

30 April 2020

Karen Harragon
Director
Social and Infrastructure Assessments
NSW Department of Planning Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Karen,

**RE: COUNCIL SUBMISSION REGARDING EXHIBITION OF STATE SIGNIFICANT
DEVELOPMENT SSD 9483
CHATSWOOD EDUCATION PRECINCT (UPGRADES TO CHATSWOOD PUBLIC
SCHOOL AND CHATSWOOD HIGH SCHOOL)**

I write to you regarding the exhibition of the development application for the Chatswood Education Precinct involving upgrades to Chatswood Public School and Chatswood High School at 5 Centennial Avenue and 24 Centennial Avenue, Chatswood (State Significant Development SSD 9483).

The proposal has been lodged on behalf of School Infrastructure NSW (SINSW) and involves the following:

Chatswood Public School (CPS)

- Construction of new buildings in footprint of existing buildings as follows:
 - P1: Seven storey building, being 5 storeys of built form and two storeys of covered play area, comprising 17 homebases.
 - P2: Part four, part five storey building comprising 12 homebases, covered outdoor learning area, canteen, amenities, kiln, staff facilities and rooftop uncovered play-space.
 - G: Single storey hall with stage and seating for 264 people and outside hours school care facilities.
 - New 18 space carpark off Jenkins Street with sports court above.
- Demolition of buildings D, H, I and three covered outdoor learning areas.
- Retention of heritage buildings A and B.
- Provision of 53 permanent learning and teaching homebases (25 existing and 28 new).

Chatswood High School (CHS)

- Construction of new buildings in footprint of existing buildings as follows:
 - Q: Administration – Part three, part four storey administration and staff building including reception, library, general learning spaces and covered outdoor learning area.
 - S: Science and General Learning – Part four, part five storey building comprising 42 general learning spaces and two workshops with associated areas.
 - T: Two storey multi-purpose hall including stage, sports room facilities, four general learning spaces and associated areas.

- Construction and upgrades result in 123 permanent learning and teaching classrooms (21 existing being upgraded and 102 new).
- Associated site works and landscaping.

The abovementioned works are to be accompanied by the removal of 53 demountable classrooms across both sites.

This application follows the previous NSW Department of Education request to the Department of Planning, Industry and Environment for Secretary's Environmental Assessment Requirements (SEARs), to which Council provided comments dated 31 July 2018.

Willoughby City Council appreciates the opportunity to provide further comments on this important matter, as part of a full assessment of this proposal.

Council is cognisant of the need to provide increased education facilities in response to the growing population in the City of Willoughby, and in particular Chatswood, encouraged in the *North District Plan* and the *Chatswood CBD Planning and Urban Design Strategy to 2036*. In this regard Council has been liaising with the Department of Education for some time to facilitate long term permanent education solutions with the proposed upgrades now being progressed to application stage. These upgrades are considered to have clear strategic merit and are generally supported. It is also noted that the application positively responds to a number of issues previously raised by Council in the earlier consultation on the development of both school sites, relating to preservation of heritage on the public school site and preservation of bushland character and trees on the High School site.

The submission is divided into:

- Attachment 1 – Chatswood Primary School (CPS)
- Attachment 2 – Chatswood High School (CHS)
- Attachment 3 – Issues covering both sites
- Attachment 4 - Conditions

It is requested that further consideration be given to the issues outlined in Attachments 1 and 2, covering design, heritage, trees and open space, as well as covering both sites in Attachment 3 in relation to Transport, Stormwater Management and Environmental Health.

In the interests of being supportive in the determination process, conditions have also been provided to address issues and introduce appropriate controls. Please refer to the Attachment 4 – Conditions.

Council continues to support the augmentation of the Chatswood Education Precinct and looks forward to working with School Infrastructure NSW (SINSW) in progressing the expansion of Chatswood Primary School and Chatswood High School towards finalisation.

Should you have any enquiries regarding this submission please contact Strategic Planner, Craig O'Brien on 9777 7647 or email Craig.Obrien@Willoughby.nsw.gov.au.

Yours sincerely,



Ian Arnott
PLANNING MANAGER

Attachment 1 - Chatswood Primary School (CPS)

Design Concept

The design concept approach prepared by Architectus of a 'city campus', set in an urban context, is supported. On a constrained site, where ground level space is at a premium, increased capacity has been focused on two multi storey buildings with the massing located towards the front and middle sections of the site, towards the northern boundary.

The new buildings have the following heights:

- Building G (Hall) – RL 116 m.
- Building P1 – Six storeys, RL 125.3 m.
- Building P2 – Part 4 and 5 storeys, RL 124.8 m.
- Sports Court height – RL 107.12 m.

The CPS site is made up of Lot 1 DP 812207, being the large section of the site facing the Pacific Highway, and Lot C DP 346499, being the smaller section of the site facing Jenkins Street. Lot 1 DP 812207 is located within the existing Chatswood CBD boundary, as well as the boundary proposed under the *Chatswood CBD Planning and Urban Design Strategy to 2036* (the *Strategy*). Under *Willoughby Local Environmental Plan 2012 (WLEP 2012)*, neighbouring sites on the Pacific Highway are B5 – Business Development with a height maximum of 18m and floor space ratio between 2:1 and 3.7:1. The neighbouring site of 688 Pacific Highway has a recent approval with an RL of 127.885 m, being a similar height to that proposed at the CPS. While the *Strategy* does not propose any changed controls for the site and the western side of the Pacific Highway, a maximum height of RL 246.8m and no maximum floor space ratio is proposed opposite on the eastern side (with the B3 – Commercial Core zone unchanged).

It is considered that the development scale within the CPS site, and in particular the design concept providing a larger scale on Lot 1 DP 812207 and a lower scale on Lot C DP 346499, is consistent with a 'city campus'.

The overall design is based on achieving the desired school density, responding to existing services and topographical site constraints, maximising ground level space and preserving and improving the visibility and relationship of heritage items to each other and as part of the streetscape.

The following is noted:

- The single storey Building G is to be located on the site of an existing car park accessed from the Pacific Highway. It has been set back 12.8m from the Pacific Highway to increase view corridors to/from Building A (noting its heritage significance).
- Building P2 is to be located on the site of an existing outdoor play area. It is to be a four storey building with roof top play area, separated by 3.3m to Building G to the east and 9.33m to Building P1 to the west (within which the existing terraced play area is retained). The set back to the northern boundary (and James Street) is approximately 7m.
- Building P1 is to be located on the site of an existing play area. It is to be a seven storey building, being 5 storeys of built form and two storeys of covered play area, set back 4.55m from the western boundary and between 2m and 3.1m from the northern boundary.

