shown in the Figure 22 which is an extract from the plan below. The Plan includes 40 objectives that will guide the development of the Sydney region focussed on population, housing, employment, connection and the environment.

Greater Parramatta is the core of the Central River City area and includes the Parramatta West Public School. Part of the vision is to ensure this area includes urban renewal and new neighbourhoods which will have the flow on effect of increased population. The expansion of the school will assist in ensuring the new population has appropriate education infrastructure to support this growth.

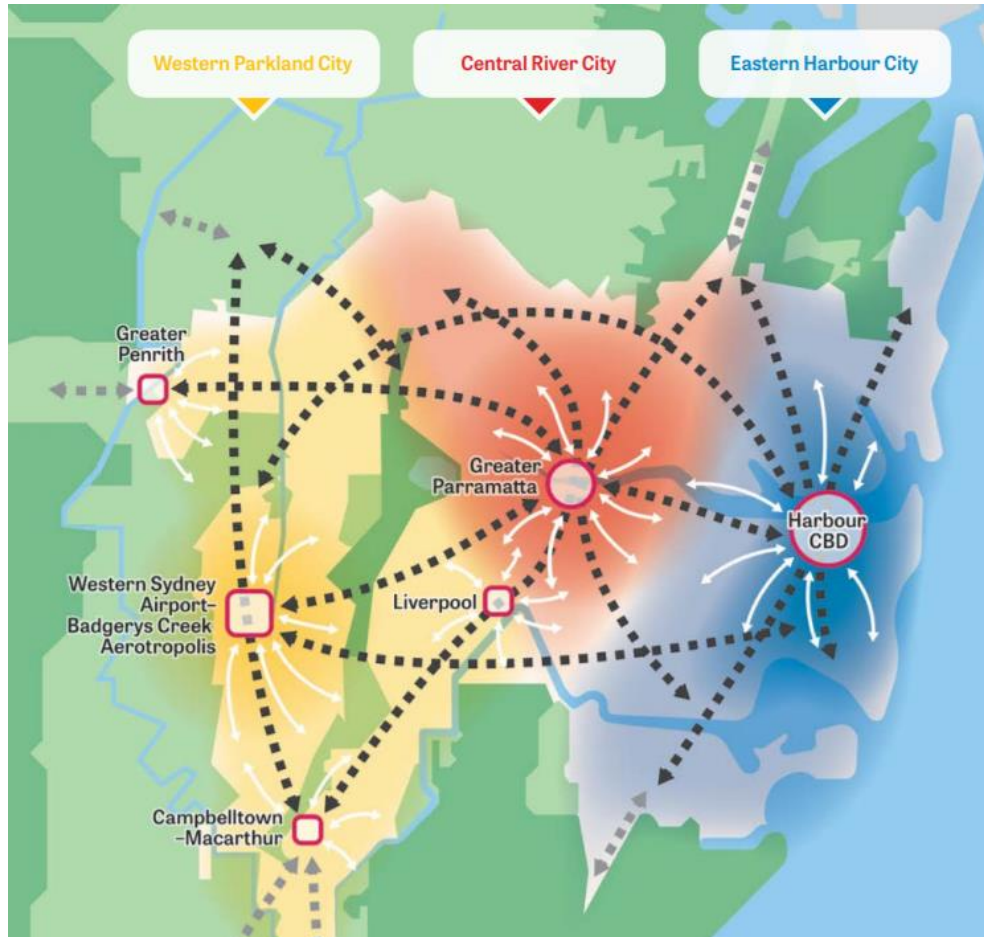


Figure 22: Extract from Greater Sydney Region Plan showing the three cities within the Metropolis

To support the greater region plan there are five district plans. The school is located within the Central City District, or which Parramatta is also the core. Section 7.3.2 below outlines the detail of this district plan and how the school application meets its objectives and strategies.

7.3.2 Greater Sydney Commission's Central City District Plan

In March 2018, the Greater Sydney Commission finalised the district plans for the Greater Sydney region, including the region containing Parramatta, the Central City District. The Central City District, 'the District' is the major component of the Central River City identified in the Region Plan above in Section 7.3.1. It is a 20-year plan to manage growth in the context of economic, social and environmental matters to achieve the 40-year vision of Greater Sydney.

Figure 23 below is an extract from the structure plan map for the District and it shows that the school is within the metropolitan centre of Greater Parramatta and close to the Economic Corridor. Some of the planning priorities that are important to this proposal for alterations and additions to the school include:

- Planning Priority C1 – Planning for a city supported by infrastructure
- Planning Priority C3 – Providing services and social infrastructure to meet people's changing needs

- Planning Priority C10 – Growing investment, business opportunities and jobs in strategic centres

The proposal addresses the directions and planning priorities by delivering high quality infrastructure, social services, employment opportunities and connectivity to public transport and educational facilities.

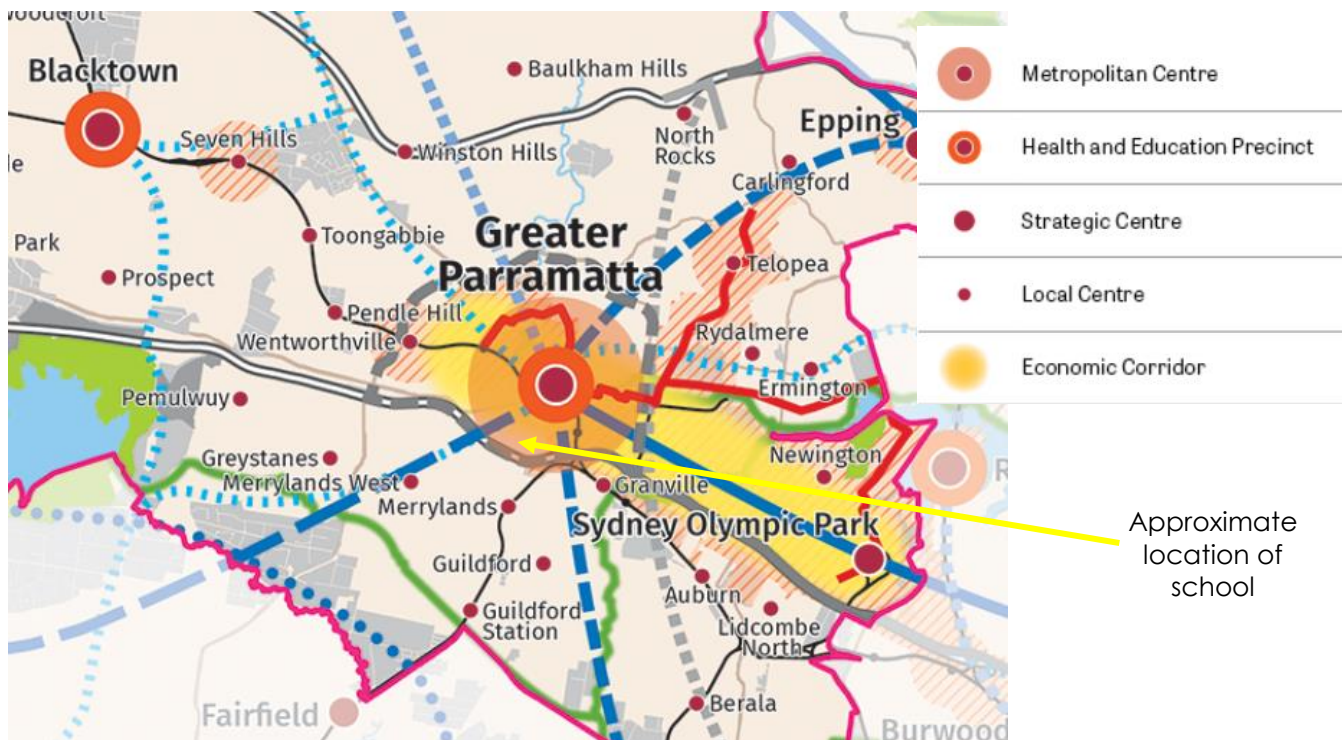


Figure 23: Extract of Structure Plan for Central City District showing Greater Parramatta

7.3.3 Building Momentum – State Infrastructure Strategy 2018-2038

The State Infrastructure Strategy has been used as a basis for the infrastructure used in the district and regional plans detailed above. Adopted in February 2018, the strategy provides six strategic directions for infrastructure in NSW including:

1. Continuously improve the integration of land and infrastructure planning so that population growth does not erode the amenity and character of our suburbs, towns and communities.
2. Plan, prioritise and deliver an infrastructure program that represents the best possible investment and use of public funds.
3. Optimise the management, performance and use of the State's assets to strengthen the management of infrastructure assets.
4. Ensure NSW's existing and future infrastructure is resilient to natural hazards and human-related threats by embedding consideration of risk and resilience into all projects.
5. Improve state-wide connectivity and realise the benefits of technology, ensuring that NSW becomes a leader in the adoption and use of digital technology.
6. Drive high quality consumer-centric services and expand innovative service delivery models in infrastructure sectors by being innovative in buying services and delivering new assets.

The strategy contains 122 recommendations across NSW's key infrastructure sectors of transport, energy, water, health, education, justice, social housing, culture, sport and tourism. The strategic objective in the Strategy relating to education is:

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

The relevant recommendations for Parramatta West Public School's proposal to meet this objective include the following:

- *Fully fund and implement the School Assets Strategic Plan.*
- *Progressively upgrade all existing permanent learning spaces to Future Learning environments over the long term.*
- *Embed consideration of joint and shared used, partnership, and place-making opportunities in Schools Community Planning.*

The proposed alterations and additions will provide an important upgrade to the school and enable additional shared use of the school spaces within the community.

7.3.4 Future Transport Strategy 2056

The *Future Transport Strategy 2056* was adopted at the same time as the regional strategy in March 2018. The Strategy *acknowledges the vital role transport plays in the land use, tourism, and economic development of towns and cities.*

The vision for this strategy has been designed around the following six outcomes:

1. Customer Focused – Customer experiences are seamless, interactive and personalised, supported by technology and data.
2. Successful Places – The liveability, amenity and economic success of communities and places are enhanced by transport.
3. A Strong Economy – The transport system powers NSW's future economy and enables economic activity across the state.
4. Safety and Performance – Every customer enjoys safe travel across a high performing, efficient network.
5. Accessible Services – Transport enables everyone to get the most out of life, wherever they live and whatever their age, ability or personal circumstances.
6. Sustainability – The transport system is economically and environmentally sustainable, affordable for customers and supports emissions reductions.

Parramatta West Public School is relatively well serviced in relation to transport, existing buses, trains, motorway links and future cycleways. Expanding the use of existing infrastructure and transport links is an economical and sustainable option.

8 Non-Statutory Policies, Plans and Guidelines

There are a number of State non-Statutory plans and guidelines that are considerations for any development in NSW. These policies and plans are detailed below.

8.1 Policies, Plans and Guidelines

8.1.1 NSW State Priorities

The Premier of NSW has 12 priorities for the State that are shown below:

1. *Creating jobs – 150,000 new jobs by 2019*
2. *Delivering Infrastructure – Key metropolitan, regional and local infrastructure projects to be delivered on time and on budget*
3. *Driving public sector diversity – Increase the number of women and Aboriginal and Torres Strait Islander people in senior leadership roles by 2025*
4. *Improving education results – Increase the proportion of NSW students in the top two NAPLAN bands by eight per cent by 2019*
5. *Improving government services – Improve customer satisfaction with key government services every year, this term of government to 2019*
6. *Improving service levels in hospitals – 81 per cent of patients through emergency departments within four hours by 2019*
7. *Keeping our environment clean – Reduce the volume of litter by 40 per cent, by 2020*
8. *Making housing more affordable – 61,000 housing completions on average per year to 2021*
9. *Protecting our kids – Decrease the percentage of children and young people re-reported at risk of significant harm by 15 per cent by 2020 (based on the 2019 cohort of children)*
10. *Reducing domestic violence reoffending – Reduce the proportion of domestic violence perpetrators reoffending by 25 per cent by 2021 (based on the 2019 cohort of perpetrators)*
11. *Reducing youth homelessness – Increase the proportion of young people who successfully move from Specialist Homelessness Services to long-term accommodation to more than 34 per cent by 2019*
12. *Tackling childhood obesity – Reduce overweight and obesity rates of children by five percentage points by 2025*

The alterations and additions to Parramatta West Public School will meet the relevant priorities by:

- Creating more jobs both during and after construction;
- Delivering an upgrade to an essential piece of infrastructure; and
- Providing a modern facility that can provide high quality education.

Further the NSW Government have 18 State Priorities that include the following:

Strong Budget and Economy

1. *Make NSW the easiest state to start a business*
2. *Be the leading Australian state in business confidence – encourage business investment*
3. *Increase the proportion of people completing apprenticeships and traineeships to 65% by 2019*
4. *Halve the time taken to assess planning applications for State Significant Developments*
5. *Maintaining the AAA credit rating*
6. *Deliver strong budgets – Expenditure growth to be less than revenue growth*

Building Infrastructure

7. *Improving road travel reliability – 90% of peak travel on key road routes is on time*
8. *Increase housing supply across NSW - Deliver more than 50,000 approvals every year*

Protecting the Vulnerable

9. *Transitioning to the National Disability Insurance Scheme – Successful transition of participants and resources to NDIS by 2018*
10. *Creating sustainable social housing – Increase the number of households successfully transitioning out of social housing by 5% over three years*

Better Services

11. *Improving Aboriginal education outcomes – Increase the proportion of Aboriginal and Torres Strait Islander students in the top two NAPLAN bands for reading and numeracy by 30%*
12. *Better government digital services – 70% of government transactions to be conducted via digital channels by 2019*
13. *Cutting wait times for planned surgeries*
14. *Increasing cultural participation – Increase attendance at cultural venues and events in NSW by 15% by 2019*
15. *Ensure on-time running for public transport – Maintain or improve reliability of public transport services over the next four years*

Safer Communities

16. *Reducing violent crime – LGAs to have stable or falling reported violent crime rates by 2019*
17. *Reducing adult re-offending by five per cent by 2019*
18. *Reduce road fatalities by at least 30 per cent from 2011 levels by 2021*

As detailed above the Parramatta West Public School will provide a stronger economy by increasing employment and education opportunities, provide improved education services to children in the local area and improve social infrastructure.

8.1.2 NSW State Plan 2010

NSW State Plan 2010 is a ten year plan to rebuild the economy, provide quality services, renovate infrastructure, restore government accountability, and strengthen our local environment and communities. The plan is based around five key strategies:

1. *Rebuild the economy - Restore economic growth and establish NSW as the 'first place in Australia to do business';*
2. *Return quality services - Provide the best transport, health, education, policing, justice and family services, with a focus on the customer;*
3. *Renovate Infrastructure - Build the infrastructure that makes a difference to both our economy and people's lives;*
4. *Strengthen our local environment and communities - Improve people's lives by protecting natural environments and building a strong sense of community; and*
5. *Restore accountability to government - Talk honestly with the community, return planning powers to the community and give people a say on decisions that affect them.*

The proposal addresses an increase in demand for high quality school facilities and will generate positive social, environmental and economic benefits. The proposal is consistent with the strategies and objectives of the NSW State Plan 2010.

8.1.3 NSW Long Term Transport Master Plan 2012

The Long Term Transport Master Plan 2012 sets the framework for the NSW Government to deliver an integrated and modern transport system. The master plan is principally focused on six key transport objectives, including:

1. *Integrating modes to meet customer needs;*
2. *Getting Sydney moving again;*
3. *Sustaining growth in Greater Sydney;*
4. *Providing essential access to regional NSW;*

5. Supporting efficient and productive freight; and
6. Statewide actions.

The subject site is highly accessible and well serviced by public transport. The proposed alterations and additions to Parramatta West Public School will maximise and encourage the use of public transport infrastructure in proximity to the site.

8.1.4 NSW Healthy Urban Development Checklist

The Healthy Urban Development Checklist (HUDC) is a NSW Health initiative aimed to assist health professionals in providing comprehensive and consistent advice on urban development. Development and implementation of the HUDC is guided by four key principles; *equity, early engagement, interdependence and building partnerships*. The objectives of the checklist are to:

- Provide a standardised tool to guide and inform feedback and advice to local governments and developers on urban development policies and plans in NSW;
- Evaluate the health aspects of urban developments;
- Support engagement between urban planners and developer and health professionals; and
- Inform others (planners, developers, policy makers) about the range of factors that need to be considered in healthy urban development.

The checklist is structured into ten (10) chapters, each chapter focuses on a healthy urban development characteristic. The ten characteristics and their key considerations are addressed with regards to the proposed development in Table 14 below.

Table 14: Healthy Urban Development Checklist

CHAPTER REFERENCE	COMMENT
Healthy Food HF1: Promote access to fresh, nutritious and affordable food HF2: Preserve agriculture lands HF3: Provide support for local food production	Not Applicable.
Physical Activity PA1: Encouraging incidental physical activity PA2: Promote opportunities for walking, cycling and other forms of active transport PA3: Promote access to usable and quality public open space and recreational facilities	The Parramatta West Public School is well placed to make use of public transport and walking and cycling distance to a number of residential areas. The school is now and will continue to be available for community use.
Housing H1: Encourage housing that supports human and environmental health H2: Encourage dwelling diversity H3: Promote affordable housing H4: Ensure that housing that is adaptable and accessible	Not Applicable.
Transport and Physical Connectivity TC1: Improve Public Transport Services TC2: Reduce car dependency and encourage active transport	The site has convenient access to public transport, including bus stops close by and within walking distance of two railway stations.

CHAPTER REFERENCE	COMMENT
TC3: Encourage infill development and/or integration of new development with existing development TC4: Encourage telephone and internet connectivity	
Quality Employment EM1: Improve location of jobs to housing and commuting options EM2: Increase access to a range of quality employment opportunities EM2: Increase access to a range of quality employment opportunities EM3: Increase access to appropriate job training	The proposed alterations and additions to Parramatta West Public School will result in additional employment opportunities for the local community, including opportunities during construction for local tradespeople and business and long-term teaching roles.
Community Safety & Security CS1 Consider crime prevention and sense of security	The proposed development allows for a high degree of surveillance and promotes safety for children, residents, staff and visitors. A crime prevention through environmental design report (CPTED) report has been prepared and is included in Appendix R.
Public Open Space PS1: Public access to green space and natural area PS2: Ensure that public open spaces are safe, healthy, accessible, attractive and easy to maintain PS3: Promote quality streetscape that encourage activity PS4: Engender a sense of cultural identity, sense of place and incorporate public art PS5: Address the preservation and enhancement of places of natural, historic and cultural significance	Not applicable
Social Infrastructure SI1: Provide access to a range of facilities to attract and support a diverse population SI2: Respond to existing (as well as projected) community needs and current gaps in facilities and/or service SI3: Provide for early delivery of social infrastructure SI4: Promote an integrated approach to social infrastructure planning SI5: Maximise efficiencies in social infrastructure planning and provisions	The proposed alterations and additions to Parramatta West Public School responds to the existing and projected needs of the community by delivering an improved and upgraded school facility for additional student places.
Social Cohesion & Social Connectivity SC1: Provide environments that will encourage social interaction and connection amongst people SC2: Promote a sense of community and attachment to place	The proposed development is consistent with the desired future character of the area and will enhance social cohesion and connectivity through optimising amenity.

CHAPTER REFERENCE	COMMENT
SC3: Encourage local involvement in planning and community life SC4: Minimise social disadvantage and promote equitable access to resource SC5: Avoid community severance, division or dislocation	
Environment and Health EH1: Contribute to enhancing air quality EH2: Contribute to enhancing water quality, safety and supply EH3: Minimise disturbance and health effects associated with noise, odour and light pollution EH4: Consider the potential for hazards (both natural and man made) and address their mitigation EH5: Avoid locating urban development in vector catchments	A preliminary construction management plan has been prepared and included in Appendix K. It addresses potential air, noise, odour and light pollution and will provide mitigation strategies to minimise any impacts or disturbances during construction. The design of the building and use of sustainable design will contribute to improved air quality and minimise health impacts from inappropriate building methods. Further appropriate lighting, noise attenuation measures and stormwater management will reduce light pollution, noise and improve water quality from the site.

8.1.5 Sydney's Bus Future 2013

Sydney's Bus Future is the NSW Government's long-term plan to redesign Sydney's bus network to address existing and projected customer needs. The plan sets out step-by-step actions to deliver fast and reliable bus services by creating new routes, simplifying timetables and making interchanges more convenient. The three stages of Sydney's bus future include:

1. *Improve bus customer experience;*
2. *integrate bus services across Sydney; and*
3. *Serve future growth*

The proposed development supports the aims of Sydney's Bus Future 2013 by proposing alterations and additions to Parramatta West Public School which is in proximity to existing bus services and not far from railway stations. The Transport Assessment addresses provisions of public transport and bus networks in proximity to the site, refer to Appendix H. There is also an overview of existing bus services provided in Section 3.5.

8.1.6 Sydney's Cycling Future 2013

Sydney's Cycling Future 2013 aims to coordinate planning and investment to ensure cycling is a safe, convenient and enjoyable transport option. The objectives of the plan are to achieve the following:

- Investment in separated cycleways, providing connected bicycle networks to major centres and transport interchanges;
- Promotion and better use of existing network; and
- Ongoing engagement with government, councils, stakeholders, developers and bicycle users.

The proposed development supports the objectives on Sydney's Cycling Future 2013. Refer to the Transport Assessment in Appendix H for details relating to the provisions and networks for bicycle users. There is also an overview of existing cycleways provided in Section 3.5.

