



Armidale High School Redevelopment

*State Significant
Development (SSD 9095)
May 2019*



May 2019

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Cover photo

View of Central Courtyard (NBRS Architecture)

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Glossary

Abbreviation	Definition
AAA	Aboriginal Archaeological Assessment
AHD	Australian Height Datum
AHIMS	Aboriginal Heritage Information Management System
AHS	Armidale High School
BAM	Biodiversity Assessment Method
BC Act	<i>Biodiversity Conservation Act 2016</i>
BDAR	Biodiversity Development Assessment Report
BCA	Building Code of Australia
CIV	Capital Investment Value
Consent	Development Consent
CEMP	Construction Environmental Management Plan
CNVMP	Construction Noise and Vibration Management Plan
COLA	Covered Outdoor Learning Area
Council	Armidale Regional Council
CPTED	Crime prevention through environmental design
CTMP	Construction Traffic Management Plan
CRN	Country Rail Network
Department	Department of Planning and Environment
DHS	Duval High School
EFSG	Educational Facilities Standards and Guidelines
EIS	Environmental Impact Statement
ENA	Environmental Noise Assessment
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
FFL	Finished Floor Level
GANSW	Government Architect NSW
GFA	Gross Floor Area
GLS	General Learning Spaces
HIS	Heritage Impact Statement
HVAC	Heating, Cooling, and Air Conditioning
JHR	John Holland Rail

LEP	Local Environmental Plan
LGA	Local government area
LTEMP	Long-Term Environmental Management Plan
Minister	Minister for Planning
NML	Noise Management Level
OEH	Office of Environment and Heritage
PAHs	Polycyclic Aromatic Hydrocarbons
PCT	Plant Community Type
PMF	Probable Maximum Flood
RAP	Remedial Action Plan
RL	Reduced Level
RMS	Roads and Maritime Services
RtS	Response to Submissions
SDRP	State Design Review Panel
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the Department of Planning and Environment
SEPP	State Environmental Planning Policy
SINSW	School Infrastructure NSW
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SRtS	Supplementary Response to Submissions
SSD	State Significant Development
TIA	Traffic Impact Assessment
TSCA	Targeted Soil Contamination Assessment
VENM	Virgin Excavated Natural Material
VSAQP	Validation Sampling and Analysis Quality Plan
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design



Executive Summary

This report provides an assessment of a State significant development (SSD) application for the redevelopment of Armidale High School (AHS) (SSD 9095). The site is located at 158-182 Butler Street, Armidale. The Applicant is the Department of Education and the proposal is located within the Armidale Regional local government area (LGA).

The Department identified transport, traffic and parking and built form, as the key issues for assessment. The Department has considered the merits of the proposal in accordance with relevant matters under section 4.15(1) and the objects of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the principles of Ecologically Sustainable Development (ESD), and issues raised in submissions as well as the Applicant's responses. The Applicant has worked through issues of access and upgrades to footpaths and roads surrounding the site with Council. The Department is also satisfied that other environmental issues of low risk once recommended conditions of consent and mitigation measures are taken into account. The Department therefore recommends approval be issued.

The proposal seeks approval for the construction of three new buildings between two and three storeys in height linked by an undercroft, a single storey addition to the existing gymnasium, consolidation of agricultural facilities in a separate new building, alterations to the existing car parking, landscaping works and installation of new utilities, drainage and communications infrastructure. The school would have the capacity to accommodate 1,580 students and 110 full time equivalent staff, an increase from 67. The proposal would provide a total of 79 general learning spaces, new administrative facilities, and new sporting facilities. The proposed school would accommodate students and staff from the existing Armidale High School (currently decamped to Duval High School) and Duval High School and become Armidale Secondary College.

The proposal has a Capital Investment Value (CIV) of \$63 million and would generate 120 operational jobs and 40 construction jobs. The proposal is SSD under clause 15 of schedule 1 of the State and Environmental Planning Policy (State and Regional Development) 2011, as it is development that has a CIV of more than \$20 million for the purpose of redeveloping the existing school. Therefore, the Minister for Planning is the consent authority.

The application was publicly exhibited between Thursday 15 November 2018 and Wednesday 12 December 2018. The Department of Planning and Environment (the Department) received a total of nine submissions, including eight submissions from public authorities (including Armidale Regional Council), and one submission from the public. An additional six submissions from public authorities were received in response to the Applicant's Response to Submissions (RtS). No submissions from the public were received in response to the RtS. The key issues raised in the submissions include traffic, transport, car parking and pedestrian safety, built form, construction noise and construction hours.

The Applicant's RtS included further information and responses to the key issues raised in submissions. The RtS included revised architectural plans showing amended building heights and footprints, an amended arborist report, landscape plans, view analysis, traffic impact assessment, construction noise and vibration management plan, and preliminary construction management plan. The RtS was referred to public agencies including Council, who raised concerns regarding safety around traffic, transport, parking and provision of infrastructure. In response to Council's concerns, the Applicant submitted a supplementary RtS (SRtS) which provided further information regarding the provision of pedestrian and traffic infrastructure associated with the school redevelopment.

The Department considered the construction and operational traffic impacts of the proposal as well as the pedestrian and cycling infrastructure surrounding the subject site. Roads and Maritime Services supported the issues raised by Transport for NSW and Council particularly with regard to the pedestrian railway crossing at Butler Street. Council also raised concerns regarding safety and required road and footpath upgrades to improve the safety of pedestrians accessing the site. The Applicant engaged with Council to address Council's concerns. The Department is satisfied that the traffic and infrastructure concerns have been adequately addressed through the RtS, SRtS and managed through recommended conditions of consent

The proposed school building would be up to three storeys in height. The Department has assessed the built form and considers that the design would utilise the natural slope of the land to minimise the bulk and scale of the proposal when viewed from the street, while providing modern, well designed facilities.

The Department considers the application is consistent with the objects of the EP&A Act including ESD and the New England North West Regional Plan 2036. The Department is satisfied the subject site is suitable for the proposal and would provide improved educational facilities for existing and future students of Armidale Secondary College. The Department concludes the proposal is in the public interest and recommends that the application be approved subject to conditions.



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1. Introduction

This report provides an assessment of a State significant development (SSD) application for the redevelopment of Armidale High School (AHS) into Armidale Secondary College at 158-182 Butler Street, Armidale (SSD 9095) to accommodate a total of up to 1,580 students and up to 110 full-time equivalent (FTE) staff.

The proposal seeks approval for the construction of three new buildings consisting of two and three storeys in height linked by an undercroft, a single storey addition to the gymnasium, consolidation of agricultural facilities in a new building, alterations and additions to the existing car parking areas, landscaping works and installation of new utilities, drainage and communications infrastructure. The application has been lodged by the Department of Education (the Applicant). Demolition of former school buildings has been undertaken through a separate approval pathway.

1.1 Site description

The subject site is located at 158-182 Butler Street, Armidale with frontages to Mann Street, Miller Street and Kentucky Street (**Figure 1**) and is legal described as:

- Lot 1 Section 49 in DP 758032.
- Lot 2 Section 49 in DP 758032.
- Lot 1 Section 161 in DP 758032.
- Lot 7005 in DP 1052246.
- Lot 74 in DP 755808.
- Lot 1151 in DP 821627.
- Lot 1 in DP 196298.

The subject site is located within the Armidale Regional local government area (LGA) and is approximately 1km south west of the Armidale town centre (**Figure 2**).

1.2 Surrounding development

The site is primarily surrounded by residential development. Armidale Bicentennial Arboretum is located to the south of Kentucky Street. An industrial area is located to the north west of the site. The Armidale railway line runs adjacent to Mann Street at the north east corner of the site (**Figure 2**).



Figure 1 | Subject site (Base source: Nearmap 2018)

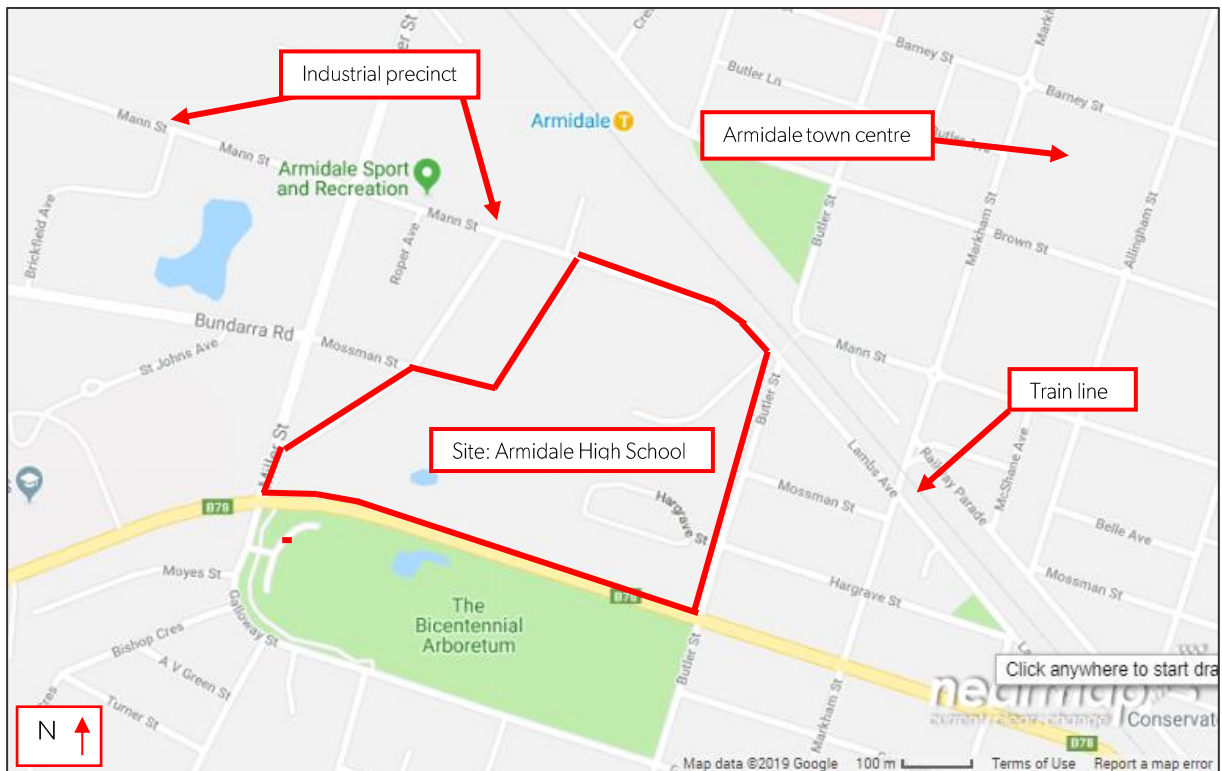


Figure 2 | Local context map (Base source: Nearmap 2018)



2. Project

2.1 Physical layout and design

The key components and features of the proposal (as refined in the Response to Submissions (RtS) and Supplementary RtS) are provided in **Table 1** and are shown in **Figure 3** to **Figure 12**.

Table 1 | Main components of the project

Aspect	Description
Project Summary	Redevelopment of AHS including the construction of three two and three storey buildings, additions to the existing gymnasium, car parking, landscaping and installation of utilities to accommodate up to 1,580 students (an increase of 620) and 110 staff (an increase of 43).
Demolition	• Students and staff were decanted from the site at the end of 2018 to Duval High School (DHS). • Demolition has been undertaken through a separate planning pathway.
Built form	• Retention of two existing buildings: ◦ Block B – locally listed heritage item. ◦ Gymnasium. • Construction of two, two and three storey buildings comprising: ◦ science and general learning space (GLS). ◦ wood and metal and food and textiles workshops. ◦ administration area, library and staff rooms. • Extension to the existing gymnasium. • Construction of a new agricultural building. • Construction of new sports courts. • Carparking and internal access roads. • Landscaping works.
Heritage	• Block B (retained) is a locally listed heritage item.
Site area	• 183,800m².
Gross floor area (GFA)	• 17,173.56m².
Uses	• Educational establishment.
Access	• Two vehicular access points along Butler Street. • Pedestrian access from Lambs Avenue, Butler Street, Kentucky Street and Mann/Stephen Street.

	Improvements to pedestrian infrastructure on Butler Street and Manns Street.
Car parking	Increasing parking by 45 spaces to 185 car parking spaces including five accessible spaces.
Bicycle parking	Parking for 100 bicycles, with an initial provision of 70 bicycle racks.
Public domain and landscaping	10,700m² hard landscaping. 19,200m² soft landscaping. - Removal of 44 trees. - Planting of 242 new trees.
Hours of operation	- No change to existing school operational hours (8:50am until 3:25pm). - Out of school hours uses up to 10pm.
Signage	- Two Type A signs: 3.5m high with an LED signage panel located at the south eastern and south western corners of the site. - One Type B signs: 1.5m high static sign at the main pedestrian entrance on Butler Street. - Five Type C signs: 1.5m high static signs at all other gate entry points. - Lettering on the school façade.
Jobs	- Operational: 110. - Construction: 40.
CIV	\$63 million.
Remediation	To be undertaken as part of the early works undertaken.

2.2 Project Area / Site Description

The site is located approximately 1km to the south of Armidale town centre, and north of Armidale Bicentennial Arboretum. To the east of the site is residential development, with industrial land uses to the north west.

The subject site was previously occupied by AHS until the end of 2018 when students and staff were decanted from AHS to DHS. Decanting of students and staff was to enable demolition of the majority of buildings on-site with the exception of Building B, a locally listed heritage item, and the gymnasium (Building O), early works and construction of a car park (subject of a separate planning pathway).

2.3 Physical Layout and Design

The proposal includes the construction of new buildings in a north eastern facing semi-circular shape around the existing Block B heritage item.

The proposed development includes the construction of three new buildings two and three storeys in height linked by an under croft, a single storey addition to the gymnasium, consolidation of agricultural facilities in a new building, sporting facilities, carparking, landscaping works and installation of new utilities, drainage and communications infrastructure.

The former Armidale High School had a capacity of 960 students and 67 staff. The proposal is to increase the student numbers by 620 to a maximum of 1,580, and staff by 43 to 110.

2.4 Uses and Activities

The proposal is for the use of the site as a high school (secondary college) and also for community use.

The school hall and playing fields are proposed to be available for out of school hours use including the continuation of the use of the multi-purpose hall, external basketball courts (available for school or community use between 3:30pm-10pm Monday to Friday, and 7am-10pm on weekends) and associated facilities for school or community events, such as presentation nights, drama or music recitals, or other gatherings of the public (whether one-off or periodic events).

2.5 Timing

Demolition and site preparation works were approved under a separate approval pathway. These works commenced in early 2019 and are expected to be completed by late 2020.

The proposal is seeking approval to allow construction to commence in mid-2019. It is proposed that construction works would occur in one stage. The Applicant has forecast completion of construction for opening in 2021.

2.6 Related Development

The first building (Block B) was constructed in 1922-23. Up until 2010, the site has had building improvements and construction works on 15 occasions.

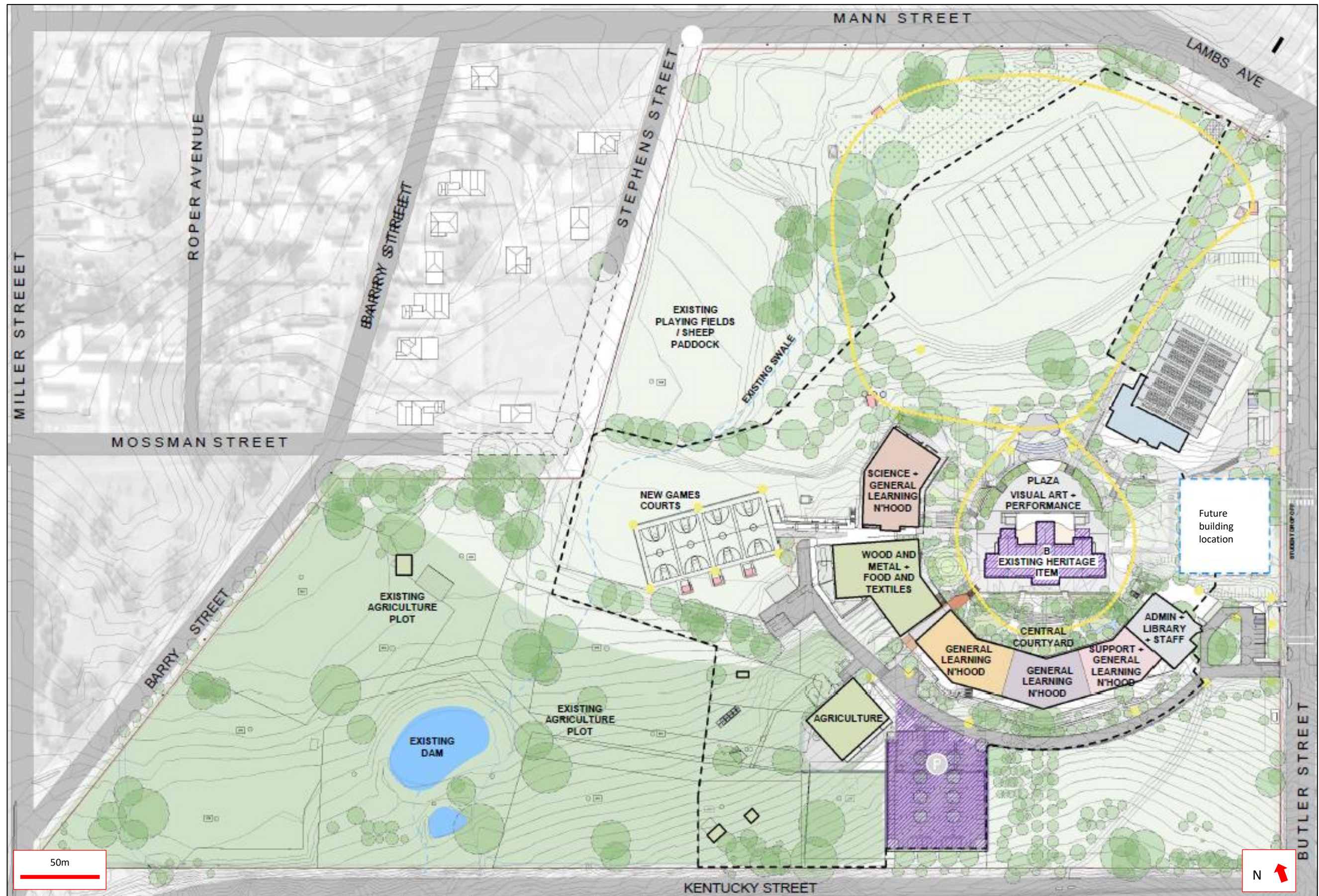


Figure 3: Proposed site layout (Base source: SRTS, 2019)

