

Your Ref: SSD 8677

29 January 2018

Karen Harragon
GPO BOX 39 SYDNEY NSW 2001

Attention: Director - Social and Other Infrastructure Assessments

Dear Ms Harragon

ALTERATIONS AND ADDITIONS TO FAIRVALE HIGH SCHOOL 1 THORNEY ROAD, FAIRFIELD WEST (SSD 8677) NOTICE OF EXHIBITION

On 15 December 2017 Council received a notice of public exhibition from the Department of Planning and Environment inviting comment in relation to State Significant Development Application SSD 8677. Council notes the application involves alterations and additions to Fairvale High School comprising:

- Partial demolition of Block A and complete (ground floor) and complete demolition of Blocks C and G;
- Removal of 18 demountable buildings one shed four Covered Outdoor Learning Space (COLA). One water tank and other landscaping features;
- Tree removal;
- Construction of a new three storey multi-purpose hall;
- Construction of concrete sports courts and new COLA in Northern Sports Oval;
- Landscaping works;
- Increase student capacity from 1360 up to 1560 and 10 additional full time equivalent.

Council has referred the application to relevant internal stakeholders including catchment management, development assessments, traffic engineering, natural resources and biodiversity, waste management and building control and compliance. Comments and recommendations received are discussed below.

COMMENTS

Catchment Management Comments

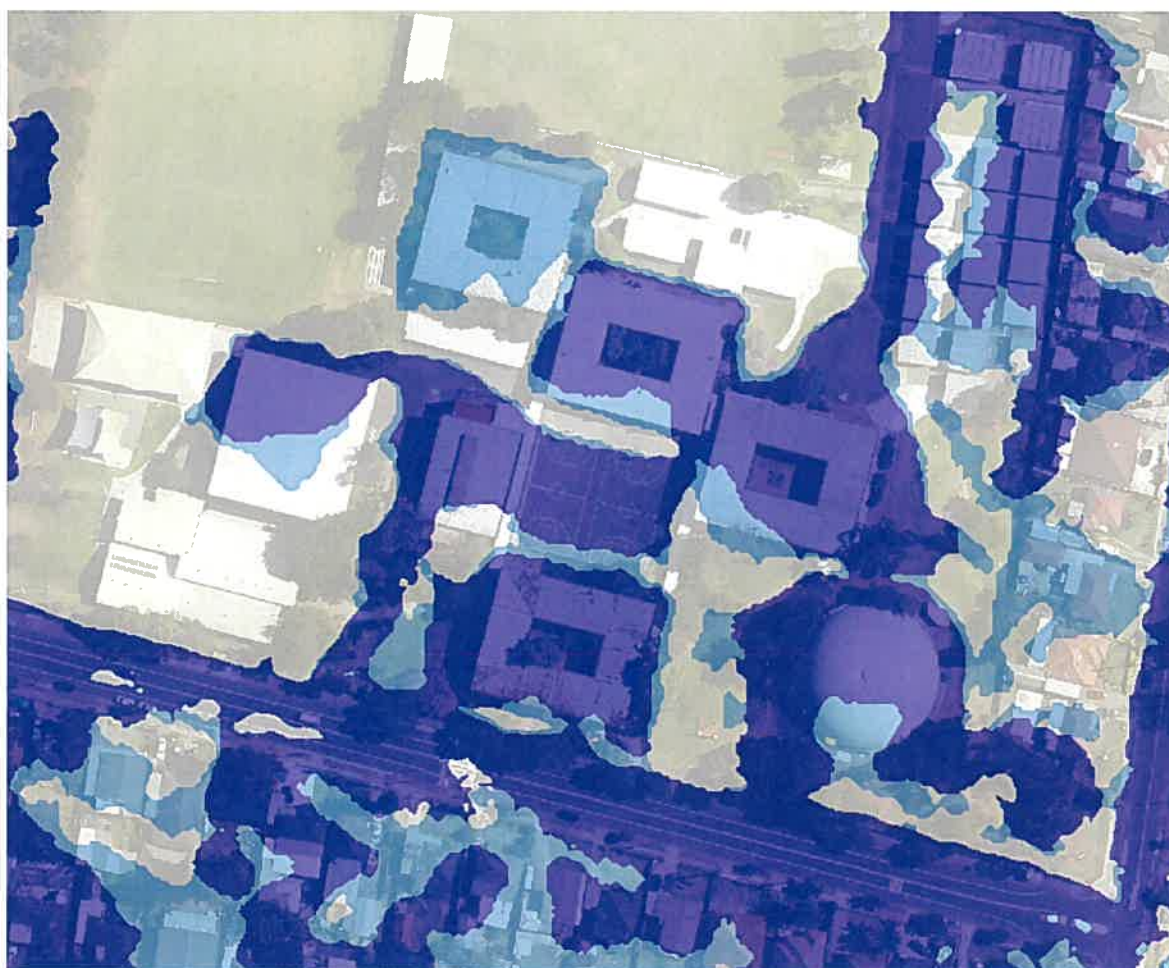
At the time the SEARS assessment was undertaken only a mainstream flood study had been done for this locality. The proponent has correctly identified that this site is not affected by mainstream flooding. Since that time Council has undertaken the Draft Central Overland Flood Study, which covers the subject site. This study is now complete and is to go on public exhibition shortly before proceeding to Council for adoption.

