

31 January 2018

File No: SSD 8373  
Our Ref: R/2017/9/A

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Attention: Peter McManus  
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Dear Peter

**State Significant Development application for the Alexandria Park Community School Redevelopment, Park Road, Alexandria (SSD 8373)**

I refer to the letter dated 11 December 2017 which invites the City of Sydney ("the City") to comment on the State Significant Development (SSD) application.

It is understood that the proposal will accommodate up to 1,000 primary school students and up to 1,200 secondary school students. It is noted that the delivery of the project will be undertaken in stages and that the proposal involves the following works:

- Demolition of all existing buildings on-site, including the temporary pop-up schools;
- Remediation of specific areas of the site containing contaminated fill;
- Construction of multiple school building of up to five stories along the western and southern parts of the site comprising:
  - Classroom home bases;
  - Collaborative learning spaces;
  - Specialist learning hubs;
  - Learning support spaces;
  - Offices for teachers and administrative staff;
  - Library; and
  - Student canteen.
- Construction of a sports hall and multiple outdoor sports courts;
- An all-weather multipurpose synthetic sports field;
- Informal play spaces and Covered Outdoor Learning Space or COLA;
- Dual use community spaces;
- A pre-school for 39 children;
- Site landscaping including green links, community garden and open space;
- Construction of a new car park and associated vehicular access point of Belmont Street; and
- Augmentation and construction of ancillary infrastructure and utilities as required.

The redevelopment of the site for a new school is considered to be a positive outcome for Sydney. The City has reviewed the development application and provides you with the following observations for your consideration:

### **Access Easement – Western boundary**

On the western boundary shared with 92 Buckland Street there is an existing 2m easement on school land for pedestrian/bicycle access between Buckland and Belmont in favour of Council. The easement is not clearly identified in the submitted documents or plans, however the plans do show this area will remain unbuilt upon adjacent to the staff car parking area.

To ensure this access path is not inadvertently overlooked and built over, it is recommended that the plans be updated to clearly identify this easement for pedestrian/bicycle access in accordance with the registered Easement for Access.

### **Park Road and shared community use of facilities**

The Department of Education has separately requested the City to commence the process of closing part of Park Road, ultimately to allow an expanded synthetic multi-use sports field across the department and City land.

As part of this, ongoing discussions between staff from the City and the Department have been occurring regarding shared community use of the facilities. As such, the City would like to consider an agreement with the Department (landowner) to offer the sports field to the community out of school hours, weekends and school holidays. The agreement should include booking conditions and systems to be used to maximise access to the community.

In addition to the general use agreement, the City would also like to include maintenance and cost sharing agreement with the landowner to ensure the field receives the appropriate level of maintenance and asset renewal.

In this regard, the Department of Planning and Environment should ensure that the proposed development does not prejudice these ongoing discussions.

In addition, the conditions of any approval should ensure that the vehicular traffic generated and servicing needs of the proposal are able to be comfortably accommodated in the surrounding road network following the closure of Park Road.

### **Sports field**

As noted above, it is understood the sports field will be available for use by the community after school hours. The EIS states that the proposed sports field will be synthetic turf to meet the high demand expected by the school and the community. The standard of the synthetic turf should be to International Rugby Board standard to cater for both contact and non-contact sporting codes.

It is unclear from the plans what the height of the proposed perimeter fencing is around the sports field. It is recommended that a maximum 1.2m fence around the sports field is provided to ensure the facility is inviting for use by local residents and sporting groups. No objection is raised to sports nets along the northern elevation to stop balls bouncing out of the field.

## **Sydney DCP 2012 – Streets and Lanes**

The Sydney Development Control Plan 2012 (DCP) shows a future extension of Park Road through to McEvoy Street along the eastern boundary of the southern school block. Although DCP's do not apply to State Significant Development applications, the City considers this link to be an important connection for the community.

The DCP requires a road, however the City considers that a through site link may be adequate to provide access in lieu of a road. A through site link will facilitate public access and connectivity to the school and provide community access through to the new competition sports field and community facilities.