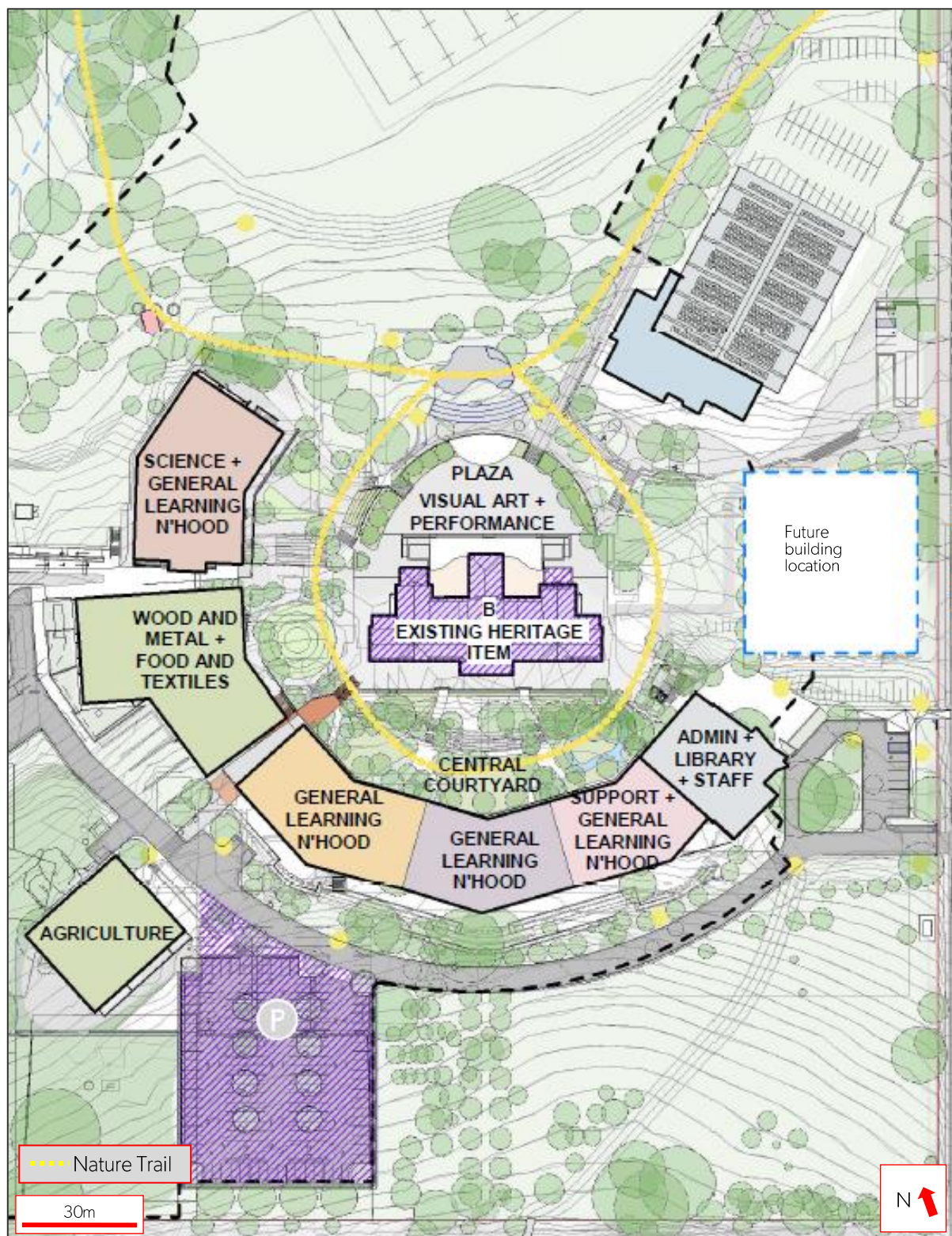


Figure 4 | Project layout (Base source: SRTS, 2019)

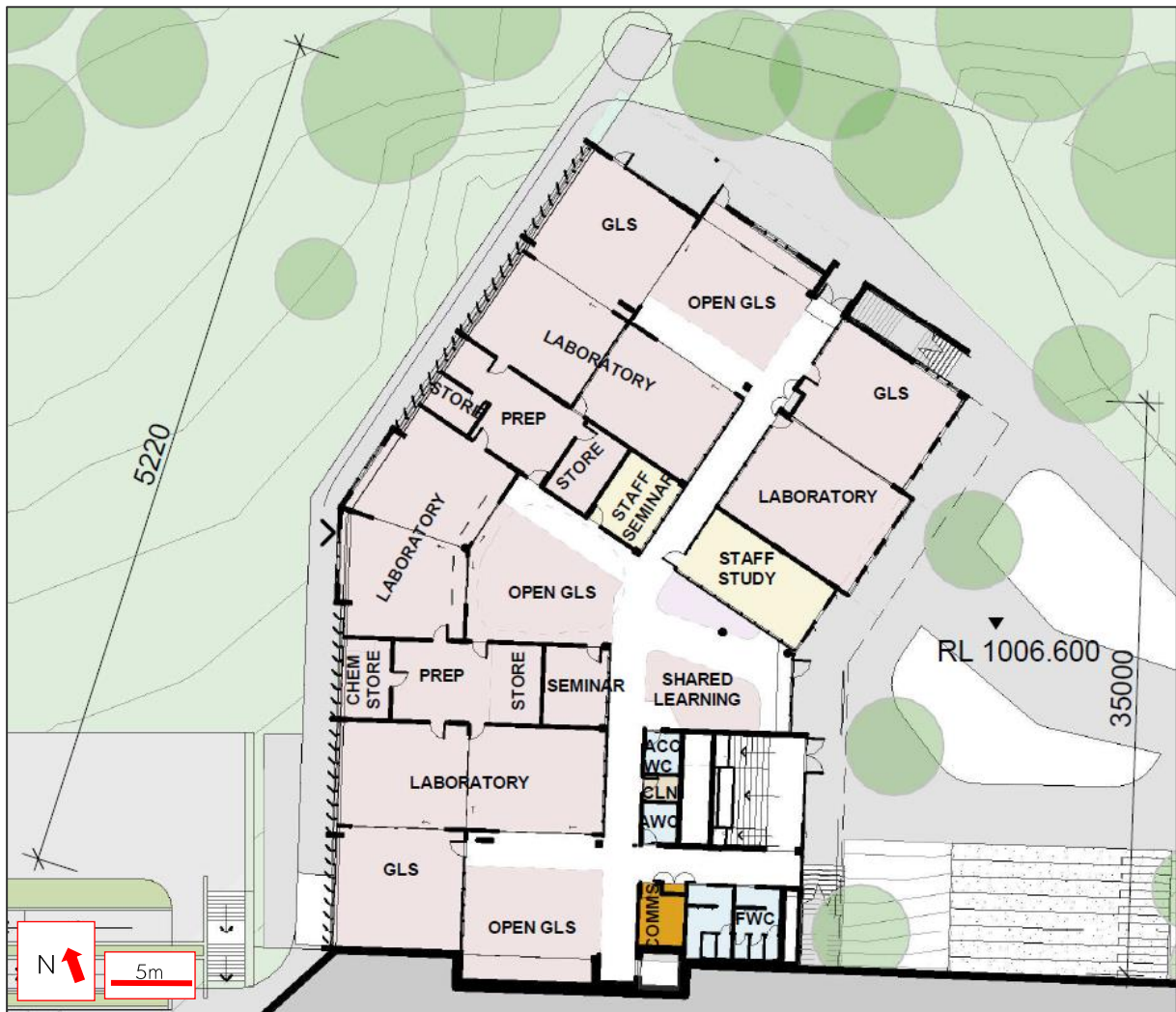


Figure 5 | Science and General Learning Spaces Ground Floor (Base source: SRTS, 2019)



Figure 6 | Science and General Learning Space First Floor (Base source: SRTS, 2019)

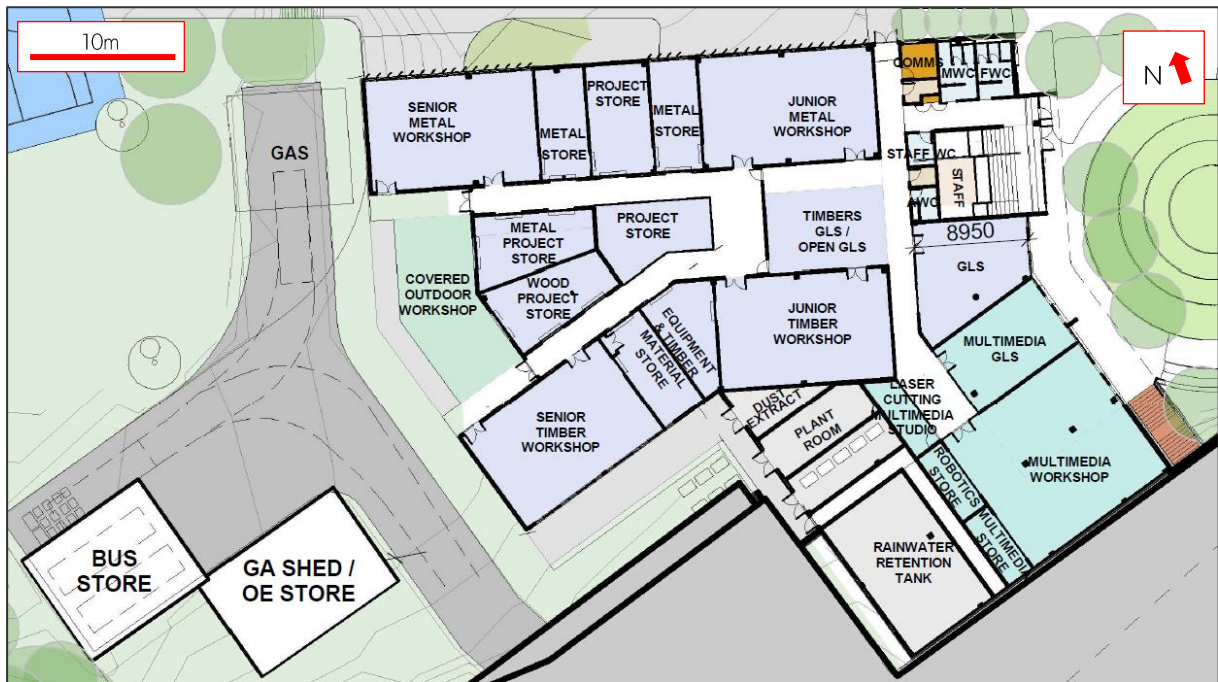


Figure 7 | Wood and Metal + Food and Textiles Ground Floor (Base source: SRTS, 2019)



Figure 8 | Wood and Metal + Food and Textiles First Floor (Base source: SRTS, 2019)

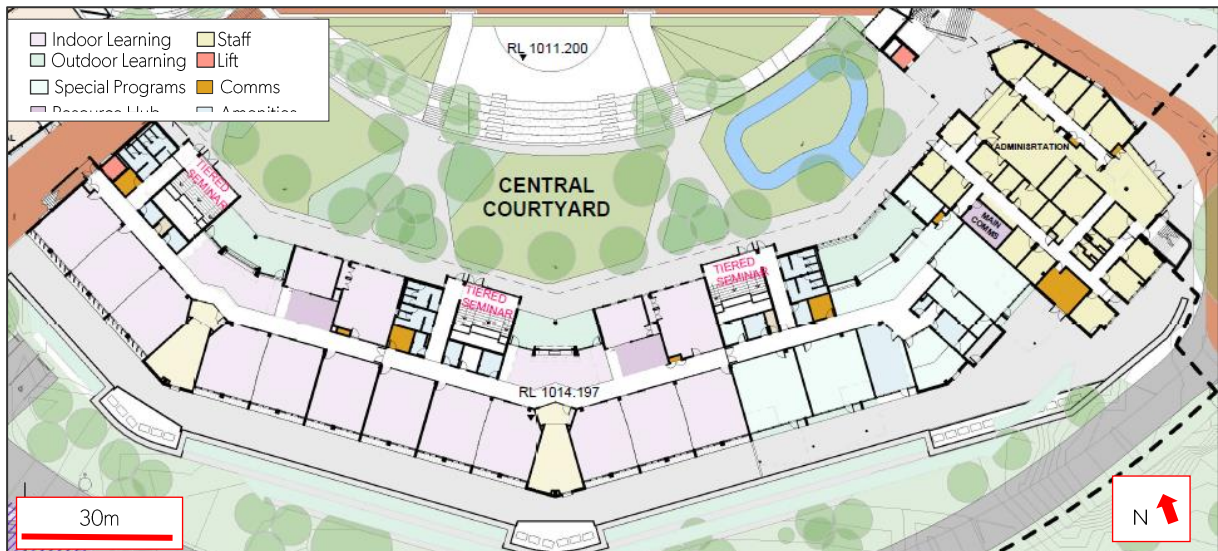


Figure 9 | General Learning Space and Administration Ground Floor (Base source: SRtS, 2019)

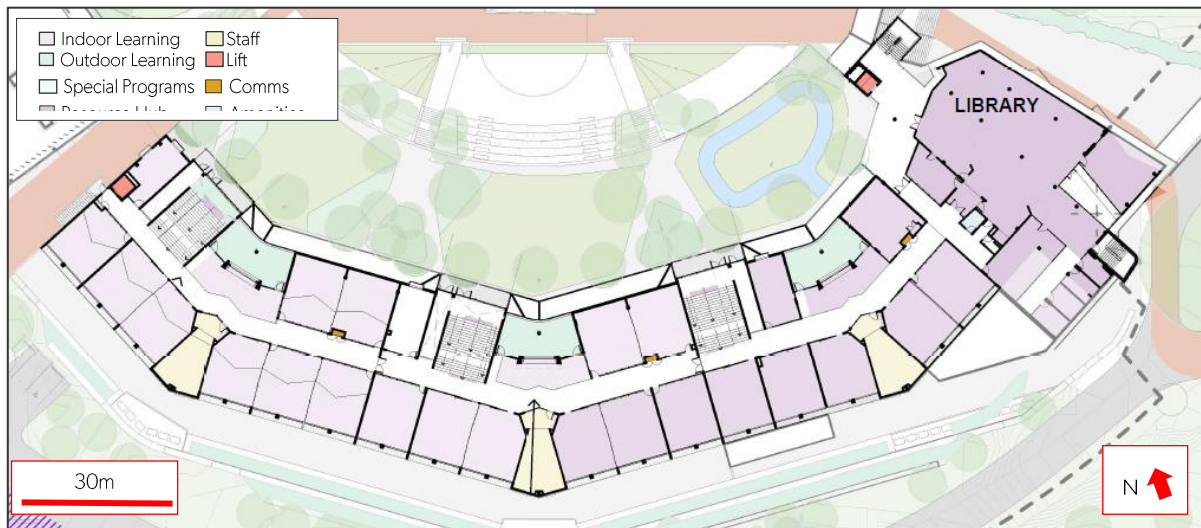


Figure 10 | General Learning Spaces and Administration First Floor (Base source: SRtS, 2019)

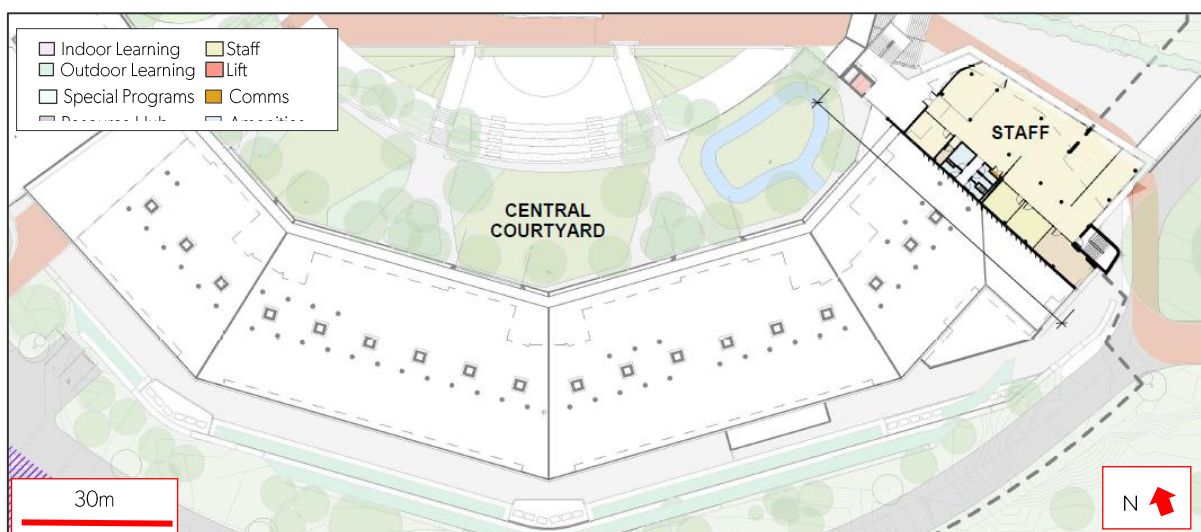


Figure 11 | General Learning Spaces and Administration Second Floor (Base source: SRtS, 2019)

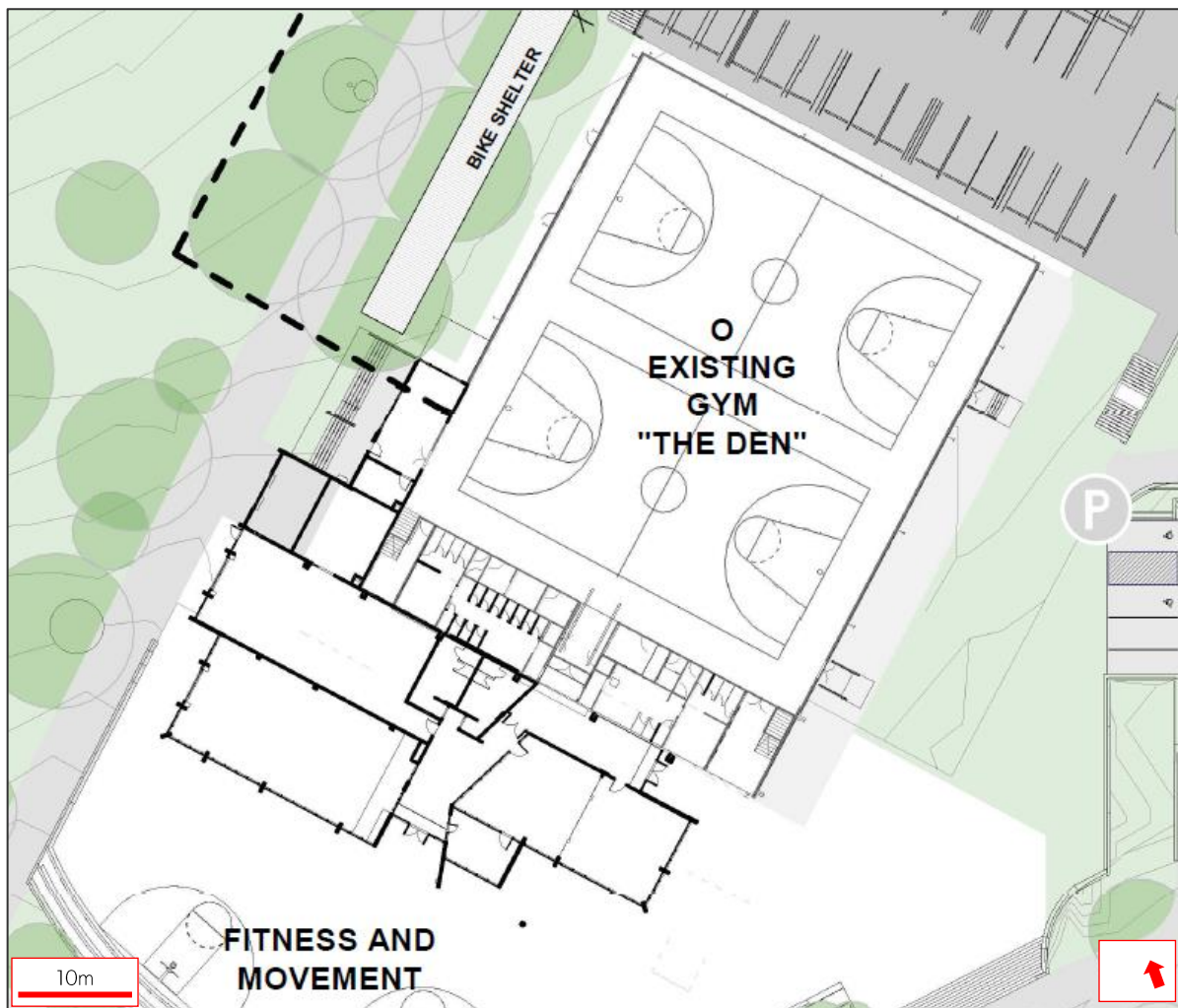


Figure 12 | Fitness and Movement Building – existing gymnasium with addition (Base source: SRtS, 2019)



3. Strategic Context

3.1. Project need and justification

Public school enrolments across NSW are anticipated to be 40,000 students higher in 2019-2020 than they were in 2015-16. In response to the need for additional public education infrastructure as a result of increased demand, the NSW Department of Education is delivering new schools and upgrading existing schools to meet this demand through the Government's \$1 billion Rebuilding NSW Schools fund.