8.1.7 Sydney's Walking Future 2013

Sydney's Walking Future 2013 aims to increase the number of people walking to help reduce the burden of congestion on our roads and free up capacity on key public transport corridors. The objectives of Sydney's Walking Future 2013 are to:

- Promote walking for transport;
- Connect people to places through safe walking networks around centres and public transport interchanges;
- Engage with partners across government, with councils, non-government organisations and the private sector to maximise effectiveness.

The proposed alterations and additions to Parramatta West Public School supports the objectives of Sydney's Walking Future 2013 by maintain existing pedestrian access and establishing a new pedestrian entry to the North site.

8.1.8 Crime Prevention Through Environmental Design (CPTED) Principles

The Crime Prevention Through Environmental Design (CPTED) guidelines were prepared by the NSW Police in conjunction with the NSW Department of Planning and Environment. CPTED assessment provides a clear approach to crime prevention and focuses on the 'planning, design and structure of cities and neighbourhoods' as well as individual development proposals.

The main aims of the policy are to:

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

A CPTED Assessment has been prepared by Barker Ryan Stewart and is included as Appendix R. The CPTED Assessment concludes that the proposed design of the redeveloped School incorporates natural surveillance, access control, territorial reinforcement and space management design principles to deter crime. Further, the redevelopment School proposes to employ many existing CPTED measures that have been successful at deterring crime at the existing School.

Notwithstanding this, the assessment has also made a number of recommendations to enhance these outcomes. A summary of these recommendations is included below:

- *Incorporate bollards and strategic landscaping techniques to limit vehicular access to pedestrian areas and school entrances.*
- *Installation of an alarm system in any new buildings to deter after hours intruders.*
- *Clearly delineate public spaces from private areas and promote signage where required to enforce this.*
- *Signage must clearly identify spatial restrictions and security measures to deter unauthorized access.*
- *Utilise strategic landscaping to maintain direct sightlines along the perimeter of the 'North' and 'South' sites to promote natural surveillance.*
- *Maintain low level planting in appropriate locations to provide good visibility of the site from surrounding streets. Low lying shrubs must be maintained of density to allow for these required sightlines and community surveillance.*
- *Surveillance of main entrance points, pathways, and concealed areas should be maximised through a combination of CCTV and contracted security. This must be maintained on weekends and holidays when the opportunity for criminal activity in a school environment may be higher.*
- *Any car park areas should have the capacity be well lit at night to accommodate for after school activities and community usage of facilities.*
- *Sensor lighting may also be used to illuminate required areas.*
- *Implementation of an on-going environmental maintenance plan that upholds the aesthetic requirements for effective community spaces. Involve school parents or community groups for additional effective space management.*

9 Local Planning Framework

The relevant local plans and policies are outlined below.

9.1 Holroyd Local Environmental Plan 2013

Although the site now falls within the City of Parramatta Local Government Area (LGA), it previously was part of Holroyd LGA and as such the Holroyd Local Environmental Plan (LEP) and other local policies are applicable.

9.1.1 Permissibility

Under the provisions of the Holroyd Local Environmental Plan 2013 the site is zoned R2 Low Density Residential, as shown in Figure 24 below. The zone objectives are:

- To provide for the housing needs of the community within a low density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.
- To allow residents to carry out a range of activities from their homes while maintaining neighbourhood amenity.

The proposal is considered to be consistent with the zone objectives for the following reasons:

- The development is a significant opportunity to expand Parramatta West Public School and deliver a high-quality education establishment and meet the demand of a growing population due to suburban densification; and
- Provides services to meet the day to day needs of the local community.

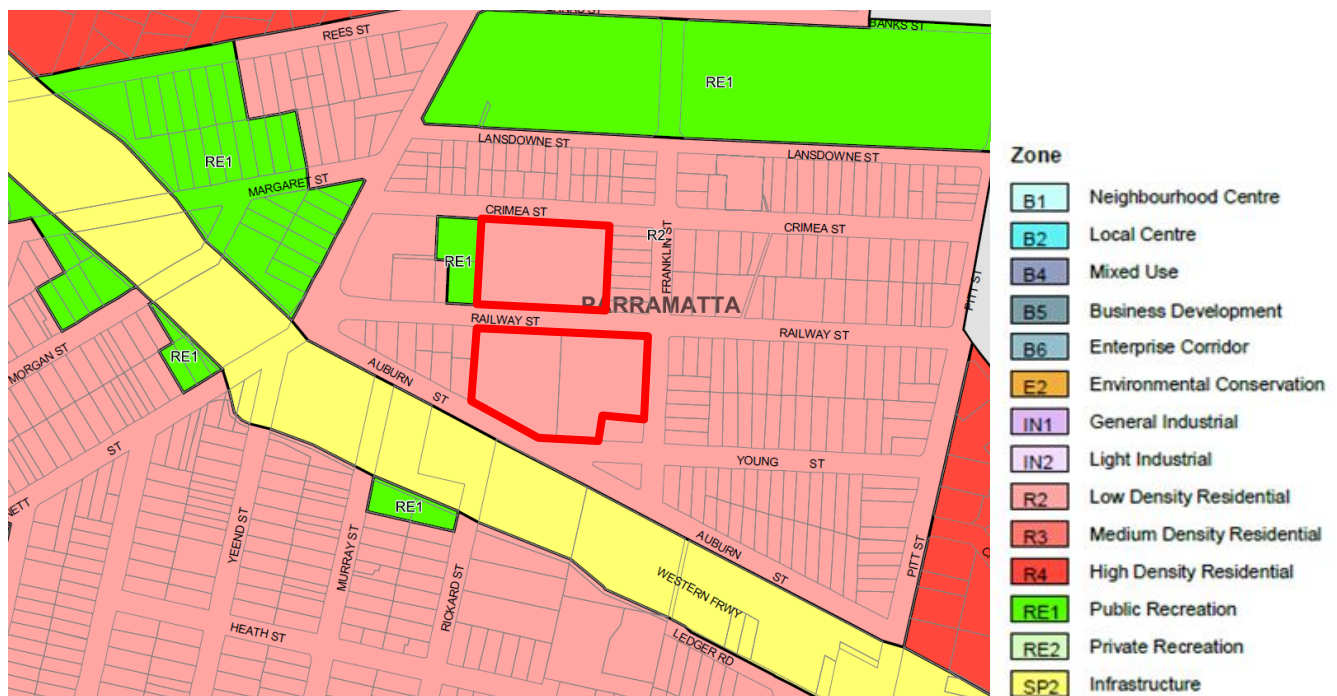


Figure 24: Extract from Land Zoning Map

An educational establishment is not included in the uses that are permissible with development consent. However as the SEPP (Educational Establishments and Child Care Facilities) 2017 permits educational establishments within a prescribed zone, which includes the R2 zone, this overrides the LEP.

9.1.2 Development Standards

It should be noted that clause 42 of the SEPP (EE&CC) 2017 allows development consent to be granted for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by the SEPP or any other environmental planning instrument under which the consent is granted, including this LEP.

Notwithstanding the above, this proposal has considered the relevant LEP development standards that are applicable to the application which are detailed below.

Clause 4.3 Height of Buildings

This clause and associated mapping outlines the maximum height of building for the site. The subject site has a permissible height of 9m, as shown in Figure 25.

The proposed development is 1 and 2 storeys in height and is between 7.451m and 10.697m at its maximum height with an average of just over 9 metres. The roof design results in parts of the building exceeding the maximum building height limit control of 9 metres within the LEP. They are however within the SEPP (EE&CCF) complying development controls of 22 metres or less than 12 metres given the side setback.



Figure 25: Extract from Building Height Map

At its highest point, the building is 1.697m over the permissible height of 9m or 18.9% variation. Although this appears like a significant variation, the maximum height is only at the ridge of the buildings and the majority of the building is lower and under the maximum height. However as discussed above, Section 43 of the SEPP (EE&CCF) 2017 allows for development consent to be granted to a State Significant development even though it contravenes a development standard imposed by an environmental planning instrument, such as this one.

Due to the slight slope of the site the natural ground and building height varies across the elevations. Table 15 below outlines the extent of the height variations.

Table 15: Height variations across the building and elevations

Elevation	Height	Variation from LEP Maximum	% Variation from LEP Maximum
South elevation	9.578m	0.578m	6.4%
South elevation	9.819m	0.819m	9.1%
North elevation	8.428m	0m	N/A
North elevation	10.418m	1.418m	15.8%
West elevation	10.697m	1.697m	18.9%
West elevation	7.451m	0m	N/A
East elevation	7.451m	0m	N/A
East elevation	8.256m	0m	N/A
Average	9.012m	0.012m	0.1%

The maximum extent of departure is 1.697 metres. This represents a variation of approximately 18.9% to the Holroyd LEP maximum height control. However due to the slope of the site the height varies across the development with an average departure of 0.012 metres or 0.1% based on the heights over each elevation.

3D renders of the proposed new school building shows the architectural style and variation in height due to roof design and slope of the site.

Even though a clause 4.6 submission is not required for this proposal, justification is provided in Table 16 below as to why the proposal should be supported and to show that the proposal still meets the objectives and planning considerations in relation to height.

Table 16: Justification of Height Variation

Questions / Planning Considerations	Response / Comment
Is a development which complies with the standard unreasonable or unnecessary in the circumstances of the case?	Strict compliance with the development standard is considered unnecessary in the circumstances of the case because the proposed height variation will result in a better design outcome than a development that complies with the building height limit and will not cause adverse view loss, privacy, overshadowing or visual impacts. Specifically: • The building will not cause any significant overshadowing impacts on open space, playground areas or public or private spaces; • The architectural design adds to the amenity of the school and neighbourhood; • The design does not present an attempt to attain additional development yield on site given compliance with the applicable FSR controls; • The design incorporates a sloped roof which is characterised by maximum heights only on part of the development, which is reflected in Table 1 above; and • The design allows for an increase in landscaped areas and open space (outdoor learning and play spaces) for both sides of the school site which is important in a school environment.

Questions / Planning Considerations	Response / Comment
Would the underlying objective or purpose of building height be defeated or thwarted if compliance was required?	A development that strictly complied with the building height standard would result in an increase in building footprint and a resulting loss in playground space, landscaping and outdoor learning areas. The spread of home base rooms into other areas of the site would result in an inferior design outcome for the site and school. With a small variation in building height, this building allows for further development opportunities to cater for additional staff and students in the future as required.
Has the development standard been virtually abandoned or destroyed by Council's own actions departing from the standard?	No, there does not appear to be a significant departure from the height standards in the immediate locality.
Is the zoning of the land unreasonable or inappropriate?	No, although in the past many schools had special use/ purpose zones in which height and FSR restrictions were not applicable. In addition, should have the development been able to be complying development under the SEPP – EE&CCF then the height could have been a maximum of 12 - 22m (depending on setback) and no variation would have been required.
Are there sufficient environmental planning grounds to justify contravening the development standard?	The development demonstrates sufficient planning and environmental outcomes to support the variation. Consideration should be given to the following: • Although the proposed development in part exceeds the maximum height limits for the site, the development has been designed with consideration of the site and surrounding development; • The new learning facility is generally consistent with the built form of developments on and surrounding the site; • There is no expected significant view loss from surrounding developments as a result of this proposal; • There are no significant overshadowing impacts on existing school buildings, nearby developments, public areas or private open space (Refer to shadow diagrams included in the architectural drawings in Appendix D); • The proposed development has an FSR of 0.3:1, and complies with the maximum FSR identified in the LEP of 0.5:1; • The proposal will not cause adverse privacy impacts on nearby residential developments. The development proposes the inclusion of strategically angled windows along the eastern façade. This will reduce opportunities for overlooking onto neighbouring properties; • View lines are minimized resulting in maintenance of privacy for the neighbouring properties; • The building has a setback of between 7m and 10m from the adjoining boundaries; and • Substantial tree planting is proposed to further mitigate height issues and will create a buffer zone between the proposed building and neighbours.
Does the development satisfy the objectives of the development	The proposal is considered to generally satisfy the height clause objectives for the following reasons:

Questions / Planning Considerations	Response / Comment
standard? The objectives of the height clause are: (a) <i>to minimise the visual impact of development and ensure sufficient solar access and privacy for neighbouring properties,</i> (b) <i>to ensure development is consistent with the landform,</i> (c) <i>to provide appropriate scales and intensities of development through height controls.</i>	• There are no adverse visual impacts of the proposal on the school, streetscape or amenity of the area; • The proposal will not inhibit neighbouring properties solar access for more than approximately 2 hours during the winter solstice; • The design of the building adjoining neighbouring properties includes architectural and landscaping elements to reduce the potential for adverse privacy impacts; • The height of the building will present an attractive architectural element to the school and surrounds; • The proposal has been designed with the slope of the site and this is one of the reasons for the relatively minor height variation and the differences in height variation across the building footprint; • The height will reduce the hard stand footprint of the building and thereby increasing the availability of outdoor play and learning areas; and • It is an important expansion of public infrastructure which is consistent with surrounding landform, scale and intensity.
Does the development satisfy the objectives of the zone? The objectives are: • <i>To provide for the housing needs of the community within a low density residential environment.</i> • <i>To enable other land uses that provide facilities or services to meet the day to day needs of residents.</i> • <i>To allow residents to carry out a range of activities from their homes while maintaining neighbourhood amenity.</i>	Having regard for the height variation, the proposed development is considered to remain consistent with the zone objectives for the following reasons: • The facility provides additional education infrastructure for a growing community that is consistent with the residential zoning; • The updated facilities at the school are available for use by the community outside of school hours which enables additional space for community uses such as sporting and other recreational activities, both passive and active; • Substantially meets and maintains the required FSR of low density residential zoning, 0.3:1 compared to the maximum permissible of 0.5:1; • The land use and design are consistent with surrounding developments and provide an attractive architectural and landscape solution for the site; and • The development will provide permanent, high quality educational services to meet day to day needs of the Parramatta West community.
Does the development satisfy the objectives of the Holroyd LEP?	The proposed variation is consistent with relevant aims of the Holroyd LEP, for the following reasons: • The high-quality development will contribute to the education and employment needs of the community by increasing the student/ staff levels without acquiring additional land; • The proposal promotes social well-being and equity principles through an increase in the opportunity for education in the area. Reduced travel times for students and parents are associated with positive social impacts; • Provides an increase to public education facilities close to transport and other services; • Provides additional spaces for community use outside of school hours;

Questions / Planning Considerations	Response / Comment
	- The proposal is designed in conjunction with environmental design principles aimed at promoting the conservation of the environment within the City of Parramatta Local Government area (LGA); - The non-compliance has no significant adverse impacts on the setting of any items of cultural or environmental heritage; and - Promotes a high standard of urban design which would be reduced by any proposal that aims to redistribute development across the entirety of the site to meet numerical compliance.
Would the contravention raise any significant matter or hinder the attainment of the objectives of the EP&A Act?	The proposed variation is consistent with several of the objectives of the Act including: - The orderly use and development of land is promoted by increasing the staff and student numbers; - The development promotes social welfare through an increase in available public education facilities; - The proposal facilitates economic development through an increase in paid staff; - The proposal will increase space available for community uses outside of school hours; - The proposal does not impact the conservation of any threatened species or habitats; - The development does not impact the cultural or Aboriginal heritage of the site or area; - Effective design and amenity of the built environment is achieved through architectural elements and effective use of space; and - The health and safety of staff and students who occupy the school grounds is facilitated by design that is in accordance with BCA standards as detailed in report in Appendix BB.
Is there public benefit in maintaining the development standard?	No. For the reasons outlined above, the proposal is a better urban design outcome and will not cause adverse impacts on surrounding land or the environment. It is anticipated that the community will benefit from retaining existing open space areas in a reduced footprint design.

The proposed development complies with the objectives of the height clause, zoning, LEP and Act as detailed above and will not have significant adverse impacts on adjoining or nearby properties. Accordingly, strict compliance with the development standard is considered unnecessary in the unique circumstances of the case because the proposed height variation will result in better design excellence outcomes than a development that complies with the building height limit and will also provide more outdoor play and learning space.

The development will have both social and economic benefits to the local community through increased access to education and employment, improved facilities for out of hours activities, achieves energy efficiency via intuitive design and construction, and will deliver flexible learning facilities for a growing community.

The development will future proof the school by providing the required additional classroom space and is an important commitment to the community through the expanding of an essential piece of public

infrastructure. Higher buildings allow the maximisation of open space and play grounds for the school, and also allows for future building expansion on open space as population growth may require.

There are sufficient environmental planning grounds to warrant the variation; the proposed development is consistent with relevant objectives and is in the public interest.

Clause 4.4 Floor Space Ratio

This clause and associated mapping outlines the maximum floor space ratio (FSR) for the subject site. The subject site has a maximum permissible floor space ratio of 0.5:1, as shown in Figure 26.

The existing school (not including demountables) has a FSR of 0.18:1 and the proposed school with the alterations and additions has a FSR of 0.3:1 which is under the maximum permissible.

The subject site has undergone alterations and additions since construction. To date the school has been developed on the South site, with the North site utilised for recreation. Continued expansion and growth of the school population has resulted in 13 demountable classrooms being located over open space areas. The construction of a new building and relocation of the administration areas to the North site will enable the removal of a number of the demountable buildings and readdress the imbalance of open space on each site.

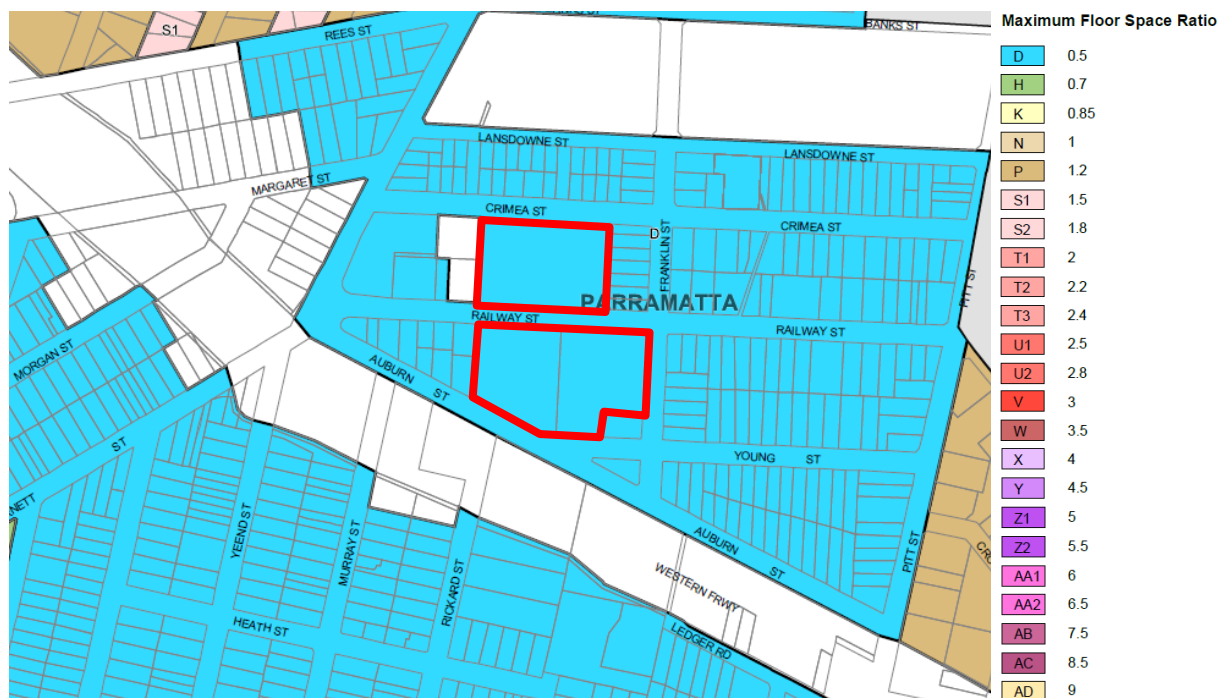


Figure 26: Extract from floor space ratio map

Clause 4.6 Exceptions to development standards

Clause 4.6 permits variations to development standards, however as stated above, Section 43 of the SEPP (EE&CCF) 2017 allows for development consent to be granted to a State Significant development even though it contravenes a development standard imposed by an environmental planning instrument and therefore a Clause 4.6 variation is not required for this application. Notwithstanding this, justification has been provided above.

9.1.3 Other LEP Provisions

The following clauses are the other relevant provisions of the LEP that are applicable to the proposed development.

Clause 5.10 Heritage Conservation

This clause and associated mapping outlines items listed within Schedule 5 of the LEP – Environmental Heritage. The South site portion of the school is listed as 'Parramatta West Public School, circa 1887', local heritage item I13. Refer to Figure 27, below.

A heritage impact assessment has been prepared and is included in Appendix C. It concludes:

The heritage significance of the Parramatta West Public School would not be impacted by the proposed development work. As the new building is proposed on the north side of Railway Street the significance is retained. In addition, no works have been proposed to the two significant heritage buildings (1887 building F and 1937 building E) at Parramatta West Public School. In addition to the new development on north side of Railway Street and after internal alterations to two existing non-significant school buildings (B and D) on the southern school site 20 new permanent teaching spaces would be provided in total.

By demolishing the cluster of 9 scattered demountable structures from the existing school site in favour of new building, the congestion around heritage buildings would be cleared and general settings would be improved. This would help in opening the views to and from the heritage buildings and will also improve circulation, landscape, open spaces and play areas across the school.