It is recommended that the site planning along this boundary does not preclude provision of a future through site link (or at the least provide an appropriate frontage to a future link).

This following design changes are recommended:

- Relocate the substation from the north-end of the eastern boundary carpark.
- Removal / relocation of the on-grade car-parking on the north-end of the eastern boundary.
- The provision of a larger landscaped setback from the eastern boundary.
- A larger landscaped setback could facilitate a more direct and legible eastern entry to the community centre from Power Avenue and greater depth for the landscaped edge. It is recommended that the centre address the future link to provide an active and engaging frontage and to maximize communal use in accordance with Principle 3 of the SEPP (Educational Establishments and Child Care Facilities) 2017, (Education SEPP). This would also demonstrate consistency with the NSW Department's Educational Facilities Standards and Guidelines (EFSG) principle of providing facilities that are flexible and adaptable to support multiple purposes including current and future use.
- A larger landscaped setback will facilitate increased separation to the level one pre-school break-out area to mitigate potential overlooking from the adjoining site at 17 Power Avenue. A greater landscaped depth would provide for the planting of mature trees, which will provide additional screening.

## **Shadows**

The shadow studies provided at 9am, 12pm and 3pm in midwinter do not provide sufficient detail to fully assess the amenity impacts on adjoining properties. In order to undertake a detailed analysis of the overshadowing impacts, additional material in the form of detailed views from the sun at hourly intervals would need to be provided in relation to the affected properties. Each neighbouring apartment would need to be counted individually and the analysis would need to provide both existing and proposed hours of solar access to living room windows, private and communal open space.

## Urban Design

### Architectural expression / materials and finishes

Generally the architectural expression appears to provide a warm and engaging form that will establish a vibrant backdrop to Alexandria Park. However, the following comments should be noted:

- The strategic use of the perforated metal screen element to unify the architectural form and provide a central identity for the building is supported. No material sample of this element has been provided. While it appears that the screen will provide good solar shading, detailed information relating to the level of transparency and screen's impact on the solar amenity of habitable spaces e.g. classrooms would be beneficial.
- Vertical louvre blades are provided on the west facades to provide protection from solar gain. This will have the added benefit of providing privacy from the adjoining properties along the western boundary.
- The external finishes legend provided on the elevations does not provide adequate information to clearly communicate the proposed materials, finishes and colours, and no Material Sample board has been provided. Without a comprehensive materials and finishes sample board, the understanding of proposed finishes is limited.
- The material identified as BAL/CON is missing from the finishes legend.
- The exterior cladding panel identified as MLF on the western elevation is identified as a fixed metal louvre, but is illustrated as a flat cladding panel. This is unclear.
- Flammable cladding should not be used.

### Library

The proposed entry to the library is not generously sized or clearly legible, as it appears to be partially obscured by the pivot-gates to the southern hub at ground floor (Ground Floor Plan – Northern Hubs, AR.DA.2101\_P1). The entry does not appear to be accessible, as a clear and level path is precluded by the built-in seat and wide access steps. Consideration should be given to enlarging the library entry and reconfiguring it to provide a more legible, direct and accessible entry.

### Perimeter Fencing

The Fencing Strategy Plan prepared by Context does not identify any barriers restricting access from the central part of the Southern Hub to the external 'Canopy Classrooms' located along the western and southern boundaries at the ground floor. There does not appear to be passive surveillance to all areas of these spaces, so some form of barrier would ensure that access is limited to times when supervision is available. The provision of barriers to restrict unsupervised access to the external 'Canopy Classrooms' located along the western and southern boundaries at the ground floor would improve safety outcomes by providing clear access control

## Bicycle Parking

It is noted that 144 bicycle parking spaces are proposed in three locations within the school grounds. 98 student bicycle parking spaces will be located in the staff car park and 30 student bicycle parking spaces adjacent to Power Avenue and 20 staff bicycle parking spaces will be located indoors near the end of trip facilities.