The Department considers that the proposal is appropriate for the site given:

- it would provide new and improved teaching and education facilities.
- it is consistent with the New England North West Regional Plan 2036, as it would provide much needed school infrastructure in an existing regional community.
- it is consistent with the Transport for NSW's Future Transport Strategy 2056 as it would provide a new educational facility in a highly accessible location and provide access to additional new employment opportunities close to public transport.
- it would provide much needed school infrastructure and opportunities to co-share facilities with the local community.
- it is consistent with Infrastructure NSW's State Infrastructure Strategy 2018 – 2038 Building the Momentum as it proposes:
 - a school design to accommodate infrastructure and facilities sharing with communities.
 - it would provide direct investment in the region of approximately \$63 million, which would support 40 construction jobs and 110 operational jobs.



4. Statutory Context

4.1 State significant development

The proposal is SSD under section 4.36 (development declared SSD) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as the development has a CIV in excess of \$20 million and is for the purpose of alterations or additions to an existing school under clause 15 of Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011.

The Minister is the consent authority under section 4.5 of the EP&A Act.

In accordance with the Minister for Planning's delegation to determine SSD applications, signed on 11 October 2017, the Executive Director, Priority Projects may determine this application as:

- the relevant Council has not made an objection.
- there are less than 25 public submissions in the nature of objection.
- a political disclosure statement has not been made.

4.2 Permissibility

The site is located within the R1 General Residential zone by the Armidale Dumaresq Local Environmental Plan (ADLEP) 2012. An educational establishment is permissible with consent within the zone. Therefore, the Minister for Planning or a delegate may determine the carrying out of the development.

4.3 Other approvals

Under Section 4.41 of the EP&A Act, a number of other approvals are integrated into the State significant development approval process, and consequently are not required to be separately obtained for the proposal.

Under Section 4.42 of the EP&A Act, a number of further approvals are required, but must be substantially consistent with any consent for the proposal (e.g. approvals for any works under the *Roads Act 1993*).

The Department has consulted with the relevant public authorities responsible for integrated and other approvals, considered their advice in its assessment of the project, and included suitable conditions in the recommended conditions of consent (see **Appendix C**).

4.4 Mandatory matters for consideration

4.4.1 Environmental planning instruments

Under section 4.15 of the EP&A Act, the consent authority is required to take into consideration any environmental planning instrument (EPI) that is of relevance to the development the subject of the development application. Therefore, the assessment report must include a copy of, or reference to, the provisions of any EPIs that substantially govern the project and that have been taken into account in the assessment of the project.

The Department has undertaken a detailed assessment of these EPIs in **Appendix B** and is satisfied the application is consistent with the requirements of the EPIs.

4.4.2 Objects of the EP&A Act

The objects of the EP&A Act are the underpinning principles upon which the assessment is conducted. The statutory powers in the EP&A Act (such as the power to grant consent/approval) are to be understood as powers

to advance the objects of the legislation, and limits on those powers are set by reference to those objects. Therefore, in making an assessment, the objects should be considered to the extent they are relevant. A response to the objects of the EP&A Act is provided at **Table 3**.

Table 2 | Response to the objects of section 1.3 of the EP&A Act

Objects of the EP&A Act	Consideration
(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	The proposal involves the construction of new school buildings for the amalgamation of DHS and AHS.
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal includes measures to deliver ecologically sustainable development (ESD) (Section 4.4.3) through targeting a Green Star rating. A condition is recommended to achieve a minimum 4-Star Green Star rating.
(c) to promote the orderly and economic use and development of land,	The proposal is an orderly and economic development and use of the land as the proposal provides for the redevelopment of an existing school which would provide new, fit-for-purpose educational facilities on a site owned by the Department of Education.
(d) to promote the delivery and maintenance of affordable housing,	Not applicable.
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	A Biodiversity Development Assessment Report (BDAR) was submitted with the application. The Department's consideration is outlined in Section 6 of this report.
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	Block B is a locally listed heritage item which has been retained. The Department has undertaken a detailed assessment of the heritage impacts in Section 6 of this report. An Aboriginal Archaeological Assessment was provided with the Environmental Impact Statement (EIS). The Department's consideration is outlined in Section 6 of this report.
(g) to promote good design and amenity of the built environment,	The building has a modern functional design and would integrate with the surrounding built environment.

(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The proposal would promote proper construction and maintenance of buildings subject to recommended conditions of consent.
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	The Department publicly exhibited the proposal (Section 5.1), which included consultation with Council and other public authorities and consideration of their responses (Sections 5 and 6).
(j) to provide increased opportunity for community participation in environmental planning and assessment.	The Department publicly exhibited the proposal as outlined in Section 5.1, which included notifying adjoining landowners, placing a notice in newspapers and displaying the proposal on the Department's website and at Council during the exhibition period. Issues raised in submissions have been addressed in Section 6.

4.4.3 Ecologically Sustainable Development

The EP&A Act adopts the definition of ESD found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle.
- inter-generational equity.
- conservation of biological diversity and ecological integrity.
- improved valuation, pricing and incentive mechanisms.

The Applicant has undertaken a self-assessment using the Green Star Design and As Built Scorecard V1.2. The self-assessment resulted in a 3-Star Green Star rating which does not meet the suggested 4-Star Green Star rating in the Educational Facilities Standards and Guidelines (EFSG) design guide.

The proposed ESD initiatives include:

- a building management system to control natural ventilation and assisted crossflow.
- building fabric would meet or exceed thermal sealing performance under the Building Code of Australia.
- collection and use of solar energy.
- heating, ventilation and air conditioning (HVAC) system would be managed from a central controller to set operational schedules and levels to avoid excess use.
- use of energy efficient LED light sources and light sensors to control lights use in areas where natural light is available.
- rainwater harvesting for irrigation purposes.
- water saving outlets and appliances.
- re-use or recycling of building materials from existing buildings.
- use of sustainable transport options through the implementation of a Greet Travel Plan (GTP).

In accordance with the Educational Facilities Standards Guideline (EFSG), the proposed school should target a minimum 4-star Green Star Rating. The Department has recommended a condition that requires the Applicant to register for a minimum 4-star Green Star rating with the Green Building Council Australia prior to the commencement of building works.

The Department has considered the proposed development in relation to the ESD principles. The precautionary and inter-generational equity principles have been applied in the decision-making process via a thorough and rigorous assessment of the environmental impacts of the proposed development. The proposed development is consistent with ESD principles as described in section 6.6.5 and Appendix 24 of the Applicant's EIS, which has been prepared in accordance with the requirements of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).

Overall, the proposal is consistent with ESD principles and the Department is satisfied the proposed sustainability initiatives would encourage ESD, in accordance with the objects of the EP&A Act.

4.4.4 Environmental Planning and Assessment Regulation 2000

Subject to any other references to compliance with the EP&A Regulation cited in this report, the requirements for Notification (Part 6, Division 6) and Fees (Part 15, Division 1AA) have been complied with.

4.4.5 Planning Secretary's Environmental Assessment Requirements

The EIS is compliant with the Planning Secretary's Environmental Assessment Requirements (SEARs) and is sufficient to enable an adequate consideration and assessment of the proposal for determination purposes.

4.4.6 Section 4.15(1) matters for consideration

Table 4 identifies the matters for consideration under section 4.15 of the EP&A Act that apply to SSD in accordance with section 4.40 of the EP&A Act. The table represents a summary for which additional information and consideration is provided for in **Section 6** (Assessment) and relevant appendices or other sections of this report and EIS, referenced in the table.

Table 3 | Section 4.15(1) matters for consideration

Section 4.15(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Satisfactorily complies. The Department's consideration of the relevant EPIs is provided in Appendix B of this report.
(a)(ii) any proposed instrument	The Department's consideration of proposed instruments is provided in Appendix B of this report.
(a)(iii) any development control plan (DCP)	Under clause 11 of the SRD SEPP, DCPs do not apply to SSD.
(a)(iiia) any planning agreement	Not applicable.
(a)(iv) the regulations <i>Refer Division 8 of the EP&A Regulation</i>	The application satisfactorily meets the relevant requirements of the EP&A Regulation, including the procedures relating to applications (Part 6 of the EP&A Regulation), public participation procedures for SSD and Schedule 2 of the EP&A Regulation relating to EIS.

(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	Appropriately mitigated or conditioned - refer to Section 6 of this report.
(c) the suitability of the site for the development	The site is suitable for the development as discussed in Sections 3, 4 and 6 of this report.
(d) any submissions	Consideration has been given to the submissions received during the exhibition period. See Sections 5 and 6 of this report.
(e) the public interest	Refer to Section 6 of this report.

4.4.7 Biodiversity Conservation Act 2016

Under section 7.9(2) of the *Biodiversity Conservation Act 2016* (BC Act), SSD applications are “to be accompanied by a BDAR unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values”.

A BDAR was provided with the EIS and with the RtS. The BDAR provided an assessment of the biodiversity on the site in accordance with the BC Act. The BDAR identified that there are two plant community types (PCT) present on the subject site and are listed as Threatened Ecological Communities under the BC Act:

The BDAR also noted three candidate species are predicted to occur at the site. An assessment was undertaken for all three candidate species against a Biodiversity Assessment Method (BAM). The BAM determined that the proposed development would not have any serious and irreversible impacts within the subject site that would not require offsets for native vegetation, therefore no ecosystem or species credits would be required for the proposed development.

The impact of the proposal on biodiversity values has been assessed in the BDAR accompanying the EIS and considered in **Section 6** of this report.

5. Engagement

5.1 Department's engagement

In accordance with Schedule 1 of the EP&A Act, the Department publicly exhibited the application from Thursday 15 November 2018 until Wednesday 12 December 2018 (28 days). The application was exhibited at the Department and on its website, at the NSW Service Centre and at Armidale Regional Council's (Council) office.

The Department placed a public exhibition notice in the Armidale Express Extra and Armidale Express on Wednesday 14 November 2018 and notified adjoining landholders and relevant State and local government authorities in writing. The Department representatives visited the site to provide an informed assessment of the development.

The Department has considered the comments raised in the public authority and public submissions during the assessment of the application (**Section 6**) and/or by way of recommended conditions in the instrument of consent at **Appendix C**.

5.2 Summary of submissions

The Department received a total of nine submissions, comprising eight submissions from public authorities (including Council), and one submission from the public. A summary of the issues raised in the submissions is provided at **Tables 5** and **6** below and copies of the submissions may be viewed at **Appendix A**.

Table 4 | Summary of Government Agency Submissions

Submitters	Number	Position
Government Agencies	7	
• Crown Lands	✓	Comment
• Environment Protection Authority (EPA)	✓	
• Essential Energy	✓	
• Heritage Division of Office of Environment and Heritage (OEH)	✓	
• OEH	✓	
• Roads and Maritime Services (RMS)	✓	
• Transport for NSW (TfNSW)	✓	

Table 5 | Summary of Council, Community and Special Interest Group Submissions

Submitters	Number	Position
Council	1	Comment
Community	1	
	0	Object
	1	Support
	0	Comment

5.3 Key Issues – Government Agencies

A summary of the issues raised in the public authority submissions is provided at **Table 6** below and copies of the submissions may be viewed at **Appendix A**.

Table 6 | Summary of public authority submissions to the EIS exhibition

Crown Lands
Crown Lands provided the following comments in relation to the proposal:
- Noted that a public park is located along the northern boundary of the subject site, which is a Crown reserve. The plans for the proposal show that this reserve is largely fenced from the existing school site and no construction is to occur in this area. - No impacts on Crown land are anticipated and no objections are raised to the proposal. However, Crown Lands requested that the Applicant be made aware of the reserve should any unanticipated impacts be identified during construction and/or operation of the school.
EPA
The EPA provided comments in relation to:
- waste management – strongly encourages the proponent to continue to engage and consult with Council regarding resource recovery and waste disposal. - excavated soils be classified as Virgin Excavated Natural Material (VENM) and exemption for ENM prior to re-use or disposal. All other waste materials be classified in accordance with the EPA's Waste Classification Guidelines. - contaminated land management – the EIS identified the presence of asbestos and polycyclic aromatic hydrocarbons (PAHs) on the site and acknowledged that the Remedial Action Plan (RAP) identified that the site could be made suitable for its intended use. - that the Stormwater Management Plan be incorporated into conditions of consent. - dust management – the proponent as far as practicable minimise generation of air emissions and that dust mitigation measures be identified and implemented in a Construction Environmental Management Plan (CEMP).

- construction noise and vibration – that all feasible and reasonable work practices be implemented to minimise noise levels.
- the Construction Noise and Vibration Management Plan (CNVMP) identifies proposed construction hours outside the Interim Construction Noise Guideline. The EPA recommended limiting construction work to standard hours.
- the Environmental Noise Assessment (ENA) identified that the location of the mechanical plant for the GLS had not yet been finalised and recommended an acoustic assessment be completed once the type and location of mechanical plant has been finalised.
- should noise complaints be received, the EPA may require noise monitoring be undertaken and / or additional noise mitigation measures be implemented.

Essential Energy

Essential Energy provided comments in relation to:

- modifications to the electrical distribution network would be required.
- works and costs for network augmentation are to be met by the proponent.
- Essential Energy issued a Design Information Package (Project Id: 116031) to Marline Newcastle Pty Ltd outlining the electrical distribution network requirements.

Heritage Division

Heritage raised the following concerns with regard to the proposal:

- the proposal should have no adverse impact upon the railway items of State heritage significance which are located to the north west of the subject site.
- advice given prior to the application being made was not considered prior to lodgement.
- an Historical Archaeological Assessment was omitted from the EIS.
- Heritage Division does not object to the provision of an Archaeological Watching Brief be provided in the contract for construction.
- No further referral is required unless State significant historic heritage or archaeology is identified.

OEH

OEH provided the following comments:

- if surface disturbance identifies Aboriginal objects, then all works must halt and a suitably qualified archaeological specialist must be contacted to develop an appropriate management strategy, and that the site be registered in the Aboriginal Heritage Information Management System (AHIMS).
- if human remains are located, all works must halt immediately, and the NSW Police are to be contacted. No further action is to be undertaken until the NSW Police provide written notification to the proponent. If the remains are identified as ancestral Aboriginal, then OEH must be contacted.

RMS

RMS provided the following comments:

- supported issues raised by TfNSW and Council on:
 - the efficiency and safety of Kentucky Street – Butler Street intersection.
 - the proposed school bus bays facilities and school bus operational issues at the school.
 - the railway pedestrian crossing at Butler Street.
 - the requirement for a Road safety Audit.
 - traffic calming and speed management around the school.
 - the implementation of the Green Travel Plan (GTP).
- key concerns are the safety and efficiency of the road network, traffic management, the integrity of infrastructure assets and the integration of land use and transport.
- Kentucky Street is on the Waterfall Way route. Waterfall Way [MR76] is a classified (State) road under the *Roads Act 1993*. Any proposed works on a State road would require the consent of RMS.
- the EIS, specifically 6.6.4 Transport and Accessibility, the 'baseline' for impact assessment is reasonable however, Appendix 17 - *Traffic Impact Assessment*, does not include all reasonably feasible mitigation options.
- the assessed impact is not considered acceptable within the policy context of RMS for the following reasons:
 - to encourage slower vehicle speeds around schools, consideration should be given to the installation of traffic calming devices.
 - the advanced warning signage and delineation of the Kentucky Street pedestrian refuge needs to be improved to provide better visibility.
 - RMS supports council's suggestion for an off-road bus bay.
- additional work has been identified as being required prior to the opening of the redeveloped Armidale Secondary College including:
 - aligning the proposed Green Travel Plan (GTP) with the NSW Government guidelines for Active Transport planning which identifies a 2km radius for walking and 5km radius for cycling from the target destination.
 - drop off facilities need further assessment to ensure road safety requirements are maintained around the school.
- a Road Safety Audit (RSA) is required and should consider:
 - advance warning signage for the pedestrian crossing near Butler Street.
 - intersection of Lambs Avenue/Mann Street and Butler Street.
 - existing pedestrian crossing.
 - stopping restrictions on both sides of Lambs Avenue/Mann Street.
 - placement of vegetation.

TfNSW

TfNSW provided comments in relation to:

- rail crossings – should there be an increase in the frequency of rail services, the risk level would need to be reassessed and the need for risk mitigation measures would need to be reconsidered.

- provision of detailed design of the five proposed bus bays demonstrating compliance with disability access standards and guidelines.
- the proponent should consult with local bus operators and TfNSW regarding the temporary relocation of AHS to DHS.
- bicycle parking and end of trip facilities for staff and student be provided in accordance with the relevant Australian Standards and Austroads Guidelines.
- the proponent should provide catchment data to determine the likely demands on the transport network prior to commencement of school operations.

TfNSW also provided recommended conditions in relation to the following, should the application be approved:

- GTP be prepared including target mode shares to reduce reliance on private vehicles.
- Traffic and Parking Management Plan which details measures to safely manage daily transport to/from the school, including traffic and parking management.
- signage and Line Marking Plan be prepared in consultation with Council.
- a Road Safety Audit (RSA) be conducted on all relevant sections of road utilised for bus and private vehicle drop-off/pick-up and appropriate road safety measures implemented based on RSA recommendations.

John Holland Rail (JHR), on behalf of Country Rail Network (CRN), provided suggested conditions to TfNSW to be included in their response:

- demolition and construction Risk Assessment/Management Plan and Safe Work Method Statement be submitted for review prior to Construction Certificate issue.
- if excavation in, above, below, or adjacent to rail corridors, then a geotechnical assessment confirming no adverse impact would be had on the stability of the rail corridor during construction.
- provision of an assessment based on the Australian Level Crossing Assessment Model to identify key potential risks at the level crossings as a result of construction traffic.
- should cranes be used above the rail corridor, a safety assessment of any potential intrusion of the works necessary for the proposal on the Danger Zone, and that any works by undertaken by a qualified Protection Officer.
- approval to work, access and possession of the rail corridor be assessed and endorsed by JHR.
- JHR does not foresee any safety risks associated with the proposed fencing along Lambs Avenue and Mann Street.
- the proposed development, including proposed stormwater management measures would be unlikely to have an adverse impact on the rail corridor during construction and operation.
- the proposed development would not be adversely affected by rail, noise or vibration based on current operations.
- development lighting and external finishes of buildings should not temporarily blind or cause distraction to the railway corridor.

-
- use of red and green lights is to be avoided in all signs, lighting or building colour schemes which face the rail corridor.
 - access to the rail corridor is prohibited.

5.4 Key Issues – Council/Community/Special Interest Groups

5.4.1 Council key issues

Council does not object to the proposal, however, it provided comments in relation to:

- Traffic assessment:
 - Designation of the speed zone for Butler Street was incorrectly identified in the TIA.
 - Council is of the opinion that there has been an underestimation of pedestrian movements using the Kentucky Street pedestrian refuge crossing. The pedestrian refuge was installed due to limited sight distance available at Butler Street and should remain to provide a safe crossing location.
 - Concerns are raised with regard to the railway pedestrian crossing at Butler Street. The developer has a responsibility to ensure that a safe travel path is available to students to the proposed development. Should an upgrade be required, it would be the responsibility of the rail provider in conjunction with the developer.
 - Require a condition of consent to review the rail crossing and confirmation of time frames for any required upgrades.
 - Council are not in favour of increased traffic flows on Hargrave and Mossman Streets as they are minor residential streets.
 - Study was lacking in consideration of local traffic environment.
 - Road safety concerns were not identified, despite complaints made to Council regarding the Miller/Kentucky intersection and have submitted Blackspot funding applications. There have been six motor vehicle accidents in the last five years.
- Parking requirements:
 - Considers that the traffic assessment of car parking for the development was flawed.
 - Sampling methodology considered only one daytime sampling regime.
 - The report made little or no reference to the impact of increase occupancy on neighbouring properties.
 - The formula used for determining the number of car parking spaces for years 11 and 12 is reflective of a metropolitan school, not a school whose catchment includes rural properties, where distances of travel and lack of public transport contribute to a higher reliance on private car use.
 - Risk of impacting on local residents should be minimised and off-street car parking for students should be provided in accordance with the parking likely to be generated by the development.
 - Recommended Council's DCP car parking rates be adopted resulting in a total of 163 off-street car parking spaces being provided, with an appropriate mix for student parking be provided.