A map showing the flood risk precincts as per the Central Overland Flood Study can be found below, as well as the definitions of each risk precinct.

High Flood Risk: This has been defined as the area of land below the 100- year flood event that is either subject to a high hydraulic hazard or where there are significant evacuation difficulties.

Medium Flood Risk: This has been defined as land below the 100-year flood level that is not within a High Flood Risk Precinct. This is land that is not subject to a hydraulic hazard or where there are no significant evacuation difficulties.

Low Flood Risk Precinct: This has been defined as all land within the floodplain (i.e. within the extent of the probable maximum flood) but not identified within either a High Flood Risk or a Medium Flood Risk Precinct. The Low Flood Risk Precinct is that area above the 100-year flood event.



High Flood
Risk Precinct

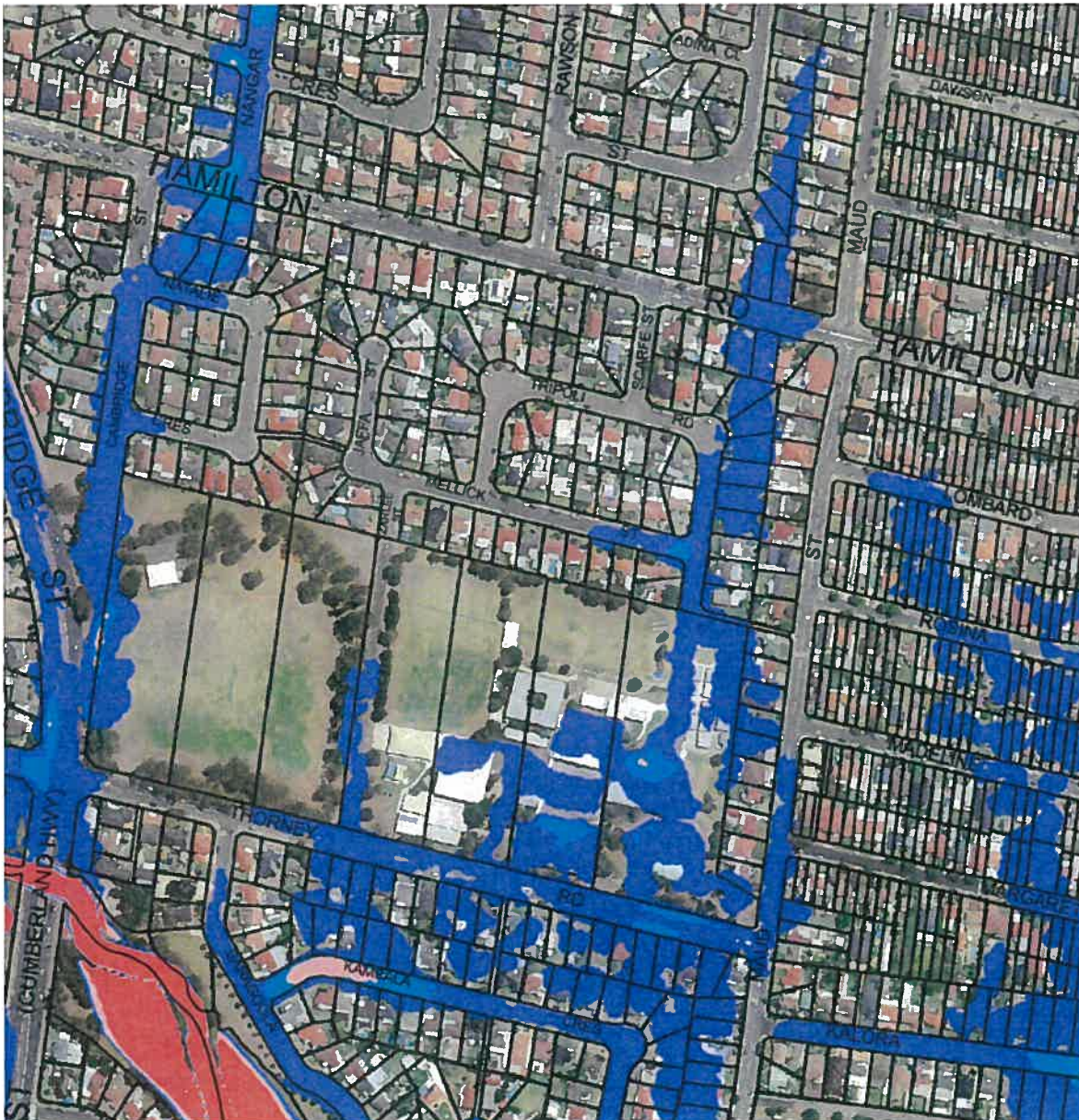
Medium Flood
Risk Precinct

Low Flood Risk
Precinct

As can be seen in the map above, a large portion of the site, including the location of proposed works is within the Medium and Low Flood Risk precincts. A map showing depth of water in the 100 year ARI event is included below.

The map shows that the flow path within the school originates several streets north of the site, and continues to increase as it travels downstream. The majority of the site is impacted by flooding less than 0.3m deep, but there are some locations with flooding greater than 0.5m.

As the flow path is substantial, works within it can have negative impacts both upstream and downstream. Additionally, the flow path could impact the proposed works with flood damages taking place if they do not use a flood compatible design.



Council Officers recommendation: It is critical that the proponent considers this information and the impact this flooding may have on the proposed works and existing surrounding development. A flood risk assessment, flood risk management plan and hydraulic engineering report should accompany the application as the adoption of the modelling is imminent. Please ensure that flood sensitive design techniques are addressed as part of this proposal.