- At the Jenkins Street frontage, a car park with sports court above is proposed. The height is two storeys and the set back from the northern boundary is 5m.

In regards the relationship to neighbouring properties along the northern boundary:

- Building G is adjacent to a B5 zone.
- Building P2 is adjacent to a R2 Low Density Residential zone, and set back approximately 7m.
- Building P1 is also adjacent to a R2 Low Density Residential Zone. A further set back away from the northern boundary is restricted by the existing heritage building (Building B), and also towards the east by topography (significant change of levels).
- The Jenkins Street car park is adjacent to a R2 Low Density Residential zone, and within an existing building foot print.

The increase in height for proposed Buildings P1 and P2, and the relationship with low density residential development in James Street and Jenkins Street has been noted. A further issue in this relationship is the change in levels between the school site and the two streets.

Open playing areas and windows on these buildings should be located and designed to minimise noise and overlooking to the neighbouring low density residential properties. In addition proposed building P1, being the closest building to a boundary, should be designed carefully to minimise visual bulk to the north and west boundaries.

The proposed development at the CPS, being on a constrained site located within the Chatswood CBD, involves a satisfactory response to neighbouring properties while at the same time addressing the need to increase school capacity.

Heritage

The proposal has been referred to the Heritage Section of Council, who have noted:

"The subject site is listed as a Heritage Item (I106) within Schedule 5 Environmental Heritage under the Willoughby LEP 2012. The subject site is considered to be of local significance. Although the heritage listing applies to the whole property, the two buildings that have heritage significance are the main building that fronts Pacific Highway, built around late 1800 and the other two storey building located to the south west (off Centennial Avenue), built in the early 1900."

Both the sites are in the vicinity of heritage listed items under the WLEP 2012. These are: Item I66 (19 Centennial Avenue - House including original interiors), Item I67 (60 Centennial Avenue - House including original interiors), Item I245 (9 Centennial Avenue - House including original interiors) and Item I238 (767 Pacific Highway - Old Fire Station).

The following points are noted from a heritage point of view:

"The removal of vehicular entry from Pacific Highway and erection of a new single storey Hall (Building G) behind the existing building line (Building A) will improve the view of the listed building from the north (Pacific Highway). This is further facilitated by the removal of existing Building D. Adequate distance has been provided in the location of the hall from Building A and thereby not affecting the curtilage of the listed item."

No heritage objection is raised to the erection of the new buildings P1 and P2. Although these buildings involve an increase in height, they are located away from the curtilage of the heritage buildings A and B. The proposed buildings will leave a greater space around the heritage buildings and reduce the clutter around these buildings.

No heritage objection is raised to the demolition of the buildings (D, H and I) and all the covered outdoor learning areas which have been added over time as these do not contribute to the heritage significance of the site. The opening up of the internal courtyard will enhance the view between Buildings A and B. This is considered to be positive.

The demolition of the demountables on the southern side will improve the views of Building B which is currently obscured by these buildings. No heritage objection is raised to new car park with access from Jenkins. It is considered that proposed setback from Centennial Avenue will retain the significance of the heritage listed item (I245) at 9 Centennial Avenue. The other two items (I66 and I67) are located considerable distance away from the subject site and unlikely to be affected by the proposed development. There will be no impact on I238 - Old Post Office, which is located considerable distance away and also considering the fact that there is no change to the heritage item Building A facing the Pacific Highway."

It is considered that the proposed development is satisfactory from a heritage viewpoint, subject to conditions (See Attachment 4 – Conditions).

Trees and Open Space

The proposal has been referred to the Open Space Section of Council who have noted:

- Development will enable retention of trees assessed as high retention value in the Arborist's Report.
- A number of medium and low retention value trees are to be removed. The landscape plans provided indicate details of trees and other vegetation to be replanted.

It is considered that an appropriate response has been proposed to the issues of tree removal, with tree replacement and open space provision (both active and passive).

Attachment 2 – Chatswood High School (CHS)

Design Concept

The design concept approach prepared by Architectus of a 'bush campus' is supported. The new buildings (Q, S, and T) are proposed towards the north western section of the site. The overall design is based on achieving the desired school density, responding to existing services and topographical site constraints, maximising ground level space and preserving the bushland character.

The development of the high school is largely within the foot print of existing buildings. A large portion of the site, towards the Eddy Road (southern side), including land zoned E2 Environmental Conservation and characterized by trees, is not impacted.

The new buildings have the following heights:

- Building Q – Part three, part four storeys building, RL 103.4 m.
The set back from the northern boundary is 12.84m.
- Building S – Part four, part five storey building, RL 102.7 m.
This building is located behind building T and is set back approximately 24m from the western boundary.
- Building T – Two storey building, RL 97.704 m.
The set back from the northern boundary is 12.49m and 23.88m from the western boundary.

It is considered that the development scale within the CHS site is consistent with the design concept of a 'bush campus' and with surrounding development.

The proposed development of the CHS site does not occur within close proximity of any boundary with neighbouring properties, zoned either R2 Low Density Residential to the north, south and west, or R4 High Density Residential to the east.

Heritage

The proposal has been referred to the Heritage Section of Council, who have noted:

"There are no heritage listed items within this site. However, the site is in the vicinity of 60 Centennial Avenue (I67) and two other heritage listed items at 19 Centennial Avenue (I66) and 9 Centennial Avenue (I245). Item I67 adjoins the subject site, items I66 and I245 are on the opposite side of the subject site and considerable distance away."

The following points are noted from a heritage point of view:

"The proposed Building T is separated from Item I67 at 60 Centennial Avenue by a substantial landscaped area. This will provide adequate separation. No heritage objection is raised to the location of proposed Building T in relation to the locally listed item."

"There will also be no heritage impact on the existing listed items at 9 and 19 Centennial Avenue from the proposed development, due to its distance and physical separation."

It is considered that the proposed development is satisfactory, from a heritage viewpoint, subject to conditions (See Attachment 4 – Conditions).