- GTP
 - The provision of only 20 bicycle parking spaces for 1,580 students is insufficient.
 - Recommended the installation of more bicycle parking, or the design should allow for the provision of an increase in bicycle parking if the demand warrants it.
- There appears to have been little consideration to vehicle/pedestrian conflict point at Butler St/Lambs Ave. No information has been provided as to whether the pedestrian crossing would remain or be removed.
- Stormwater management:
 - the proposed drainage system discharges to the natural water course on the north side of the site to the Butler Street kerb.
 - Council's engineering code requires that all stormwater outlets to natural gullies and water courses in the urban area have a Gross Pollutant Trap installed at or near the stormwater pipe system.
 - Council's preference would be for direct connection to the existing stormwater pipe in Butler Street, preferably to an existing pit. If connection to an existing pit cannot be achieved, a new junction pit constructed over the existing pipe line would be required.
- Consideration should be given to providing upgrades to existing infrastructure upgrades including strengthened pavement for the bus zone, full width pavement upgrade/renewal along the full length of the school along Butler Street, removal of redundant line-marking, removal of the east kerb widenings and west kerb blisters where no longer required, an assessment of street lighting and upgrading where necessary including at the proposed new pedestrian crossing.
- With the increase in occupancy of the site, Council requests a Developer Servicing Plan (DSP) charge be applied to the development in accordance with section 306 of the *Water Management Act 2000* and Council's Policy for the additional students.
- Council noted that additional applications would need to be lodged and approval obtained for Trade Waste and Plumbing and Drainage.

Council did not provide recommended conditions in their submission.

5.4.2 Community issues

A summary of the issues raised in the one public submission is provided at **Table 7** below.

Table 7 | Summary of the public submission to the proposal

Issue	Comment
Air Quality	• Any potential disturbance to or deterioration of the air quality with particular consideration to dust or asbestos blown from the site during the redevelopment construction.
Construction hours	• Being kept informed of the hours of construction, anticipating that whilst they would be outside the normal hours of operation of the current school site, they would take into consideration the residential nature of the area.

	• Advice in advance of any major adverse impact anticipated during the construction period.
Contact Details	• Having an ongoing and readily accessible contact person to discuss any impacting concerns that may arise as neighbouring property owner over the duration of the construction period.
Noise	• Potential for construction noise and vibrations affecting the quiet social residential amenity of the area or causing physical effect on my property from drilling or blasting or affecting personal health and wellbeing of property residents.
Traffic	• Increased traffic flow and noise from heavy vehicles during construction phase and after completion with an increased student population requiring access to the site. • Potential decreased access to on street parking adjacent to our property during the construction period from heavy vehicle traffic and on-site worker parking.

5.5 Response to Submissions

Following the exhibition of the application the Department placed copies of all submissions received on its website and requested the Applicant provide a response to the issues raised in the submissions.

On 15 March 2019, the Applicant provided an RtS (**Appendix A**) on the issues raised during the exhibition of the proposal. The RtS included amended architectural plans including amended building heights and footprints, amended arborist report, landscape plans, view analysis, traffic impact assessment, CNVMP, and preliminary construction management plan.

The RtS was made publicly available on the Department website and was referred to the relevant public authorities. An additional five submissions were received from public authorities, including Council, EPA, OEH, RMS, and TfNSW. No submissions were received from the public. A summary of the issues raised in the submissions is provided at **Table 8** and copies of the submissions may be viewed at **Appendix A**.

Table 8 | Summary of public authority submissions to the RtS

EPA

EPA's comments have been acknowledged and relevant management plans would be prepared and/or updated to incorporate comments on the project. The EPA has no further comments or issues to raise regarding the project.

OEH

OEH advised they have no outstanding issues for this proposal.

RMS

RMS provided the following comments on the RtS:

- Council is the roads authority for all public roads (other than freeways or Crown roads) in the local government area pursuant to section 7 of the *Roads Act 1993*.
- After further consultation with Council, RMS relies on their response to the issues raised on the below matters:
 - Council's suggestion for an off-road bus bay.

- o Requirement for a GTP to encourage modal shift but walking and cycling network improvements would need to be in place to support this initiative.
- o Consultation is required for the management of Drop off facilities with the school and parents.
- o Some of the items raised in the Road Safety Audit would require confirmation of actions required to achieve close out of the responses.
- Otherwise RMS accepts the responses to their submission dated 18 December 2018.

TfNSW

TfNSW provided the following comments in relation to bus infrastructure:

- the Applicant has noted that compliance with bus capable infrastructure standards and disability access standards/guidelines would be satisfied at the Detailed Design stage, following SSD approval. The Department could consider implementing conditions of consent to ensure compliance would be achieved.

Council confirmed the RtS has addressed some aspects of its original submission. However, reiterated its concerns which are provided in **Table 9**.

Table 9 | Summary of Council's submission to the RtS

Issue	Discussion
Public roads • Accident history of the Miller/Kentucky intersection and the increase in traffic through the intersection as a result of the proposed development should be addressed. • Changes to Butler Street vehicle movements need to consider resulting queueing lengths in Butler Street, delays resulting from pedestrian crossing movements and risk to pedestrians of turning traffic from Butler Street. • The technical reports do not highlight the level of commercial traffic utilising Kentucky Street and Mann Street. We contend that traffic/pedestrian safety has in some matters been down played to reduce requirements for infrastructure upgrades and seeks to shift same to council responsibility rather than the proponent of the development, the Department of Education/SINSW. • There are a series of interconnecting traffic safety issues which Council believe have been considered individually rather than holistically. Council are of the opinion that there may be the potential for substantial risk associated with the proposed design.	• The public roads concerns raised by Council were resolved in the meeting held between the Applicant and Council on 10 April 2019. It was determined that the Applicant would provide upgrades to pedestrian infrastructure to improve pedestrian safety and removed Council's concerns with regard to traffic safety issues.
Buses • The bus bay should be located within the school grounds. • Following the most recent changes to bus movements by the Department of Transport, the school would be used as one of the bus transfer stops for the afternoon school runs.	• The bus bay matter was discussed in the meeting between the Applicant and Council on 10 April 2019. • It was resolved that the bus bay would remain on Butler Street but

• There are seven buses that all come together in the location and then the students transfer between buses for their relevant route. • The length required for 7 buses is approx. 95m. • Numbers may be increased further by other buses coming and going. • This would need to be considered in conjunction with the Department of Transport and the local bus operators before the final design is determined. • A longer bus bay would improve all the traffic safety issues.	would be extended to cater for a maximum of 7 buses. • Amended plans were submitted as part of the SRtS including this change.
Car Parking • Relocation of the student parking to the south hill area has been rejected by the proponent as the area has native grasses identified as important in the flora and fauna assessment. • Concerns raised with regard to the conflict between the student car park entry/exit and bus layover/pedestrian movements as identified in the RSA. Council encouraged the car park be relocated, and an off-street bus bay be provided.	• This matter was discussed at the meeting between the Applicant and Council on 10 April 2019. • Conflicts between the bus bay area and the car parks were resolved with the entry/exit being relocated to the north of the bus bay. • Amended plans were submitted as part of the SRtS.
Pedestrian and bicycle infrastructure • The significant increase in maximum the student population (an additional 620 students up from 960) is a substantive change and as such the surrounding facilities should be fully considered and upgraded as appropriate. • Pedestrian infrastructure at the Butler Street rail crossing requires upgrade for the increased pedestrian and bicycle traffic. • The existing crossing point on Manns Street is in an average state of repair and requires upgrade and enhancement to accommodate the increased pedestrian traffic that would occur, and the increased use of bicycles desired by the GTP. • Issues at the crossing relate to gaps where students could potentially trip and fall, width of the crossing, capacity of the approach routes and feasibility for use by cyclists. • Council would review infrastructure upgrade requirements with the submission of detailed design plans. • Areas such as the bus bay should be considered as part of the detailed design process to assess the existing pavements suitability for the increase loads and movements.	• The Applicant has agreed to provide pedestrian/cycling facilities including an upgraded footpath 1500mm wide along the western side of Butler Street between Manns Street and Kentucky Street. • The Department has recommended a condition of consent which requires the detail design and construction of the pedestrian infrastructure prior to operation of the school.
Road Safety Audit • Provision of a Road Safety Audit (RSA) is required and forward to Council for review and comment. Undertake the necessary upgrades prior to the school being opened.	• This item was discussed during the meeting between the Applicant and Council on 10 April 2019. • Through the resolution of other items, the need for a RSA was removed.

- A full reassessment should be undertaken of Butler Street that considers the car parking entries, pedestrian entry, bus parking, kiss and ride parking, street pedestrian crossing points. A number of matters are raised in the RSA further supporting this need.
- The RSA was undertaken by TTM on a dry day and night with clear skies, with the school non-operational. While the assessment is detailed, these factors limit the assessor's ability to fully understand some site issues and the impacts of winter/wet days in Armidale.

Stormwater drainage

- Plan 7070-BIRZ-SW-09 of the stormwater drainage plan set, shows multiple pipes connecting to a pit on the footpath. To avoid issues with the installation of other services within the footpath reserve, Council requires the pipes to be combined within the school grounds and a single pipe taken across the footpath.
- This matter was resolved at the meeting between the Applicant and Council.
- It was determined that blisters be removed from Butler Street between Mossman and Hargrave Streets to improve stormwater flow.

Landscaping

- Council has assessed the tree in the south eastern corner of the site and found that it is not protected by any restriction for removal. Council agree that "lifting the crown" or branch trimming would meet the identified safety concern. The tree is a poplar that is believed to be 100 years old or more.
- This matter was resolved during the meeting between the Applicant and Council.
- It was decided that crowning of the lower area of the tree be undertaken to improve vehicle/pedestrian visibility.
- The Department has recommended a condition that this be undertaken within six months of the commencement of construction.

Street lighting

- Street lighting at the existing crossing at Lambs Avenue and the new crossing location proposed in Butler Street must have a lighting assessment undertaken and upgrade requirements completed by the proponent. Consideration need to be given to the low sun in the afternoon after school finishes, early darkness in winter – gloom at 4.30pm / 5pm dark by 6pm. The auditors have shown the crossing at night, but similar poor lighting occurs in the late afternoon at around 5pm during winter.
- Operation of the new enlarged school would likely extend hours of use by students and teachers and may generate pedestrian traffic at night. This additional need is generated by the development and as such the costs should be the responsibility of the proponent.
- This was resolved at the meeting between the Applicant and Council.
- A condition has been recommended which requires the assessment and installation of appropriate street lighting for pedestrian crossing facilities on Butler Street and at the Butler/Mann Street intersection.

The Applicant submitted a supplementary RtS (SRtS) including minutes from a meeting held between Council and the Applicant demonstrating that all Council's outstanding concerns had been addressed (as outlined above) with regard to traffic, transport, parking and infrastructure provision. Conditions have been recommended to ensure the finalisation of design details in relation to the delivery of agreed infrastructure.



6. Assessment

The Department has considered the EIS, the issues raised in submissions and the Applicant's RtS and SRtS in its assessment of the proposal. The Department considers the key issues associated with the proposal are:

- traffic, transport, parking and pedestrian safety.
- built form.

Each of these issues is discussed in the following sections of this report. Other issues were taken into consideration during the assessment of the application and are discussed at **Section 6.3**.

6.1 Traffic, transport, parking and pedestrian safety

6.1.1 Construction Traffic

The Applicant provided a Construction Traffic Management Plan (CTMP) with the EIS. The CTMP provides proposed construction vehicle routes (**Figure 13**), and site access arrangements during construction (**Figure 14**). The CTMP demonstrates that all inbound vehicles enter the site from Butler Street via Kentucky Street to the south. Outbound vehicles exit the site from either Butler Street via Kentucky Street to the east or via Lambs Avenue and Mann Street to the north and west.

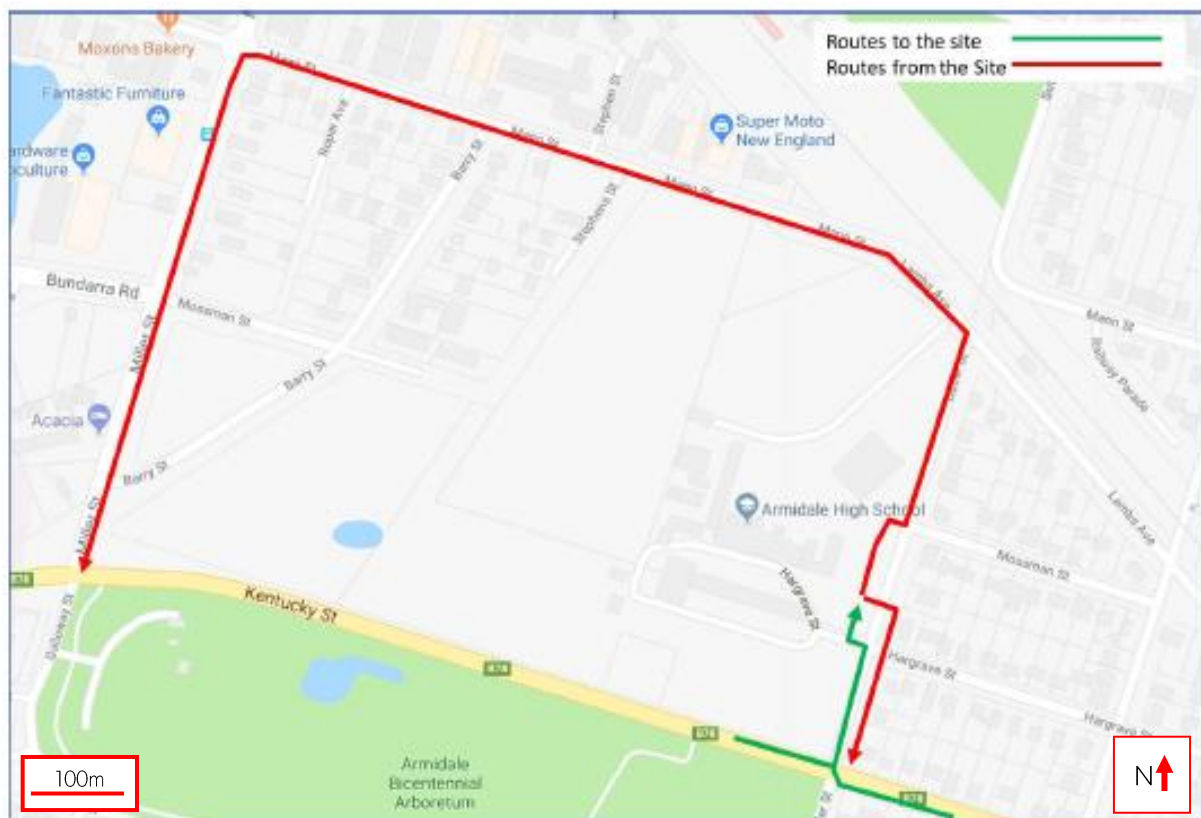


Figure 13 | Proposed construction vehicle routes (Source: EIS, 2018)

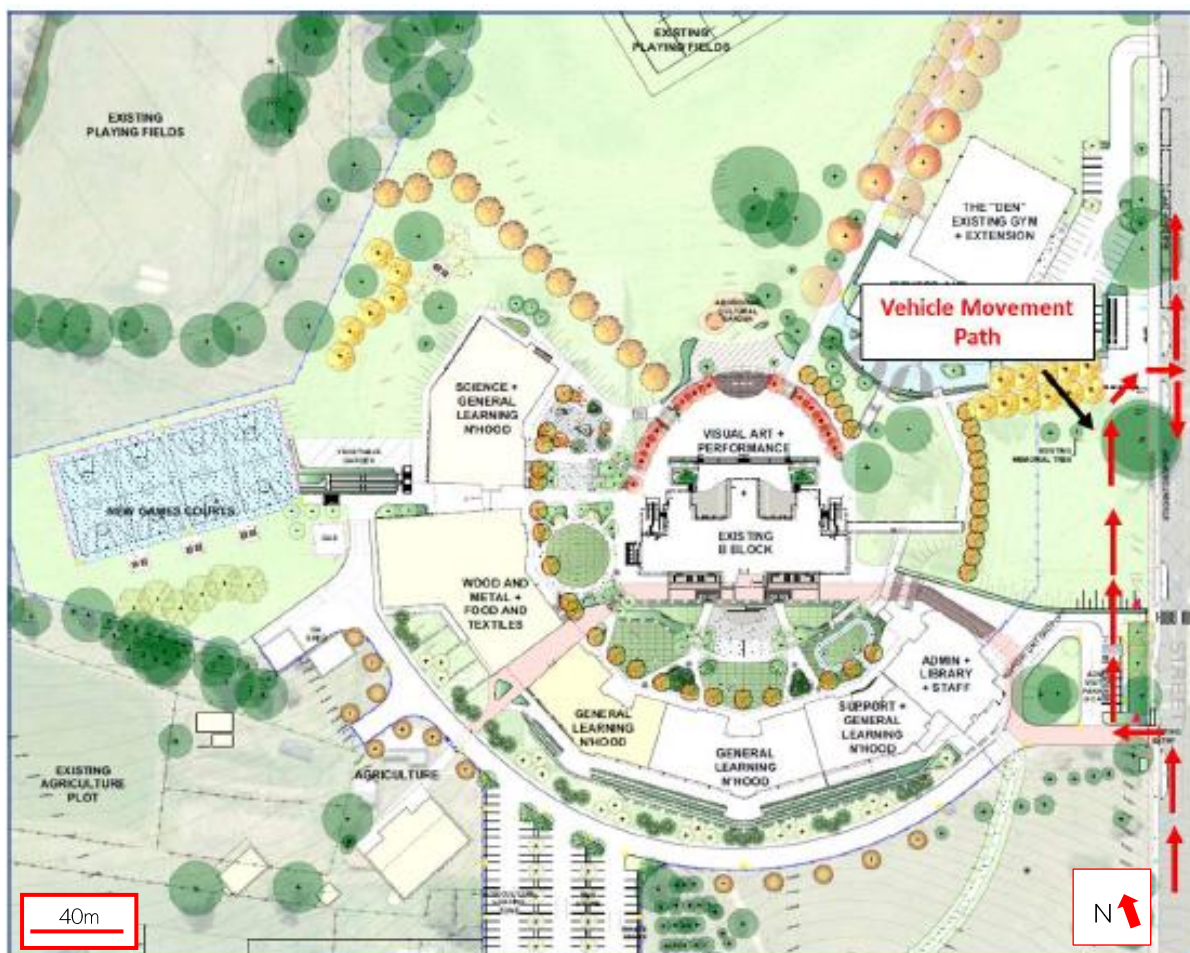


Figure 14 | Proposed construction vehicle movement plan through the site (Source: EIS, 2018)

The CTMP estimates that five trucks (truck and dog) would access the site per day during the demolition phase. Based on the volume of vehicle movements on the local road network surrounding the site the road network would be able to maintain the existing Level of Service (LoS) with these additional vehicle movements. The Department considers the identified construction traffic routes as being the most appropriate for entering and exiting the site as it would reduce delays for vehicles entering the site and minimise vehicle conflicts entering and exiting the site.

The early works undertaken as part of a separate development approval process include the construction of a car park to the south of the proposed building which would be used by construction workers' vehicles, to reduce any impact to on-street parking availability.