The overall streetscape character of Railway Street would not be impacted because new building is proposed on the other side of the street which would preserve the existing settings and views on the school on south side. Planting new trees as part of landscape and retention of mature trees fronting both streets would help preserving the landscape character which would also soften views to the new buildings behind. Since the prelodgement meeting with the local council suggested the character of the proposed building fronting Railway Street was too "industrial" the windows have been adjusted to be more vertically proportioned and the brickwork has been given more visual texture to assist its compatibility with the heritage buildings on the southern side of Railway Street.

It is concluded that the proposed development on a significant local heritage place, Parramatta West Public School, NSW is consistent with guidelines and fulfils the objectives of the heritage conservation provided in Holroyd Local Environmental Plan (HLEP 2013) and Part H (Specific controls for development in the vicinity of a heritage item) on heritage conservation of Holroyd Development Control Plan 2013 (HDCP) and there are no heritage issues preventing the assessing authority from approving this application subject to the typical conditions of development consent.

It should be noted that no works are proposed on buildings of heritage significance. The construction of proposed new learning facilities will be located on the North site, which are not included in the heritage listing. The alterations to the buildings on the South site are mainly internal and will not impact on the heritage significance of the site or surrounds.

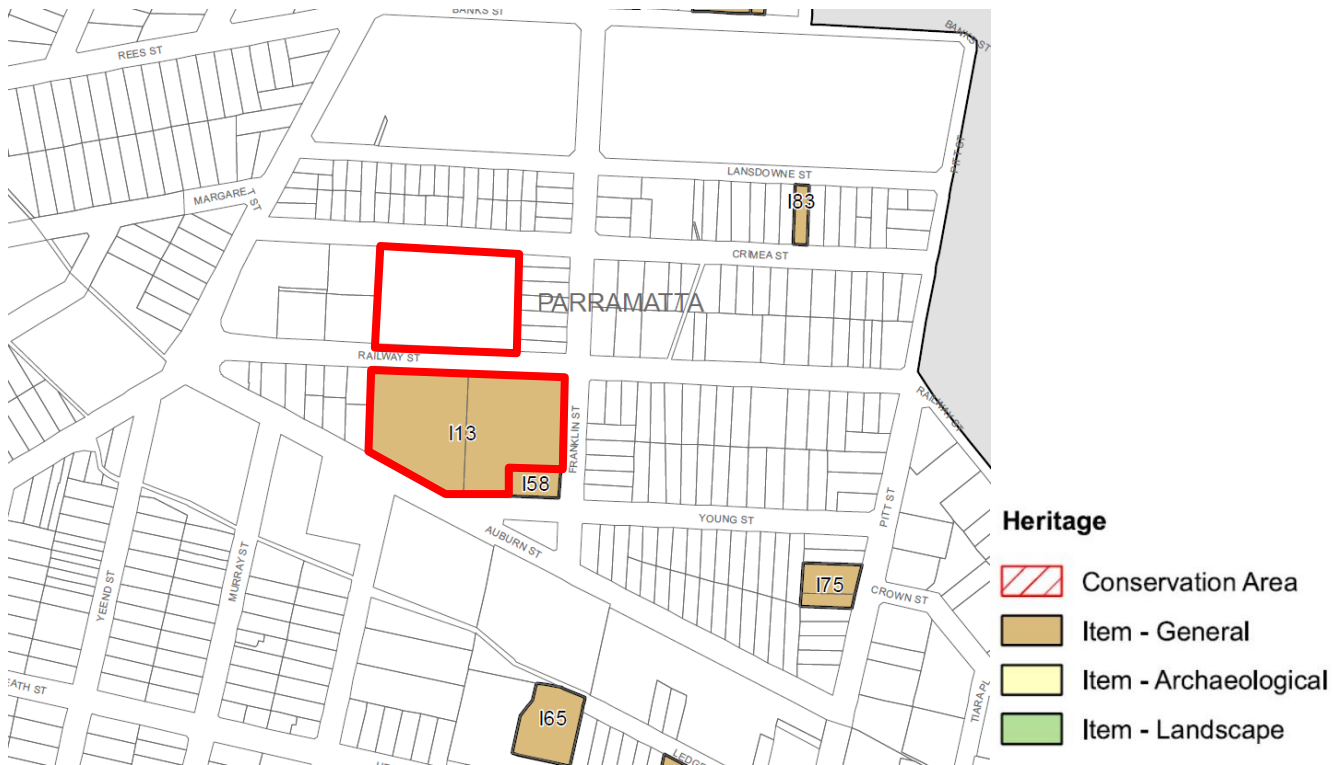


Figure 27: Extract from heritage map

Clause 5.12 Infrastructure development and use of existing buildings of the Crown

The purpose of this clause in relation to this proposal is to ensure that the LEP does not restrict, prohibit or enable the restriction or prohibition of the use of existing buildings of the Crown by the Crown.

The LEP does not restrict, prohibit or enable the restriction or prohibition of the use of the buildings on the site by the Crown or the Department of Education.

Clause 6.4 Flood planning

The site is not specifically subject to flooding, however a flood impact assessment and overland flow assessment was required by Council. The objectives of this clause are:

- (a) to minimise the flood risk to life and property associated with the use of land,
- (b) to allow development on land that is compatible with the land's flood hazard, taking into account projected changes as a result of climate change,
- (c) to avoid significant adverse impacts on flood behaviour and the environment.

A flooding assessment is included in Appendix S and concludes that:

Based on the findings of the investigation, flooding does not pose a constraint on the proposed alterations and additions to the school as the new building is located on land which lies outside the extent of the PMF event.

Clause 6.7 Stormwater management

The objectives of this stormwater management clause are:

- (a) to minimise the impacts of urban stormwater on properties, native vegetation and receiving waters,
- (b) to avoid any adverse impacts on soils and land stability,

- (c) to protect the environmental values of water identified for urban waterways in the Sydney Harbour and Parramatta River and Georges River catchments.

The proposed alterations and additions to the school have been designed having consideration to stormwater, ensuring permeable surfaces and managing potential for impacts on adjoining properties and nearby waterways. A stormwater management plan has been prepared and is included in Appendix J. This shows that the proposal meets and addresses the objectives and controls included in this clause.

Clause 6.8 Salinity

This clause and associated mapping has identified a moderate salinity potential on both the North and South sites as shown in Figure 28 below. The geotechnical report (included in Appendix T) has considered the potential for salinity on the site and has concluded that:

The results of the chemical testing indicate that the sample tested had an estimated salinity of 210 mg/kg. The aggressivity results suggest that provided that surfaces of concrete or steel structures are protected by damp proof membranes, the exposure classification in AS3600 – 2009 and AS4100 – 2009 would be A1 and A respectively.

Therefore the building can be appropriately protected during construction from the potential impacts of salinity in the sites soil.

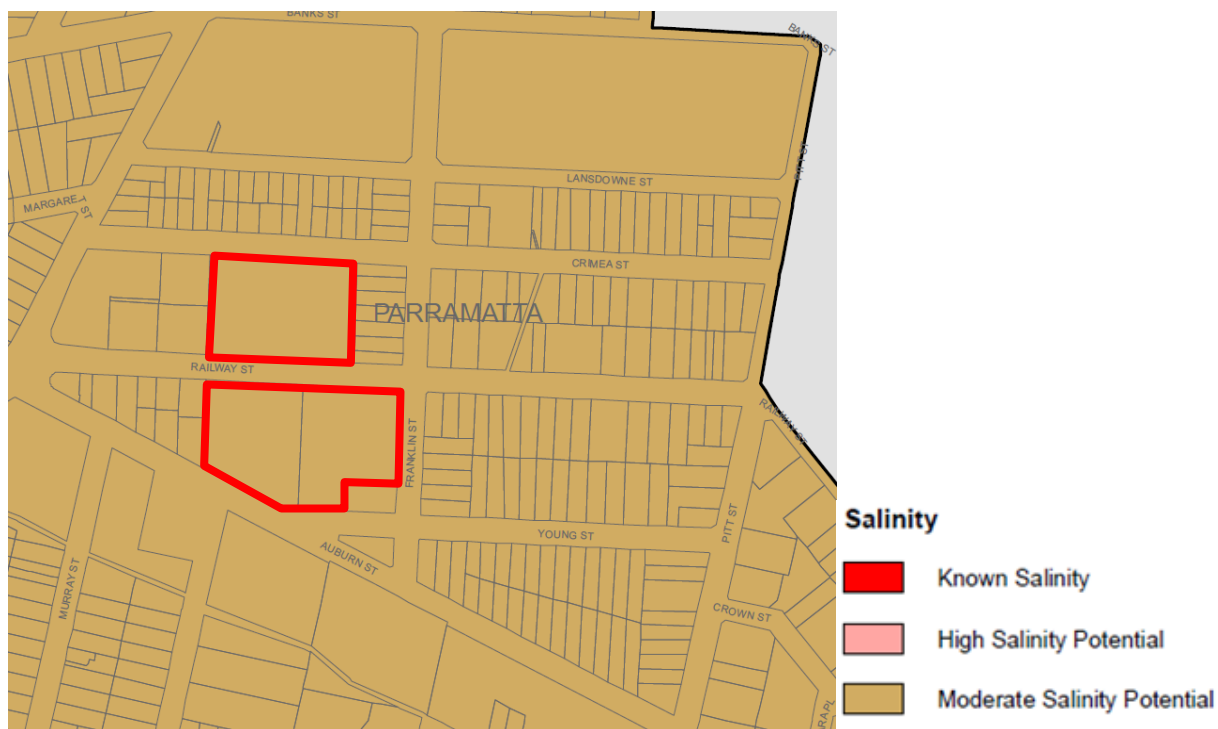


Figure 28: Extract from salinity map

Clause 7.10 Essential Services

The site can be serviced by water, electricity, sewage, communications, fire, vehicular access and stormwater management. Each service will be appropriately extended and upgraded for the new buildings. Various servicing reports have been prepared to show this and are included in Appendix I, J, Y and Z.

9.2 Holroyd Development Control Plan 2013

Clause 11(a) of State Environmental Planning Policy (State and Regional Development) 2011 excludes the application of development control plans. In addition, Clause 35(9) of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 states that the provisions of any development control plan are of no effect.

Notwithstanding this, the design will have regard for relevant aspects of the Holroyd DCP, included in Table 17 below.

There are no specific controls relating to educational establishments in the Holroyd Development Control Plan 2013.

Table 17: Assessment against Holroyd Development Control Plan 2013

DCP SECTION	COMMENT
Part A - General Controls	
Introduction	
Section 1. Subdivision	Not Applicable
Section 2. Roads and Access	No new roads or vehicular access to the sites are proposed. Any new kerb crossings or temporary crossings needed during construction will be provided in accordance with Council policies.
Section 3. Car Parking <i>Requirements:</i> <i>1 space per staff member</i> <i>1 space per 100 students for visitors</i> <i>Pick-up and Set-down area and bus bays.</i>	No additional off-street car parking is proposed to be provided as part of this application. A traffic impact assessment has addressed this issue and is included in Appendix H.
Section 4. Tree and Landscape works	Some trees are required to be removed as part of the proposed new works. These have been identified and considered in the Arborist Report included in Appendix F. To replace the trees to be removed, landscaping has been proposed in accordance with the plan included in the Appendix G.
Section 5. Biodiversity	A Biodiversity assessment has been prepared and is included in Appendix M. No adverse impacts on biodiversity will occur as a result of the proposed works. Further a waiver to the requirement for BDAR has been provided by OEH. Refer to Appendix EE for details.
Section 6. Soil Management	A sediment and erosion control plan has been prepared and is included in Appendix J with the civil plans and also as part of the preliminary construction management plan in Appendix K. A full geotechnical assessment of soils on the site, contamination and salinity have been prepared – refer to documents in Appendices Q and T. Soils have not been identified as acid sulfate soils. Appropriate measures have been recommended

DCP SECTION	COMMENT
	for the saline soils found on the site, as included in Section 9.1.3.
Section 7. Stormwater Management	A stormwater management plan has been prepared and is included in Appendix J.
Section 8. Flood Prone Land	The site is not within a flood prone area, however an overland flow assessment was undertaken and a flooding assessment completed. This shows the site is not subject to flooding, refer to Appendix S.
Section 9. Managing External Road Noise and Vibration	A noise and vibration assessment was undertaken that considered this issue. No adverse impacts are foreseen for the proposal nor for adjoining sites during construction. Refer to Appendix U.
Section 10. Safety and Security	A CPTED assessment has been prepared as part of the application. The proposal generally complies with the principles of CPTED. Refer to Appendix R.
Section 11. Waste Management	A waste management plan has been prepared that considers waste during demolition, construction and ongoing operation. Refer to Appendix E.
Section 12. Services	The site can be adequately serviced as detailed in sections 4.3.9 and 10.10.
Part B - Residential Controls	
Introduction	Noted
Section 1. General Residential Controls	These controls are generally more applicable to residential development, however the proposed building on the North site has been designed to ensure that the potential for impacts on the amenity and privacy of adjoining residents will be minimised. The building has been designed to fit with the character of the area and the surrounding development.
Section 2. Dwelling Houses and Secondary Dwellings	Not Applicable
Section 3. Dual Occupancy and Semi Detached Dwellings	Not Applicable
Section 4. Attached and Small Lot Housing	Not Applicable
Section 5. Multi Dwelling Housing	Not Applicable
Section 6. Residential Flat Buildings	Not Applicable
Section 7. Controls for Landlocked Sites	Not Applicable
Part C - Commercial, Shop Top Housing and Mixed Use Development Controls	Not Applicable
Part D - Industrial Controls	Not Applicable
Part E - Public Participation	Consultation has occurred as part of the preparation of this application and will occur during assessment. Refer to Section 11 for more details.
Part F - Advertising and Signage Controls	

DCP SECTION	COMMENT
Introduction	Noted – Detailed assessment under SEPP No 64 is included in Section 7.2.7 above.
Section 1. General Signage Controls	The proposed signage has been integrated into the new building and complies with the objectives and controls of this section.
Section 2. Signs in Residential Zones	The sign is permissible as part of the approved application for the expansion of the school. It will be integrated into the building design and will not be obtrusive to the surrounding residential area.
Section 3. Signs in Business Zones	Not Applicable
Section 4. Signs in Industrial Zones	Not Applicable
Section 5. Signs in Open Space and Infrastructure Zones	Not Applicable
Section 6. Special Provisions	Not Applicable
Section 7. Sign Specifications	As detailed above the sign has been integrated into the design of the building and generally complies with the provisions of a wall sign.
Part G - Places of Public Worship Controls	Not Applicable
Part H - Heritage and Conservation Controls	
Section 1. Development Requirements for Heritage Items	A heritage impact assessment has been prepared and is included in Appendix C. No significant impacts on the heritage value of the existing school is anticipated as part of the proposed development.
Section 2. Conservation and development works on Heritage Items	No works on actual heritage items are proposed. The works that are occurring on the same site as the historic buildings are mainly internal alterations and will not impact on the significance of the original buildings.
Section 3. Specific Development Controls for Heritage Conservation Areas	Not Applicable
Section 4. Specific controls for development in the vicinity of a heritage item	As detailed above a heritage impact assessment has been prepared and is included in Appendix C.
Section 5. Conservation Incentives	Not Applicable
Part I - Child Care Centre Controls	Not Applicable
Part J - Site Specific Controls	Not Applicable
Part K - Holroyd Gardens Controls	Not Applicable
Part L - Town Centre Controls	Not Applicable
Part M - Merrylands Centre Controls	Not Applicable
Part N - Transitway Station Precinct Controls	Not Applicable
Part O - Guildford Pipehead Site Controls	Not Applicable
Part P - Pemulwuy Residential Controls	Not Applicable
Part Q - Pemulwuy Northern Employment Lands Controls	Not Applicable
Part R - Tamplin Road Reserve	Not Applicable

9.3 Other Council Plans and Policies

This section considers other Council plans and policies that may be applicable to the proposed development.

9.3.1 City of Parramatta Council's Disability Inclusion Action Plan

The City of Parramatta Council's Disability Inclusion Action Plan (DIAP) outlines practical steps council will be taking over the next four years to create a more inclusive community for people with disability who are living in the Parramatta local government area.

There are four key focus areas included in the DIAP that were nominated by people with a disability as being of primary importance to the creation of an inclusive community, they include:

- *Developing positive community attitudes and behaviours*
- *Creating liveable communities*
- *Supporting access to meaningful employment*
- *Improving access to services through better systems and processes.*

To accompany these four focus areas, the Council has included several objectives, actions and outcomes they want to meet in relation to ensuring that new places are inclusive. As part of the proposal for Parramatta West Public School, an accessibility review was prepared by Morris Goding Accessibility Consulting that includes recommendations for how the new works can ensure they are accessible to all and inclusive. The review is included in Appendix V.

9.4 Contributions

The site is covered by the 'Holroyd Section 94 Development Contributions Plan 2013' (S94/7.11 Plan), even though the property is now located within the City of Parramatta. It should be noted that Section 94 is now Section 7.11 under the EP&A Act 1979 as recently amended.

The purpose of this S94/7.11 Plan is to:

- *ensure that adequate public amenities and services are provided to meet the demands of expected development in the Holroyd LGA;*
- *ensure that the existing community is not unreasonably burdened by the provision of public amenities and services required as a result of future development;*
- *demonstrate the relationship between the expected development and the demand for additional public amenities and services;*
- *authorise the Council or an accredited certifier to require a monetary contribution and/or dedication of land towards the provision, extension or augmentation of necessary public amenities and services to support the expected future development within the Holroyd LGA;*
- *to provide a schedule of local infrastructure works and expenditure to meet expected development demands;*
- *establish the basis for determining contribution rates for expected development and Council's strategy for the collection, expenditure, accounting and review of development contributions;*
- *enable the council to be both publicly and financially accountable in its assessment and administration of this development contributions plan.*

The S94/7.11 Plan does not include contributions for non-residential development outside of centres or specific locations. Therefore, there are no Section 7.11 contributions applicable to this development.

There is no specific Section 7.12 (previously Section 94A) Contributions plan for this area and subclause (1) of this section of the EP&A Act 1979 states:

- (1) *A consent authority may impose, as a condition of development consent, a requirement that the applicant pay a levy of the percentage, authorised by a contributions plan, of the proposed cost of carrying out the development.*

As there is no contributions plan that requires payment under this section of the Act, no contributions can be required as a condition of consent.

Crown Developments such as a school provide facilities that are a significant benefit for the public in terms of essential community services and employment opportunities. These activities are not likely to require public services and amenities in the same way as development undertaken with a commercial objective.

The NSW Department of Education is a government agency that relies on government funding to provide new and upgraded facilities for both the school community and the public generally. If a contribution had been required, this would divert a significant portion of public funds and may have impacted on the funds available for the alterations and additions to Parramatta West Public School. The proposed development of the school will provide additional infrastructure that will be able to be used by the community and take pressure of existing public facilities, including a multi-purpose hall.

As outlined in section 7.11, the enclosed correspondence from Hunt & Hunt Lawyers (refer Appendix O) confirms that the consent authority has no power to impose conditions (including conditions relating to monetary contributions) without the NSW Department of Education consent.

10 Environmental Impact Assessment

The following sections assess the likely impacts of the development in accordance with the SEARs and the relevant section of the EP&A Act 1979. Please note the SEARs requirements have been included in blue at the commencement of each section.

10.1 Built Form and Urban Design (SEAR 4)

- Address the height, density, bulk and scale, setbacks of the proposal in relation to the surrounding developments, topography, streetscape and any public open spaces.
- Address the impact of the development on the existing open space to the north of Railway Street.
- Address design quality, with specific consideration of the overall site layout, streetscape, open spaces, façade, rooftop, massing, setbacks, building articulation, heritage significance, materials, colours and Crime Prevention Through Environmental Design Principles.
- Provide details of any digital signage boards, including size, location and finishes.
- Demonstrate in consultation with and to the satisfaction of the Government Architect NSW that design excellence will be achieved in accordance with Schedule 4 Schools – design quality principles of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.
- Detail how services, including but not limited to waste management, loading zones, and mechanical plant are integrated into the design of the development.
- Detail how the existing mature trees along the peripheries and the street frontages can be retained and integrated with the landscape design.

10.1.1 Built Form, Density and Site Layout

The buildings on the North site have been located and designed to minimise impact on the local landscape, surrounding properties and at the same time enhance the amenity of the new and existing sites. To achieve this the proposed development has:

- Ensured the building height was kept to a minimum of 2 storeys along the boundary shared with residential neighbours, this along with the sloping roof away from the common boundary minimises the impact of overshadowing.
- Setback the building from the eastern boundary to enable most existing trees to be retained and additional landscaping to screen the building and improve the neighbouring amenity.
- Designed the façade along the eastern boundary with the use of screening and angled windows to ensure visual and acoustic privacy is maintained.
- The building connects through open spaces by ensuring there is a connection from the western open space and the central open space area through the hall.
- Included an administrative and staff area at the front entry to the building to ensure it is easily recognisable and create a sense of arrival.
- Ensured the southern façade of the new building reflects and does not detract from the heritage buildings opposite.

These design elements along with the information included in the Schedule 4 Design Statement (Appendix P) and the Heritage Impact Assessment (Appendix C) show that the building has been designed considering the surrounding environment and neighbouring elements.

10.1.2 Surrounding Open Space

The main element of surrounding open space is to the west of the North site, Burra Reserve. It is a Council managed reserve and provides an open space element for the residents and a green buffer between the church and ambulance station and the site of the proposed school building.