Trees and Open Space

The proposal has been referred to the Open Space Section of Council who have noted:

- The area of Blue Gum High Forest (BGHF) on the Chatswood High Site is not impacted by the works. A Biodiversity Assessment Report has been prepared which concludes no significant impact on the BGHF.
- It is noted that due to removal of some non-core native vegetation there is a requirement for offset credits (3) to be purchased in compliance with the Biodiversity Conservation Act.
- The majority of vegetation on the Centennial Avenue frontage of the High School (not BGHF) is to be retained.
- A number of trees within the site will be removed by the proposed works, however the landscape plans detail locations of replacement trees and other landscaping.

Attachment 3 – Issues covering both sites

Transport Management for both sites

In regards the Chatswood Primary School site, it is noted that 18 car spaces are existing on this site (being 16 staff car spaces accessed from the Pacific Highway and 2 Chatswood Out of School Hours Care staff car spaces from Jenkins Street). Under the proposal, this number will not change with a total of 18 car spaces proposed, all accessed via Jenkins Street. The existing Pacific Highway access would be closed.

In regards the Chatswood High School site, it is noted that 120 car spaces are existing and 104 are proposed. The reduction results from the removal of the Oliver Street car parking area and replacement with dedicated drop off / pick up bays (four).

A Transport and Accessibility Study has been submitted with the proposal, dated 23 March 2020 and prepared by the Transport Planning Partnership.

The proposal has been referred to Council's Traffic Section, who have provided general comments below.

- There will be an impact on the road network from traffic generated by the development as follows:
 - Increased pedestrian traffic (school children) during morning and afternoon peaks.
 - Increased school staff parking demand.
 - Increased traffic drop off/pick up and traffic generation to/from schools.
- The application does need to be referred to the TfNSW. There will be an increase of foot traffic/pedestrian movements crossing the Pacific Highway (at Victoria Avenue and Albert Avenue intersection) and vehicle driveway access to/from Pacific Highway. Transport infrastructure designs (signal design/crossing width/ driveway access design) should be reviewed by this authority due to increased pedestrian movements, to maximise school children safety during school peak hours.
- Changes proposed to the driveway on the Pacific Highway would require TfNSW review and approval.
- All driveway designs and accesses on local roads would require Council Local Traffic Committee review and Council approval.

The following specific comments have been provided regarding parking:

- Existing and proposed car parking provisions are not compliant with *Willoughby Development Control Plan (WDCP)* requirements, however both schools are located within good proximity to the Chatswood Transport Hub (Metro, Train and Bus). Both schools also have well connected cycle paths. A reduced on-site parking provision will reduce traffic generation and traffic congestion in the surrounding area, which is consistent with *Willoughby Community Strategic Plan* and *Willoughby Street Parking Strategy*.
- The Transport Impact Study suggested that on-street parking is available for each school staff parking needs and demand. The point is made that school teachers should not depend on street parking, as unrestricted parking zones are limited for local residents and associated visitors parking. The development should consider and provide adequate 'reduced' number of staff parking without depending on street parking.
- The Transport Impact Study suggested that Council apply time parking restrictions to the adjacent local streets. This is not necessarily the solution. The point is made that

Council has previously encountered resistance to further parking restrictions in the area around both schools.

The following further issues are raised by Council:

- Proposed post construction vehicle and pedestrian accesses (at Jenkins Street and Oliver Road) should have a separate access point/paths for vehicles and pedestrians to avoid pedestrian/ vehicle conflicts (Transport Impact Study Figure 6.6 & 6.7).
- During construction phase, the 4 available parking spaces should be increased and prioritised for special needs school students drop off and pick up.
- It is not clear where school staff parking will be provided during construction phase (which is 36 months). No staff travel plans are provided.
- It is not clear where the schools temporary loading and unloading parking spaces/areas are during construction phase.
- The temporary drop off/ pick up zone on Centennial Ave (south side, east of Whitton Road) is supported if required, however, pedestrian crossings at Whitton Road need to be manned during the AM and PM school peak hours, ensuring school children safety while maintaining good traffic flows from Whitton Road (Transport Impact Study Figure 6.4).
- On-site parking is to be provided to meet school staff parking demand without reliance on on-street parking. In this regard a plan is to be developed by the school to actively encourage staff to utilise public transport.
- Internal parking allocations need to be prioritised based on the school's operation needs (student special needs drop off/pick up, loading & unloading spaces, etc)
- Construction phase and post-construction phase loading and unloading spaces need to be provided.

The following measures should be considered by the proponent to cater for the increase in traffic as a result of the development:

- Improve pedestrian crossing facilities (capacity and safety) on Pacific Highway (at Victoria Avenue and Albert Avenue signalised crossing points) and overhead bridge facility – to ensure they are convenient, safe and accessible. In this regard further consultation is recommended with the TfNSW.
- Provide Local Area Traffic Management (LATM) for the schools traffic movements and drop off and pick up activities, such as, installation of roundabout(s) on Centennial Avenue (at Jenkins Street and/or Edgar Street) to facilitate safe U-turn movements, to access both sides of Centennial Avenue and Jenkins Street drop off zones and for traffic to return to the highway. A condition is proposed in Attachment 4.

The following mitigation measures proposed in the Transport Impact Study are also supported:

- Introduce staggered start and finish times for both schools.
- Implement green travel plans and an integrated traffic and transport plan for both schools.
- Run Safe Routes to Schools campaigns (walking and cycling) by both schools working with Council Road Safety Officer and the School Parents and Citizens Committee.
- Provision of a shuttle bus and services (to/from other strategic centres such as St Leonards and Epping).

Conditions have been suggested in Attachment 4 – Conditions.

Stormwater Management for both sites

The Stormwater Management Report and plans, prepared by Wood and Grieve Engineers, detail the proposed management measures. These have been assessed by Council's Engineering Section, who have provided comments below.

Section C.5 of the *WDCP* and the associated Technical Standard 1 (an attachment to *WDCP*) detail Council's requirements for stormwater management. Section C5.3.1 requires that all major developments (which includes educational establishments) are to provide OSD (on-site stormwater detention) in accordance with Technical Standard 1.

The Chatswood Educational Precinct sites are located within OSD Zone 1, which requires:

- An OSD volume of 327m^3 / hectare of impervious area.
- A Permitted Site Discharge (PSD) of 225L/s / hectare of impervious area.