The CTMP indicates that there would be a Driver Code of Conduct provided to construction workers, to reduce any impact on the local road network and maintain a high level of safety for the general public and construction workers.

Council, TfNSW and RMS raised no concerns regarding the proposed construction traffic volumes or vehicle routes. The Department considers that the proposed construction traffic routes are appropriate and would have the least impact on surrounding residential properties.

The CTMP did not provide any consideration of pedestrian safety around the site during construction. The Department requires the CTMP to be amended to include pedestrian safety as a condition of consent.

6.1.2 Traffic

A Traffic Impact Assessment (TIA) was provided with the EIS and later updated as part of the RtS. The TIA undertook a survey of the existing traffic conditions on the roads surrounding the site. The proposed development includes an additional 1,009 students and 63 additional staff on the site, resulting in an additional 449 vehicle trips in the morning school peak, and an additional 287 vehicle trips in the afternoon school peak.

A traffic survey of the surrounding streets found that all intersections surrounding the subject site are currently operating at a Level of Service (LoS) A. The traffic survey found that the redevelopment of AHS would lead to a doubling of traffic movements along Kentucky Street would result in the majority of intersections continuing to operate at a LoS of A and the following intersections operating at a LoS B:

- Butler Street/Kentucky Street (morning and afternoon peaks).
- Lambs Avenue/Markham Street (morning peak).

The TIA was referred to Council RMS and TfNSW who raised no objection with the assessment of the traffic generation of the proposed development.

The Department has reviewed the TIA as revised in the RtS and the additional documentation, including meeting minutes submitted as part of the SRTS, and considers that as the impact on existing traffic conditions and traffic generated by the proposed development is acceptable.

6.1.3 Transport

A travel mode survey was included in the TIA. The survey was conducted at both AHS and DHS. The survey results included details regarding trip generation and distribution for the proposed development. The findings of the survey are provided in **Table 10** and **Table 11** below.

Table 10 | Existing travel modes to and from Duval High School (2018)

	Travel Mode					Total
	Bus	Bicycle	Passenger	Drove	Walk	
Morning Peak						
Student Arrivals in Peak (8-9am)	26.4	0.7	50.7	0.7	15.9	95
Student Arrivals outside Peak	0	0	2.9	0	2.5	5
All student arrivals	26.4	0.7	53.6	0.7	18.5	100
Weighted Car Passengers in Peak	-	-	39	-	-	-
Evening Peak						
Student departures in General Peak (3-4pm)	22.5	0.7	30.1	0.4	41.3	94.9
Student Departures outside General Peak Hour	3.6	-	-	0.4	1	5.1
All student departures	26.1	0.7	30.1	0.7	42.4	100
Weighted Car Passengers in peak	-	-	22.7	-	-	-

Table 11 | Existing travel modes to and from Armidale High School (2018)

	Travel Mode					Total
	Bus	Bicycle	Passenger	Drove	Walk	
Morning Peak						
Student Arrivals in Peak (8-9am)	26	3	43	1	19	91
Student Arrivals outside Peak	0.7	0.7	3.4	0	4.1	9.0
All student arrivals	26.2	3.4	46.2	1.4	22.8	100
Weighted Car Passengers in Peak			35			
Evening Peak						
Student departures in General Peak (3-4pm)	22	3	36	1	25	88
Student Departures outside General Peak Hour	4.8	0.7	2.8	0	4	12.4
All student departures	26.9	4.1	38.6	1.4	29	100
Weighted Car Passengers in peak			26.4			

The survey results found that for students at DHS, the number of car passengers decreased in the afternoon with more than 40% of students walking home and 22.5% of students catching public transport (bus). The majority of private vehicle pick-up trips occurred between 3:25pm and 3:30pm.

Armidale train station is located to the north of the site, and a public bus stop is located to the west of the site. There are two train services per day – one departing Armidale for Sydney in the morning, and one arriving from Sydney in the evening. Train services are not an option for daily commuting to and from the school. Buses are the only available public transport option for students and staff travelling to/from the proposed development.

Bus route 483 services Armidale, with the closest bus stop located greater than 450m to the west of the school. Public transport services are limited in and around the school. The school would rely on dedicated bus services in the morning and afternoons for travel to and from the school. The proposal includes an expanded on-street bus zone on Butler Street adjacent to the site which would be able to accommodate up to six buses (**Figure 15**).

The TIA indicates that there are currently 25 dedicated school buses service AHS and DHS, and that the number of services would be expected to increase with the development of Armidale Secondary College. Currently 250 DHS students (41.3%) walk to and from school each day. The TIA indicates that a maximum 32 dedicated school buses would service the proposed development and utilise the proposed bus zone. The proposed on-street bus zone is 90m long and would accommodate up the proposed 32 bus services per hour at peak drop-off/pick-up times in the morning and afternoons. TfNSW and RMS did not raise any concerns with regard to the length of the bus bay or the number of bus services. During the exhibition of the application, Council raised concern with the bus bay capacity, however was supportive of the increase to accommodate six buses at a time.

The Department considers that the proposed number of buses would provide adequate transport services for the school and would encourage an alternate mode of transport to private car travel.

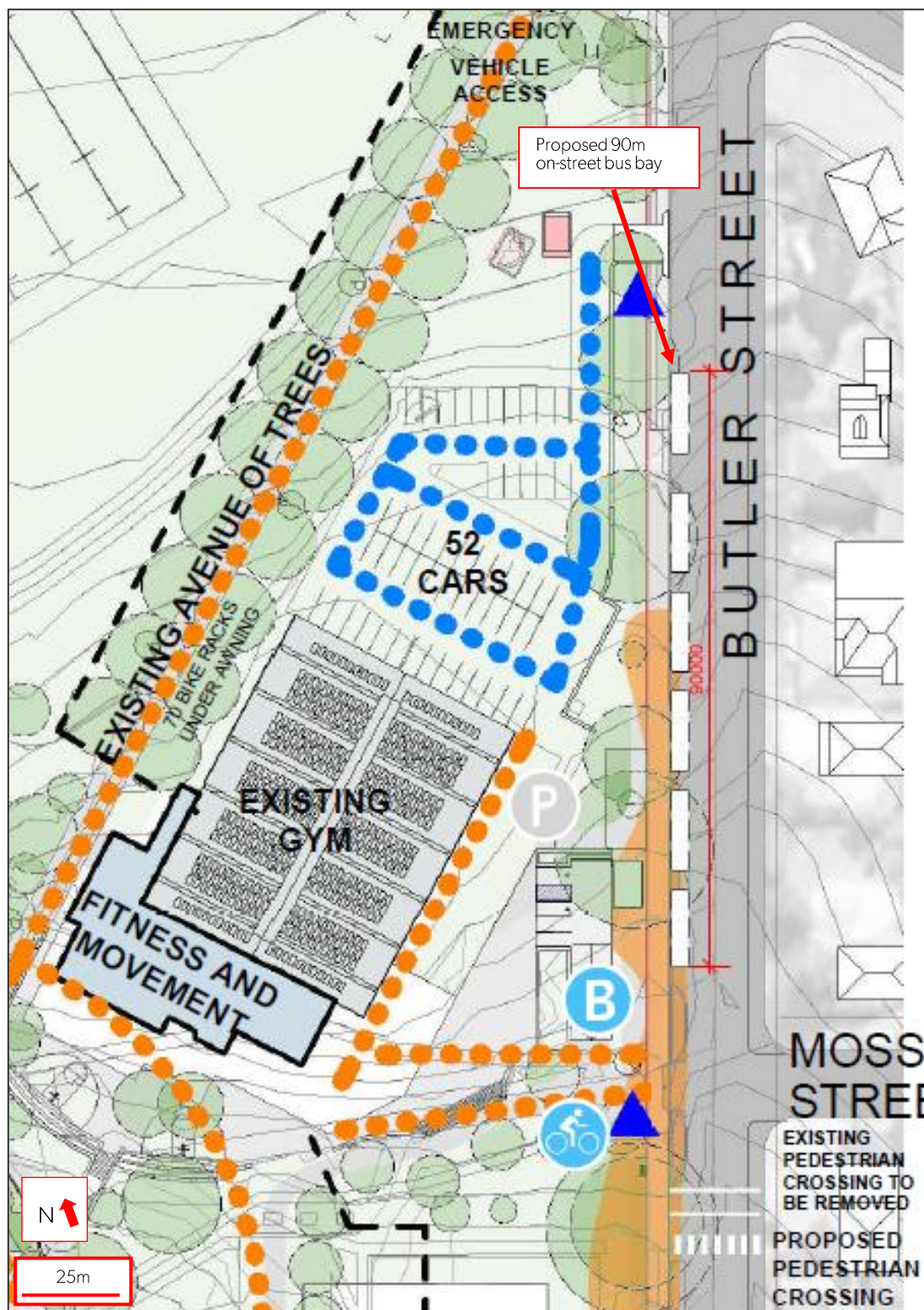


Figure 15 | Proposed bus bays (Base source: SRTS, 2019)

6.1.4 Parking

Council's DCP includes recommended car parking numbers for schools and requires one car parking space per full time equivalent (FTE) employees and one car parking space for every ten Year 11 and 12 students. The DCP also recommends separate drop-off/pick-up facilities for private vehicles and buses. The proposed development provides a capacity of 110 staff and a total of 1,580 students (472 students in years 11 and 12) resulting in a

requirement of 110 staff parking spaces, and 48 car parking spaces based on year 11 and 12 student numbers - a total of 158 car parking spaces under Council's DCP.

A parking study was undertaken at both AHS and DHS to determine the travel and parking habits of staff. The results are summarised in **Table 12**.

The proposal includes a total of 185 parking spaces spread across three parking areas as follows:

- 52 car parking spaces adjacent to the gymnasium.
- eight car parking spaces adjacent to the administrative building.
- 121 car parking spaces to the south of the proposed school building.
- four spaces between the bus bays and the gymnasium.

Table 12 | Existing staff travel patterns at Duval and Armidale High Schools (2018)

Staff travel mode	
Duval High School	
Staff Present	41
Staff who drove	36
Car drivers (%)	88
Staff who parked on-site	36
Staff parked on street	0
Armidale High School	
Staff Present	32
Staff who drove	30
Car drivers (%)	94
Staff who parked on-site	26
Staff parked on street	4

The proposal includes parking for 185 which would be 27 car parking spaces more than is required by Council's DCP (158 car parking spaces). The Department supports the proposed car parking provision as it reduces the reliance of on-street car parking on surrounding residential developments.

Three vehicular access points to the car parks are proposed and access would be from Butler Street, with two-way internal circulation roads (**Figure 16**). Butler Street has a 50km/h speed zone and would have good sight distance to the north and south from each proposed access point.

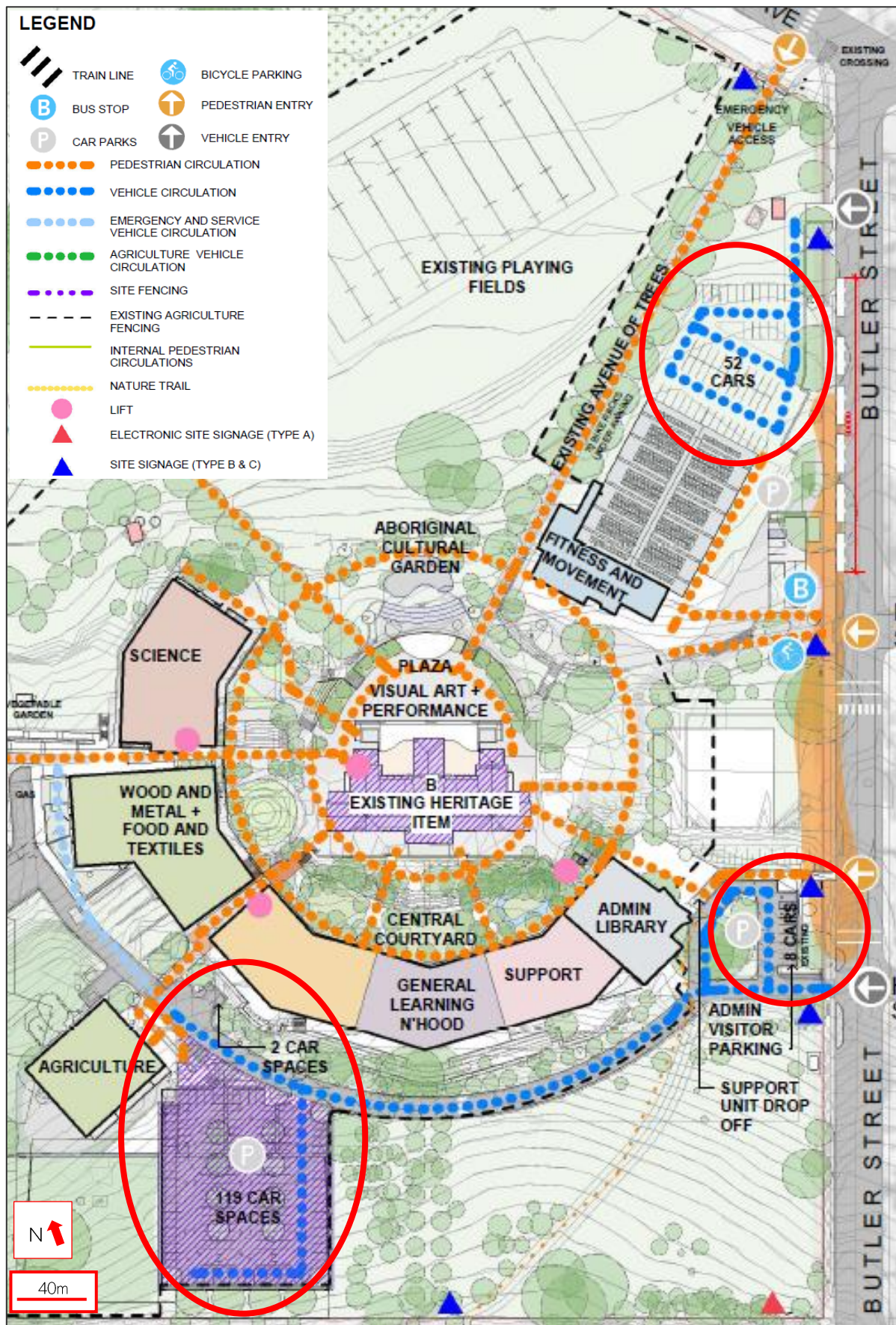


Figure 16 | Proposed parking areas (Base source: SRtS, 2019)

6.1.5 Green Travel Plan

The TIA provided information regarding a GTP being prepared for the school to encourage a change in travel mode choice toward sustainable transport options to reduce private vehicle trips.

Carpooling has been identified as an opportunity to reduce the number of private vehicles travelling to and from the school. Carpooling would rely on the school setting up and managing a system for shared use of private vehicle. The TIA has identified two mobile phone applications that are designed to assist with managing carpooling:

- Carpool – School Edition: allows the creation of groups to assist with the effectiveness and efficiency of carpooling.
- Cozi – allows parents to create shared calendars and can assign driving ‘shifts’ amongst their group.

The GTP also indicates that public transport (bus) information would be provided, including service numbers and routes, origin and destination, bus stops locations and shortest and safest pedestrian routes to/from the site from various bus stops.

The TIA acknowledges that there are limited public transport options in proximity to the site. This is in part due to the rural nature of the area. Dedicated school bus routes would service the site as discussed in **Section 6.1.3**.

Active modes of transport, including walking and cycling have been identified in the TIA. The GTP would also highlight access points to the proposed school from Kentucky Street, Butler Street and Lambs Avenue, with pedestrian crossings highlighted to encourage staff and students to walk to school.

Council’s DCP requires one bicycle parking space per five pupils over year 4 (10 years old). The proposal is for 1,580 high school students (aged 12 and over). There are no provisions in Council’s DCP for staff. Therefore, a total of 316 bicycle parking racks would be required to comply with Council’s DCP. The proposed development includes 100 bicycle racks and end of trip facilities. 70 racks to be located adjacent to the existing gymnasium, which would primarily be used by students, and 30 bicycle racks to be located adjacent to the administration building for use by staff (**Figure 17**). End of trip facilities for students would be located in the gymnasium and end of trip facilities for staff would be located within the administration building.

While the proposed development would provide one third of the required bicycle parking spaces under Council’s DCP, it is considered reasonable due to the lack of an established bicycle network. Travel surveys undertaken indicate that travel by bicycle to the existing school is low for both DHS (**Table 10**) and AHS (**Table 11**). The proposed development also indicates that additional bicycle racks could be installed should demand increase.

As the site has limited access to public transport, the TIA indicates there are few opportunities to reduce car travel to and from the proposed school. The TIA suggests that GTP information would be available on the school’s website, as well as hard copies being distributed to students and staff of the school. The Department considers it appropriate for the GTP to be updated annually to ensure the plan remains current and reflects any changes in circumstances.

Council was supportive of the development of a GTP, however raised concern with the safety of pedestrian movements over the existing railway line and the original plan to provide only 20 bicycle racks. Council was provided the RtS and was supportive of the amendment to increase bicycle racks from 20 to 100.

The Department considers the measures proposed within the TIA would achieve a reduction in private vehicle use through the promotion of public and active transport to staff and students. The Department has recommended a condition of consent to ensure ongoing monitoring and annual review of the GTP is carried out

for the life of the development. The Department considers that with a recommended condition relating to the preparation and implementation of a GTP, travel to and from the site would be appropriately managed.

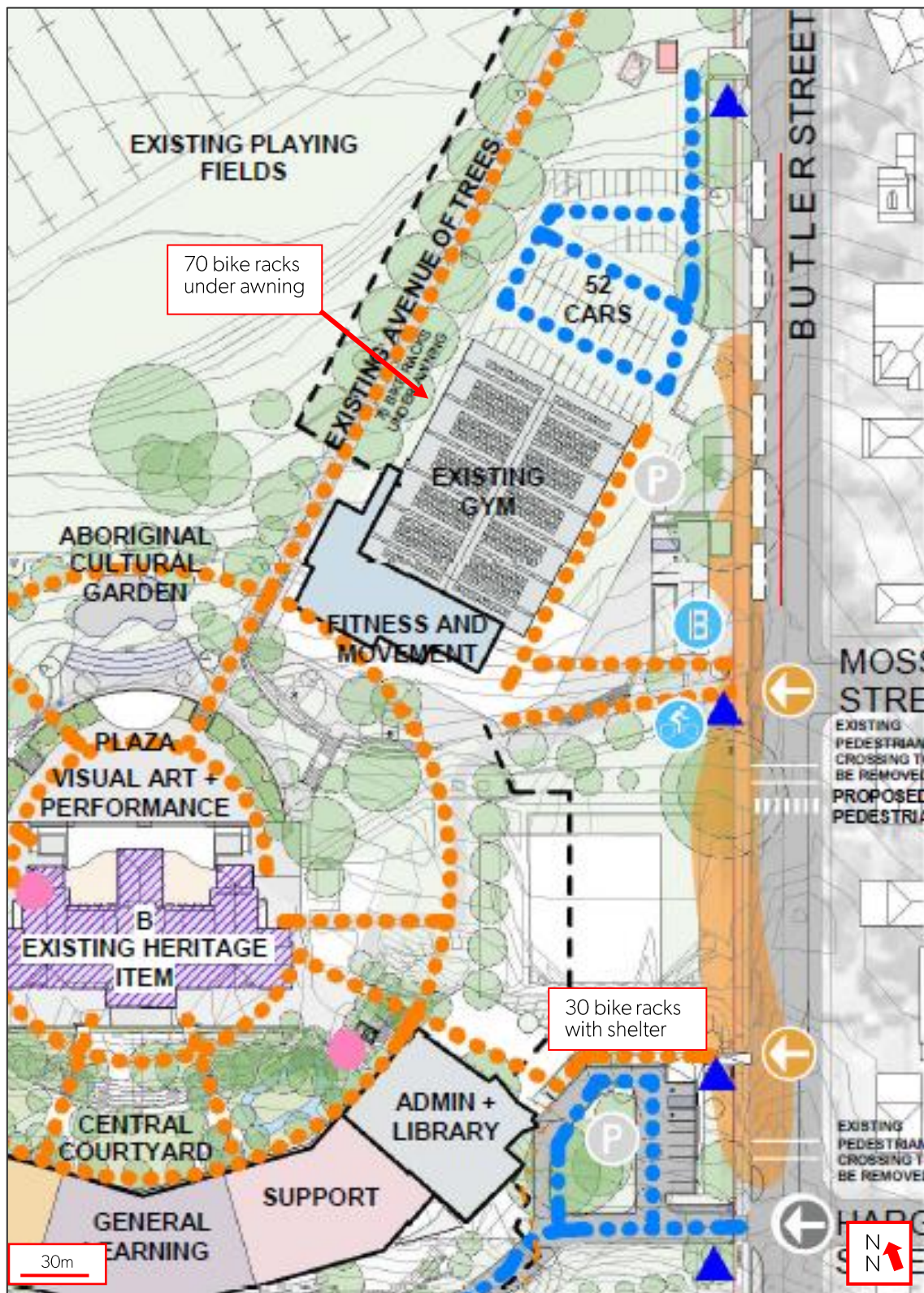


Figure 17 | Bicycle parking locations (Base source: SRtS 2019)

6.1.6 Pedestrian safety

The pedestrian infrastructure surrounding the site includes footpaths and two at-grade crossings (**Figure 18**) over the rail line to the north. The Applicant provided information relating to the pedestrian infrastructure located

around the site, including the railway level crossing and the pedestrian route from the Markham Street level crossing (**Figure 19**). The footpath along the western side of Butler Street is approximately one metre wide and in poor condition. Council raised concerns with both the footpath and rail crossings.