If the Department requires further information, or advice concerning Fairfield City Council's panel of flood consultants, Fairfield City Council's panel of consultants, please contact Fairfield City Council's Catchment Management team on 9725 0222.

Building Control and Compliance Comments

A partial Building Code of Australia (BCA) assessment was completed by Council's Building team in relation to the following BCA issues which would have an impact on the proposed development during the assessment.

Fire Separation (Part C BCA) – The building can achieve the required fire separation.

Travel Distances (Part D BCA) – The building can achieve the required travel distances.

Access and Egress (Part D BCA) – The access and egress to the building is generally compliant.

Essential Services (Part E BCA) – The required essential services will be determined at CC stage.

Health and Amenity including Toilets (Part F BCA) – The proposal will satisfy the requirements with the BCA.

Council Officers Recommendation: Considering the above points the Building and compliance raises no objection to the proposal subject to planning consideration and acceptance of the standard conditions detailed in **Attachment A** of this response.

Development Assessment Comments

A review of the documentation submitted was undertaken and the following recommendations are made below:

- Provision of a detailed construction management;
- That the developer pay the appropriate section 94A contribution fee;
- That waste and garbage removal is limited to the hours of 6am to 6pm in order to mitigate impacts on traffic flow on Thorney Road;
- A detailed landscape plan be provided with detailed planting schedule;

- Proposal should provide a vegetation buffer to site boundaries alongside residential properties particularly in the North East Corner of the Site utilising Cumberland plain woodland vegetation.

Council Officers Recommendation: Subject to the above recommendations Council raises no further objections in relation to the proposal.

Natural Resources Comments

Councils Natural Resources team have reviewed the attached Arboricultural Impact Appraisal and Method Statement by Naturally trees dated 25 October 2017 and the Biodiversity Assessment by SLR dated 7 December 2017. After reviewing the above documentation in conjunction with Landscape Plan Sheet 1 and 2 the Natural Resource team raises no objections to the proposal.