For the Public School Site, fronting the Pacific Highway, the report details that there are three catchments, which have the following details:

East Catchment

- Area = 0.93ha
- Existing Impervious area = 83%
- Proposed impervious area = 69%
- Existing 1% AEP flow = 594L/s
- Proposed 1% AEP Flow = 539L/s
- No OSD system proposed
- Reduction in flow is due to a reduction in impervious area
- For the full catchment area, PSD in accordance with Technical Standard 1 = 209L/s in 1%AEP storm
- For the impervious area, OSD volume in accordance with Technical Standard 1 = 210m^3

West Catchment

- Area = 0.25ha
- Existing impervious area = 81%
- Proposed impervious area = 71%
- Existing 1% AEP flow = 157L/s
- Proposed 1% AEP Flow = 147L/s
- No OSD system proposed
- Reduction in flow is due to a reduction in impervious area
- For the full catchment area, PSD in accordance with Technical Standard 1 = 57L/s in 1%AEP storm
- For the impervious area, OSD volume in accordance with Technical Standard 1 = 58m^3

North Catchment

- Area = 0.16ha
- Existing impervious area = 0%
- Proposed impervious area = 45%
- Existing 1% AEP flow = 99L/s
- Proposed 1% AEP Flow = 100L/s
- 5m^3 OSD system proposed
- Proposed 1%AEP flow with OSD = 87L/s
- For the full catchment area, PSD in accordance with Technical Standard 1 = 36L/s in 1%AEP storm

- For the impervious area, OSD volume in accordance with Technical Standard 1 = 24m³

For the High School site, fronting Centennial Avenue, the report details the following:

- Total site area = 5.97ha
- Area of the proposed new works on the site = 2.17ha
- Existing impervious area = 74%
- Proposed impervious area = 70*
- Existing 1% AEP flow = 1,270L/s
- Proposed 1% AEP Flow = 1,170L/s
- No OSD system proposed
- Reduction in flow is due to a reduction in impervious area
- For the full catchment area, PSD in accordance with Technical Standard 1 = 488L/s in 1%AEP storm
- For the impervious area, OSD volume in accordance with Technical Standard 1 = 497m³

Council's policy requires OSD to be included as part of stormwater management systems, to control peak flows from development sites and reduce flooding downstream. From the above, while the proposed stormwater system does not result in an increase in impervious area, it does not meet the stormwater management requirements in Technical Standard 1. Technical Standard No.1, states *"When full or partial development of a site is proposed, OSD must be provided to cover all the impervious area. No credit will be given for existing impervious areas."* Therefore, any comparison of flows should be made to a 100% pervious site, and not to the existing site.

Given the size of the site, and that not all the site will be redeveloped, Council understands that it may not be feasible to provide OSD for all the impervious area on the entire site. However, OSD is required for the areas in which the new works are occurring.

For the High School, the area of the new works is clearly defined in the stormwater report, and has an area of 2.17 ha, and an impervious area of 70%, or 1.52 ha. OSD is required to be provided for an impervious area equal to 1.52ha, with a minimum volume of 497m³.

For the Public School site, the proposed works occupy the majority of the site. However, the existing buildings to be retained may be excluded from the requirements for OSD. Consequently, OSD is required to be provided for an impervious area of 1.09ha (1.34ha total proposed impervious area – 0.25 ha existing buildings to be retained). This requires a minimum volume of 356m³. The OSD system should be designed so that it caters for a minimum impervious area of 1.09ha, which could be a mix of existing or new impervious areas.

The Stormwater Management Report details that the major drainage system needs to be designed for a 20 year ARI storm event. This is not acceptable to Council, as the major drainage system needs to be designed for the 1% AEP event. Freeboard of 300mm minimum needs to be provided between major overland flow paths within the site and adjacent floor levels. For the catchment area of the OSD systems, during a 1% AEP storm the full catchment area needs to drain to the OSD tank / basin, either via the piped drainage system or by overland flow paths, when the capacity of the piped system is exceeded.

In conclusion, therefore, the stormwater management system proposed for the site is not accepted in its current form. Stormwater conditions have been included in Attachment 4 to ensure that the stormwater system complies with Council's requirements.

Environmental Health issues for both sites

Both sites were investigated for potential contaminants of concern and subject to a Stage 2 Detailed Site Investigation (DSI) conducted by JBS&G Australia Pty Ltd.

The Chatswood High School site was found to be suitable for the proposed continued use.

The Chatswood Public School site required a Stage 3 Remedial Action Plan (RAP) to be prepared due to the presence of PAHs, heavy metals and TRH that exceed the criteria. Based on the identified contamination, JBS&G recommended the development of a RAP to guide the required management of identified soil contamination during and following redevelopment such that the site can be considered suitable for the proposed educational land use.

The subsequent RAP was also prepared by JBS&G and submitted as supporting documentation for the proposal. The RAP concludes that the preferred method of remediation is to leave the bulk of the contaminated material in-situ as significant excavation activities would be required to facilitate treatment of the identified contaminants, impacting upon items of heritage significance (Aboriginal and European) at the site. In addition, contamination at the site is considered to be wide-spread in soils and shows no discernible pattern of distribution. As such, hotspot removal is not likely to be successful without significant excavation and offsite disposal of impacted materials.

This preferred approach relies on the use of existing and proposed surfaces and structures for capping contaminated soils either in place or by controlled cut and fill works. The remediation work is relatively simple and is classified as Category 1 because the proposal is state significant development and therefore requires development consent. The remediation works have been included in the DA documentation and is considered as ancillary to the main development application. The remediation strategy requires ongoing management in the form of an Environmental Management Plan to maintain the physical barrier between site users and the contamination and minimise potential future ground disturbance.

Conditions of consent are suggested in Attachment 4.

Attachment 4 - Conditions

Recommended to be included in any Conditions of Approval

It is noted that these Council conditions may need to be altered to be consistent with the State Significant Development approach to Approvals and the conditions contained within.

Futhermore the Council conditions below apply to both sites unless specifically stated.

1. Construction Environmental Management Plan

Prior to commencement of remediation works, a Construction Environmental Management Plan (CEMP) shall be prepared by the Principal Contractor or the Principal Contractor's Remediation Contractor, which documents the environmental monitoring and management measures required to be implemented during the remediation and construction related activities associated with the construction of the site. The CEMP shall address each of the nominated items in Section 8.1.2 and shall include the Contingency Plan, referred to in Section 7 of the Remedial Action Plan (RAP). Additional environmental management requirements may be required as part of development consent.