Figure 18 | Location of railway level pedestrian crossings (Source: EIS, 2018)

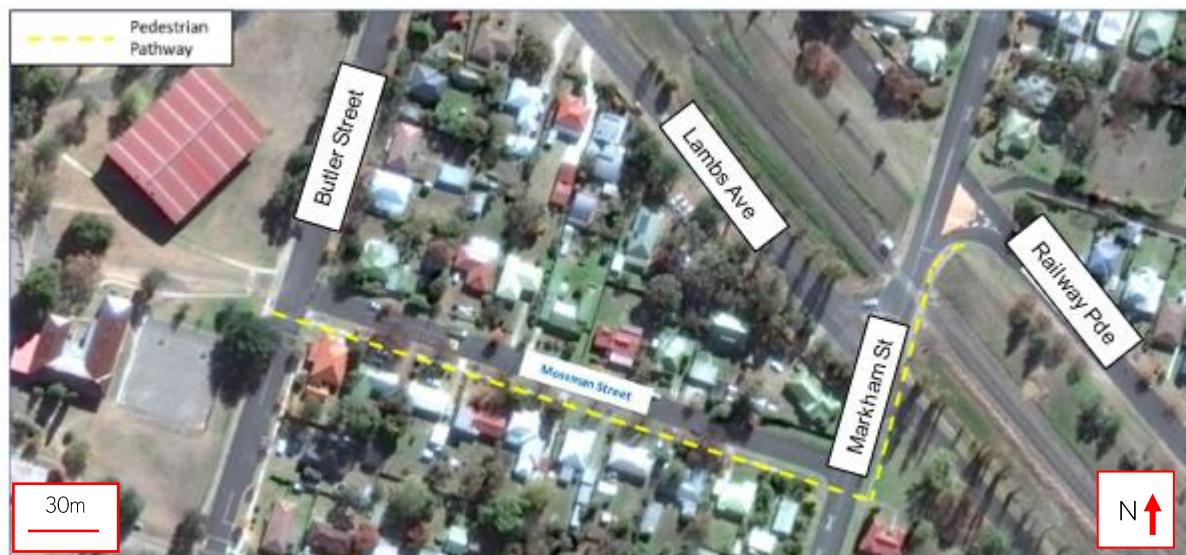


Figure 19 | Pedestrian pathway from Markham Street railway crossing to Armidale High School (Source: RtS, 2019)

The Department forwarded Council's concerns to the Applicant who met with Council. At the meeting it was resolved that prior to the operation of the school:

- the Applicant would replace the entire footpath adjacent to the school, along the western side of Butler Street and along Manns Street to a minimum width of 1,500mm.

- the Applicant would align the pedestrian crossing kerb ramp on Kentucky Street to the pedestrian crossing kerb ramp adjacent to the school.
- the Applicant would remove the concrete blisters to enhance stormwater flow.
- pedestrian infrastructure would be provided at the Memorial Gates entry on Manns Street as part of the project, with a condition of consent requiring detailed design to be conducted in discussion with Council.

During the meeting, Council and the Applicant discussed the pedestrian crossing over the rail line, including TfNSW comments in their submission on the application which stated that "Transport for NSW carried out their own review and notes that the risk level at the crossing will be assessed should the frequency of the rail service increase, and the need for risk mitigation measures will be considered at this time." Council and the Applicant agreed that this matter had been resolved.

The Department has reviewed the information provided by the Applicant, and the comments provided by Council in response to the EIS and RtS. Council and the Applicant resolved issues in relation to pedestrian safety through an agreement in relation to the provision of a new footpath. The Department considers that to accommodate the increase in student numbers using the footpath along Butler Street, that a footpath with a minimum width of 1500mm be provided the full length of Butler Street adjacent to the boundary of the site. To soften the visual impact of the footpath, the Department has recommended a condition of consent for street trees to be planted at regular intervals adjacent to the footpath. The specific details of the footpath and tree planting would be determined in consultation with Council.

6.2 Built form

The proposal includes the construction of an extension to the existing gymnasium, an agriculture building and three buildings, two and three storeys in height. These buildings would include:

- science and GLS.
- wood and metal and food and textiles workshops.
- GLS.
- administration area, library, and staff rooms.

The proposed development was subject to the State Design Review Panel (SDRP) process prior to the lodgement of the application. The SDRP provided feedback which was addressed as part of the EIS.

6.2.1 Options Analysis

During the design phased of the proposed development, an options analysis was undertaken with reference to the Educational Facilities Standards Guidelines (EFSG), and the environmental, social and historical requirements of the site.

The Department of Education identified the following needs for the school to inform the proposed design:

- be designed to meet the current and future secondary education demands for residents of Armidale.
- removal of existing demountable teaching spaces.
- provided 79 teaching spaces and specialist learning spaces for up to 1,580 students.
- high quality design features, materials and finishes.
- retention of the existing locally listed heritage item.
- upgrade outdoor spaces.

NBRS Architecture developed a range of options (**Figure 20**) as follows:

- **Option 1** Learning Courtyard: Retention of some buildings and addition of multiple small buildings around a common core around the retained 1922 heritage building (Block B);
- **Option 2** Learning Village: Retention of only the 1922 heritage building (Block B) and construction of new buildings in a grid like layout to establish a 'village' network within which the heritage building is the central feature; and
- **Option 3** Learning Hub: Construction of two-storey buildings in a radial arrangement around the retained 1922 heritage building (Block B) stepping in response to the sloping site.

In consultation with the Department of Education and the Project Reference Group (including representatives from both AHS and DHS, Director of Schools Office, and both AHS and DHS Parents and Citizens groups) resolved to proceed with the Learning Hub option. The Learning Hub design was considered to best respond to the site constraints, design objectives of the school and desired future focussed and accessible learning space outcomes and also embraces the heritage item, making it the heart of the school.

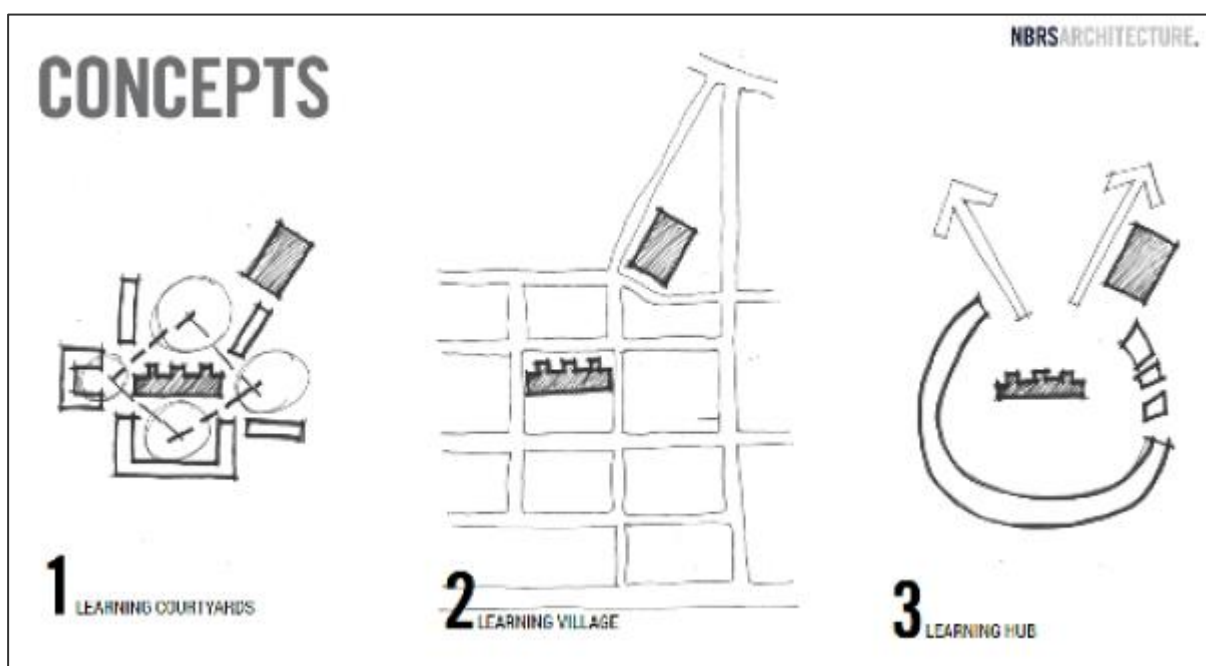


Figure 20 | Options Analysis (Source: RtS, 2019)

6.2.2 Building height

The site is not subject to maximum building height or floor space ratio clauses within the ADLEP 2012. The proposed school buildings would be two and three storeys, with a maximum of 12.27m in height. Existing Block B is two storeys in height. The residential development to the east is primarily single storey.

The proposed design results in floor to ceiling heights of 3.65m, which would provide good environmental amenity for occupants of the site and would maintain the environmental amenity of existing surrounding developments which is discussed further in **Section 6.2.3** and **6.2.4**.

The Department considers that the proposed building heights are acceptable in relation to the height of the heritage building being retained onsite (**Figure 21**) and the height of development in the locality as they are similar heights.



Figure 21 | North elevation showing proposed building heights in comparison to Block B - eastern (above) and western (below) portions (Source: RtS, 2019)

6.2.3 Privacy

To the north, east and west of the site are residential zones and the Armidale Bicentennial Arboretum is located to the south of the site. The proposed buildings would have a minimum setback of 43m to the eastern boundary, and over 100m to the northern and western boundaries. These setbacks provide significant separation to the residential developments ensuring existing levels of privacy would be maintained.

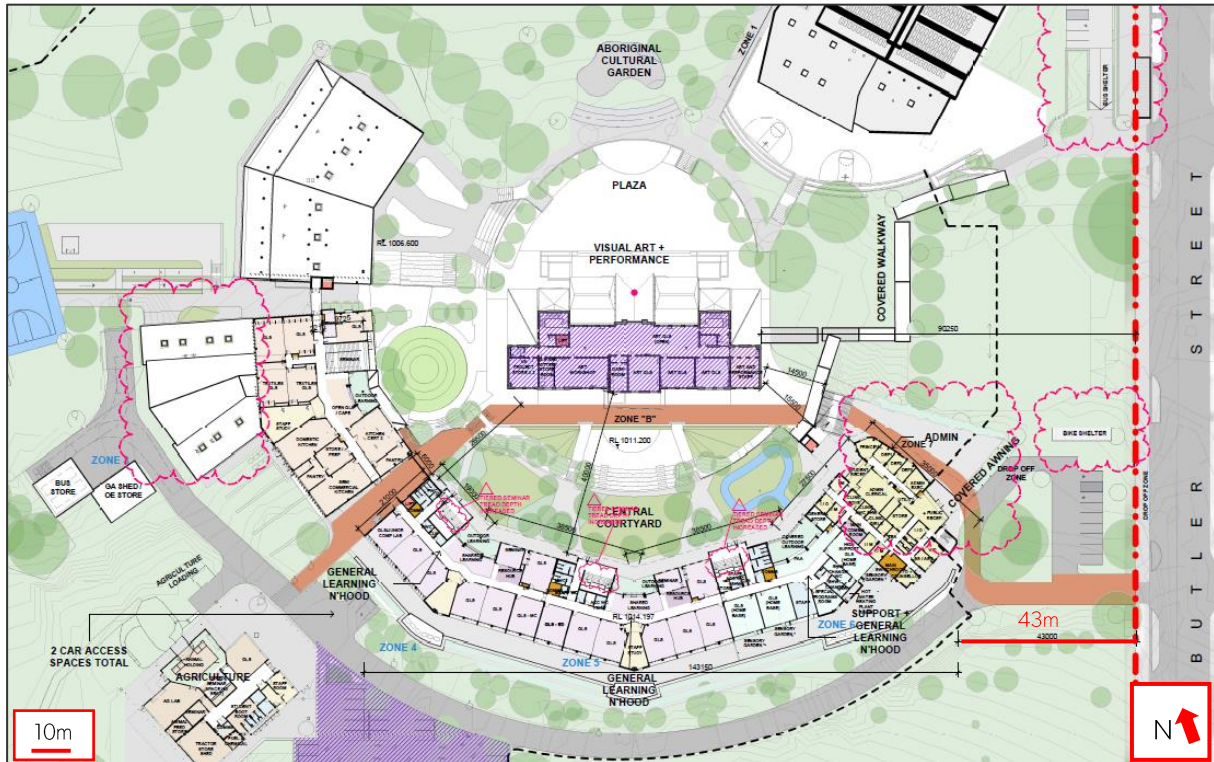


Figure 22 | Partial site plan (Source: RtS, 2019)

6.2.4 Solar access

Shadow diagrams were provided as part of the EIS. The shadow diagrams (**Figure 23** to **Figure 25**) show that the proposed buildings would not impact on surrounding development, ensuring that solar access is maintained at current levels. Additionally, the proposed buildings have been designed to have minimal impact on solar access of other proposed buildings within the site.

The GANSW raised concern with regard to the solar access of ground floor, south facing classrooms. The Applicant responded with a Daylight Factors Review which demonstrated that the proposal complies with the requirements of the Building Code of Australia for natural lighting in classrooms. The Daylight Factors Review was referred to GANSW, who advised that the information provided was satisfactory to address their concerns.

The Department considers that the proposal has been designed to ensure the solar access of surrounding development is maintained, and that the proposed school buildings would have adequate solar access.

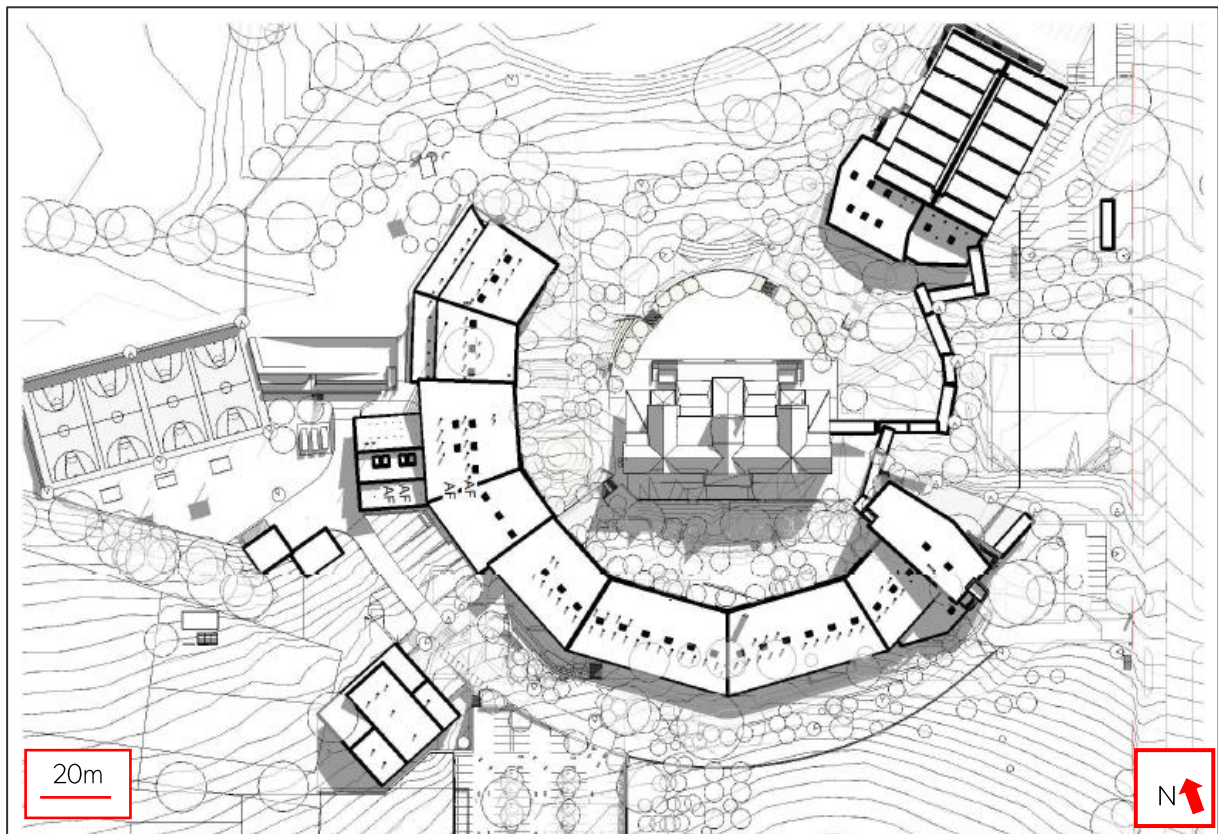


Figure 23 | Shadow Diagram – Winter 9am (Source: EIS, 2018)