Traffic and Transport Comments

The proposed redevelopment will accommodate 200 students and 10 staff. Fairfield Citywide Development Control Plan (DCP) 2013 has a parking requirement of 1 space per employee plus 1 space per 10 students in year 12 for a school development. Based on this rate, the redevelopment would require provision of an additional 12 car parking spaces. State Environmental Planning Policy (State and regional development) 2011, Clause 11 states that the DCP does not apply for state significant development. The applicant has justified that the existing number of car parking spaces will be adequate to cater the demand created by the redevelopment. As such, no issues are raised in regard to parking.

The traffic report and the Construction Traffic Management Plan (CTMP) submitted along with the application has been reviewed, and the following comments are provided:

- The SIDRA files should be submitted to Council for further assessment; and
- The swept path submitted along with the CTMP shows that some parking spaces have to be removed during the construction stage. Further information to be submitted by the applicant detailing the measures to ameliorate demand for parking during the construction stage.

Council Officers Recommendation: Council raises no further issues in relation to the parking rates. Council requests review of the SIDRA files for further assessment on traffic management issues. Please contact Philip Saverimuttu City Projects: Built Systems Co-ordinator Traffic and Transport on 9725 0261.

Waste Management Comments

Councils Waste Management team has provided the following comments:

- 1) No comments on the Waste Management Plan as it is fine;

- 2) The Asbestos Management Plan is not met basic requirement. This is a asbestos register, not management plan
- 3) No comment on the ESD.

Councils Officers Recommendation

The applicant needs to provide an asbestos management plan which details the ongoing management of asbestos both during the construction and or removal of asbestos in the future. Council raises no objections to the proposal.

Environmental Health Comments

Environmental Health has no objection to the proposed development subject to the recommendations contained within the Acoustic Report Ref: 101558-FHS, Dated 31/10/17 being implemented.

The inclusion and implementation of the unexpected finds protocol as detailed in Contamination assessment REF: E30428KPrpt, dated 19/6/17 must also be implemented.

Strategic Land Use Planning Comments

The subject site is located at 1 Thorney Road, Fairfield west and encompasses 4 lots including: Lot 12 Sec 1 DP 1779, Lot 13 Sec 1 DP 1779, Lot 14 Sec 1 DP 1779 and Lot 10 DP 502048. The site contains a public one way through road that the school uses for parking.

The school is bordered to the west by Avery Park which is crown land administered by Fairfield Council zoned RE1 Public Recreation. The north and east of the site is bordered by residential dwellings zoned R2 Low Density Residential. To the south of the site is Thorney Road a major arterial road linking Wakeley to Fairfield, which forms the main access and egress point of the proposal.

The subject site is zoned R2 Low Density Residential. The land use is defined as an educational establishment under Fairfield Local Environmental Plan 2013 (FLEP 2013). Educational establishments are permitted with consent on land zoned R2.

The Capital Investment Value for the development works exceed \$20 million and it is therefore considered State Significant Development as stipulated under Sub Clause 2 clause 15 Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011.

Section 88 of the EP&A Act considers the application Crown development as the application has been lodged by and on behalf of the Department of Education.

The development proposal must comply with Clause 35(6) Part 4 of State Environmental Planning Policy (Educational Establishments and Child Care

Facilities) 2017. This sets out provisions relating to design quality and community use of school facilities. Council has reviewed Appendix 7 - Design Quality Statement and raises no objections to the development proposal.

Clause 4.3 Part 4 Development Standards of Fairfield Local Environmental Plan 2013 (FLEP 2013) applies a Height of Buildings Development Standard of 9 metres for land zoned R2.

The redevelopment proposes a Height of buildings of 11 metres Clause 42 Part 4 of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 stipulates that:

"Development 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 proposal contravenes FLEP 2013 Height of Building development standard of 9 metres for R2 Low Density Residential zones. No Clause 4.6 Variation is required as Clause 42 of SEPP Educational Establishments and Child Care Facilities) 2017 over rides FLEP 2013.

Council Officers Recommendation: The submitted EIS complies with SEARS's requirements. The re-development will result in a centralisation of the student body to the centre of the school. The removal of the bini shell and demountable buildings on the eastern periphery of the site will result in more open space being provided between adjoining residents and school buildings resulting in a buffer. This will improve outlook and amenity for surrounding residents. Council raises no objections to the proposal.



Patrick Warren
STRATEGIC LAND USE PLANNER