The CEMP is required to address each of the required elements and procedures provided in Table 8.1 of the RAP in full detail and to include detailed monitoring processes and procedures, corrective actions and reporting requirements.

(Reason: Environmental compliance, amenity)

2. Work Health and Safety Management Plan

A Work Health and Safety Management Plan (WHSP) shall be prepared by the Remediation Contractor prior to commencement of remediation works. The Plan shall contain procedures and requirements that are to be implemented as a minimum during the works, in addition to the Contingency Plan, referred to in Section 7.1 of the RAP.

The objectives of the WHSP are:

- To apply standard procedures that minimises risks resulting from the works;
- To ensure all employees are provided with appropriate training, equipment and support to consistently perform their duties in a safe manner; and
- To have procedures to protect other site workers and the general public.

These objectives will be achieved by:

- Assignment of responsibilities;
- An evaluation of hazards;
- Establishment of personal protection standards, mandatory safety practices and procedures;
- Monitoring of potential hazards and implementation of corrective measures; and
- Provision for contingencies that may arise while operations are being conducted within the site.

(Reason: Environmental compliance, worker health and safety)

3. Contaminated Land – Remediation and Validation

The Chatswood Public School site must be remediated in accordance with the Remedial Action Plan (RAP) prepared by JBS&G Australia Pty Ltd, Ref. No. 55579/127236 (Rev 0),

dated 20 February 2020. Any variations to the RAP must be approved in writing by the NSW Department of Planning, Industry and Environment (NSW DPIE) prior to the commencement of any work.

A Stage 4 Validation Report, clearly stating that the objectives stated in the approved RAP have been achieved and the land is suitable for the continued use, must be submitted to, and approved by NSW DPIE in writing, together with notice of completion of remediation pursuant to clause 18 of SEPP 55.

The Validation Report and notice of completion of remediation must be submitted to NSW DPIE prior to any excavation, demolition, or other building works, undertaken that are not associated with the remediation.

(Reason: Environmental compliance)

4. Environmental Management Plan

The validation of the site as suitable for the proposed use will be contingent upon the implementation of an Environmental Management Plan (EMP) to manage residual risks posed by contaminated material to future site users.

Where required, the EMP shall contain the following elements:

- A statement of the objectives of the EMP – i.e., to ensure continued suitability of the site after it has been remediated;
- Identification of residual environmental contamination issues at the site that require ongoing management/monitoring to meet the EMP objectives, including the type of contamination and location within the site (including survey plans);
- Documentation of environmental management measures which have been implemented to address the identified environmental issues at within the site;
- Description of management controls to limit the exposure of the site users to known areas of contamination to acceptable levels;
- Description of responsibilities for implementing various elements of the provisions contained in the EMP;
- Timeframes for implementing the various control/monitoring, etc. elements outlined in the EMP;
- Environmental monitoring and reporting requirements (if required) for the future management of environmental impact underlying the site;
- Corrective action procedures to be implemented where EMP assessment criteria are breached.

(Reason: Environmental compliance, public health and safety)

PRIOR TO ISSUE OF CONSTRUCTION CERTIFICATE

The following conditions of consent must be complied with prior to the issue of a construction certificate.

5. Stormwater Plan

Prior to the issue of the Construction Certificate, submit to the Certifying Authority for approval, detailed stormwater management plans in relation to the on-site stormwater management and disposal system for the development. The construction drawings and specifications shall be prepared by a suitably qualified and experienced civil engineer. All

drawings shall comply with Part C.5 of Council's Development Control Plan and Technical Standards, AS3500.3 – Plumbing and Drainage Code and National Construction Code. The drawings shall include the following:

- For the High School Site, an OSD system with a minimum volume of 497m³ and a PSD of 342L/s, with a catchment area of 1.52ha of impervious area, covering the total area of proposed works. All roof and impervious area from the proposed works shall drain through the OSD facility.

- For the Public School Site, an OSD system with a minimum volume of 356m³ and a PSD of 245L/s, with a catchment area of 1.09ha of impervious area.

(Reason: Ensure compliance)

6. Construction Management Plan (CMP)

Submit, for approval by the Principal Certifying Authority, detailed Construction Management Plan (CMP) for each site. The CMP shall address:

- (a) Construction vehicles access to and egress from the site.
- (b) Parking for construction vehicles.
- (c) Locations of site office, accommodation and the storage of major materials related to the project.
- (d) Protection of adjoining properties, pedestrians, vehicles and public assets.
- (e) Location and extent of proposed builder's hoarding and Work Zones.
- (f) Tree protection management measures for all protected and retained trees.

(Reason: Compliance)

7. Local Area Traffic Management Plan (LATM)

Prior to the issue of the Construction Certificate, a detailed Local Area Traffic Management Plan shall be prepared for pedestrian and traffic management for each site, and be submitted to Council's Engineering Section for approval. The plan shall: -

- (a) Be prepared by a RMS accredited consultant.
- (b) Be in accordance with the current version of AS1742.3 and its associated handbook; and the RMS's Traffic Control at work site manual.
- (c) Implement a public information campaign to inform any road changes well in advance of each change. The campaign shall be approved by the Traffic Committee.
- (d) Nominate a contact person who is to have authority without reference to other persons to comply with instructions issued by Council's Traffic Engineer or the Police.
- (e) Confine temporary road closures to weekends and off-peak hour times and shall be the subject of approval from Council. Prior to implementation of any road closure during construction, Council shall be advised of these changes and a Traffic Control Plan shall be submitted to Council for approval. This Plan shall include times and dates of changes, measures, signage, road markings and any temporary traffic control measures.
- f) Analyse and provide recommendations on installation of roundabout(s) on Centennial Avenue (at Jenkins Street and/or Edgar Street) to facilitate safe U-turn movements, to access both sides of Centennial Avenue and Jenkins Street drop off zones and for traffic to return to the highway.

(Reason: Public safety and amenity)

8. Heritage Report

All the recommendations of the submitted Heritage Report, prepared by Nimbus Architecture & Heritage, dated 27 May 2019 are to be fully complied with. Details of compliance with the Recommendations are to be detailed and submitted with the Construction Certificate plans prior to the issue of Construction Certificate.