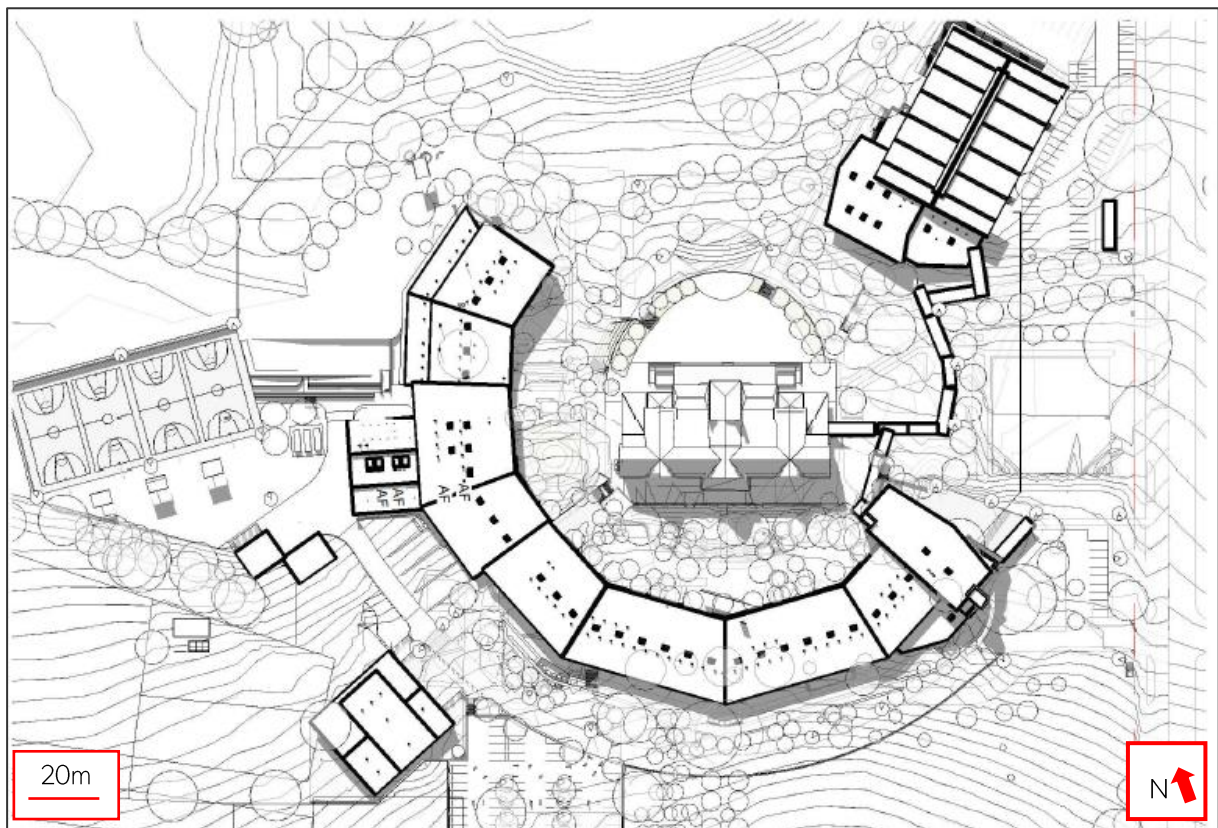


Figure 24 | Shadow Diagram – Winter 12pm (Source: EIS, 2018)

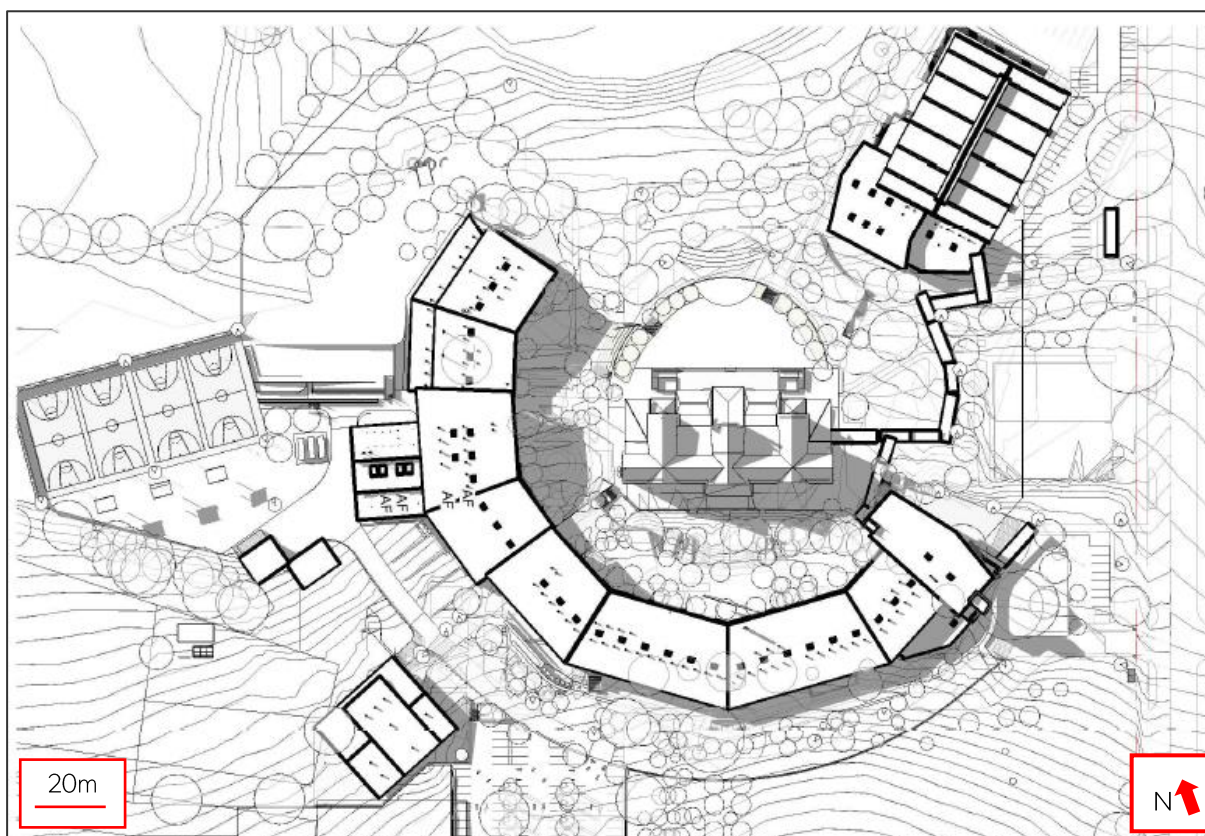


Figure 25 | Shadow Diagram – Winter 3pm (Source: EIS, 2018)

6.3 Other Issues

The Department's consideration of other issues is provided at **Table 13**.

Table 13 | Summary of other issues raised

Issue	Findings	Recommended Condition
Aboriginal Cultural Heritage	- Apex Archaeology prepared an Aboriginal Archaeological Assessment (AAA) which was lodged with the EIS. - The AAA was prepared in accordance with OEH's document <i>Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales</i>. - The AAA stated that there are no recorded Aboriginal sites within the study area, and "many years of the site being used as a school including associated infrastructure have erased any potential for subsurface archaeological material to be present." - The EIS and associated Appendices was referred to OEH who advised that if either Aboriginal objects, or human remains are	- The Department considers that despite early works including site preparation works being undertaken under a separate planning pathway, it would be appropriate to require conditions of consent relating to the establishment of an unexpected finds protocol. - Based on the above, the Department considers that Aboriginal Cultural Heritage has been adequately addressed. - The Department has recommended a condition requiring: - implementation of an unexpected finds protocol.

located all works must cease and for Aboriginal relics, an archaeological specialist must be contacted to develop an appropriate management strategy developed and the site registered on AHIMS. For human remains, the NSW Police must be contacted, and if the remains are identified as Aboriginal, then OEH must also be contact.

- Early works, including demolition and site preparation, were proposed and approved under a separate planning pathway.

Biodiversity	• A BDAR was provided with the EIS and with the RtS. • The BDAR provided an assessment of the biodiversity on the site in accordance with the BC Act. • The BDAR identified that there are two plant community types (PCT) present on the subject site and are listed as Threatened Ecological Communities under the BC Act: ○ Ribbon Gum - Mountain Gum - Snow Gum grassy open forest or woodland of the New England Tableland Bioregion and occurs at a highly degraded and significantly modified condition. ○ Blakely's Red Gum - Yellow Box grassy woodland of the New England Tableland Bioregion. • The BDAR also noted the following are candidate species predicted to occur at the site: ○ White-bellied-Sea-Eagle, which is vulnerable and has a high sensitivity to potential gain. ○ Small Snake Orchid, which is an endangered species and has a high sensitivity to potential gain. ○ Tusked Frog, is an endangered population with a very high sensitivity to potential gain.	• Based on the information within the BDAR, and having regard to OEH's comments, the Department considers that impacts on biodiversity on the site have been minimised and mitigated. • The Department is satisfied that there would be minimal impact on the local ecosystem and endemic species. • The Department considers that no additional conditions or amendments are necessary.
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	• An assessment was undertaken for all three candidate species against a Biodiversity Assessment Method (BAM). • The proposal includes the removal of 44 trees. • The BAM determined that the proposed development would not have any serious and irreversible impacts within the subject site that would not require offsets for native vegetation, therefore no ecosystem or species credits would be required for the proposed development. • OEH reviewed the information provided and raised no concerns with regard to the BDAR.	
Community use of school facilities	• The proposal includes the continued use of the multi-purpose hall, external basketball courts and associated facilities for school or community events, such as presentation nights, drama or music recitals, or other gatherings of the public (whether one-off or periodic events). • It is proposed that these uses would occur after the core school hours and possibly up to 10pm. • The design has responded to the use of school areas by the public by including fencing, external lighting and other access and security considerations.	• The Department has reviewed the proposal in relation to potential use of facilities outside normal school hours. • The Department has recommended a condition requiring the preparation of an Out of Hours Event Management Plan.
Contamination	• Targeted Soil Contamination Assessment (TSCA) and a Remedial Action Plan (RAP) were provided with the EIS. • The TSCA concluded that the site could be made suitable for the proposed continued use of the site as a school. • The TSCA identified that samples were primarily taken from areas that would be disturbed by the redevelopment of the site, primarily within the footprints of proposed buildings. • Sampling results concluded that samples were generally below the adopted	• The Department has reviewed the information provided in the EIS, RtS and RAP as well as the EPA's comments and considers that, subject to the Applicant demonstrating that remediation had been carried out in accordance with the RAP, the site could be made suitable for its intended use. • The Department has recommended a condition requiring: ○ provision of a Validation Report.

assessment criteria, with the exception of polycyclic aromatic hydrocarbons (PAHs) and asbestos.

- No other unacceptable health risk was identified for on or off-site receptors.
 - The TSCA concluded that the soils at the site would likely be classified as general solid waste, with the exception around sample HA1 which indicated soils had asbestos containing material and would require further sampling to be tested prior to removal.
 - The RAP provided remediation strategies including excavation of impacted soils, stockpiling, waste classification, material tracking, and reinstatement of validated soils.
 - The EPA noted that the EIS identified asbestos and PAHs were found within the soils tested.
 - The EPA noted that most of the contaminated materials were proposed to be excavated, tested, and re-used/disposed of appropriately.
 - The EPA recommended that excavated soils be classified as Virgin Excavated Natural Material (VENM) and exemption for ENM prior to re-use or disposal. All other waste materials be classified in accordance with the EPA's Waste Classification Guidelines.
 - The EPA recommended that any approval granted requires the proponent to implement the RAP during the demolition and construction works associated with the development, including the preparation of a validation report for the development site which should be provided to the EPA upon completion of the development.
 - Consideration may also be given to engaging an EPA accredited site auditor.
- preparation of a Long-Term Environmental Management Plan.

- The EIS, TSCA and RAP identified that the site could be remediated and made suitable for its intended use, subject to remediation in accordance with the RAP.
- The Applicant provided advice that the remediation works identified in the RAP were undertaken as part of the early works undertaken through a separate planning approval pathway.

Dust management	• The EPA provided comments in relation to dust management requiring the proponent as far as practicable: ◦ to minimise generation of air emissions. ◦ dust mitigation measures be identified and implemented in a CEMP.	• The Department has reviewed the comments made by the EPA and considers that dust can be appropriately managed and has recommended conditions accordingly. • The Department has recommended conditions requiring: ◦ covering loads prior to leaving the site. ◦ mud splatter, dust and other materials to be removed prior to vehicles leaving the site.
Flooding, stormwater and drainage	• The site is not impacted by the Probable Maximum Flood (PMF). Therefore, the site is not subject to flooding. • The Stormwater Management System includes a total of 240m³ stormwater storage. • The site currently has two connection points to the street drainage system along Mann and Butler Streets. • The proposal retains these drainage points. • Consideration has been given to Council's Water Sensitive Urban Design (WSUD) principles. • Primary treatment to the paved areas and car park would be via Enviropod inserts, and secondary treatment of all site water, would be via stormwater filters. • The proposal also includes stormwater harvesting with filters, booster pump and all associated pipework and valves.	• The Department supports the proposed stormwater harvesting for the site, particularly the proposed use for toilet flushing and irrigation. • The Department has reviewed the information provided in relation to flooding, stormwater and drainage, as well as comments made by the EPA and considers that the proposal has adequately addressed concerns raised by Council. • Notwithstanding, the Department has recommended a condition requiring the Stormwater Management Plan be incorporated into conditions of consent.

- The stormwater harvesting system would be used for toilet flushing and irrigation purposes.
- The EPA has reviewed the proposal in relation to stormwater management and recommended that the Stormwater Management Plan be incorporated into conditions of consent.

Heritage

- A Heritage Impact Statement (HIS) was provided as part of the EIS.
- The HIS identified that Block B is a locally listed heritage item under the ADLEP 2012.
- Block B is proposed to be retained with proposed school buildings located in a semi-circle shape surrounding Block B.
- The proposal was referred to the Heritage Division of OEH who advised:
 - the proposal would have no adverse impact upon the railway items of State heritage significance in the vicinity of the site.
 - the placement of the new buildings and associated landscaping provide an opportunity to recreate an arrival space to the original front entry with consideration to the historical drive and envisioned road layout.
 - there are opportunities to re-establish views of the front of the building.
 - the new building obscures and dominates the heritage building and removes all public views of the front of the building from Hargraves, Butler and Kentucky Street.
 - the identified significant view from Hargraves Street to the heritage building would be lost.
 - the design should be informed by a masterplan for the whole of the site.
 - Retention of significant views to the north of the heritage building are positive.
- The Department notes that the proposed buildings have been sited around the heritage building making it a focal point of the school.
- The Department has considered the information provided within the HIS, and the submissions from Council and the Heritage Division and considers that the proposal has had due regard to the local significance of Block B.
- The Department is satisfied the proposal would not adversely impact on the heritage significance of the local heritage item
- Notwithstanding, the Department considers it appropriate to require an unexpected finds protocol be established in lieu of an archaeological watching brief.

- new buildings could be placed to the north of the building and relate to the established axis without obstructing significant views.
- advice from the local Council should be sought in relation to heritage.
- no objection would be raised with regard to the provision of an archaeological watching brief prior to construction.
- The Applicant responded to Heritage Division's concern that the significant view from Hargraves Street would be lost in a view analysis which was submitted in the RtS.
- The view analysis demonstrated that there would not be any significant changes to the views towards the heritage building from outside the school grounds, with the exception from Butler Street looking west, which would have an improved view towards the heritage building.
- Council raised no concerns with regard to the proposal in relation to heritage or potential impacts on Block B, or the proposed landscaping.
- An archaeological watching brief was provided as part of the RtS.

Landscaping

- A landscape plan was provided with the EIS.
- The landscape plan indicated that approximately 89 trees were removed as part of the early works.
- The proposal includes the removal of a further 40 trees and the planting of 242 trees.
- To provide amenity to the proposed school, the Department considers it reasonable to require replacement trees to be planted across the site.
- The Department has recommended a condition requiring the preparation of a Landscape Management Plan including:
 - species to be planted on-site.
 - monitoring and maintenance measures.
 - provision of 242 locally endemic trees.
 - be advanced and established local native tree species with a minimum tree height of 2-2.5m

and/or plant container pot size of 100 litres.

Noise and vibration

- An ENA was prepared by Day Design Pty Ltd was submitted with the EIS.
- JHR, on behalf of the CRN, provided comment in relation to noise, vibration and air quality and advised that the development would not be adversely affected by rail, noise or vibration based upon the current rail operations.
- The EPA provided the following comments in relation to noise and vibration:
 - that all feasible and reasonable work practices be implemented to minimise noise levels.
 - the CNVMP identifies proposed construction hours outside the Interim Construction Noise Guideline.
 - limiting construction work to standard hours.
 - the ENA identified that the location of the mechanical plant for the GLS had not yet been finalised and recommended an acoustic assessment be completed once the type and location of mechanical plant has been finalised.
 - Should noise complaints be received, the EPA may require noise monitoring be undertaken and / or additional noise mitigation measures be implemented.
- A CNVMP was submitted with the RtS.
- The CNVMP identified that the noise management level (NML) for construction activities is 49dBA, and highly noise affected NML is 75dBA.
- The calculated receptor noise levels at the residential development to the east of the site would be 56-73dBA for excavation,
- The Department has reviewed the submitted documentation and taken into consideration the advice provided by JHR and the EPA and considers that the noise impacts have been adequately addressed.
- The Department has recommended conditions requiring:
 - works to be undertaken during recommended standard construction hours.
 - intra-day respite periods.
 - construction vehicles do not arrive at the project site outside approved construction hours.
 - safety risk assessment to determine practicable use of audible movement alarms.
 - noise complaints process.

and for rock breaking would be 63-80dBA.

- While it would be expected that noise levels during construction would be 58-76dBA.
- The majority of the proposed works would be located a minimum of 43m from the adjacent residential development to the east of the subject site.
- The proposed hours of construction are:
 - Monday to Friday: 7am to 6pm
 - Saturdays: 8am to 4pm
 - No works on Sundays or Public Holidays.
- The Department does not support the construction hours exceeding standard hours and considers it appropriate to require intra-day respite periods.

Utilities

- | | |
|--|---|
| <ul style="list-style-type: none"> • The application was forwarded to Council and Essential Energy for comment. • Essential Energy advised that modifications to the electrical distribution network would be required, and that the works are to be met by the proponent. | <ul style="list-style-type: none"> • The Department notes comments made by Essential Energy and considers that subject to relevant approvals and written confirmation from service providers, adequate services could be provided to the site. • The Department has recommended a condition requiring: <ul style="list-style-type: none"> ○ approval from relevant service providers. ○ written advice from the electricity supplier, telecommunications and gas carriers that satisfactory arrangements have been made for adequate services. |
|--|---|

Waste

- | | |
|---|--|
| <ul style="list-style-type: none"> • A Waste Management Plan (WMP) prepared by ME Tech Consulting was provided as part of the EIS. • The WMP indicates that the school has been designed to generate comparatively small amounts of waste to minimise off-site disposal. • The design considered: <ul style="list-style-type: none"> ○ appropriate location of waste management facilities. ○ use of standard material sizes to | <ul style="list-style-type: none"> • The Department has considered the CWMP and the WMP, as well as the comments provided by the EPA and has recommended conditions relating to the implementation of the WMP. • The Department has recommended a condition requiring: <ul style="list-style-type: none"> ○ waste generated by the proposal be assessed, |
|---|--|

- reduce waste generation.
 - use of pre-cut/fabricated material.
 - use of basic design to reduce off-cuts.
 - potential for re-use of off-cuts.
 - The WMP has identified waste management strategies during construction.
 - The WMP identified expected waste management from the construction of the proposed redevelopment.
 - The WMP included estimates on waste generation by the proposal based on the NSW EPA's *Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities*, as well as existing operational waste, and through reviewing other schools with similar existing or proposed number of students.
 - The case studies enable a more accurate assessment of the required waste management of the proposed school.
 - The WMP identified a waste strategy for the school and that it would continually be evaluated and amended where necessary by the school.
 - The EPA provided comments on waste management, strongly encouraging the proponent to continue to engage and consult with Council regarding resource recovery and waste disposal.
- classified and managed in accordance with relevant guidelines.
 - concrete waste water be disposed off-site .

6.4 Public Interest

On balance the Department is satisfied that the proposal would be in the public interest. The proposal would deliver additional and enhanced teaching facilities and would provide a greater capacity than the former AHS to accommodate up to 1,580 students. The redeveloped school would provide new facilities which would result in improved educational outcomes for the region. It would also provide direct investment in the region of approximately \$63 million, which would support 40 construction jobs and an additional 43 (total of 110) FTE operational jobs. Although the application seeks approval for the removal of 44 trees, the proposal would deliver the planting of 242 locally endemic trees which would contribute not only to the setting of the school, the wider community and the immediate locality.



7. *Evaluation*

The Department has reviewed the EIS, RtS, SRtS and assessed the merits of the proposal, taking into consideration advice from the public authorities including Council. Issues raised in submissions have been considered and all environmental issues associated with the proposal have been thoroughly addressed.

The Department considers the key issues associated with the assessment of the proposal relate to:

- traffic, transport, parking and pedestrian safety.
- built form.

Conditions have been recommended to satisfactorily address any outstanding, residual, construction or operational issues. The application would improve education results through the provision of new and improved teaching facilities and meet the growing needs of Armidale.

The proposal would provide much needed school infrastructure and provide opportunities to co-share facilities with the local community.