Presently the North site and the Burra Reserve read as a contiguous portion of open space, apart from internal fencing. Photograph 6 below shows Burra Reserve and the boundary fencing.



Photograph 6: Adjoining Burra Reserve

The location of the proposed building on the eastern portion of the North site will ensure that the western portion of the school site and Burra Reserve maintain the contiguous feel and buffer between the development in that area.

The landscaping plan in Appendix G shows how the site of the new building will be managed and improved, existing trees to be retained, new plantings and connections.

There will be limited impacts on the nearby open space as a result of the proposed development. During construction, a site compound will be established adjacent to Burra Reserve which will be managed to ensure any potential for impacts will be minimised. Refer to preliminary Construction Management Plan in Appendix K for details.

10.1.3 Design Quality & Excellence

A Design Statement has been prepared for the proposed development and is included in Appendix P. The building has been designed for the NSW Department of Education by architects Conrad Gargett. It includes the following design elements that create feeling of quality and excellence:

- *Creates dynamic edges with variation in the external material to create areas of light and shade and varying degrees of transparency.*
- *Includes an external colour palette that is complimentary to the existing buildings and context.*
- *Incorporates opportunities for activation with seating and learning areas at building edges and creating visual connections across the site.*
- *Sensitively incorporates services by concealing and integrating services wherever possible.*
- *Uses high quality and durable materials to avoid the need for maintenance and to maintain the aesthetic intent long term.*

The building has been well designed to ensure that it fits with the local area, residential and historic school development. The setbacks and low scale elements work together with the extensive landscaping to ensure design quality and excellence.

10.1.4 Signage

Signage is proposed to identify the school only and will be an integral part of the building. No digital signage board is proposed as part of this development. Refer to details in section 4.3.7 above.

Consideration of the signage has been undertaken in accordance with State and local policies and is compliant.

10.1.5 Visual Impact

The proposed building has been designed to fit within the streetscape and the school environment. Existing and proposed landscaping will be used to screen the school and adjoining residential development and minimise the impact of the building on the east and north and will frame the building entrance and linkage to open space to the south and west.

To minimise building height and to maximise design efficiency the proposed roof is monopitch at 5 degrees with lowest roof edges facing the Railway Street and the neighbours to the east. In addition, the building has been lowered from the Railway Street level by about 900mm on average. This along with the high roof edge facing the new courtyard to the north will ensure that the greater height will not be perceptible when viewed from the street.

Figures 16 and 31 show 3D images of the proposed building and its relationship to the surrounding development. The design and limited height of the building ensures that it has a good relationship with nearby development including the existing school on the opposite side of Railway Street. Refer also to the streetscape elevations in Appendix D.

10.1.6 Servicing

The servicing for the school has been outlined in Sections 4.3.9 and 10.10. All services and infrastructure can be provided to the new building within the existing limits and capabilities or with relatively minor augmentations.

10.1.7 Landscape Design

A detailed landscape plan has been prepared by Conrad Gargett for the North site and surrounding the new buildings. Refer Appendix G and an extract included in Figure 29 below.

The landscape design for the North site shows integration with the building design and the general philosophy includes:

- The main courtyard space provides connections between the main parts of the building as well as bringing in landscaping and greenery;
- Connections with the oval space proposed to be located to the west of the new building;
- The consolidation of the landscape buffer zone to the east aids in reducing the impact of the building on adjoining residential neighbours;
- The small gardens to the east create opportunities for small and controlled outdoor learning settings; and
- Accessible paths are seamlessly integrated into the landscape without the need for balustrades.

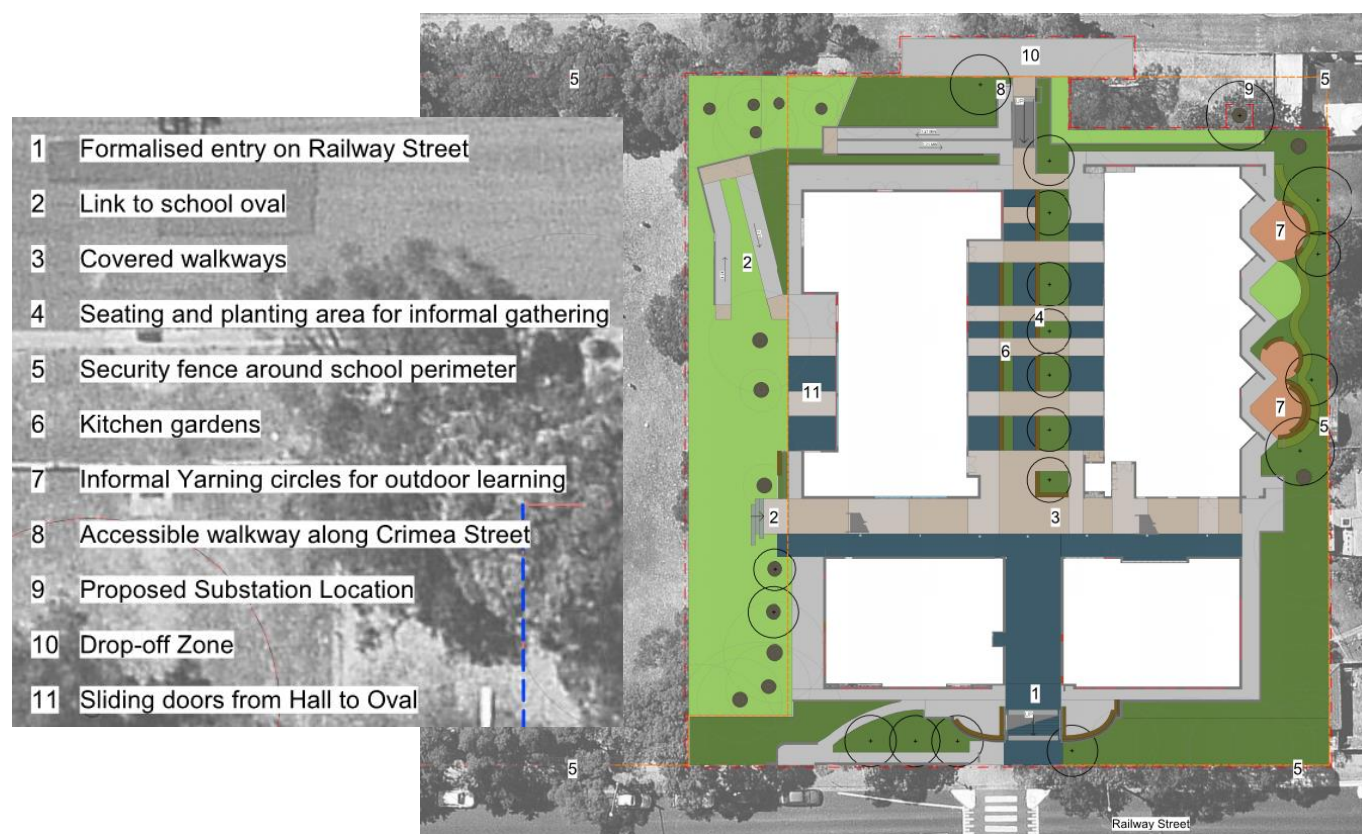


Figure 29: Extract from Landscape Plans

Figure 29 shows the main elements of the landscape master plan for the site as detailed above. It provides sufficient screening to the east and good connections to the open space and play areas to the west. It also provides outdoor learning areas for the children to enhance their learning and social experiences in an accessible environment.

10.2 Heritage (SEAR 5)

Address the impact of the proposal on the heritage significance of the site and the surrounding heritage items.

A heritage impact assessment (Appendix C) was prepared by Conrad Gargett as the South site is listed as a local heritage item with Holroyd LEP 2013. The assessment concluded as follows:

The heritage significance of the Parramatta West Public School would not be impacted by the proposed development work. As the new building is proposed on the north side of Railway Street the significance is retained. In addition no works have been proposed to the two significant heritage buildings (1887 building F and 1937 building E) at Parramatta West Public School. In addition to the new development on north side of Railway Street and after internal alterations to two existing non-significant school buildings (B and D) on the southern school site 20 new permanent teaching spaces would be provided in total.

By demolishing the cluster of 9 scattered demountable structures from the existing school site in favour of new building, the congestion around heritage buildings would be cleared and general settings would be improved. This would help in opening the views to and from the heritage buildings and will also improve circulation, landscape, open spaces and play areas across the school.

The overall streetscape character of Railway Street would not be impacted because new building is proposed on the other side of the street which would preserve the existing settings and views on

the school on south side. Planting new trees as part of landscape and retention of mature trees fronting both streets would help preserving the landscape character which would also soften views to the new buildings behind. Since the prelodgement meeting with the local council suggested the character of the proposed building fronting Railway Street was too "industrial" the windows have been adjusted to be more vertically proportioned and the brickwork has been given more visual texture to assist its compatibility with the heritage buildings on the southern side of Railway Street.

It is concluded that the proposed development on a significant local heritage place, Parramatta West Public School, NSW is consistent with guidelines and fulfils the objectives of the heritage conservation provided in Holroyd Local Environmental Plan (HLEP 2013) and Part H (Specific controls for development in the vicinity of a heritage item) on heritage conservation of Holroyd Development Control Plan 2013 (HDCP) and there is no major heritage issues preventing Cumberland City Council from approving this Development Application subject to the typical conditions of development consent.

Following from this report and assessment, it can be determined that the proposed new building will not have a significant adverse impact on the heritage significance of the original school buildings or their setting.

10.3 Environmental Amenity (SEAR 6)

- Detail amenity impacts including solar access, acoustic impacts, visual privacy (especially on the eastern side), view loss, overshadowing and wind impacts. A high level of environmental amenity for any surrounding residential land uses must be demonstrated
- Detail any proposed use of the school grounds out of school hours (including weekends) and any resultant amenity impacts on the immediate locality and proposed mitigation measures

10.3.1 Solar Access and Overshadowing

The proposed building on the North site has been designed with an increased setback, a sloped roof and limited height along the eastern boundary to ensure that adequate solar access would still be provided to the adjoining residences rear yards.

Shadow diagrams have been prepared and included with the architectural drawings in Appendix D. They show that there will be adequate solar access to the adjoining properties during 9am to 3pm on June 21. Extracts from the plans are included in Figure 30 below show that the neighbouring properties have sunlight for over 3 hours per day during the winter months and meet the requirements of Council.



9.00am Shadow – 21 June

No shadow of neighbours to the east, small shadow of front of school to south and open space areas to west and centre

**12.00noon Shadow – 21 June**

No shadow of neighbours to the east or open space areas, small shadow of front of school building to south

**3.00pm Shadow – 21 June**

Some shadow of neighbours to the east, shadow of front of school and open space area in centre only

Figure 30: Extract from Shadow Diagrams

10.3.2 Acoustic Impacts

The setback and design of the building elements along the eastern façade along with increased landscaping will provide an acoustic buffer to the nearby residences. In some cases, the noise during lunch and recess will be reduced due to the building mass. Currently the area on the North site is being used as a play space with no buffer provision apart from landscaping.

The area to the east of the building, between the residences and new building will have direct access from the home bases and can be used for supervised outdoor learning. As this is supervised, it is not anticipated that it will create any significant noise concerns for the residents.

An acoustic report has been prepared by Wood and Grieve Engineers that considers not only operational noise but also noise during construction. Refer to Appendix U. It concludes that the impacts on the nearby residents and noise receptors can be managed appropriately and will not have significant adverse impacts.

10.3.3 Visual Privacy

As detailed above, the building has been designed to ensure that the privacy of adjoining residents has been maintained through landscaping, screens and angle of the windows on the eastern façade. Specifically, the new facilities have been designed to minimise loss of privacy between the adjacent residences and the school through the following:

- The design of the façade along the shared boundary angles the teaching space windows away from the adjacent houses, maintaining privacy for both the school and the residential neighbours. Refer to sheet PW-01-SD-AR-DR-1502-C of the architectural plans included in Appendix D.

- The planning of the classrooms adjacent to the eastern boundary of the site (shared with residential neighbours) minimise the impact from large gatherings within the communal hall facility. The community hall facility is sited adjacent to the school oval.
- The planning of the internal classrooms along the eastern boundary is designed to have spaces for small group activities rather than larger gatherings of students at the outer edges of the rooms.
- Administration facilities along the shared neighbour's boundaries include small meeting areas and offices. Larger shared facilities for staff room and canteen are sited adjacent to the school oval.
- Deep planting setbacks, of over 7m are provided along the shared neighbour boundary to the east.

Therefore, no significant adverse impacts on the adjoining residents will result from the proposed school development.

10.3.4 View Impacts

The building on the North site is located on generally flat land and as such there are limited views that will be impacted. Notwithstanding this, there are a number of dwellings that have been looking onto an open space area that will have their immediate views impacted by a new building.

For the properties to the east, to ameliorate impacts, the building has been set back from the boundary (over 7m) to enable as many existing trees as possible to be retained and to provide adequate space for additional landscaping.

For the properties to the north, landscape elements and retention of as many trees as possible, will provide a buffer area and break up the façade. Further, on this boundary there will only be two smaller built elements and a courtyard space.

Figure 31 shows the setting of the building along Crimea Street and the limited height and sloping roof to reduce potential impacts on surrounding development, views and the streetscape.



Figure 31: View of Proposal from Crimea Street looking South East

Notwithstanding the above, to ensure view loss has been considered, the Land and Environment Court (LEC) view loss planning principle assessment was undertaken for the adjoining properties and is detailed below based on *Tenacity Consulting v Warringah [2004] NSWLEC 140*.

Step 1 – Assessment of views to be affected

Step 1: “The first step is the assessment of views to be affected. Water views are valued more highly than land views. Iconic views (e.g. of the Opera House, the Harbour Bridge or North Head) are valued more highly than views without icons. Whole views are valued more highly than partial views, e.g. a water view in which the interface between land and water is visible is more valuable than one in which it is obscured.”

The views from the residential properties are considered local filtered views of an existing school playing field and council reserve beyond. They would not be considered iconic views of water or the like but could be considered pleasant views of open space through trees. The aerial photograph in Figure 32 below provides an idea of the direction of the views and the extent of vegetation through which they are filtered.



Figure 32: Aerial photo showing location of views and constraints

Step 2 – Where are the views obtained from?

Step 2: “The second step is to consider from what part of the property the views are obtained. For example the protection of views across side boundaries is more difficult than the protection of views from front and rear boundaries. In addition, whether the view is enjoyed from a standing or sitting position may also be relevant. Sitting views are more difficult to protect than standing views. The expectation to retain side views and sitting views is often unrealistic.”

The existing dwellings along Franklin Street are mainly single storey, with one two storey dwelling. The views would be mainly from rear yards, verandahs or potentially second floor bedroom windows. Much of the potential for views however has been restricted due to the relatively large solid fence located along the boundary as can be seen in Photograph 7 below. Also as shown in the aerial photo in Figure

32 a number of the properties also have sheds or other structures along the fence line that would further restrict views.



Photograph 7: View of boundary fence (located in background) with school and adjoining houses

As the site is used as part of the school it is important not only to retain the privacy of the residents but also the privacy of the children playing, which is no less important and therefore the solid fencing was used. This provided for safety and privacy of the children but has restricted the views from the residences.

No formal assessment was undertaken from the dwellings, however due to the limited view available, this was not considered necessary at this point in the process.

Step 3 – Assessing extent of impact

Step 3: "The third step is to assess the extent of the impact. This should be done for the whole of the property, not just for the view that is affected. The impact on views from living areas is more significant than from bedrooms or service areas (though views from kitchens are highly valued because people spend so much time in them). The impact may be assessed quantitatively, but in many cases this can be meaningless. For example, it is unhelpful to say that the view loss is 20% if it includes one of the sails of the Opera House. It is usually more useful to assess the view loss qualitatively as negligible, minor, moderate, severe or devastating."

The majority of the filtered view will be lost, however there will still be a landscaped view of over 7m from the boundary to the building in the background. The rear fence of all the houses are approximately 1.8m, which would obscure much of the view in most cases from ground level and as only one property has a second floor, the impacts are minimal.

The proposal has included a significant landscape element along the western boundary to ensure the visual impacts of the development are minimised.

Step 4 – Assess reasonableness of proposal

Step 4: *"The fourth step is to assess the reasonableness of the proposal that is causing the impact. A development that complies with all planning controls would be considered more reasonable than one that breaches them. Where an impact on views arises as a result of non-compliance with one or more planning controls, even a moderate impact may be considered unreasonable. With a complying proposal, the question should be asked whether a more skilful design could provide the applicant with the same development potential and amenity and reduce the impact on the views of neighbours. If the answer to that question is no, then the view impact of a complying development would probably be considered acceptable and the view sharing reasonable."*

The proposed development is considered to be "reasonable" as the proposal complies with height along the boundary, includes increased setback of over 7m from the common boundary, complies with FSR and all other development controls.

Even with a compliant height over the entire building, the full view over the playing fields is unable to be retained, with any building to cater for the school requirements.

Therefore, considering the following:

- The views of the sporting fields, although pleasant are not iconic;
- The proposed development complies with height along the boundary;
- The existing fencing along the boundary is at least 1.8m in height and solid in construction;
- The majority of the existing dwellings are single storey and would only have views of trees, many of which are being retained or replacements planted; and
- Significant landscaping is proposed along the boundary within the setback of more than 7m;

It is unlikely that there will be significant adverse impacts from loss of views of the adjoining dwellings to the east.

10.3.5 Out of Hours Impacts

The existing school is being used for out of school hours care from Monday to Friday and also for other community uses during the week and on weekends. The extent of this usage is detailed in Section 4.3.8 above.

These community uses will continue and some will be relocated from the existing South site to the North site and some will remain in their current location. The acoustic report included in Appendix U included the following recommendations for out of school hours events and uses:

- The hall should not be operated beyond 10pm such as to reduce the risk of sleep disturbance to surrounding residences; and
- Concerts should be restricted to operation during the day time, no later than 6pm, to reduce any potential noise impacts.

As long as these limitations are placed on out of school hours activities the adverse impacts will be minimised and residents and other noise receptors will not be impacted.

10.3.6 Wind Impacts

The proposal is for a two (2) storey building within an existing residential area that includes the school, a church, child care centre, small reserve / park and other small-scale commercial / community development. The site and surrounds are extensively landscaped with trees and shrubbery. Given the siting of the proposed school, the surrounding low scale 1-2 storey development and considerable distance / space between buildings on this and adjacent sites, it is considered that this development will not result in any discomfort of pedestrians or residents from potential wind impacts created by the built form in the area, such as wind tunnelling or the like.

10.4 Transport and Accessibility (SEAR 7)

Include a transport and accessibility impact assessment, which details, but not limited to the following:

- accurate details of the current daily and peak hour vehicle, public transport, pedestrian and cycle movement and existing traffic and transport facilities provided on the road network located adjacent to the proposed development;
- an assessment of the operation of existing and future transport networks including public transport networks, and their ability to accommodate existing trips and the forecast number of trips to and from the development;
- details of estimated total daily and peak hour trips generated by the proposal, including vehicle, public transport, pedestrian and bicycle trips based on surveys of the existing and similar schools within the local area;
- the adequacy of public transport, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand of the proposed development;
- the impact of the proposed development on existing and future public transport infrastructure within the vicinity of the site in consultation with Council, Roads and Maritime Services and Transport for NSW and identify measures to integrate the development with the transport network;
- the identification of infrastructure required to ameliorate any impacts on traffic efficiency and road safety impacts associated with the proposed development, including details on improvements required to affected intersections;
- details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan and the provision of facilities to increase the non-car mode share for travel to and from the site;
- the impact of trips generated by the development on nearby intersections, with consideration of the cumulative impacts from other approved developments in the vicinity, and the need/associated funding for, and details of, upgrades or road improvement works, if required. Traffic modelling is to be undertaken using SIDRA network modelling for current and future years;
- the proposed walking and cycling access arrangements and connections to public transport services;
- details of any proposed school bus routes along bus capable roads (i.e. travel lanes of 3.5 m minimum) and infrastructure (bus stops, bus layovers etc.);
- the proposed access arrangements, including car and bus pick-up/drop-off facilities, and measures to mitigate any associated traffic impacts and impacts on public transport, pedestrian and bicycle networks, including pedestrian crossings and refuges and speed control devices and zones;
- measures to maintain road and personal safety in line with CPTED principles;
- proposed bicycle parking provision, including end of trip facilities, in secure, convenient, accessible areas close to main entries incorporating lighting and passive surveillance;
- proposed number of on-site car parking spaces for teaching staff and visitors and corresponding compliance with existing parking codes and justification for the level of car parking provided on-site;
- an assessment of the cumulative on-street parking impacts of cars and bus pick-up/drop-off, staff parking and any other parking demands associated with the existing and proposed development;
- details of emergency vehicle access arrangements;
- an assessment of road and pedestrian safety adjacent to the proposed development and the details of required road safety measures to minimise the risk of vehicle-pedestrian crashes;
- details of measures to prevent or minimise the need for students to cross Railway Street throughout the school day;
- service vehicle access, delivery and loading arrangements and estimated service vehicle movements (including vehicle type and the likely arrival and departure times);
- proposed management of construction traffic impacts, detailed within a draft Construction Traffic Management Plan, including:
 - assessment of cumulative impacts associated with other construction activities (if any);

- an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity;
- details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process;
- details of anticipated peak hour and daily construction vehicle movements to and from the site;
- details of on-site car parking and access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle;
- details of temporary cycling and pedestrian access during construction; and
- traffic and transport impacts during construction, including cumulative impacts associated with other construction activities, and how these impacts will be mitigated for any associated traffic, pedestrian, cyclists, parking and public transport.