(Reason: Heritage conservation)

9. Heritage Photographic Survey of Chatswood Primary School

Prior to the issue of the Construction Certificate, a photographic survey of the Chatswood Primary School site is to be lodged with Willoughby City Council for its historical archives. The photographic survey is to be submitted in a report format, and shall include:

- (a) A front cover marked with:
 - (i) the name/location of the property;
 - (ii) the date of the survey;
 - (iii) the name of the company or persons responsible for the survey.
- (b) A layout plan of the existing building and site; identifying rooms and features shown in the photographs.
- (c) Photographs of the interior, exterior, grounds and a streetscape view of the building, labelled to indicate their location in relation to the layout plan. Photographic records of each elevation and each room and any architectural/ decorative features or finishes are to be included. Where colour is a feature of the building (for example, the building features stained glass, leadlight or polychrome brickwork), additional colour photographs are to be included in the photographic survey report.

Documentary evidence from the applicant confirming lodgement is to be provided to the Accredited Certifier.

(Reason: Heritage conservation)

10. External Finishes External Finishes

All external building materials shall be in colours and textures, which are compatible with the heritage character of the locality and the listed items. All painted finishes are to be neutral, recessive colours appropriate to the character of the area and reduce the impact on the heritage listed items within the site and in the vicinity. In this regards, a Schedule of Colours and Finishes for the two sites are to be submitted with the documentation for Construction Certificate prior to the issue of Construction Certificate.

(Reason: Visual amenity and heritage conservation)

11. Internal Noise Levels

The development shall be designed and constructed to comply with the appropriate internal noise criteria contained in the acoustic report prepared by Day Design Pty Ltd, Rep. No. 6698-1.1R Rev A, dated 10 March 2020. The required acoustical treatment shall be in accordance with Section 8.0 of that acoustic report. Certification from an appropriately qualified acoustic consultant that the building has been designed to meet this criteria shall be submitted to the Certifying Authority prior to issue of the Construction Certificate.

(Reason: Amenity)

12. Building Ventilation

To ensure that adequate provision is made for ventilation of the building, mechanical and/or natural ventilation shall be provided. These shall be designed in accordance with the provisions of:

- (a) The National Construction Code:
 - (i) AS1668.1, AS1668.2 and AS3666.1 as applicable; and/or
 - (ii) Alternative solution using an appropriate assessment method

Details of all mechanical ventilation and exhaust systems, and certification provided by an appropriately qualified person verifying compliance with these requirements, shall be submitted to the Certifying Authority prior to the issue of the Construction Certificate.

Classrooms requiring doors and windows to be closed to achieve the internal noise criteria shall be provided with an air conditioning system with fresh air supply.
(Reason: Health and compliance)

13. Construction and Fitout of Food Premises

All works associated with any food premises construction and fit out shall comply with the:

- (a) Australian Standard AS 4674:2004 – Design, Construction and Fitout of Food Premises;
- (b) Food Standards Code (Australia) and Food Safety Standard 3.2.3 – Food Premises and Equipment;
- (c) Food Act 2003 and Food Regulation 2015;
- (d) National Construction Code – Building Code of Australia and any relevant Australian Standards;
- (e) Plumbing Code of Australia and Australian Standard/New Zealand Standard AS/NZS 3500 series on Plumbing and Drainage; and
- (f) Sydney Water commercial trade wastewater requirements for food premises and the most recent editions of any relevant Water Services Association of Australia codes of practice, guidelines, policies and requirements.

Detailed design plans of all areas relating to the food premises operations, including sectional elevations, to scale, and specifications of the equipment, finishes and operations, shall be submitted to the Certifying Authority for approval, prior to a Construction Certificate being issued.

(Reason: Public health, safety and compliance)

14. Noise Mechanical Ventilation Services

To minimise the impact of noise onto receivers on surrounding land, all mechanical services shall be designed to ensure “offensive noise”, as defined under the provisions of the Protection of the Environment Operations Act 1997, is not emitted from the development. Details of the proposed equipment, siting, appropriate noise criteria and any attenuation required shall be prepared by an appropriately qualified acoustic consultant in an acoustic report and accompany the application for a Construction Certificate. The ventilation systems shall be designed to comply with the approved acoustic report assessing mechanical ventilation noise.

(Reason: Amenity, environmental compliance and health)

PRIOR TO COMMENCEMENT OF WORKS

The following conditions of consent have been imposed to ensure that the administration and amenities relating to the proposed development comply with all relevant requirements. All of these conditions are to be complied with prior to the commencement of any works on site.

15. Licensee Details

The name, address and contractor licence number of the licensee who has contracted to carry out the work or the name and permit number of the owner-builder who intends to carry out the work, for each site, shall be furnished in writing to the Principal Certifying Authority.

NB: Should changes be made for the carrying out of the work the Principal Certifying Authority must be immediately informed.

(Reason: Information)

DURING DEMOLITION, EXCAVATION AND CONSTRUCTION

The following conditions are to be complied with throughout the course of site works including demolition, excavation and construction.

16. Hours of Work

All construction/demolition work relating to this approval must be carried out only between the hours of 7 am to 5 pm Mondays to Fridays and 7 am to 12 noon on Saturdays. No work is permitted on Sundays or Public Holidays.

(Reason: Ensure compliance and amenity)

17. Construction Information Sign

A clearly visible all weather sign is required to be erected in a prominent position on each site detailing:

- (a) that unauthorised entry to the work site is prohibited;
- (b) the excavator's and / or the demolisher's and / or the builder's name;
- (c) contact phone number/after hours emergency number;
- (d) licence number;
- (e) approved hours of site work; and
- (f) name, address and contact phone number of the Principal Certifying Authority (if other than Council)

ANY SUCH SIGN IS TO BE REMOVED WHEN THE WORK HAS BEEN COMPLETED.

Council may allow exceptions where normal use of the building/s concerned will continue with ongoing occupation, or the works approved are contained wholly within the building.

(Reason: Ensure compliance)

18. Building Site Fencing

Public access to each site and building works, materials and equipment on each site is to be restricted, when work is not in progress or each site is unoccupied.

A temporary safety fence is to be provided to protect the public, located to the perimeter of each site (unless separated from the adjoining land by an existing structurally adequate fence, having a minimum height of 1.5m). Temporary fences are to have a minimum height of 1.8m and be constructed of cyclone wire or similar with fabric attached to the inside of the fence to provide dust control.