Concern is raised with the proposed location of student bicycle parking within the staff car parking area. The ARUP report recommends signage warning motorists, convex mirrors in blind spots and a 10km/h speed restriction to reduce the potential conflict between motorist and student cyclists. Given this is a new development, the location of the bicycle parking locations should be designed to reduce conflict between students on bicycles and motorists as a priority. The use of convex mirrors are considered to be ineffective for car movements and must not be supported as a safety measure for students on bicycles. Alternative and safe bicycle parking locations should be investigated within the school grounds. As such, bicycle parking for student use should be provided as follows:

- a. Adjacent to all pedestrian entries to the site including Park Road, Buckland Street and Belmont Street.
- b. Any bicycle parking located within car parking areas must be physically separated from manoeuvring cars such as with medians or fencing.
- c. At least 80 percent to be located within school fencing to improve security
- d. At least 50 percent of bicycle parking within school fencings is to be weather protected
- e. Layout and design must comply with Australian Standard AS 2890.3:2015 Parking Facilities Part 3: Bicycle Parking Facilities.

## Heritage Impact

The Preliminary Aboriginal Archaeological Assessment (December 2017) undertaken by Extent Heritage Pty Ltd concludes that “further assessment of Aboriginal cultural heritage is recommended...with formal Aboriginal community consultation and a staged program of archaeological test excavations” as previous work in the Alexandria locality has resulted in the identification of Aboriginal stone objects, shell midden material and human remains.

The Historical Archaeological Assessment (September 2017) by Extent Heritage Pty Ltd concludes that “the proposed development is unlikely to have a substantial archaeological impact”. However, excavation may uncover unexpected historical archaeological remains. The stormwater drain, which contributes to the Alexandria Canal, is not assessed as an archaeological feature but is of heritage significance. Excavation may impact on the stormwater drain running through the school site.

The following Heritage conditions are recommended:

### **ABORIGINAL ARCHAEOLOGICAL ASSESSMENT**

- (a) *A copy of the Preliminary Aboriginal Archaeological Assessment (December 2017) by Extent Heritage Pty Ltd should be provided to the Metropolitan Local Aboriginal Land Council (LALC) to review and provide comment on the findings and recommendations for integration prior to finalisation.*

- (b) *Further assessment of Aboriginal cultural heritage is recommended in the form of an Aboriginal Cultural Heritage Assessment Report (ACHAR), with formal Aboriginal community consultation and a staged program of archaeological test excavations.*
- (c) *The development of an Aboriginal Cultural Heritage Management Plan to undertake these works and management of cultural deposits during and following the construction, must be incorporated into the project's conditions of consent.*

### **ARCHAEOLOGICAL INVESTIGATION**

- (a) *The applicant must apply to the Heritage Division of the Office of Environment and Heritage for an excavation permit under Section 140 of the Heritage Act 1977.*
- (b) *Should any potential archaeological deposit likely to contain Aboriginal objects be identified by any person during the planning or historical assessment stage, application must be made by a suitably qualified archaeologist to the NSW Government Office of Environment and Heritage for an excavation permit for Aboriginal objects.*
- (c) *The applicant must comply with the conditions and requirements of any excavation permit required, and are to ensure that allowance is made for compliance with these conditions and requirements into the development program.*
- (d) *General bulk excavation of the site is not to commence prior to compliance with the conditions and requirements of any excavation permit required.*
- (e) *Should any relics be unexpectedly discovered in any areas of the site not subject to an excavation permit, then all excavation or disturbance to the area is to stop immediately and the Heritage Council of NSW should be informed in accordance with section 146 of the Heritage Act 1977.*
- (f) *Should any Aboriginal objects be unexpectedly discovered then all excavation or disturbance of the area is to stop immediately and NSW Government Office of Environment and Heritage is to be informed in accordance with Section 89A of the National Parks and Wildlife Act 1974;*
- (g) *Should any archaeological remains or Aboriginal objects be discovered, a copy of recording of the finds and the final archaeological summary report is to be submitted to Council's Heritage Specialist prior to issue of an Occupation Certificate.*

### **Trees**

The Architectural Plans, Landscape Plans and Arborist Report Tree Retention Plan are inconsistent with each other. The Arborist Report recommends the removal of a number of trees which are shown as being retained in Appendix F of the report. In addition, the Architectural Plans and Landscape Plans show a number of trees recommended for removal but have them shown as being retained. All plans and documentation should be updated to align with one another in terms of tree removal and retention.