The proposal is considered to be in the public interest as it would provide:

- new school facilities for existing and future students and staff.
- significant investment in infrastructure.
- employment construction and operational employment opportunities.

The Department concludes the impacts of the development are acceptable and can be appropriately mitigated through the implementation of the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved subject to conditions.



8. Recommendation

It is recommended that the Executive Director Priority Projects Assessments, as delegate of the Minister for Planning:

- **considers** the findings and recommendations of this report; and
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to grant consent to the application;
- **agrees** with the key reasons for approval listed in the notice of decision;
- **grants consent/approval** for the application in respect of SSD 9095, subject to the conditions in the attached development consent; and
- **signs** the attached development consent and recommended conditions of consent/approval.

Prepared by

Iona Cameron

Senior Planner, Social and Other Infrastructure Assessments

Recommended by:

Andrew Beattie

Team Leader

Social Infrastructure Assessments

Recommended by:

Karen Harragon

Director

Social Infrastructure Assessments



9. Determination

The recommendation is: Adopted / Not adopted by:

David Gainsford

Executive Director

Priority Projects Assessments

29/5/19.



Appendices

Appendix A - List of Documents

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows.

1. Environmental Impact Statement
<https://www.planningportal.nsw.gov.au/major-projects/project/10171>
2. Submissions
<https://www.planningportal.nsw.gov.au/major-projects/project/10171>
3. Applicant's Response to Submissions
<https://www.planningportal.nsw.gov.au/major-projects/project/10171>
4. Applicant's Supplementary Response to Submissions
<https://www.planningportal.nsw.gov.au/major-projects/project/10171>

Appendix B – Statutory Considerations

ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report includes references to the provisions of the EPIs that govern the carrying out of the project and have been taken into consideration in the Department's environmental assessment.

Controls considered as part of the assessment of the proposal are:

- State Environmental Planning Policy (State & Regional Development) 2011 (SRD SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP)
- State Environmental Planning Policy No. 64 – Advertising Structures and Signage (SEPP 64)
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)
- Draft State Environmental Planning Policy (Remediation of Land) (Draft Remediation SEPP)
- Draft State Environmental Planning Policy (Environment) (Draft Environment SEPP)
- Armidale Dumaresq Local Environmental Plan (ADLEP) 2012.

COMPLIANCE WITH CONTROLS

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

The proposal is SSD in accordance with section 4.36 of the EP&A Act because it is development for the purpose of an educational establishment with a capital investment value (CIV) in excess of \$20 million, under clause 15 (educational establishments) of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011, as in force at the time of lodgement.

Table B1 | SRD SEPP compliance table

Relevant Sections	Consideration and Comments	Complies
3 Aims of Policy The aims of this Policy are as follows: (a) to identify development that is State significant development	The proposed development is identified as SSD.	Yes
8 Declaration of State significant development: section 4.36 (1) Development is declared to be State significant development for the purposes of the Act if: (a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and (b) the development is specified in Schedule 1 or 2.	The proposed development is permissible with development consent. The proposal is for the purpose of a new school, under clause 15 (1) of Schedule 1 of the SRD SEPP.	Yes

State Environmental Planning Policy (Infrastructure) 2007

The Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development

adjacent to particular types of infrastructure development, and providing for consultation with relevant public authorities about certain development during the assessment process.

Educational establishments are no longer covered under the traffic generating development provisions of the Infrastructure SEPP as they are considered under the Education SEPP. Notwithstanding, the application was referred to RMS for comment.

Clause 87 of the Infrastructure SEPP relates to the impacts of rail noise and vibration on educational establishments. John Holland Rail (JHR), manages the Country Regional Network (CRN) rail lands which are adjacent to the northern property boundary of the subject site. JHR provided comments on the proposal in relation to Clause 87. To ensure impacts of construction work is minimised, the Department has recommended a condition that requires the provision of a sub-plan under the Construction Environmental Management Plan.

The proposal is therefore consistent with the Infrastructure SEPP given the consultation and consideration of the comments from the relevant public authorities. The Department has included suitable conditions in the recommended conditions of consent (see **Appendix C**).

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

The Education SEPP commenced on 1 September 2017 and aims to simplify and standardise the approval process for child care centres, schools, TAFEs and universities while minimising impacts on surrounding areas and improving the quality of the facilities. The Education SEPP includes planning rules for where these developments can be built, which development standards can apply and constructions requirements. The application has been assessed against the relevant provisions of the Education SEPP.

Clause 42 of the Education SEPP states that consent may 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 the consent is granted. The proposed school complies with the development standards. The Department’s consideration of the variations to the development standards is addressed in **Section 6** of this report and in the following consideration of the Armidale Dumaresq Local Environmental Plan (ADLEP) 2012.

Clause 57 of the Education SEPP requires traffic generating development that involve addition of 50 or more students to be referred to the RMS. The Application was referred to RMS in accordance with this Clause.

Clause 35(6)(a) requires that the design quality of the development should evaluated in accordance with the design quality principles set out in Schedule 4. An assessment of the development against the design principles is provided in **Table B2**.

Table B2 | Consideration of the Design Quality Principles

Design Principles	Response
Context, built form and landscape	The site planning provides good aspect for the classrooms and for maximising light to classrooms and open space. The school has been designed to fit into the surrounding built-form and includes appropriate landscaping.
Sustainable, efficient and durable	The proposal includes ESD elements to achieve the equivalent of a 3-star Green Star rating. The materials chosen are durable and require low maintenance.

Bicycle parking is provided within the school site and a GTP submitted which encourages sustainable travel modes.

The Department requires the proposed development to achieve a minimum of 4-Star Green Star rating in accordance with the Educational Facilities Standards Guidelines.

Accessible and inclusive	Accessible travel paths are provided in all sections of the site and lifts are included in every connector. Lifts are provided for all multi-storey buildings and would provide access to upper floors for occupants with mobility issues. The school hall and playing fields are proposed to be available for out of school hours use including the continuation of the use of the multi-purpose hall, external basketball courts (available for school or community use between 3:30pm-10pm Monday to Friday, and 7am-10pm on weekends) and associated facilities for school or community events, such as presentation nights, drama or music recitals, or other gatherings of the public (whether one-off or periodic events).
Amenity	The proposal creates a variety of interesting and useable learning, passive and active recreation spaces and enhance the amenity of the internal spaces by guaranteeing light and winter sun access.
Health and Safety	The proposal provides large open spaces for recreation, as well as large setbacks to the property boundaries, whilst providing clear accessible entry points.
Whole of life, flexible, adaptable	The proposed learning areas are flexible and provide adaptable presentation areas throughout the learning hub building.
Aesthetics	The proposal evokes design enhancement by proposing appropriate articulation of buildings.

State Environmental Planning Policy No. 64 – Advertising and Signage

SEPP 64 applies to all signage that under an EPI can be displayed with or without consent and is visible from any public place or public reserve.

The development includes a total of eight signs of three types (**Figure 29**) and two business identification signs attached to the administration building (**Figure 30**). The Applicant provided that all proposed sign types would have a base gabion cage filled with local basalt to link the colours and materials of the signs with the local landscape and character of the area.

Two 'Type A' signs would be approximately 3.5m tall, 2.5m wide and 0.2m deep. The Type A sign would have the school logo, school name (illuminated) and an LED message board. It is proposed to have the LED screen on 24 hours a day, seven days a week. The Type A signs would be located along Kentucky Street which is a main road.

One 'Type B' sign is proposed to be located at the main pedestrian entry on Butler Street. Five 'Type C' signs are proposed to be located at all other entry points to the school Type C signs are a smaller version of the Type B

signs. The Type B and Type C signs would not have LED panels which better reflect the residential nature of the street.

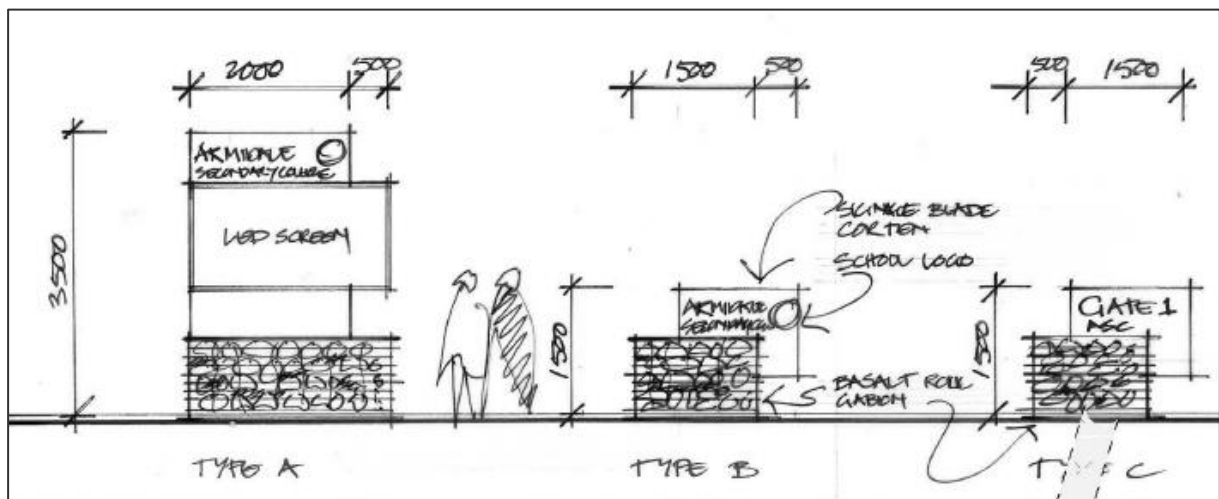


Figure 26 | Proposed Signage types (Source: SRTS, 2019)



Figure 27 | Proposed business identification signs at the point of arrival (Source: SRTS, 2019)

The Applicant has advised that signage for DHS has a restriction on hours of operation for one to two hours either side of normal school hours, where normal school hours are considered to be 8am until 4pm. The Applicant advised that it is expected that the proposed signs would have similar restriction to their operation as the signs at DHS. Given community use is proposed outside school hours, the Department considers it reasonable to allow the hours of operation of the signs to be greater than two hours after normal school hours and considers that illumination until 9pm is reasonable.

The proposed signs would have multiple messages rotated throughout each day with upcoming school events as well as the school logo and motto.

Under clause 8 of SEPP 64, consent must not be granted for any signage application unless the proposal is consistent with the objectives of the SEPP and with the assessment criteria which are contained in Schedule 1.

Table B3 provides an assessment of the proposed signage against the criteria within SEPP 64.

Table B3 | SEPP 64 compliance table

Assessment Criteria	Comments	Complies
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?	Eight signs of three different types are proposed. Two Type A signs proposed to be located at the south eastern and south western corners of the site are proposed to be illuminated pylon signs. These would be the only illuminated signs in the vicinity of the site. These signs would be adjacent to the Armidale Bicentennial Arboretum. The signs located along Butler Street (Type B and Type C) are smaller in scale and would not have LED illuminated panels. Type B and C signs are in keeping with the low density semi-rural residential area adjacent to the subject site. As light spill would be likely from the Type A signs towards the residential zones to the east and west of the site. Consequently, the Department considers it reasonable to limit any LED illumination to between 7am and 9pm.	Yes
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	The only signs located adjacent to the site include a static sign for the Armidale Bicentennial Arboretum adjacent to the south eastern and south western corners of the subject site along Kentucky Street. To the north west of the site is an industrial area. Some of the industrial premises have pylon signs which are similar in scale to the proposed Type A signs. However, the industrial area is removed from the locations of the proposed signs. While there are no other signs along Butler Street, the proposed signs are small in scale and the Department considers that these signs would not adversely affect the residential amenity of Butler Street.	Yes
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, waterways, rural landscapes or residential areas?	The area is primarily residential, with the streetscape dominated by trees. The proposed illumination of the signs 24 hours a day seven days a week is not in keeping with the amenity of the area and could result in light spillage into the adjacent homes. Consequently, the Department considers it reasonable to limit LED illumination to between 7am and 9pm.	No

Views and vistas		
Does the proposal obscure or compromise important views?	The proposed signs would not obscure or compromise important views.	Yes
Does the proposal dominate the skyline and reduce the quality of vistas?	No views or vistas would be adversely affected by the proposed signs.	Yes
Does the proposal respect the viewing rights of other advertisers?	The proposed signage would not affect the viewing rights of other advertisers.	Yes
Streetscape, setting or landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The proposed Type A signs would be a maximum 3.5m in height, which would be similar to the existing sign on the site at the corner of Kentucky and Butler Streets.	Yes
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The streetscape is dominated by trees, with some road signs, and location signs for the Armidale Bicentennial Arboretum. Type B and Type C signs would contribute to the visual interest of the school and draw attention to the pedestrian access points.	Yes
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	The signs would not increase clutter.	No
Does the proposal screen unsightliness?	There is no unsightliness in the vicinity.	No
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The proposed signs would not protrude above buildings.	No
Does the proposal require ongoing vegetation management?	The location of the proposed signs would require trees to be trimmed to allow full visibility of the Type A signs. Ongoing vegetation management required would be minimal.	Yes
Site and building		
Is the proposal compatible with the scale, proportion and other characteristics of the site or	The proposed signs would be compatible with the scale of the proposed development.	Yes

building, or both, on which the proposed signage is to be located?		
Does the proposal respect important features of the site or building, or both?	The proposed Type B and C signs respect the important features of the site, most particularly the locally listed heritage item "Block B" which is to be retained.	Yes
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The proposed signs would use locally sourced basalt which would reflect the colourings of retaining walls used within the vicinity of the site.	Yes

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?	It is proposed to have a school logo attached to the four pylon signs, as well as the illumination of the school name, and an LED screen operational 24 hours a day, seven days a week. However, the Department considers it reasonable to limit LED illumination to between 7am and 9pm.	Yes
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Illumination

Would illumination result in unacceptable glare?	The proposed LED screen located on the corner of Kentucky/Butler Streets may result in light pollution for the adjacent low-density residential development. The Department therefore considers it reasonable to limit illumination to between 7am and 9pm.	Yes
Would illumination affect safety for pedestrians, vehicles or aircraft?	The illumination would be unlikely to affect the safety of pedestrians or aircraft. The signs may pose a distraction risk to vehicles driving along Kentucky Street, Butler Street or Lambs Avenue. However, the Department considers it reasonable to limit LED illumination to between 7am and 9pm.	No
Would illumination detract from the amenity of any residence or other form of accommodation?	There are no other illuminated signs in the vicinity of the subject site and the adjacent dwellings. It is considered that four illuminated signs with LED screens would detract from the residences on the eastern side of Butler Street. However, the Department considers it reasonable to limit LED illumination to between 7am and 9pm.	No
Can the intensity of the illumination be adjusted, if necessary?	It is unknown if the illumination could be adjusted. However, it is proposed to restrict the operation of illumination which would manage light spill during non-daylight hours.	Yes

Is the illumination subject to a curfew?	It is proposed to have the LED screens illuminated 24 hours a day seven days a week. The Department considers this to be unnecessary and would provide undue impacts on the amenity of the adjacent low-density residential development. The Department considers that the LED panel should be subject to a curfew of 9pm.	Yes - by condition
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Safety

Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The proposed signage would not reduce safety for pedestrians.	Yes
Would the proposal reduce safety for any public road?	The proposed signage would not obscure sight lines to road traffic signs and signals and would not reduce the safety on public roads.	Yes

The Department is not satisfied that four pylon signs with illumination and LED screens is within keeping of the low-density residential character of the area. The Department considers such a high concentration of signs would have an unnecessary and unacceptable impact on the amenity of the surrounding dwellings.

State Environmental Planning Policy No. 55 - Remediation of Land

SEPP 55 aims to ensure that potential contamination issues are considered in the determination of a development application. The EIS includes a Targeted Soil Contamination Assessment (TSCA) for the site which concludes that the site is subject to minor contamination and would with appropriate remediation, could be managed by controls in the Construction Environmental Management Plan (CEMP). However, to ensure potential contamination risks would be managed and ensure the site is suitable for ongoing use as an educational establishment, a Remedial Action Plan (RAP) was provided with the EIS. The RAP identified contaminants of potential concern are PAHs and asbestos. Under SEPP 55, the proposed remediation works would be classified as 'Category 1' works due to the presence of heritage items on the site.

The Department has considered the Applicant's assessment of the contaminants on the site, the proposed remediation strategy and the comments received from the EPA and is satisfied that areas of the site identified as being contaminated could be appropriately remediated. The Applicant advised that remediation was undertaken as part of early works through a separate planning pathway and that no remediation was proposed as part of this application.

The Department concurs with the EPA and recommends conditions including the provision of a Validation Report, the preparation of a CEMP and by developing an unexpected find protocol to ensure measures are in place should any unanticipated contamination be found during works.

Draft State Environmental Planning Policy (Remediation of Land)

The Draft State Environmental Planning Policy (Remediation of Land) (Draft Remediation SEPP) will retain the overarching objective of SEPP 55 promoting the remediation of contaminated land to reduce the risk of potential harm to human health or the environment.

Additionally, the provisions of the Draft Remediation SEPP requires all remediation work that is to be carried out without consent, to be reviewed and certified by a certified contaminated land consultant, categorise remediation work based on the scale, risk and complexity of the work and require environmental management plans relating to post-remediation management of sites or ongoing operation, maintenance and management of on-site remediation measures (such as a containment cell) to be provided to council. The Department is satisfied that the proposal would be consistent with the objectives of the Draft Remediation SEPP.

Draft State Environmental Planning Policy (Environment)

The Draft State Environmental Planning Policy (Environment) (Draft Environment SEPP) is a consolidated SEPP which proposes to simplify the planning rules for a number of water catchments, waterways, urban bushland, and Willandra Lakes World Heritage Property. Once adopted, the Draft Environment SEPP will replace seven existing SEPPs. The proposed SEPP will provide a consistent level of environmental protection to that which is currently delivered under the existing SEPPs. Where existing provisions are outdated, no longer relevant or duplicated by other parts of the planning system, they will be repealed.

Given that the proposal is consistent with the provisions of the existing SEPPs that are applicable, the Department concludes that the proposed development will generally be consistent with the provisions of the Draft Environment SEPP.

Armidale Dumaresq Local Environmental Plan 2012

The ADLEP 2012 aims to encourage the development of housing, employment, infrastructure and community services to meet the needs of the existing and future residents of the Armidale Regional LGA. The ADLEP 2012 also aims to conserve and protect natural resources and foster economic, environmental and social well-being.

The Department has consulted with Council throughout the assessment process and has considered all relevant provisions of the ADLEP 2012 and those matters raised by Council in its assessment of the development (refer to **Section 6**). The Department concludes the development is consistent with the relevant provisions of the ADLEP 2012. Consideration of the relevant clauses of the ADLEP 2012 is provided in **Table B4**.

Table B4 | Consideration of the ADLEP 2012

ADLEP 2012	Department Comment/Assessment
Clause 4.3 Building height	Under the ADLEP, a maximum building height does not apply to the subject site.
Clause 4.4 Floor Space Ratio	Under the ADLEP, a maximum floor space ratio does not apply to the subject site.
Clause 5.10 Heritage conservation	The site is identified on the Heritage Map and within Schedule 5 of the ADLEP 201. Item IO49 is the AHS Block B which was constructed in 1921. Section 6 of this report includes detailed consideration of the cultural heritage on and surrounding the subject site.
Clause 6.6 Essential Services	The site is currently serviced by water, electricity, sewerage and telecommunications. The site has vehicular frontage to all property boundaries providing appropriate access to the site. Detailed consideration of improved stormwater management is provided in Section 6 of this report.

Other policies

In accordance with Clause 11 of the SRD SEPP, Development Control Plans (DCP) do not apply to State significant development. Notwithstanding, the objectives consideration of relevant controls under the Armidale Dumaresq DCP, where relevant, have been considered in **Section 6** of this report.

Appendix C – Recommended Instrument of Consent / Approval