Fences are to be structurally adequate and be constructed in a good and workmanlike manner and the use of poor quality materials or steel reinforcement mesh as fencing is not permissible.

The public safety provisions and temporary fences must be in place and be maintained throughout construction.

(Reason: Safety)

19. Provide Erosion and Sediment Control

Erosion and sediment control devices shall be provided whilst work is being carried out in order to prevent sediment and silt from site works (including demolition and/or excavation) being conveyed by stormwater into Council's stormwater system natural watercourses, bushland, trees and neighbouring properties. In this regard, all stormwater discharge from each site shall meet the requirements of the Protection of Environment Operations Act 1997 and the Department of Environment, Climate Change and Water guidelines. The control devices are to be maintained in a serviceable condition AT ALL TIMES.

(Reason: Environmental protection)

20. No Storage on public areas

Building materials, plant and equipment and builder's waste, are not to be placed or stored outside each site, unless in an authorized manner.

(Reason: Safety)

21. Skips and Bins

Rubbish skips or bins are not to be placed outside each site.

(Reason: Safety)

22. Public Tree Protection

Unless identified by the development consent, no tree roots over 50mm diameter are to be damaged or cut and all structures are to be bridged over such roots.

Should any problems arise with regard to the existing or proposed trees on public land during the construction or bond period, the applicant is to immediately Contact Council's Open Space section and resolve the matter to Council's satisfaction.

(Reason: Tree management)

23. Waste Classification – Excavation Materials

All materials excavated and removed from each site (fill or natural) shall be classified in accordance with the Environment Protection Authority (EPA) Waste Classification Guidelines prior to being disposed of to a NSW approved landfill or to a recipient site.

(Reason: Environment and Health Protection)

24. Asbestos Sign to be Erected

On sites involving demolition or alterations and additions to building where asbestos cement is being repaired, removed or disposed of a standard commercially manufactured sign not less than 400mm x 300mm containing the words "DANGER ASBESTOS REMOVAL IN PROGRESS" is to be erected in a prominent visible position on the site. The sign is to be erected prior to the commencement of works and is to remain in place until such time as all asbestos cement has been removed from the site to an approved waste facility.
(Reason: Public Health and safety/Ensure compliance)

25. Asbestos Removal and Disposal

Works involving the removal of asbestos must comply with the Code of Practice for Safe Removal of Asbestos (National Occupational Health and Safety Commission 2012 (1994).

Demolition is to be carried out in accordance with the applicable provisions of Australian Standard AS 2601 – The Demolition of Structures.

All asbestos laden waste, including bonded or friable asbestos must be disposed of at a waste disposal site approved by the NSW Department of Environment, Climate Change and Water.

Upon completion of the asbestos removal and disposal the applicant must furnish the Certifying Authority with a copy of all receipts issued by the waste disposal site as evidence of proper disposal.
(Reason: Environmental protection/Public health and safety)

26. Hazardous Materials – Clearance Certificate

Following completion of the removal of any hazardous material identified in the Hazardous Building Materials Survey (HBMS) prepared by JBS&G Australia Pty Ltd, a clearance certificate shall be issued by an appropriately qualified occupational hygienist and submitted to the Certifying Authority. The clearance certificate shall verify that the site is free from any hazardous materials.
(Reason: Health and safety)

27. Unexpected Finds Protocol

An unexpected finds contingency plan should be incorporated into site redevelopment works. In the event that previously unidentified contaminated soils or materials are identified during site redevelopment, works should cease in the immediate vicinity and the affected area isolated to minimise disturbance. A suitably qualified contaminated site consultant should be engaged to assess the degree, type and extent of contamination and establish a suitable remediation plan. The Site Manager/landowner shall notify Council in writing when they become aware of any contamination.
(Reason: Environment & Health Protection)

28. Importation of Fill

Any material to be imported onto the site for levelling, construction or engineering purposes must satisfy the Office of Environment & Heritage (OEH) requirements for virgin excavated natural material (VENM), or excavated natural material (ENM). The determination of VENM or ENM must be made by suitable qualified consultant. Pre-certification of the imported material shall be made and details made available to Council upon request.
(Reason: Environment & Health Protection)

29. Dust Control

The following measures must be taken to control the emission of dust:

- (a) Dust screens must be erected around the perimeter of the site and be kept in good repair for the duration of the work.
- (b) Any existing accumulation of dust (e.g. in ceiling voids and wall cavities) must be removed using an industrial vacuum cleaner fitted with a high efficiency particulate air (HEPA) filter.
- (c) All dusty surfaces must be wet down and any dust created must be suppressed by means of a fine water spray. Water used for dust suppression must not be allowed to enter the street or stormwater system.
- (d) All stockpiles of materials that are likely to generate dust must be kept damp or covered.
- (e) Demolition work must not be carried out during high winds, which may cause dust to spread beyond the boundaries of the site.

(Reason: Amenity)

30. Construction Noise & Vibration

Construction noise and vibration shall be controlled in accordance with the recommendations contained within Section 11.0 of the acoustic report prepared by Day Design Pty Ltd, Rep. No. 6698-1.1R Rev A, dated 10 March 2020.

(Reason: Amenity and environmental compliance)

PRIOR TO OCCUPATION OF THE DEVELOPMENT

The following conditions of consent must be complied with prior to the issue of an occupation certificate.

31. School Facilities Standards

The development of each site is to be in accordance with the terms of this consent and comply with the requirements of the Building Code of Australia and where relevant the NSW State Government Publications:

- (a) School Facilities Standards—Landscape Standard,
- (b) Schools Facilities Standards—Design Standard,
- (c) Schools Facilities Standards—Specification Standard

(Reason: Ensure compliance)

32. Access for the Disabled - Disability Discrimination Act

The development on each site must comply with the requirements of the Disability Discrimination Act.

It should be noted that this approval does not guarantee compliance with this Act and the applicant/owner should investigate their liability under this Act.

(Reason: Access and egress)

33. On-Street Traffic Measures

The applicant is required to obtain approval from the relevant road authorities (Department of Transport / RMS) for design and implementation of on-street traffic measures associated with each school site. Design plans and details must include all signage and line-marking adjustments and must be prepared by qualified engineers. The design must comply with Department of Transport and RMS's requirements. The approval must be submitted to the Principal Certifying Authority.