A transport assessment has been prepared by ARUP which considered the above requirements of the SEARs and relevant State and local policies and legislation. The report is included in Appendix H and concluded that:

A traffic and transport assessment has been carried out for the proposed school upgrades. The school had 766 students enrolled in 2017, and a total of 49 staff (including 10 non-teaching staff). The proposed upgrades provide new learning areas to cater for 961 students and 52 staff. Key findings of the report are:

- The new school will be developed north of the existing school along Railway Street. Connectivity between the existing school in the south and new school in the north will be through the existing raised zebra crossing across Railway Street.
- The school is located outside of a recommended walking catchment from the nearest train stations. Four different bus routes serve the school.
- School bus 9402 services the school in the morning, with 20 students being dropped off at the bus zone along Railway Street. School bus 9574 services the school in the afternoon, with 20 students being picked up at the bus zone along Railway Street.
- There are currently no staff parking spaces on the site as a result of demountable school buildings taking up the staff car parking area. There is parking available on street for staff parking which does not impact on adjacent residents.
- A total of 90 additional vehicles (from additional staff and students) are estimated to be generated by the completion of the school.
- Given the permeable spread and local nature of the traffic, the additional traffic generated will not adversely affect the surrounding road network. Local traffic along Franklin Street, Young Street, Railway Street and Auburn Street will become slightly busier as a result of the completion of the school.
- In general, the existing pick-up arrangement was found to be disorganised with improper driver behaviour observed such as 3-point turns along Railway Street and Franklin Street, in order to exit to the collector roads of Pitt Street and Burnett Street. Vehicle movements were found to be busy with double parking observed along Franklin Street, making the overall school environment less safe than desired.
- The following priorities should be introduced to control on-street parking:
 - Utilise kerbside along the school frontages for drop-off and pick-up activity with appropriate signage
 - Encourage staff parking to occur along Auburn Street where there is capacity for all day car parking without impacting on local residents
 - Educating parents of proper drop-off and driving behaviours
 - Enforcement through traffic wardens, penalties and signs
- The existing pedestrian crossing in Railway Street will be upgraded with the installation of pedestrian fencing.
- A new pedestrian crossing of Franklin Street has been proposed but is awaiting a Roads and Maritime funding grant.

To accompany this report a Green Travel Plan has also been prepared and is included in Appendix FF. The assessment includes details of how the SEARs requirements have been considered and included in the report.

Below are an overview of the main traffic and accessibility issues and how they have been considered and assessed.

10.4.1 Parking

The existing school car park for staff is currently covered by demountable classrooms that are needed to cater for the student population. Staff are therefore utilising on-street parking in the surrounding streets. Until it can be determined that the demountables are no longer required, the eleven (11) additional staff vehicles that are estimated could easily be accommodated on-street, especially Auburn Street which is currently underutilised.

In addition, a green travel plan has been prepared (Appendix FF) which includes solutions for reducing the potential impacts of staff parking such as staff carpool, encourage public transport use and encourage active transport use through the provision of bicycle parking and shower facilities.

Based on the above there will not be significant adverse impacts from the proposed alterations to the school on parking in the local area.

10.4.2 Traffic Generation

The Transport Assessment prepared by ARUP (Appendix H) includes details of the impact of the proposal and the future traffic generation. The assessment confirmed that a total of 90 additional vehicles to the school are anticipated during the morning peak which was identified as the busiest school period.

The school is accessible from a variety of collector roads and has a permeable road network surrounding the site. This permeable spread of traffic ensures that the additional movements will not adversely impact on the surrounding road network. Due to the relatively low generation numbers and number of under-utilised intersections, SIDRA modelling has only been used for the Railway / Pitt Street intersection. This modelling shows that the proposed school upgrade will only have a minimal impact on the performance of the surrounding road network and this intersection will continue to operate with an acceptable level of service with only moderate delays.

10.4.3 Drop off and Pick Up

Drop-off continues over approximately an hour period, however this coincides with the commuter peak so is therefore considered the busiest period with the most additional vehicle movements. The pick-up on the contrary, occurs for a short period of 20 minutes, but has a lesser impact as it does not coincide with a commuter peak period.

Currently both the drop-off and pick-up arrangements are disorganised and potentially unsafe. Therefore, the transport assessment recommends that a designated drop-off and pick-up location with appropriate enforcement is needed for the school to function efficiently. The assessment recommends appropriate controls in conjunction with an education and enforcement program to make the drop-off and pick-up process run more efficiently and effectively and reduce impacts on the immediate streets. The additional North Site will assist in that the pick-up and drop-off points will be able to be separated based on two campuses, rather than a single campus.

10.4.4 Public Transport

The existing public transport network is primarily bus-based, with the closest train station being 1.5-2km from the school, which is outside of the recommended walking catchment for a school. Five different bus routes are located near the school and two school buses service the school in the morning and afternoon along Railway Street.

The green transport plan also includes encouraging students to shift away from private vehicle use and look at public transport or active transport options.

10.4.5 Construction Traffic

Details of construction traffic and management measures have been included in the transport assessment and have also been included in the preliminary construction management plan (CMP) (Appendix K). The plan includes details of construction vehicles, routes of travel, parking and access arrangements, pedestrian management, consultation requirements and measures to ameliorate any impacts.

The preliminary CMP will be finalised when a contractor has been employed to undertake the construction and will include these measures and any additional included as conditions of development consent.

10.5 Ecologically Sustainable Development (SEAR 8)

- *Detail how ESD principles will be incorporated in the design and ongoing operation phases of the development.*
- *Demonstrate that the development has been assessed against a suitably accredited rating scheme to meet industry best practice.*
- *Detail measures to implement water sensitive urban design (WSUD) principles, including stormwater harvesting, storage and re-use.*
- *Detail measures to minimise consumption of energy generated from non-renewable sources and to implement effective energy efficiency measures.*

A report on Ecologically Sustainable Development (ESD) and its use within the proposed Parramatta West Public School was prepared by Wood and Grieve Engineers. Refer to Appendix N. The school has incorporated a number of ESD initiatives including a self-assessed Green Star Design and As Built v1.2 Rating which complement the initiatives undertaken to reduce the greenhouse gas emissions, potable water consumption, minimising waste, improved indoor environment and material resources of the site.

Below is a summary of the ESD initiatives from the report in Appendix N.

The development's commitment to reducing the overall environmental impact is evident of the holistic approach taken to long-term sustainability. Documented initiatives cover a range of categories including:

- *Energy & greenhouse gas emissions reduction*
 - *Use of on-site Renewable Energy (Photovoltaic solar system)*
 - *Efficient lighting e.g. LEDs*
 - *Daylight and motion sensors for lighting*
 - *Architectural shading devices*
 - *Minimisation of conditioned spaces*
 - *Operable windows (where acoustics allow)*
- *Potable water reduction*
 - *Water efficient fixtures and fittings.*

- Water monitoring systems, which can identify leaks and amend losses before greater loss occurs.
 - Rainwater collection and reuse.
- Minimising waste to landfill
- The indoor environment
 - Acoustic comfort will be optimised to ensure building appropriate internal noise and reverberation levels are achieved in accordance with best practice standards.
 - Material Selections will focus on reducing volatile organic compounds (VOC) levels and minimise formaldehyde impacts.
 - Natural Cross Ventilation through the installation of operable louvres, this will improve thermal comfort of students and reduce energy consumption related to the HVAC system.
- Occupant amenity and comfort
 - Outdoor covered walkways which offer a connection to nature that indoor corridors cannot provide, and are a less carbon intensive option than indoor conditioned corridors.
 - Access to quality views
 - Thermal comfort is provided in line with the expectations for schools under the EFSG, while maintaining energy efficiency throughout the design.
 - Artificial Lighting Design will ensure the optimum lighting comfort is achieved.
- Emissions
- Building management
 - Waste provisions – appropriate waste provisions are to be included within the project to ensure recycling rates & reduced waste to landfill is optimised.
 - Building Commissioning & Tuning Procedures.

The ESD report identifies how these principles will be incorporated into the design and ongoing operation of the proposed development as required under the EP&A Regulation as shown below:

- The Precautionary Principle – The proposal does not present any threat of serious or irreversible environmental damage, and therefore in this regard, the precautionary principle does not need to be exercised in regard to the proposed works.
- Inter-Generational Equity – The ESD initiatives detailed above and associated environmental outcomes through architectural and engineering design will ensure that the health, diversity and productivity of the environment are maintained and enhanced for the benefit of future generations.
- Conservation of Biological Diversity and Ecological Integrity – The site does not present any issues of biological diversity or ecological integrity as the land has been cleared and modified over time and as such no external impacts are identified.
- Improved Valuation, Pricing and Incentive Mechanisms – All up front and ongoing costs associated with the environmental performance of the proposed development have been considered in the design of the proposal and are considered reasonable and acceptable.

10.6 Social Impacts (SEAR 9)

Include an assessment of the social consequences of the schools' relative location and decanting activities if proposed

A social impact assessment (SIA) was prepared by Barker Ryan Stewart and is included in Appendix W. The SIA concluded that:

This Social Impact report has been prepared to assess the potential social impact that may flow from the redevelopment of the Parramatta West Public School.

The report identified that whilst the development will have some minor negative impacts, they have been mitigated through design and additional community benefits evident in an increase to student size.

It can be concluded that the proposal will:

- Provide increased access to educational facilities through an additional 107 student positions at the school;*
- Improve the visual amenity of the existing buildings which are characterised by older brick and demountable buildings;*
- Create safe public and private areas via the adoption of CPTED principles;*
- Generate economic benefits by creating employment opportunities during the construction, cleaning / maintenance, and ongoing teacher operation phases.*

Overall it is considered that the proposal will generate positive ongoing social impacts.

In addition, further positive impacts are that the school will provide additional resources for community use such as the new school hall, it has been designed for accessibility in all areas, and the school is located close to residential areas, services and transport.

The minor negative impacts identified in the SIA include:

- Potential for overshadowing and privacy impacts,
- Potential for impacts on heritage buildings,
- Minor impacts on school timetable, access and use during construction,
- Increased pressure from population on school infrastructure,
- Perceived increase in traffic near the school, and
- Removal of small number of trees on the North site.

All of these impacts have and/or can be mitigated by the following:

- Design solutions such as increased setbacks and window direction and design elements to ensure any impacts on the heritage buildings is minimised,
- Implementation of a construction management plan like the preliminary plan included in Appendix K,
- Management of the school population across Parramatta region schools by the NSW Department of Education,
- The traffic assessment prepared for this proposal does not show a significant increase in traffic as a result of the proposed school additions, however the report does recommend appropriate and additional traffic management measures to ensure traffic near and access to the school during and after construction is managed appropriately and any impacts minimised, and
- Planting of replacement trees and vegetation on the site in accordance with the landscape plans included in Appendix G.

Therefore, although there are some negative impacts of the proposal, the positive impacts and follow on employment, economic and education benefits outweigh them.

10.7 Noise and Vibration (SEAR 10)

- *Identify and provide a quantitative assessment of the impacts of the main noise and vibration generating sources on the sensitive receivers (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) during demolition, site preparation, bulk excavation, construction and operation, including consideration of any public address system, school bell, mechanical services (e.g. air conditioning plant), waste storage facility locations, time restrictions on grounds maintenance powered equipment, time restrictions on waste*

collection services, use of any school hall for concerts etc. (both during and outside school hours) and any out of hours community use of school facilities.

- Outline feasible and reasonable measures to minimise and mitigate the potential construction and operational noise impacts (including explicit evaluation of the need to install physical noise barriers and impose time restrictions on the use of the facilities proposed to be available for community use) on surrounding occupiers of land, the users of the site and the nearby Orthodox Church.

As detailed above, a Noise and Vibration assessment has been prepared by Wood and Grieve Engineers and is included in Appendix U. This included assessment of the noise from the site both during and after construction. The report concluded that:

An acoustic assessment for the proposed redevelopment/expansion to the Parramatta West Public School has been conducted. This document forms part of the documentation package to be submitted to the Department of Planning as part of the SSD application.

This report has provided criteria, in-principle treatment and design requirements, which aim to achieve the statutory criteria as discussed in the report. In terms of noise criteria, the following have been provided:

- Internal noise levels in accordance with City of Parramatta Council and the Educational Facilities Standards & Guidelines
- Noise criteria for emissions from the development
- Construction noise criteria
- Construction vibration criteria

An operational noise assessment has been conducted for the Hall and the upgrade to the existing buildings at the school site. This includes predicted operation as a communal facility and holding a concert. A construction noise and vibration assessment has also been conducted and recommendations made.

Glazing for any new educational facilities has been designed in accordance with the EFSG and the SEPP Infrastructure based on external noise levels. The external glazing and façade elements to the Hall should be designed such as to control noise emissions to surrounding receivers.

The facilities are proposed to be naturally ventilated, however a maximum sound power level has been proposed for condenser units in the event that they are required. This level should be reviewed when more information is known regarding proposed location, in order to determine if any acoustic treatment is required.

An assessment as to whether windows can be open to achieve natural ventilation in accordance with the DoP Interim Guideline has been conducted. Facilities at the existing school site can achieve natural ventilation based on the criteria from the DoP Guideline. Specific details on the requirements of the Hall have been provided in Section 5.2.

Even though no assessment can be considered as being thorough enough to preclude all potential environmental impacts, having given regard to the above listed conclusions, it is the finding of this assessment that the development application should not be refused on the grounds of excessive noise generation.

The information presented in this report shall be reviewed if any modifications to the features of the development specified in this report occur, including and not restricted to selection of air-conditioning units, layout of equipment, modifications to the building and introduction of any additional noise sources.

The report includes techniques to manage noise during construction through appropriate positioning of equipment and screening as shown in Figure 33. Specific recommendation for construction works out of standard working hours are also included.

It also includes details of operational noise and recommendations for managing the school address system, traffic noise, maintenance equipment, waste collection, hall operation and general student noise. Appropriate measures have been included to mitigate noise generated during normal school operations.



Figure 33: Extract from acoustic assessment showing screens during construction

10.8 Sediment, Erosion and Dust Controls (SEAR 11)

Detail measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles and impact on air quality.

A sediment and erosion control plan has been prepared by Adams Consulting Engineers with the civil plans in Appendix J and is also part of the preliminary Construction Management Plan included in Appendix K. The measures included in these plans include the following:

- Ensure stabilised site access is provided;
- Install sediment fences around any stockpiles on downstream side and ensure stockpiles are covered when not in use;
- Install and maintain site security fencing;
- Install temporary sediment basin to collect surface flows, including appropriate testing to ensure any stormwater meets the Council and EPA requirements;
- Install and maintain erosion and sediment fencing surrounding the construction site;
- Install and maintain mesh and gravel filters to any downstream stormwater pits;
- Installation of silt arrestors to collect site runoff and retain suspended particles; and

- Use of dust control measures which includes covering stockpiles, maintaining site fences and watering exposed areas.

The construction manager appointment will need to ensure these controls and any additional measures that are considered needed for the site are implemented appropriately. These recommendations for the control of sediment and erosion during construction are considered appropriate for this development.

10.9 Contamination (SEAR 12)

- Assess and quantify any soil and groundwater contamination including potential fill material underlying the existing sports fields (i.e. section of the development site North of Railway Street) and demonstrate that the site is suitable for the proposed use in accordance with SEPP 55.
- Undertake a hazardous materials survey of all existing structures and infrastructure prior to any demolition or site preparation works.

A contamination report has been prepared that looked at the history of uses on the North site and tested for any contaminants. A detailed site assessment has been prepared by Environmental Investigation Services (EIS) and is included in Appendix Q. The report concluded that:

The DSI included a review of existing reports, a supplementary site history assessment, soil sampling from 42 locations and groundwater sampling from one monitoring well. The historical assessment identified that the site has most likely been vacant and utilised as a recreational area for a school from around the 1930s. Re-contouring and levelling of the site occurred around the 1970s and it appears that fill was imported from off-site areas to facilitate this.

The investigation identified fill across the site that was impacted by building and demolition waste, including brick, concrete and glass fragments. Slag and ash were also identified in fill. The deepest fill (>1.0m) was typically in the western area of the site near the sewer alignment, and in the northern areas. This was expected based on the topography, however it is noted that the fill depths encountered by EIS were significantly less than those logged by the previous consultant who investigated the eastern area of the site.

The DSI indicated that potential risks associated with BTEX, pesticides, heavy metals (other than lead) and PCBs are unlikely to be significant as these CoPC were not identified at concentrations above the SAC or at concentrations that would warrant further consideration and assessment of risk. Lead, asbestos (as bonded ACM), carcinogenic PAHs and TRH (F3) were identified during the DSI at concentrations above the SAC. Further risk assessment of these compounds indicated that remediation is required to address risks associated with carcinogenic PAHs at one location (TP32) and asbestos (as bonded ACM) in fill across the entire site. A remediation action plan (RAP) should be prepared and submitted to facilitate the remediation.

Following this recommendation, a Remediation Action Plan has been prepared and is included in Appendix CC and concludes the following:

EIS are of the opinion that the site can be made suitable for the proposed development described in Section 1.1 provided this RAP is implemented accordingly. A site validation report and EMP should be prepared on completion of remediation activities and should be submitted to the consent authority.

The proposed remediation strategy includes the following:

The proposed remediation strategy includes excavation and off-site disposal of a localised area of fill impacted by PAHs and capping the site to address the potential risks associated with asbestos. An Environmental Management Plan (EMP) will be required to maintain the integrity of the cap so that risks associated with the asbestos remain low and acceptable.

Assessment will need to confirm whether these remediation works require further development approval.

Environmental Investigation Services also included recommendations to mitigate risks associated with the findings until remediation could be undertaken of the site. They also concluded that:

EIS are of the opinion that notification of site contamination to the EPA under the NSW EPA Guidelines on the Duty to Report Contamination under Section 60 of the CLM Act 1997 (2015) is not currently required based on the findings of this DSI.

Following the appropriate remediation works and the issue of a validation report, the site will be suitable for use as the school and no further works will be required.

10.10 Utilities (SEAR 13)

- Prepare an Infrastructure Management Plan in consultation with relevant agencies, detailing information on the existing capacity and any augmentation, protection of stormwater assets and easement requirements of the development for the provision of utilities including staging of infrastructure.
- Provide details of demands and satisfactory servicing arrangements for drinking water, waste water and recycled water.
- Prepare an Integrated Water Cycle Management Plan detailing any proposed alternative water supplies, proposed end uses of potable and non-potable water, water sensitive urban design and water conservation measures.

Section 4.3.9 above discusses the servicing of the site and how the development impacts on the infrastructure in the area.

An Integrated Water and Waste Water Management Plan was prepared by Waterman AHW and indicated that there is sufficient capacity in the water and sewer services to cater for the proposed development. The Sydney Water sewer main is approximately 30m from the proposed building, there is also an existing water main along Crimea Street. The development can be connected to both these services. This is included in Appendix I.

WSP have prepared a report in relation to electricity and communications infrastructure which confirms the augmentation required for both services. Endeavour Energy advised WSP that a new substation is required, including level 3 design. A new NBN connection is required for communications for the new building and is currently available within the street. Refer to the Power and Communications Infrastructure Report in Appendix Z.

Fire services have been considered in an Integrated Fire Services Management Plan prepared by Waterman AHW Pty Ltd and included in Appendix Y. The report confirms the upgraded hydrant and associated infrastructure required for the proposed school expansion including a 100mm brigade booster assembly.

The site is serviced by both Council and private waste contractors, a private contractor for general waste and Council for recycling. A waste management plan has been prepared by Barker Ryan Stewart and is included in Appendix E which details the waste requirements for demolition, construction and ongoing operation. Details included in Section 10.14.

A stormwater management plan has been prepared by Adams Consulting Engineers and is included with the civil plans in Appendix J. This plan indicated that there is sufficient capacity in the stormwater system, with the use of rainwater tanks and on-site detention to take the flow from the site. Full details are included in Section 10.12 below.

10.11 Contributions (SEAR 14)

Address Council's Section 94 Contribution Plan and/or details of any Voluntary Planning Agreement, which may be required to be amended because of the proposed development.

Details of contributions are included in Section 9.4 above. No contributions are applicable in the Holroyd or City of Parramatta contribution plans.

10.12 Drainage and Water Quality (SEAR 15)

Detail drainage associated with the proposal, including stormwater and drainage infrastructure, measures to minimise operational water quality impacts on surface waters and groundwater including the following:

- On-site detention (OSD) or above ground OSD designed in accordance with the Upper Parramatta River Catchment Trust Handbook – Editions 3 or 4; and
- WSUD elements designed in conjunction with OSD and/or OSR (On Site Retention) systems and integrated with the landscape design in the form of bio-swales, bioretention and similar landscape elements (in lieu of the end of pipe' proprietary treatment devices).

A stormwater management plan has been prepared by Adams Consulting Engineers and is included in Appendix J with the civil plans. It concluded as follows:

A stormwater management strategy has been developed in accordance with Part 3 of Council DCP. The stormwater management strategy will include the implementation of first flush devices, rainwater harvesting tanks, on-site detention tank and stormwater360 cartridges and trash screens.

Concept modelling on the effectiveness of the above stormwater treatment devices on the management of stormwater across the site has been undertaken using the On-site Detention Calculation sheet for Upper Parramatta River Catchment HED Secondary Outlet spreadsheet and MUSIC software package. The modelling results have demonstrated that the above treatment devices are effective at reducing the total pollutant loads, peak flows and total volume of flows generated across the proposed site in accordance with Council's requirements.