The proposed new carpark which enters via Belmont Street has not considered or acknowledged that street trees will require removal in order to facilitate the new driveway and crossover.

All trees proposed for retention should be protected in accordance with AS4970 and the Arborist Report recommendation for the duration of demolition, construction and development works.

The EIS states that all new flora species proposed to be planted at the site have specifically been chosen to ensure they are safe within a primary school environment. The proposed planting of the tree species Prickly leaf Paperbark (*Melaleuca styphelioides*) is not considered the most appropriate option as it has prickly /sharp leaves. All other tree species and planting proposed is supported.

### **Changes to Parking Restrictions**

Any changes to street parking restrictions would require separate approval from the City's Pedestrian Cycling and Traffic Calming Committee.

### **Public Domain Frontages**

Due to the extent of works proposed immediately adjoining the public domain, the site's frontages are likely to be damaged during construction, or will require upgrading and level adjustments. The Department should ensure that the surrounding public domain is protected in accordance with the City's normal requirements.

### **Flooding**

It is noted that the site is flood affected and that a Flood Risk Assessment Report has been prepared by Woolacotts Consulting Engineers. The proposed flood planning level of 13.83m AHD is supported. However, it is advised that an On-site Flood Refuge Plan should be provided instead of the Flood Evacuation Plan.

### **Stormwater**

As identified on the plans there is an existing Sydney Water culvert running across the site. Approval from Sydney Water to build over or adjacent to their major asset is required prior to determination of this application.

### **Land Contamination**

A detailed survey of the site and further groundwater investigations are to be carried out as per the recommendations outlined in the Detailed Site Investigation (DESI) document prepared by Coffey Services Australia Pty Ltd, referenced SYDEN199382-R01-Rev2 dated 26 October 2017. These investigations are to be carried out by a suitably qualified environmental consultant in accordance with the NSW Government Office of Environment and Heritage, Guidelines for Consultants Reporting on Contaminated Sites, Contaminated land Management Act 1997 and SEPP 55 Remediation of Land" confirming that the site is suitable (or will be suitable, after remediation) for the proposed use.

The Department should satisfy itself prior to determination that the proposed site will be made suitable after remediation for the proposed use.

## Noise

The intensification of the use of the premises will have potential impact on the surrounding amenity.

This potential impact will include but not be limited to an increase in the number of students using the outdoor areas and sports facilities, students leaving and entering the school and noise from vehicle movements, which the Council will have no powers to regulate.

The out of hours use of the sports facilities and external facilities has the potential to further impact on residential amenity.

The nearest noise receivers are likely to include residential users located on the western boundary along Buckland Street, northern end of Buckland Street and on the southern end of Belmont Street.

Concerns are raised that the intensification of the use and requirements for additional plant and machinery may further increase the noise levels given the close proximity of neighbouring houses to the school. Accordingly, the Department should satisfy itself prior to determination that the proposal will not unreasonably impact on the surrounding environment and that mitigation measures are required to be installed as appropriate.

## Biodiversity

A Biodiversity Assessment has not been provided as part of the application. The Environmental Impact Statement (EIS) Section 2.4.2 states that the grey-headed flying-fox, powerful owl and long-nosed bandicoot were recorded within the surrounding locality, however there is no further information or assessment provided to determine if they are using the site.

All species noted in the EIS are listed in the City's Urban Ecology Strategic Action Plan as priority species for the City. It is recommended that the biodiversity impacts related to the proposed development are to be properly assessed and documented in accordance with the Framework for Biodiversity Assessment as detailed in the SEARs dated 29 September 2017.

Should you wish to speak with a Council officer about the above, please contact Vanessa Aziz, Senior Planner, on 9265 9333 or at [vaziz@cityofsydney.nsw.gov.au](mailto:vaziz@cityofsydney.nsw.gov.au)

Yours sincerely,



**Graham Jahn AM**  
**Director**  
 City Planning | Development | Transport