All works required must be completed to the satisfaction of the relevant road authority prior to occupation of the development at the full cost to the applicant/developer.
(Reason: Ensure compliance)

34. Emergency Evacuation Plan

An Emergency Evacuation Plan is to be submitted to PCA and to the Commander for North Shore LAC – NSW Police Force, Chatswood for each site. A written acknowledgement shall be obtained attesting that the Police has no objections to the Emergency Evacuation Plan.
(Reason: Safety)

35. School Operational Management Plan

Prior to commencement of use of new buildings on each site, a School Operational Management Plan is to be prepared and submitted to Council and the PCA for approval, incorporating:

- Management of drop-off/pick-up of pupils;
- Emergency evacuation plan; and
- Student safety.

(Reason: Safety)

36. Removal of Redundant Crossings

Remove all redundant crossings together with any necessary works and reinstate the footpath, nature strip and kerb and gutter accordingly. Such work shall be carried out in accordance with Council's specification.
(Reason: Public amenity)

37. Traffic related Operational Management Plan (OMP)

An Operational Management Plan (OMP) is to be put in place for each site that places the responsibility on school staff to manage safety issues associated with the proposed normal daily school start and finish traffic operations.

In this regard an OMP is to be submitted to the Traffic Section of Council to its satisfaction and sign off, prior to occupation of any new building on each site as a school.
(Reason: Traffic & Parking, Intensity of use, Safety)

38. Loading and unloading

All loading and unloading is to be the subject of a plan to be submitted and approved by Council prior to occupation of any new building.
(Reason: Traffic, Parking, Safety)

39. Directional Signage

All directional signage associated with each school is to be the subject of a master plan submitted to and approved by Council prior to occupation of any new building. Furthermore this signage is to be at the full cost of the school/Department of Education and at no cost to Council.

(Reason: Traffic, Parking, Safety)

40. On-site Water Management System

Prior to the issue of any Occupation Certificate, the stormwater runoff from the site shall be collected and disposed of via an approved OSD system in accordance with Sydney Water's requirements AS/NZS3500.3, Council's DCP and Technical Standards. The construction of the stormwater drainage system of the proposed development shall be generally in accordance with the approved design stormwater management plans and Council's specification (AUS-SPEC). The requirements for the system shall be:

- For the High School Site, an OSD system with a minimum volume of 497m³ and a PSD of 342L/s, with a catchment area of 1.52ha of impervious area, covering the total area of proposed works. All roof and impervious area from the proposed works shall drain through the OSD facility.

- For the Public School Site, an OSD system with a minimum volume of 356m³ and a PSD of 245L/s, with a catchment area of 1.09ha of impervious area covering the total area of proposed works. All impervious area from the proposed works shall drain through the OSD facility.

(Reason: Prevent nuisance flooding)

41. Emitted Noise – Air Conditioning and Mechanical Plant

Certification from an appropriately qualified acoustic consultant that these design requirements contained in the acoustic report that assesses noise from mechanical ventilation have been met shall be submitted to the Certifying Authority prior to issue of the Occupation Certificate for the development.

(Reason: Amenity, environmental compliance and health)

42. Acoustic Treatment – Certification

Prior to the issue of any relevant Occupation Certificate, certification shall be provided from a suitably qualified acoustic engineer certifying that the acoustic treatment of any new building complies with the construction details approved and the relevant design noise criteria.

(Reason: Amenity, environmental compliance and health)

43. Certification – Ventilation

Prior to the issue of any relevant Occupation Certificate, certification shall be provided from a suitably qualified mechanical engineer certifying that all work associated with the installation of the mechanical and/or natural ventilation systems has been carried out in accordance with the relevant Australian Standards and or alternative solution.

(Reason: Amenity, environmental compliance and health)

44. Food Premises

Prior to the issue of any Occupation Certificate the fitout of the food premises shall comply with Australian Standard AS 4674:2004 – Design, Construction and Fitout of Food Premises, the provisions of the Food Standards Code (Australia) and the Food Act 2003.

(Reason: Public health, safety and compliance)

45. Food Premises Registration

Prior to an Occupation Certificate being issued, any new operators of the school canteens/food premises shall be registered with Willoughby City Council by completing and submitting the Food Business Registration Form available on Council's website.

(Reason: Public health, safety and compliance)

ONGOING CONDITIONS THAT MUST BE COMPLIED WITH AT ALL TIMES

The following conditions have been applied to ensure that the use of the land and/or building is carried out in such a manner that is consistent with the aims and objectives of the planning instrument affecting the land, and relevant legislation.

46. Hours of Operation of Chatswood Primary School

The hours of operation of Chatswood Primary School, including extra-curricular activities, are to be consistent with the development application and restricted to:

Weekdays: 6:45am to 6:15pm.

Saturday, Sunday and Public Holidays: Closed.

(Reason: Traffic & Parking, Intensity of Use)

47. Hours of Operation of Chatswood High School

The hours of operation of Chatswood High School, including extra-curricular activities, are to be consistent with the development application and restricted to:

Weekdays: 7.20am to 4.30pm.

Saturday: 7am to 2pm

Sunday and Public Holidays: Closed.

(Reason: Traffic & Parking, Intensity of Use)

48. Community use of each site

The hours of operation of buildings on each site are to be consistent with the development application and restricted to:

Weekdays: 4pm to 10.00pm.

Saturday and Sunday: 6am to 8pm

Public Holidays: Closed.

(Reason: Traffic & Parking, Intensity of Use)

49. Trees on adjoining Properties

No approval is given for the removal or pruning of trees on adjoining reserves or neighbouring land, unless identified on the consent plans.

(Reason: Environmental protection)

50. Noise Control – Offensive Noise and Vibration

To minimise the noise and vibration impact on the surrounding environment, the use of the premises, building services, equipment, machinery and ancillary fittings shall not give rise to an “offensive noise” as defined under the provisions of the Protection of the Environment Operations Act 1997.

(Reason: Amenity)

51. Heritage Buildings on Chatswood Primary School site

Should any portion of the existing building which are indicated on the approved plans to be retained be damaged, all the works on-site are to cease and written notification given to Council. No work is to resume until the written approval of Council is obtained.

(Reason: Heritage conservation and Ensure compliance)