A stormwater treatment train has been developed to manage the discharge of pollutants from the site. The treatment train includes the implantation of two (2) 5kL rainwater tank to capture and reuse stormwater runoff generated across the roof of the proposed multi-storey buildings.

Overall, Adams are generally satisfied that the stormwater runoff generated across the proposed development can be appropriately managed. We are of the opinion that the proposed stormwater management strategy can effectively manage stormwater runoff to ensure that under proposed conditions, the development will not result in an increase in pollutants or stormwater flows and results in any negative impacts to receiving waterways or downstream infrastructure.

As detailed above, on-site detention (OSD) has been incorporated into the stormwater and drainage infrastructure design of Parramatta West Public School. OSD was chosen due to its ability to be underground, hidden out of sight and hard to tamper with. Due to the proposed development being located part of a primary school the use of above ground landscape elements is not as appropriate from a safety viewpoint and thus have not been incorporated into the design.

Water Sensitive Urban Design (WSUD) has been incorporated into the overall stormwater and drainage infrastructure design through the incorporation of two (2) 5kL rainwater reuse tanks. The water is harvested from the roof during storm events thus reducing the amount of water leaving the site and lowering the water requirements of the school.

10.13 Flooding (SEAR 16)

Conduct a stormwater overland flow study determining the extent of the flow path and flood characteristics for the overland flow path affecting a 1050mm drainage line adjoining the western boundary of the site and associated former natural watercourse.

An overland flow / flood assessment has been prepared by Lyall and Associates and is included in Appendix S. This assessment concludes that:

Based on the findings of the investigation, flooding does not pose a constraint on the proposed alterations and additions to the school as the new building is located on land which lies outside the extent of the PMF event.

No design changes have been made to the development in this regard and no adverse impacts are anticipated as a result of the development.

10.14 Waste (SEAR 17)

Identify, quantify and classify the likely waste streams to be generated during construction and operation and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site.

A waste management plan has been prepared by Barker Ryan Stewart in consultation with the school. The plan is included in Appendix E and details the management of waste on the site during demolition, construction and ongoing operation of the school. The site is capable of managing the existing and proposed waste through the proposed recommendations for additional bins and services. It is anticipated that a weekly recycling service will be required and a tri-weekly general waste service. Green waste will be reused on site where possible or taken offsite by the contractor.

A preliminary construction management plan has been prepared by Adams Consulting Engineers and is included in Appendix K. This plan details the location of the construction compound and storage areas for materials and waste prior to being used and / or collected. Any demolition and green waste will be either reused on site or transferred to a recycling or waste facility. Construction waste will also be transferred to a recycling or waste facility or returned to supplier as required.

During collection of the waste no roads will be blocked or restricted and no adverse impacts on residents are anticipated.

10.15 Construction Hours (SEAR 18)

Identify proposed construction hours and provide details of the instances where it is expected that works will be required to be carried out outside the standard construction hours.

The proposed hours of operation are between 7.00am and 6.00pm on Monday to Fridays inclusive, and 8.00am to 5.00pm on Saturday. No work is to be carried out on Sunday or public holidays.

At this stage it is not anticipated that work will be required to be carried out outside of these times. If required appropriate management measures will be undertaken in accordance with the preliminary Construction Management Plan included in Appendix K.

To ensure there are no adverse impacts outside of the standard construction hours, noise management criteria were included in the Acoustic assessment included in Appendix U.

10.16 Biodiversity (SEAR 19)

Biodiversity impacts related to the proposal and the preparation of a Biodiversity Assessment are to be addressed in accordance with the requirements of the Biodiversity Conservation Act 2016.

A biodiversity assessment was undertaken by Molino Stewart Environment and Natural Hazards and is included in Appendix M. The report concludes the proposed school alterations and additions would not have a significant impact on the biodiversity values of the site and provided the mitigation measures include in the report are implemented, ecological impacts are likely to be minimal. The report went on to provide the following:

Overall, the removal of 38 planted native and exotic trees from the site is not likely to have a significant impact on the biodiversity values of the site considering the highly modified nature of the site with substantial areas of open space and surrounding planted trees. There is no evidence of remnant vegetation present on the site, with all trees and shrubs comprising native and exotic planted vegetation. There will be retention and protection of canopy on the west of the site and the remaining trees will be protected during site works. No work will be undertaken at night thereby not disturbing any native fauna that may use the site for foraging.

The biodiversity impacts are not significant based on the Biodiversity Assessment and a BDAR is not required due to the following:

- *The proposed development activity is unlikely to have a 'significant impact' on any threatened species, threatened populations or endangered ecological communities listed under the tests under Section 7.3 of the NSW Biodiversity Conservation Act 2016 or the Commonwealth Environment Protection and Biodiversity Conservation Act 1999.*
- *It does not exceed the biodiversity offsets scheme threshold as
 - *no areas within the site are mapped as having 'high biodiversity value' as identified on the NSW Biodiversity Values Map; and*
 - *vegetation clearing on the site will not exceed the native vegetation clearing thresholds identified in the Biodiversity Assessment Method as the site is not remnant vegetation and the clearing is less than 0.25ha for the minimum lot size of less than 1 ha.**
- *The development is not being carried out in it is carried out in a declared area of outstanding biodiversity value.*

Based on this assessment, it was determined that a formal Biodiversity Development Assessment Report (BDAR) was not able to be prepared and a waiver was requested and issued by OEH. A copy is included in Appendix EE.

11 Consultation

Consultation has been undertaken with the following stakeholders in accordance with the SEARs and has formed an integral part of the proposed development. A summary of the consultation process, issues raised and where the design of the proposal has responded to these issues is included below. The main stakeholders include the following:

- The Department of Planning and Environment
- Roads and Maritime Services (RMS)
- City of Parramatta Council (formerly Holroyd Council)
- Department of Industry (Water)
- Office of Environment & Heritage (OEH)
- Transport for NSW (TfNSW)
- Government Architect (GA)
- Local Residents
- School Community
- Sydney Water

11.1 City of Parramatta Council Consultation

Prior to the proposal being considered as a State Significant Development, a pre-lodgement meeting was held with the City of Parramatta Council including the following staff members:

- Sasi Kumar – Team Leader – Development Advice
- Maya Sarwary – Senior Development Advisory Officer
- Paul Clarke – Senior Development Engineer
- Lauren Bricknell – Student Development Engineer
- Kate Higgins – Urban Designer
- Gordon Trotter – Senior Traffic and Transport Engineer

The meeting minutes raised the following concerns with the proposal:

- Height exceeding LEP control;
- Concern relating to visual and acoustic privacy;
- Screen planting along boundary with adjoining residential properties;
- Traffic, parking and drop-off and pick-up areas;
- Urban design concerns relating to façade and scale of building;
- Stormwater and water sensitive urban design required;
- Full heritage assessment is required; and
- Concern over tree removal – an arborist report is required.

As part of the SEARs Council raised similar issues with the Department of Planning and Environment and these were included in the SEARs and have been addressed as part of this EIS and application.

Following the SEARs further consultation was undertaken with Council, as required, and another formal response was received, which is included in Appendix X. A response to these issues is included in Table 18 below.

Table 18: City of Parramatta Council Consultation Summary

ISSUE	COUNCIL COMMENT	RESPONSE
Retention of Open Spaces	Concern is raised as to why the new school buildings cannot be accommodated on the existing school site thereby preserving open	The new school building is located on the North site so that there can be open space

ISSUE	COUNCIL COMMENT	RESPONSE
	space in an increasingly dense urban environment. The existing playground could be made available to the community at the weekend or in the evening. The increasing densification of the area makes it even more important to retain open space for the growing community.	opened up on the South site when the demountable buildings are removed. The buildings and spaces can be used by the community based on requests to the school. Leaving the spaces open to free use may open then up to vandalism.
Urban Design	The proposed new building has in some respects an industrial aesthetic. This is at odds with the predominant residential aesthetic of the existing school buildings (in particular the historic school buildings) and of the surrounding low density residential area. Consideration should be given to modulation of the façade to reduce bulk, breaking roof planes into smaller areas, use of design features to provide fine grain visual interest, materials that are not industrial in character, windows set on the inside face, and appropriate colours.	The building is a modern architectural design to meet the needs of the school and responds to the brief to ensure there are sufficient classrooms of adequate scale and in the most cost-effective way. The building uses a mix of materials and textures to not only fit with the nearby residential development but also reflects the materials and scale of the buildings on the South site. It could be possible to emulate the roof forms of the existing school buildings, however this would result in a number of roof junctions, additional costs and increased potential for water ingress. The comments are also not taking into account the other buildings that surround the site that are not residential in nature including the church, ambulance station, and child care centre.
	The scale of the building is considerably larger than that of the existing school buildings and is at odds with the scale of surrounding development. It is recommended that the bulk of the building be reduced, in particular the scale of the Franklin Street façade.	Modern school buildings have minimum requirements for internal heights and scale that need to be included in the design. The buildings that are on the site are not meeting the needs of the school community and its expected growth. If the scale of the building is reduced, the footprint will need to be increased, which will also reduce the play space and landscaped areas around the school. The building does not directly address Franklin Street and has been set back from the houses

ISSUE	COUNCIL COMMENT	RESPONSE
		that do front Franklin Street by between 7-10m. It has been well articulated and includes elements that assist in reducing the bulk and potential for overshadowing. The height and scale of the building along the eastern boundary of the site is relatively low, compared to the internal height with a maximum height along this façade of approximately 8.3m.
	The building should be set further back from the side boundary in order to protect the amenity of neighbouring residents and to retain existing trees.	The DCP requires a 6m setback for residential development. The proposal includes a setback of between 7-10m as shown on the site plans included with the architectural set.
	The building should be sited so as to protect all existing significant canopy trees – along the side boundary as well as the street boundary. New trees should also be planted along the entire length of the Railway Street boundary. The trees should be tall trees (over 13 metres) with spreading canopies.	The building has been located so as to protect as many trees as possible on the site. The landscaping plans included in Appendix G show the trees to be removed and the landscaping proposed to replace them, particularly along the eastern boundary of the site.
	Consider upgrading the existing pedestrian crossing.	The pedestrian crossing is proposed to be improved and details are included in the traffic impact assessment included in Appendix H.
	Details of signage required and signage to be shown on the street elevations.	Signage details are included with the architectural plan in Appendix D.
	The retained playing field should remain publicly accessible.	As detailed above the playing spaces can be used by the community, similar to the other school spaces.
Design Excellence Advisory Panel (DEAP)	The proposal should be submitted to Council's Design Excellence Advisory Panel (DEAP) for review and comment.	Comments have already been received from the NSW Government Architect. Refer to Section 11.2 below.
Height	The height of the development exceeds the maximum 9m height control stipulated by the Holroyd Local Environmental Plan 2013. In order to minimise adverse impacts on the streetscape and on adjoining residential properties the height of the development should	The Education and Child Care SEPP enables State Significant Development to exceed development standards in environmental planning instruments such as LEPs.

ISSUE	COUNCIL COMMENT	RESPONSE
	comply with the 9m maximum control applicable to the site.	Notwithstanding this, the building design and location reduce the adverse impacts from the height variation which is only 1.697m.
Overshadowing	As overshadowing diagrams were not submitted to Council solar access and overshadowing of adjoining properties could not be assessed. The proposal should comply with the solar access provisions of the Holroyd Development Control Plan 2013.	Shadow diagrams are included in the architectural plans included in Appendix D. They show that the proposal provides adequate solar access to the adjoining properties.
Insufficient car parking and drop off/pick up provisions	The development provides insufficient parking and drop/off pick points within the site.	Refer to traffic impact assessment included in Appendix H.
	A Traffic and Transport Impact Assessment Report should accompany the EIS for the proposed development to identify the impacts of the proposal on the local street network and mitigation measures required to ameliorate any impacts. This report should assess the suitability of the access (entry and exit) points, internal layout, parking and traffic generation.	A traffic impact assessment is included in Appendix H.
	The traffic report and plans should include: • A plan showing all proposed off street parking facilities. • Justification of the number of parking spaces provided. A survey of the existing staff and their travel patterns will inform the amount of parking required. • All parking spaces, aisles, driveways, are to be dimensioned. • The car park, including driveways, is to be designed in accordance with the requirements specified in the relevant Australian Standards (AS 2890.1-2004, AS 2890.2-2002 and 2890.6-2009). • The use of parking spaces, such as visitor spaces, is to be labelled. • Turning paths are to be provided for critical manoeuvring areas. • Sight lines are to be provided in accordance with the minimum requirements specified in Figure 3.3 of AS 2890.1-2004 (a splay extending 2m from the driveway edge along the front boundary and 2.5m from the boundary along the driveway). This splay is to be provided on both sides of a single lane driveway and on the side of the exiting lane for a two-way driveway. This shall be illustrated on plans submitted with the final DA and not to be compromised by	A traffic impact assessment is included in Appendix H.

ISSUE	COUNCIL COMMENT	RESPONSE
	obstructions greater than 900mm in height such as landscaping, signage fences, walls or any display materials Traffic generation rates for the proposed development as described in the Roads and Maritime Services Guide to Traffic Generating Developments.	
	Bicycle parking is to be provided separately for students and staff in a secure facility, dimensioned in accordance with AS2890.3.	A traffic impact assessment is included in Appendix H.
	The drop-off and pick-up area is to reviewed to ensure it is adequate to cater for future student numbers. Consideration of mitigation measures to cater for the increase in student numbers is required.	A traffic impact assessment is included in Appendix H.
Amenity of Nearby Residents	The EIS should address the impact of the proposal on the amenity of residents, in particular the residents of properties that directly adjoin the subject site. It is recommended that sufficient setback is proposed between the new building and the eastern boundary of the site and windows be reduced/made highlight windows to reduce overlooking and acoustic impacts to adjoining properties. It is also recommended that dense landscape screening is proposed within the eastern boundary setback area of the site to assist with screening of the development and to reduce potential visual impacts from adjoining properties.	The amenity of residents has been addressed in the EIS considering the issues raised here. Refer to Section 10.3.
Acoustic Report	An acoustical investigation undertaken by a suitably qualified acoustical consultant describing and assessing the impact by the proposal and should accompany the EIS to address impacts the proposal will have on nearby and adjoining residential properties. The acoustic report shall be based on the requirements of NSW EPA New South Wales Industrial Noise Policy 2000 as well as relevant Australian Standards. (Particular Regard shall be had to the intrusive and amenity criteria within the EPA Industrial Noise Policy)	An acoustic report has been prepared and is included in Appendix U.
	The investigation shall include: (a) The identification of sensitive noise receivers potentially impacted by the proposal; (b) Details of the existing acoustic environment at the receiver locations; (c) The identification of operational noise producing facets of the development and the proposed mitigation techniques to be implemented to ensure that the proposed	An acoustic report has been prepared and is included in Appendix U.

ISSUE	COUNCIL COMMENT	RESPONSE
	use does not impact on the amenity of the area; (d) A statement indicating that the development is capable of complying with the criteria together with details of acoustic control measures that will be incorporated into the development.	
Accessibility Report	An access report in accordance with City of Parramatta Council's Disability Inclusion Action Plan should be submitted with the EIS for the proposal.	An access review has been prepared and is included in Appendix V.
Landscaping	The landscape report should address the retention of all existing canopy trees and the planting of new trees along the entire length of the Railway Street boundary.	Landscaping plans are included in Appendix G.
	Existing mature trees, assessed by a AQF Level 5 Arborist, should be retained where possible. Consideration should be made for the retention of existing mature trees and vegetation to the perimeter boundaries of the site with additional supplementary planting to provide screening and scale to the built form whilst strengthening locally endemic plant communities.	An arborist assessment is included in Appendix F.
	A recommendation is made to engage a AQF Level 5 Consulting Arborist to provide advice as to suitable locations and planting distances for large trees to minimise risk to high pedestrian zones and impacts to infrastructure.	An arborist assessment is included in Appendix F.
	The engagement of a AQF Level 5 Arborist ('Project Arborist') to provide an Existing Tree Management Plan to incorporate tree protection measures in accordance with AS4970-2009 (Protection of Trees on Development Sites).	An arborist assessment is included in Appendix F.
	The Project Arborist must supervise all constructions works, including demolition and site management, within five (5) metres of any existing tree to be retained.	An arborist assessment is included in Appendix F.
3D Model	A requirement for a 3D model that includes the school buildings across the road and the whole of the playground should accompany the EIS.	There was no requirement for a 3D model by the Department of Planning and Environment, therefore one has not been prepared. 3D images have been prepared and are included with the architectural plans in Appendix D.
Heritage impact Assessment	An assessment of heritage impact, including a full history of the site should accompany the EIS. This should be prepared by a consultant with adequate experience and knowledge in local history.	A heritage impact assessment has been prepared and is included in Appendix C.

ISSUE	COUNCIL COMMENT	RESPONSE
Flooding and Stormwater	- On Site Detention is required in accordance with the Upper Parramatta River Catchment Trust Handbook – Editions 3 or 4. - Given the nature of the Crimea Street site, above ground OSD will be acceptable, preferably designed and combined with the WSUD system. - Water Sensitive Urban Design will be required – preferably in conjunction with OSD and/or OSR (On Site Retention) systems. Refer Council's DCP 2011. - WSUD must include meaningful rainwater/stormwater capture and use, for example for landscape irrigation and toilet water flushing. - Council's aim for a site such as this is to integrate the WSUD into the landscape design using extensive deep soil with large tree planting, bioswales, bio retention and similar landscape elements. This is in preference to 'end of pipe' proprietary treatment devices. - The School may like to consider WSUD facilities as an educational resource. - Adjoining or adjacent to the western site boundary of the sites is a 1050m diameter stormwater pipeline which also corresponds to a low point in the landform indicating that this is an overland flow path. Council therefore requires an overland flood study to be conducted and submitted in conjunction with any DA. The extent of the flow path and flood characteristics may need to be addressed in the DA/building designs. - Council will require a stormwater overland flow study for this drainage line and associated (former) natural watercourse to support any DA and be reflected in building and landscape design/s. This should be prepared by a qualified and experienced stormwater / flooding engineer.	A Stormwater Management Plan has been prepared and is included in the civil plan in Appendix J. Underground OSD has been chosen for the site to ensure a safe option has been chosen for the primary school site. In conjunction with the OSD, WSUD in the form of water tanks have been used to enable reuse for landscaping and education. Above ground landscape elements are not as appropriate from a safety viewpoint and thus have not been incorporated into the design. An overland flow / flooding report has been prepared and is included in Appendix S.
	The following information is required. - Survey of the development site and immediate surrounds reduced to AHD, to be prepared by a Registered Surveyor. - Catchment analysis for 20% AEP (1 in 20 year) and 1% AEP (1 in 100 year) storm events. (This is frequently done using DRAINS software.) - Analysis of overland flow from above the site for the 5% AEP (1 in 20 year) and 1% AEP (1 in 100 year) in the event that the pipeline or	An overland flow / flood assessment was prepared and is included in Appendix S. A survey of the site is also included in Appendix B.

ISSUE	COUNCIL COMMENT	RESPONSE
	culvert is fully blocked. (This is usually done with HEC-RAS software.) - Analysis of 'high hazard' conditions (where velocity x depth >0.4/m²/s for the 1% event). - Modelling of all of these overland flow events on the site terrain before development. - Modelling of all of these overland flow events on the site terrain with the proposed development. - The DA must demonstrate (for the pipeline or culvert being fully blocked) that: - There is no building footprint within the area subject to 5% AEP flooding. - There is no fill or displacement of floodwaters in the area subject to 1% AEP flooding. - Any building between the 1% and 5% flood contours does not obstruct floodwaters up to the 1% flood level plus 500mm freeboard. (This may require the building is raised on columns or cantilevered so that undersides of slabs, beams etc. are clear of this level.) - The development will result in a safe environment for occupants, in regard to stormwater flooding - especially for any 'high hazard' area.	

11.2 Authority Consultation

As detailed above, a number of government authorities were listed for further consultation as part of the SEARs. An overview of the consultation is included in Tables 19 - 23 below. A copy of the correspondence to the authorities and their responses is included in Appendix X.

Table 19: Authority Consultation Overview

AUTHORITY	CONSULTATION DATES	RESPONSE RECEIVED	ACTION
Department of Planning and Environment	Ongoing through SEARs and meeting on 23 January 2018	No specific requests or response apart from SEARs and advice through preparation of documentation.	No further action required.
Roads and Maritime Services (RMS)	Meeting on 3 May 2018 Minutes included in Appendix X.	Refer to Table 22 below.	Comments addressed in documentation. No further action required.
Department of Industry (Water)	Letter received dated 3 April 2018.	Refer to Table 20 below.	Comments addressed in documentation. No further action required.

AUTHORITY	CONSULTATION DATES	RESPONSE RECEIVED	ACTION
	Letter included in Appendix X.		
Government Architect	Meeting held on 27 March 2018. Record of meeting notes included in Appendix X.	Refer to Table 21 below.	Comments addressed in documentation. No further action required.
Sydney Water	Not applicable.	Contact was made with Sydney Water to provide additional comment on and meet with the proponent to discuss the proposal. No response was received.	
Office of Environment & Heritage	Not applicable.	Contact was made with Office of Environment & Heritage to provide additional comment on and meet with the proponent to discuss the proposal further to the SEARs. No response was received.	
Transport for NSW	Meeting on 16 May 2018 Minutes included in Appendix X.	Refer to Table 23 below.	Comments addressed in documentation. No further action required.

Table 20 includes responses to a submission from the NSW Department of Industry – Water.

Table 20: Response to Department of Industry – Water

ISSUE	COMMENT FROM DEPT OF INDUSTRY - WATER	RESPONSE
General Impacts	It is recommended that the EIS be required to include, if relevant: Include an assessment of impacts to surface and groundwater sources including water use, water licensing arrangements, impacts on water users, waterfront land and aquifers, as well as compliance with relevant policies.	Assessment of ground water was included in the geotechnical report included in Appendix T. No impacts are foreseen on any of these matters from the proposed development.
Water Management Act 2000	- Volumetric licensing in areas covered by water sharing plans - Works within 40m of waterfront land - SSD & SSI projects are exempt from requiring water supply work approvals and controlled activity approvals as a result of the Environmental Planning & Assessment Act 1979 (EP&A Act). - No exemptions for volumetric licensing apply as a result of the EP&A Act. - Basic landholder rights, including harvestable rights dams - Aquifer interference activity approval and flood management work approval provisions have not yet commenced and are regulated by the Water Act 1912 - Maximum penalties of \$ 2.2 million plus \$ 264,000 for each day an offence continues apply under the WM Act	None of these activities or approvals are relevant to the subject site or proposal.

ISSUE	COMMENT FROM DEPT OF INDUSTRY - WATER	RESPONSE
	Flood management works	
Water Act 1912	- Volumetric licensing in areas where no water sharing plan applies - Monitoring bores - Aquifer interference activities that are not regulated as a water supply work under the WM Act. - No exemptions apply to licences or permits under the WA 1912 as a result of the EP&A Act. - Regulation of water bore driller licensing.	None of these activities or approvals are relevant to the subject site or proposal.
Water Management (General) Regulation 2011	- Provides various exemptions for volumetric licensing and activity approvals - Provides further detail on requirements for dealings and applications.	None of these activities or approvals are relevant to the subject site or proposal.
Water Sharing Plans	- Demonstrate how the proposal is consistent with the relevant rules of the Water Sharing Plan including rules for access licences, distance restrictions for water supply works and rules for the management of local impacts in respect of surface water and groundwater sources, ecosystem protection (including groundwater dependent ecosystems), water quality and surface-groundwater connectivity. - Provide a description of any site water use (amount of water to be taken from each water source) and management including all sediment dams, clear water diversion structures with detail on the location, design specifications and storage capacities for all the existing and proposed water management structures. - Provide an analysis of the proposed water supply arrangements against the rules for access licences and other applicable requirements of any relevant WSP, including: - Sufficient market depth to acquire the necessary entitlements for each water source. - Ability to carry out a "dealing" to transfer the water to relevant location under the rules of the WSP. - Daily and long-term access rules. - Account management and carryover provisions. - Provide a detailed and consolidated site water balance. - Further detail on licensing requirements is provided below.	Not applicable. For details of water usage, please refer to infrastructure report included in Appendix I and J.
Relevant policies and guidelines	The EIS should take into account the following policies (as applicable): - NSW Guidelines for Controlled Activities on Waterfront Land (NOW, 2012) - NSW Aquifer Interference Policy (NOW, 2012)	Where relevant these policies have been considered.

ISSUE	COMMENT FROM DEPT OF INDUSTRY - WATER	RESPONSE
	• Risk Assessment Guidelines for Groundwater Dependent Ecosystems (NOW, 2012) • Australian Groundwater Modelling Guidelines (NWC, 2012) • NSW State Rivers and Estuary Policy (1993) • NSW Wetlands Policy (2010) • NSW State Groundwater Policy Framework Document (1997) • NSW State Groundwater Quality Protection Policy (1998) • NSW State Groundwater Dependent Ecosystems Policy (2002) • NSW Water Extraction Monitoring Policy (2007)	
Licensing considerations	• Identification of water requirements for the life of the project in terms of both volume and timing (including predictions of potential ongoing groundwater take following the cessation of operations at the site – such as evaporative loss from open voids or inflows). • Details of the water supply source(s) for the proposal including any proposed surface water and groundwater extraction from each water source as defined in the relevant Water Sharing Plan/s and all water supply works to take water. • Explanation of how the required water entitlements will be obtained (i.e. through a new or existing licence/s, trading on the water market, controlled allocations etc.). • Information on the purpose, location, construction and expected annual extraction volumes including details on all existing and proposed water supply works which take surface water, (pumps, dams, diversions, etc). • Details on all bores and excavations for the purpose of investigation, extraction, dewatering, testing and monitoring. All predicted groundwater take must be accounted for through adequate licensing. • Details on existing dams/storages (including the date of construction, location, purpose, size and capacity) and any proposal to change the purpose of existing dams/storages • Details on the location, purpose, size and capacity of any new proposed dams/storages. • Applicability of any exemptions under the Water Management (General) Regulation 2011 to the project. Water allocation account management rules, total daily extraction limits and rules governing environmental protection and access licence dealings also need to be considered. The Harvestable Right gives landholders the right to capture and use for any purpose 10 % of the average annual runoff from their property if in the	Not applicable to this proposal.

ISSUE	COMMENT FROM DEPT OF INDUSTRY - WATER	RESPONSE
	Eastern or Central Divisions. The Harvestable Right has been defined in terms of an equivalent dam capacity called the Maximum Harvestable Right Dam Capacity (MHRDC). The MHRDC is determined by the area of the property (in hectares) and a site-specific run-off factor. The MHRDC includes the capacity of all existing dams on the property that do not have a current water licence. Storages capturing up to the harvestable right capacity are not required to be licensed but any capacity of the total of all storages/dams on the property greater than the MHRDC may require a licence.	
Dam Safety	Where new or modified dams are proposed, or where new development will occur below an existing dam, the NSW Dams Safety Committee should be consulted in relation to any safety issues that may arise. Conditions of approval may be recommended to ensure safety in relation to any new or existing dams.	Not applicable to this proposal.
Surface water assessment	The predictive assessment of the impact of the proposed project on surface water sources should include the following: • Identification of all surface water features including watercourses, wetlands and floodplains transected by or adjacent to the proposed project. • Identification of all surface water sources as described by the relevant water sharing plan. • Detailed description of dependent ecosystems and existing surface water users within the area, including basic landholder rights to water and adjacent/downstream licensed water users. • Description of all works and surface infrastructure that will intercept, store, convey, or otherwise interact with surface water resources. • Assessment of predicted impacts on the following: • flow of surface water, sediment movement, channel stability, and hydraulic regime, • water quality, • flood regime, • dependent ecosystems, • existing surface water users, and • planned environmental water and water sharing arrangements prescribed in the relevant water sharing plans.	An overland flow / flooding assessment has been undertaken and is included in Appendix S.
Groundwater assessment	To ensure the sustainable and integrated management of groundwater sources, the EIS needs to include adequate details to assess the impact of the project on all groundwater sources. Where it is considered unlikely that groundwater will be intercepted or impacted (for example by infiltration), a brief site assessment and justification for the minimal impacts may be sufficient,	It is unlikely that the proposal will have any adverse impacts on ground water. Measures have been included in relevant reports as required to show how the ground water will be protected.

ISSUE	COMMENT FROM DEPT OF INDUSTRY - WATER	RESPONSE
	accompanied by suitable contingency measures in place in the event that groundwater is intercepted, and appropriate measures to ensure that groundwater is not contaminated. Where groundwater is expected to be intercepted or impacted, the following requirements should be used to assist the groundwater assessment for the proposal. • The known or predicted highest groundwater table at the site. • Works likely to intercept, connect with or infiltrate the groundwater sources. • Any proposed groundwater extraction, including purpose, location and construction details of all proposed bores and expected annual extraction volumes. • Bore construction information is to be supplied to DPI Water by submitting a "Form A" template. DPI Water will supply "GW" registration numbers (and licence/approval numbers if required) which must be used as consistent and unique bore identifiers for all future reporting. • A description of the watertable and groundwater pressure configuration, flow directions and rates and physical and chemical characteristics of the groundwater source (including connectivity with other groundwater and surface water sources). • Sufficient baseline monitoring for groundwater quantity and quality for all aquifers and GDEs to establish a baseline incorporating typical temporal and spatial variations. • The predicted impacts of any final landform on the groundwater regime. • The existing groundwater users within the area (including the environment), any potential impacts on these users and safeguard measures to mitigate impacts. • An assessment of groundwater quality, its beneficial use classification and prediction of any impacts on groundwater quality. • An assessment of the potential for groundwater contamination (considering both the impacts of the proposal on groundwater contamination and the impacts of contamination on the proposal). • Measures proposed to protect groundwater quality, both in the short and long term. • Measures for preventing groundwater pollution so that remediation is not required. • Protective measures for any groundwater dependent ecosystems (GDEs). • Proposed methods of the disposal of waste water and approval from the relevant authority.	Refer to Geotech report, contamination report and preliminary construction management plan included in Appendices T, Q and K.

ISSUE	COMMENT FROM DEPT OF INDUSTRY - WATER	RESPONSE
	- The results of any models or predictive tools used. Where potential impact/s are identified the assessment will need to identify limits to the level of impact and contingency measures that would remediate, reduce or manage potential impacts to the existing groundwater resource and any dependent groundwater environment or water users, including information on: - Any proposed monitoring programs, including water levels and quality data. - Reporting procedures for any monitoring program including mechanism for transfer of information. - An assessment of any groundwater source/aquifer that may be sterilised from future use as a water supply as a consequence of the proposal. - Identification of any nominal thresholds as to the level of impact beyond which remedial measures or contingency plans would be initiated (this may entail water level triggers or a beneficial use category). - Description of the remedial measures or contingency plans proposed. - Any funding assurances covering the anticipated post development maintenance cost, for example on-going groundwater monitoring for the nominated period.	
Groundwater dependent ecosystems	The EIS must consider the potential impacts on any Groundwater Dependent Ecosystems (GDEs) at the site and in the vicinity of the site and: - Identify any potential impacts on GDEs as a result of the proposal including: - the effect of the proposal on the recharge to groundwater systems; - the potential to adversely affect the water quality of the underlying groundwater system and adjoining groundwater systems in hydraulic connections; and - the effect on the function of GDEs (habitat, groundwater levels, connectivity). - Provide safeguard measures for any GDEs.	Refer to comment above.
Watercourses, Wetlands and Riparian Land	The EIS should address the potential impacts of the project on all watercourses likely to be affected by the project, existing riparian vegetation and the rehabilitation of riparian land. It is recommended the EIS provides details on all watercourses potentially affected by the proposal, including: - Scaled plans showing the location of: - wetlands/swamps, watercourses and top of bank; - riparian corridor widths to be established along the creeks;	Not applicable. Refer to biodiversity assessment included in Appendix M and BDAR waiver in Appendix EE.

ISSUE	COMMENT FROM DEPT OF INDUSTRY - WATER	RESPONSE
	- existing riparian vegetation surrounding the watercourses (identify any areas to be protected and any riparian vegetation proposed to be removed); - the site boundary, the footprint of the proposal in relation to the watercourses and riparian areas; and - proposed location of any asset protection zones. - Photographs of the watercourses/wetlands and a map showing the point from which the photos were taken. - A detailed description of all potential impacts on the watercourses/riparian land. - A detailed description of all potential impacts on the wetlands, including potential impacts to the wetlands hydrologic regime; groundwater recharge; habitat and any species that depend on the wetlands. - A description of the design features and measures to be incorporated to mitigate potential impacts. - Geomorphic and hydrological assessment of water courses including details of stream order (Strahler System), river style and energy regimes both in channel and on adjacent floodplains.	
Landform Rehabilitation	Where significant modification to landform is proposed, the EIS must include: - Justification of the proposed final landform with regard to its impact on local and regional surface and groundwater systems; - A detailed description of how the site would be progressively rehabilitated and integrated into the surrounding landscape; - Outline of proposed construction and restoration of topography and surface drainage features if affected by the project; and - An outline of the measures to be put in place to ensure that sufficient resources are available to implement the proposed rehabilitation.	Not applicable, no significant changes to landform are proposed.

Table 21 includes responses to a submission from the Government Architect NSW (GANSW).

Table 21: Response to Government Architect NSW

ISSUE	COMMENT FROM GA NSW	RESPONSE
Site strategy generally	GANSW generally supports the approach to construct a new integrated learning facility on the northern section of the site, acknowledging the constraints of the southern site including heritage structures, existing demountable classrooms (to be removed) and a significant tree canopy.	Details of proposed works to the southern site have been included in this application. Unfortunately, during the meeting held with GA NSW the time was restricted and therefore the South site proposal was not included in the discussion.

ISSUE	COMMENT FROM GA NSW	RESPONSE
	Further details are required of proposed works to the southern site to enable informed feedback on these elements of the proposal. As this information was not provided these notes address the northern site only.	It should be noted that the extent of works is only internal refurbishment, and that removal of demountable buildings and remediation works post their removal are not part of the scope for this application.
Future development	A key recommendation of the Design Guide for Schools is that a master plan be established for each site. The design team should map out the likely pattern of staged / long term development across both campuses to demonstrate that this proposal will support it. Although not explicitly raised during the meeting, GANSW recommends consideration of a future new share-way in Railway Street, linking the two sides of the school campus through a raised pedestrian crossing or similar. GANSW acknowledge this would require negotiation with local council / RMS but would improve the connection between the two sides of the campus and safety of children crossing the road.	The scope of this project is limited to the replacement of demountable classrooms with permanent teaching spaces and addressing shortfalls in staff and administration facilities as well as a new hall, canteen and associated stores. The two sites are already linked by a raised pedestrian crossing in Railway Street, which is proposed to have modifications to make it safer as outlined in the Traffic report included in Appendix H.
Perimeter fencing & street address	Wherever possible, GANSW encourage access and security strategies which minimise the use and impact of palisade fencing. We encourage a design solution for both sites that creates a generous entry that is open and welcoming and the use of building facades as secure lines where possible rather than introducing secondary lines of fencing. We recommend creating a forecourt entry between the two sites with the possibility of extending the building footprint and/or entry ramps and stairs towards the street and creating a covered entry area. Landscape planting to soften or dissolve the impact of perimeter fencing along street frontages should also be incorporated.	A CPTED Assessment has been prepared and is included in Appendix R. Fencing will need to be used for the site and where possible the use of palisade fencing will be minimised. Details of the fencing are included with the Architectural and Landscape Plans in Appendices D and G. Some amendments have been made to the Architectural plans to provide a better entry area from Railway Street and linkages to the North Site.
Material & vernacular references	New buildings which are sympathetic to their surroundings will make for a more integrated school environment. GANSW acknowledge the current project references including an analysis of local vernacular structures from around the site. Further analysis of the existing school buildings and immediate surroundings is recommended to guide the development of the street front elevations and building articulation including materials and finishes.	As part of the architecture package included in Appendix D an analysis of the site and buildings has been carried out and reflected where possible in the new buildings. In addition, a heritage assessment of the impact of the new buildings on the South site heritage structures has been carried out and included in Appendix C.
Massing & building articulation	GANSW recommends further consideration be given to the massing of the new building including the possible addition of verandah	The building has been designed with an intent to provide a more protective, screened exterior to the

ISSUE	COMMENT FROM GA NSW	RESPONSE
	spaces and the separation of roof planes. The Station street building elevation could be developed to provide greater articulation of this large form in response to the patterns and scale of surrounding built form and the heritage school building opposite. Diagrams are encouraged to demonstrate the contextual appropriateness of all new works. The designers are encouraged to revisit their analysis of the existing heritage structures in developing the key street front facades. The proportions of the openings and entry portico should be reconsidered in response to this analysis and the points raised in item 3 of this letter. Further consideration could be given to the roof plane elevation as viewed from upper storey classrooms.	building, to then open up the interior, where the activity and interaction takes place. It is here where the design focuses the interstitial verandah spaces as opportunities for outdoor learning adjacent to classrooms as well as visual connection across the campus and circulation. It would not be appropriate to "ring" the outside of the building with verandahs. The scale and form of the building towards the boundaries of the site on the east and south references the heritage buildings on the South site and the heritage report (Appendix C) similarly illustrates the appropriateness of the solution. Some amendments have been made to the plans at the entry and articulation of the walls, ground and roof planes.
Indigenous Acknowledge ment	In consultation with the local Aboriginal community, identify and incorporate opportunities for integrating Aboriginal culture and heritage into the design of the built environment including wayfinding, signage or room naming, materials and colour selection, public art, placemaking, and 'welcome to country' at the entry. Indigenous landscaping should also be incorporated to promote better understanding of Bush tucker, Aboriginal seasonal changes, and the interdependencies of flora and fauna with a responsibility/duty of care for the environment.	The school already actively integrates indigenous culture into their community. The design can be amended to include appropriate indigenous designs. Key opportunities include, • Modification to gateway form to include "Welcome to Country" art/signage; • The detailed perforated metal sun-shading screens could be modified to incorporate an indigenous narrative; and • An extension of the indigenous garden from the South site to the North site could include opportunities for small group outdoor learning under existing tree canopies. Consultation can be undertaken to ensure the detail design of these elements is appropriate.
Integrated landscape strategy	An integrated landscape strategy across both sites should be further developed. All significant trees on site should be identified and protected where possible or replaced. Tree canopy targets should be established in accordance with NSW Urban Tree Canopy Targets (for further guidance see: GANSW's Greener Places)	The courtyard building design relies for its success on an integrated landscape approach that provides opportunities for seamless transition between inside to outside learning. The new building has been placed on site to retain significant trees where possible and where some have had to be removed, they

ISSUE	COMMENT FROM GA NSW	RESPONSE
	Provide a detailed open space calculation across both playgrounds in relation to the numbers of existing and proposed students. Further consideration should be given to utilising landscape buffer zones as play spaces.	have been replaced in the new landscape works. This is detailed in the Landscape plans included in Appendix G. A landscape masterplan across both sites is outside the scope of this project, however the new landscaping has been developed considering appropriate indigenous species and the existing landscaping on both the South and North Sites. A play space calculation has been included in the Architectural plans included in Appendix D. It shows there is sufficient play space for the number of proposed students at the school.
Adjoining properties	As per above new works should be considered within an overall masterplan for the school recognising potential future development of neighbouring sites in response to current zonings and controls.	The proposal has been prepared considering the potential for future development of the site. It should be noted that an overall masterplan was not part of the brief.
Community Use	Provide a community use strategy including management of access to ensure facilities are designed to support easy and controlled community use of the school facilities after hours.	The school already has a number of community groups that use the school facilities and it was a major consideration in the preparation of this application and proposal. The school has a community use strategy which can be enhanced based on the new facilities.
GANSW Design objectives	The proponents are asked to consider and address the objectives outlined in: • Better Placed: An integrated design policy for the built environment of New South Wales, GANSW 2017 • Design Guide for Schools, GANSW, 2017	Generally, the proposed new building and landscape works uphold and include the design principles in the documents referenced in this section. These have been detailed in the Parramatta West Design Statement- Assessment of Education SEPP Design Quality Principles

It should be noted that the original proposal and design for the school was as a simple development application and it would not have been necessary to prepare an overall masterplan or have consultation with the GANSW. This is what the consultation occurred later in the process and an overall masterplan was not part of the brief from NSW Department of Education.

Table 22 includes comments raised at a meeting with NSW Roads and Maritime Services (RMS) as well as responses to the comments.

Table 22: Response to NSW Roads and Maritime Services

ISSUE	COMMENT FROM RMS	RESPONSE
SEARs requirements	The Traffic Report should respond to SEARs requirements including drop off/ pickup zones.	A traffic assessment has been prepared to accompany this application and is included in Appendix H.
Pedestrian Crossing	The site context was discussed including the existing raised pedestrian crossing. RMS advised the City of Parramatta Council had proposed the upgrade of the existing pedestrian crossing in Railway Street to the current RMS and Australian standards. RMS agreed that the existing raised pedestrian crossing should be upgraded to the current RMS technical and Australian Standards. RMS advised that this upgrade should include the extension of the footpath across the drain to ensure a level surface which will also achieve accessible compliance. RMS advised the detailed design of the upgraded raised pedestrian crossing to be discussed and agreed with City of Parramatta. RMS advised that the measures proposed in the current traffic report, with a supervised pedestrian crossing are acceptable.	The upgrade of the pedestrian crossing was considered by the traffic consultants in their assessment which is included in Appendix H.
Works to Motorway onramp	RMS advised that there will be future works to the on-ramp of the motorway. This will include widening of the on-ramp road to 2 lanes and construction of a retaining wall. This may result in adjacent local roads being restricted to one way during the construction period.	Noted
Traffic generation	RMS advised that the increase to traffic resulting from the school population increase should not cause knock on effects to other nearby road intersections.	Refer to traffic assessment included in Appendix H.
Pedestrian refuge	RMS advised that the existing pedestrian refuge located on the corner of Franklin and Railway Streets is sufficient and the use of this pedestrian refuge should be encouraged as the north side of Railway Street (East) has no footpath.	Noted
Kiss and Drop zones	RMS advised that the staff currently park in Railway Street. A "kiss and drop" zones have been proposed on both sides of Railway Street, staff are to be encouraged to park on Auburn Street. A "Kiss and Drop" zone is also proposed in Crimea Street.	Noted. Refer to traffic assessment included in Appendix H. This has considered appropriate locations for kiss and drop locations in conjunction with the school.

ISSUE	COMMENT FROM RMS	RESPONSE
	RMS suggested one "Kiss and drop" zone in Railway Street, as staff resources may not cover two zones. RMS suggested timed parking restrictions in Crimea Street be discussed with Council.	
Safety at crossing	RMS suggested that to improve safety at the existing pedestrian crossing, safety training should be provided to students and parents. Other measures include an increase in safety signage at the pedestrian crossing. RMS advised that currently the pedestrian crossing is in alignment with existing school pedestrian entry gates. RMS suggested that the gates be staggered away from the pedestrian crossing to enhance safety and provide better site lines for pedestrians. RMS advised staggering the entry gates is not an imperative. The proposed stairs located near the pedestrian crossing on Railway Street are acceptable.	Refer to recommendations included in Appendix H. Further the operations of the school can be amended to ensure these details are included in parent advice.
Closure of Railway Street	RMS advised closure of Railway Street is not recommended as a vehicle turning area would be required and other traffic impacts would be problematic. A road closure is therefore not recommended. RMS advised that it would be rare to close the road in this way and that the vehicle numbers do not warrant road closure. Residents could be adversely affected by road closure and the manoeuvres of service vehicles such as rubbish trucks would be restricted. Railway Street is owned by the City of Parramatta and they will be the statutory body responsible for assessment and consideration if closure was proposed. RMS could support permanent road closure if the City of Parramatta Council were to support it first. The assessment and approval process for permanent road closure would take 12 to 18 months.	Closure of Railway Street was considered but not recommended in the traffic assessment included in Appendix H.
Crossing supervision	RMS recommended that the school submit a request for a pedestrian crossing supervisor to RMS, to attend during the following times - 8.00am to 9:30am - 2:30pm to 4.00pm	Noted

Table 23 includes comments raised at a meeting with Transport for NSW as well as responses to the comments.

Table 23: Response to Transport for NSW

ISSUE	COMMENT FROM TRANSPORT FOR NSW	RESPONSE
Drop off and pick up areas	Transport for NSW requested pedestrian access from the new building to drop-off and pickup zones.	Plans have been amended to provide this access.
Pedestrian crossing	Transport for NSW noted that existing crossings cannot always be modified to be fully compliant with Australian Standards and subject to Council advice. They also noted that Transport for NSW do not have a formal position in regard to the pedestrian crossing.	Noted – refer to comments above to RMS submission and traffic assessment in Appendix H.
Buses	Transport for NSW advised that they do not envisage any issues pertaining to buses (School & Public) from the proposed development.	Noted. Consideration of access by bus is included in traffic assessment in Appendix H.
RMS	Transport for NSW advised that RMS comments (Minutes of meeting held 3 May 2018) were appropriate. They also advised that the proposal to have drop-off/pickup zones located on both Railway and Crimea streets would improve traffic congestion as the load would be spread between the 2 streets.	Noted – refer to comments above in Table 22.
Traffic conflict	Transport for NSW questioned safety implications of ambulance vehicles along Railway Street with the proposed increase in school population and the split site.	The NSW Ambulance Service was contacted as part of the preparation of the traffic assessment and they advised as follows: <i>Compared to the current Parramatta station, the PRP will have fewer emergency vehicles entering and exiting the site. Due to this and the narrow time bands that traffic is expected to increase along Railway St, we do not believe that the proposed school upgrade development will have a negative impact on ambulance operations.</i> The traffic assessment confirmed that the ongoing use of the ambulance station and the school could occur with suitable recognition of these services within Railway Street. Refer to assessment included in Appendix H.

ISSUE	COMMENT FROM TRANSPORT FOR NSW	RESPONSE
Safety Audit	Transport for NSW requested a Road Safety Evaluation/ Audit to be undertaken. This may need to be undertaken by a traffic consultant that is independent to the project team in accordance with AusRoad Guidelines.	Noted. If required a Road Safety Audit will be undertaken following the approval of the proposal and of the final road improvements.

11.3 Community Consultation

There has been several community consultation opportunities for the school community and residents which is detailed in the Community consultation outcomes report included in Appendix AA. The consultation included:

- Information booths in shopping centres, libraries and public spaces;
- Drop-in session at the Parramatta West Public School;
- Advertisements in local newspapers;
- Websites – school and NSW Department of Educations; and
- Letterbox drop.

A summary of key issues is provided below in Table 24.

Table 24: Community Consultation Summary

ISSUE	RESPONSE
Traffic concerns for students in Railway and Crimea Streets.	A traffic assessment has been prepared to accompany the development application which recommends options for managing the traffic and crossing issues. This includes operational recommendations as well as drop-off and pick-up suggestions for students. As long as the school and NSW Department of Education adopt these recommendations for the school, the safety of students is improved, and traffic impacts will be reduced.
Lack of air-conditioning in proposed building.	The proposed building has been designed to not require air-conditioning with cross-ventilation and other important design elements which will keep the building cool in summer and warm in winter. The building however is of a design that if when built, air-conditioning is required, then it can be retro-fitted. The NSW Government recently announced the Cooler Classrooms Program and under that commitment all new schools and school upgrades should include air conditioning for their teaching spaces. As a result, the inclusion of air-conditioning in this design is under consideration and will be developed further as the detailed design progresses for construction.
Concern about play and open space during and after construction and removal of the existing demountable buildings.	During construction, play areas will be reduced and limited for the school. Options include negotiating with Council for use of Burra Reserve and /or staggering play and break times. Although this is not an ideal outcome, it will only be for a relatively short time and when complete the areas will be improved. Following construction, the demountable classrooms will be removed from the existing school site (South) and the open space and play areas restored. In addition, the new site (North) will have improved and managed play spaces.

ISSUE	RESPONSE
Safety fencing for children.	The new site for development to the North will have appropriate fencing for student safety and security. Further a CPTED (Crime Prevention Through Environmental Design) Report has been prepared and is included with the SSD application.
Privacy of residents and noise / acoustic impacts.	Windows adjoining the residential properties have been designed on an angle to ensure that the classrooms do not overlook residents and noise will be directed away from rear yards. Further the new school hall will be separated from the residents by a courtyard area and classrooms, which will provide a buffer.
Height and overshadowing of adjoining properties.	The building has been designed to limit impacts of height and overshadowing. The heights along the boundary with the residential development, are reduced and then get higher towards the middle of the site. This limits the impacts on the adjoining properties. Further the setback of between 7-10m reduces the impacts of overshadowing. Shadow diagrams have been prepared to accompany the SSD application and are included in the architectural package.
Retention of trees and vegetation on the site.	Some trees are required to be removed as a result of the proposal, however a detailed landscaping plan has been prepared to replace the vegetation where possible and restore the vegetative buffer, particularly to the east adjoining the residential area. Further no heritage associations with the trees have been identified.
Ensure there are environmental aspects to the development.	The development has been designed to be sustainable and will include water tanks, solar panels and cross ventilation. Specific sustainability details are included within the Sustainability Report included with the SSD application.

Apart from being able to respond to the issues raised with information that shows how the issues have been resolved, it is important to identify any outcomes from the consultation that have been used to guide development or changes to the plans. These outcomes ensure that:

- The traffic consultant has addressed the safety concerns of the parents and community (Appendix H);
- The arborist has considered the vegetation and trees on the site and what can be retained and protected from removal and the landscape architect has considered what can be planted (Appendix F);
- The architect has designed the building considering the surrounding residential development in terms of privacy, overshadowing, setbacks etc. (Appendix D);
- The crime prevention consultant has considered the safety and security of staff and students (Appendix R);
- The sustainability consultant has considered the best outcomes for the environment and students in the design of the building (Appendix N); and
- The acoustic consultant has considered options for noise reduction for surrounding residential development (Appendix U).

12 Justification for the Proposed Development

12.1 Justification

The public interest is best served by promoting sustainable development that is rational, orderly and economic. The proposal is permissible with consent under the SEPP (Educational Establishments and Child Care Facilities) 2017 and will generate positive social, environmental and economic benefits. The following justification is provided in support of the proposed alterations and additions to Parramatta West Public School.

- The proposal addresses an increase in demand and expectation for high quality public school facilities to service the growing community;
- The location of the site is highly suitable for the proposed development, given its proximity to public transport networks, a range of services and facilities and the existing school facilities; and
- Potential impacts arising from the proposed development can be mitigated, ensuring there will be no long-term or unreasonable impacts to the environment or surrounding developments.

The proposal will bring in a much-needed upgrade to Parramatta West Public School. It is a direct response to the increase in population from increased housing supply. In the past the answer has been relatively temporary demountable buildings. This proposal provides a purpose-built facility to cater for the additional population that responds to modern teaching and learning requirements.

12.2 Biophysical Considerations

This environmental impact statement and the various sub-consultant reports have been prepared to address the likely impacts of the proposed development on the environment. A number of mitigation measures and recommendations have been adopted to ensure that the proposed development will not result in any unacceptable impacts to the biophysical environment.

12.3 Economic Considerations

The proposed alterations and additions to Parramatta West Public School will result in significant economic benefit on a local and regional level. The proposed development facilitates economic growth by providing an expanded school facility for additional staff and students. In addition, the proposal will result in additional employment opportunities for the local community, including opportunities during construction for local tradespeople and business, as well professional roles for following construction.

12.4 Social Considerations

The proposed development has been designed in accordance with existing and projected future needs of the community by delivering a high-quality, integrated education facility that meets the day to day needs of students and staff. In addition, the proposal is a significant opportunity to futureproof the school facilities through flexible and sustainable building design. Social benefits of the proposal include:

- *Provide increased access to educational facilities through an additional 107 student positions at the school;*
- *Improve the visual amenity of the existing buildings which are characterised by older brick and demountable buildings;*
- *Create safe public and private areas via the adoption of CPTED principles;*
- *Generate economic benefits by creating employment opportunities during the construction, cleaning / maintenance, and ongoing teacher operation phases.*

12.5 Ecological Sustainable Development

The proposed alterations and additions to Parramatta West Public School has been designed with regard for key ecological sustainable development (ESD) principles as defined in Clause 7(4) of Schedule 2 of Environmental Planning and Assessment Regulation 2000.

A detailed ESD report has been prepared and is included in Appendix N. The key initiatives from the report are:

The development's commitment to reducing the overall environmental impact is evident of the holistic approach taken to long-term sustainability. Documented initiatives cover a range of categories including:

- *Energy & greenhouse gas emissions reduction*
 - *Use of on-site Renewable Energy (Photovoltaic solar system)*
 - *Efficient lighting e.g. LEDs*
 - *Daylight and motion sensors for lighting*
 - *Architectural shading devices*
 - *Minimisation of conditioned spaces*
 - *Operable windows (where acoustics allow)*
- *Potable water reduction*
 - *Water efficient fixtures and fittings.*
 - *Water monitoring systems, which can identify leaks and amend losses before greater loss occurs.*
 - *Rainwater collection and reuse.*
- *Minimising waste to landfill*
- *The indoor environment*
 - *Acoustic comfort will be optimised to ensure building appropriate internal noise and reverberation levels are achieved in accordance with best practice standards.*
 - *Material Selections will focus on reducing volatile organic compounds (VOC) levels and minimise formaldehyde impacts.*
 - *Natural Cross Ventilation through the installation of operable louvres, this will improve thermal comfort of students and reduce energy consumption related to the HVAC system.*
- *Occupant amenity and comfort*
 - *Outdoor covered walkways which offer a connection to nature that indoor corridors cannot provide, and are a less carbon intensive option than indoor conditioned corridors.*
 - *Access to quality views*
 - *Thermal comfort is provided in line with the expectations for schools under the EFSG, while maintaining energy efficiency throughout the design.*
 - *Artificial Lighting Design will ensure the optimum lighting comfort is achieved.*
- *Emissions*
- *Building management*
 - *Waste provisions – appropriate waste provisions are to be included within the project to ensure recycling rates & reduced waste to landfill is optimised.*
 - *Building Commissioning & Tuning Procedures.*

The proposal also achieves the following ESD outcomes:

- The proposal has been designed to minimise building footprint and maximise deep soil planting;
- During the demolition and construction process, materials will be recycled and reused where possible;
- Building materials and fabrics will be selected according to their environmental performance and rating; and
- A number of mitigation measures and recommendations have been adopted to ensure the proposed development does not result in any unacceptable impacts to the environment.

Table 25 outlines the principles of ecologically sustainable development as defined in Clause 7(4) of Schedule 2 of Environmental Planning and Assessment Regulation 2000.

Table 25: Principles of ecologically sustainable development

PRINCIPLE	COMMENT
(a) the precautionary principle, namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by: (i) careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and (ii) an assessment of the risk-weighted consequences of various options.	This EIS and specialist consultant reports recommend mitigation measures to avoid, minimise and offset potential impacts. This proposed redevelopment of the site will not result in any serious or irreversible environmental impacts.
(b) inter-generational equity, namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations	The proposed development responds to the need for additional student places and improved educational facilities. The proposal has been designed to ensure the education, health, diversity and productivity of the environment is maintained and enhanced for the benefit of future generations.
(c) conservation of biological diversity and ecological integrity, namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,	A biodiversity assessment has been prepared by Molino Stewart Environment and Natural Hazards to consider biodiversity matters the likely impacts of the proposed development. Refer to Section 10.7 and Appendix M. Further a waiver to the requirement for BDAR has been provided by OEH. Refer to Appendix EE for details.
(d) improved valuation, pricing and incentive mechanisms, namely, that environmental factors should be included in the valuation of assets and services, such as: (i) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement, (ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste, (iii) environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.	The cost of development and associated quantity surveyors report includes measures to ensure an appropriate level of environmental performance is achieved. Refer to Appendix A.

12.6 Public Interest

The proposal is considered to be in the public interest because:

- The proposed works are permissible with consent and have been prepared having regard to relevant State and local legislation and their objectives and controls;
- The proposal has been prepared having regard to State and local planning policies and generally complies with the aims and objectives for the site;
- The proposal is suitable for the site as evidenced by the site analysis and various site investigations, including geotechnical, site contamination and biodiversity;
- Subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unacceptable impacts on adjoining or surrounding properties or the public domain in terms of traffic, amenity, social and environmental impacts;
- The site is well serviced by public transport and walking and cycling routes. The proposal encourages non-private vehicles options to access the site;
- The proposal will result in a high quality educational environment for staff and students that:
 - Provides outdoor play and learning spaces for students,
 - Enables an excellent academic programme,
 - Supports a fulfilling and diverse extra-curricular experience,
 - Provides an inclusive, supportive and secure environment, and
 - Provides efficient and environmentally sustainable facilities;
- The proposal will make a positive contribution to the built form of Parramatta and will create an attractive streetscape along Railway Street;
- The proposal will contribute positively to energy efficiency and environmental sustainability, in that the design has incorporated many ESD features to reduce energy consumption and wastage during the life of the proposed development; and
- New jobs will be created following construction and 45 full-time equivalent jobs created during construction.

13 Environmental Risk and Mitigation Measures

Table 26 provides an assessment of environmental risk to identify the potential environment impacts associated with the proposed development and mitigation measures to avoid, minimise and offset predicted impacts.

Table 26: Environmental Risk Assessment and Mitigation Measures

RISK	MITIGATION MEASURES
Built Form and Urban Design	- The proposed development has been articulated in depth and height, allowing for adequate separation and generous setbacks to reduce the appearance of bulk and scale; and - The architectural form assists in creating visual interest and will contribute to public amenity.
Amenity	- The retention of significant trees, new landscaped areas and open space areas create a visual buffer and improves the amenity of the streetscape and school grounds as well as protecting the amenity of the neighbouring properties; - No significant views or views of the sky line will be impacted as a result of the development; and - Generous setbacks and landscaping will preserve levels of privacy, sunlight and visual amenity enjoyed by neighbouring dwellings.
Transport and Accessibility	- Upgrades to the pedestrian crossing to ensure safety of users; - Additional signage and identification of on-road parking and drop-off and pick-up points; - Identification of management recommendations for the use of the pedestrian crossing before, during and after school hours; - Provision of additional drop-off and pick-up points in Crimea Street; - Inclusion of management requirements for access and traffic routes during construction; and - Ensure buildings are designed in accordance with accessible design criteria and the Building Code of Australia (refer to BCA Assessment in Appendix BB).
Ecologically Sustainable Design (ESD)	- The proposal has been designed to minimise building footprint and maximise deep soil planting; - During the demolition and construction process, materials will be recycled and reused where possible; - Building materials and fabrics will be selected according to their environmental performance and rating; - Predominantly north-eastern orientation of buildings to maximise solar access and minimise heating and lighting requirements; - Cross-ventilation to reduce the need for air-conditioning; - Rainwater tanks for reuse with landscape irrigation; - OSD tanks and water quality treatment to control stormwater run-off and maintain downstream water quality;

RISK	MITIGATION MEASURES
	- Retention of substantial number of trees and replacement landscaping for those that will be lost; - A number of mitigation measures and recommendations have been adopted to ensure the proposed development does not result in any unacceptable impacts to the environment; and - Additional building related energy and water saving measures are specified in the Sustainability Report included in Appendix N.
Noise and Vibration	- The South site currently operates as a school and the proposed alterations and additions are unlikely to result in significant additional noise and vibration levels. The main noise sources during operation will be generated by students; and - Noise attenuation measures have been included in the design of the building on the North site and are detailed in the acoustic report included in Appendix U. - The noise and vibration report also address potential construction noise and vibration impacts and includes appropriate attenuation measures.
Biodiversity	- The proposed development will have negligible impact on existing ecological areas as there are none within close proximity to the site; and - Direct impacts on natural vegetation and habitats are minor and protective measures to retain and protect trees during construction will be implemented.
Non-Aboriginal Heritage	- The proposed development has been designed to ensure there are no significant adverse impacts on the original school buildings on the South site; and - Appropriate colours and façade treatment have been used to respect the heritage elements.
Aboriginal Heritage	As the site has been significantly disturbed in the past and no items are shown on the AHIMS register the likelihood of Aboriginal heritage impacts is minimal and no further research has been undertaken or is required.
Stormwater	The proposed alterations and additions incorporate appropriate stormwater devices to provide acceptable levels of water quality and maintain pre-development site discharge.
Contamination	A detailed Environmental Site Assessment was undertaken by EIS and evidence of contamination was found. Refer to Appendix Q. A Remediation Action Plan was recommended and will be prepared and implemented prior to any construction commencing on the site. In the interim recommendations to mitigate risks have been identified until the remediation works can be undertaken. More details on the recommendations and conclusions of the report can be found in Sections 7.1.6 and 7.2.4 and the relevant appendices.

RISK	MITIGATION MEASURES
Geotechnical	• A geotechnical assessment was undertaken to assess the stability of the site, evaluate current levels of risk and provide recommendations regarding future development at the site; • No evidence of acid sulfate soils were found on the site, notwithstanding management details should be included in case they are uncovered during construction. • Evidence of saline soils were identified, and appropriate management measures have been included in the Geotechnical report. • Details are included in Appendix T.

14 Conclusion

The Environmental Impact Statement has been prepared in accordance with the Environmental Planning and Assessment Act 1979, Environmental Planning and Assessment Regulation 2000 and Secretary's Environmental Assessment Requirements.

Our assessment confirms that the concept proposal warrants approval for the following reason:

- The subject site is suitable for the proposed development and will not result in any significant or adverse overshadowing, acoustic, privacy or amenity issues;
- The design and built form of the proposed development has been articulated to complement the streetscape and surrounding locality;
- The design of the building will contribute to visual interest and overall amenity of the area;
- Mitigation measures have been identified to manage potential environmental risks and construction impacts; and
- The development will facilitate additional employment opportunities during and after construction.

The proposal represents rational, orderly, economic and sustainable use of the land and should therefore be supported.

Appendix A – CIV Report

Provided under separate cover

Appendix B – Detailed Survey

Provided under separate cover

Appendix C – Heritage Impact Assessment

Provided under separate cover

Appendix D – Architectural Plans

Provided under separate cover

Appendix E – Waste Management Plan

Provided under separate cover

Appendix F – Arborist Report

Provided under separate cover

Appendix G – Landscape Plans

Provided under separate cover

Appendix H – Transport Assessment

Provided under separate cover

Appendix I – Integrated Water and Wastewater Management Plan

Provided under separate cover

Appendix J – Civil Plans

Provided under separate cover

Appendix K – Preliminary Construction Management Plan

Provided under separate cover

Appendix L – Secretary's Environmental Assessment Requirements (SEARs)

Provided under separate cover

Appendix M – Biodiversity Report

Provided under separate cover

Appendix N – Sustainability Report

Provided under separate cover

Appendix O – Hunt & Hunt Letter

Provided under separate cover

Appendix P – Schedule 4 Design Statement

Provided under separate cover

Appendix Q – Detailed Site Assessment Report (Contamination)

Provided under separate cover

Appendix R – CPTED Report

Provided under separate cover

Appendix S – Flooding Assessment

Provided under separate cover

Appendix T – Geotechnical Report

Provided under separate cover

Appendix U – Noise and Vibration Impact Assessment

Provided under separate cover

Appendix V – Accessibility Review

Provided under separate cover

Appendix W – Social Impact Assessment

Provided under separate cover

Appendix X – Authority Consultation Requests and Responses

Provided under separate cover

Appendix Y – Integrated Fire Services Management Plan

Provided under separate cover

Appendix Z – Power and Communications Infrastructure Report

Provided under separate cover

Appendix AA – Community Consultation Outcomes Report

Provided under separate cover

Appendix BB – BCA Report

Provided under separate cover

Appendix CC – Remediation Action Plan

Provided under separate cover

Appendix DD – Department of Education Authorisation Letter

Provided under separate cover

Appendix EE – Biodiversity Assessment Waiver

Provided under separate cover

Appendix FF – Green Travel Plan

Provided under separate cover