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ALEXANDRIA PARK COMMUNITY SCHOOL

S4.55(1A) MODIFICATION TO SSD 17_8373

Environmental Assessment
Report

Prepared for
**DEPARTMENT OF EDUCATION AND SCHOOL
INFRASTRUCTURE NSW**
16 June 2020

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1. INTRODUCTION

This report has been prepared on behalf of the Department of Education and School Infrastructure NSW (the 'Applicant') pursuant to Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (the EP&A Act).

This application seeks to modify:

- The site description on the consent to include part of Park Road (the part of Park Road that is subject to a City of Sydney Road Closure).
- Condition A2 of the consent to amend the approved architectural drawings, landscape drawings and stormwater/drainage drawings. The amended drawings propose an expanded sports field as part of an executed Joint Venture with City of Sydney Council.

The proposed expansion of the sports field over Park Road will create a unified community precinct. The proposal strengthens the ability of the school to be fully connected with the surrounding community.

Concept planning for shared use of the sports field and associated facilities within the school commenced in 2017 in collaboration with City of Sydney as a joint partner. The operational objective is for SINSW to allow the community to use the indoor school sports facilities and City of Sydney to use the outdoor school sports facilities. City of Sydney closed Park Road to facilitate the development and joint use.

The design objective is to provide a seamless transition between the outdoor playing and sporting zones of the school and Alexandria Park adjacent Park Road.

In mid-2017, the Lord Mayor of City of Sydney wrote to the Minister of Education advising that the City had a preference for the closure of Park Road for the provision of an expanded synthetic multi use sports field over the former road as a shared facility for students and the broader community. The City of Sydney requested that this opportunity be progressed, and a joint use agreement was executed.

The proposal will provide an integrated precinct for community sport. It provides an improved public domain and pedestrian friendly zone at the key public interface and entry to the school. Provision of a new high quality sports field addresses community need and also provides the school with a facility that will enhance the educational outcomes for its students.

This planning report provides a comprehensive description and assessment of the proposed modifications within the following sections of the report as listed below.

- Section 2 – Summary of the approval history and relevant background.
- Section 3 – Site and surrounding context.
- Section 4 – Strategic Planning Framework
- Section 5 – Justification for the proposed modifications
- Section 6 – Proposed modifications.
- Section 7 – Amended conditions
- Section 8 – Assessment of the modified proposal in accordance with section 4.55 (1A) of the Act 1979.
- Section 9 – Consideration of relevant matters listed under section 4.15 of the Act 1979.
- Section 10 – Summary and conclusion.

The following specialist consultants were engaged to review and update the relevant drawings and reports prepared in association with the modification application.

Table 1 Project Team

Report	Reference
Amended Architectural Drawings	Appendix A
Site Survey	Appendix B
Amended Landscape Drawings	Appendix C
Amended Stormwater Report and Plans	Appendix D
Contamination Comment	Appendix E
Lighting Drawing	Appendix F
Noise Impact Assessment	Appendix G
Transport Assessment	Appendix H
Aboriginal Cultural Impact Assessment	Appendix I
Aboriginal Cultural Heritage Statement	Appendix J
Accessibility Design Statement	Appendix K

2. BACKGROUND

2.1. CLOSURE OF PARK ROAD

On 13 August 2018, the City of Sydney Council approved the closure of a large portion of Park Road.

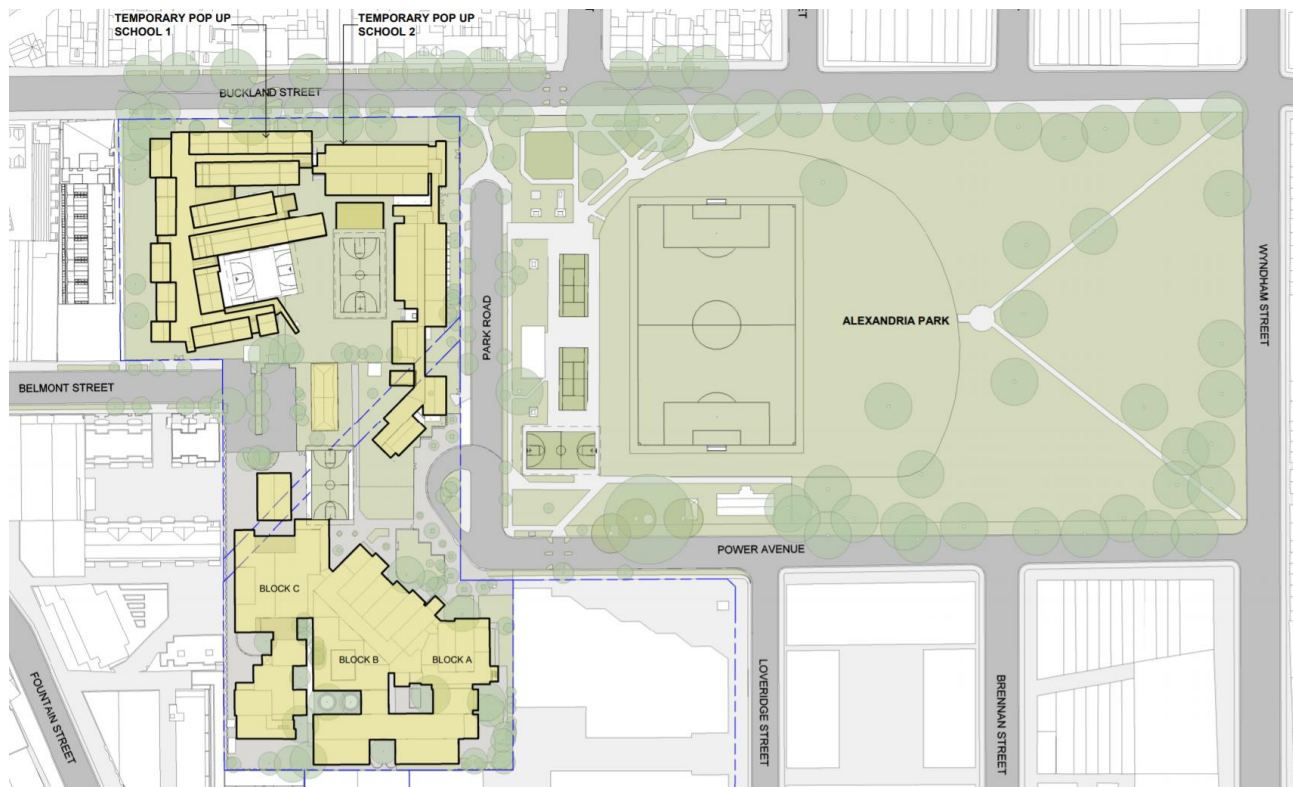
2.2. SSD 8373

On 11 February 2019, the Minister for Planning approved SSD 8373 for:

Redevelopment and operation of Alexandria Park Community School, comprising:

- *Site preparation works including demolition of existing all existing buildings and structures, including temporary pop-up schools.*
- *Site remediation works.*
- *Construction of multiple school buildings up to five storeys in height accommodating:*
 - *A childcare centre*
 - *A community centre*
- *Construction of a sports hall, multiple outdoor sports courts and all-weather multipurpose sports field.*
- *Construction of 28 on-site car parking spaces and ancillary vehicular access.*
- *Associated site landscaping and ancillary infrastructure services.*

The approved site plan for SSD 8373 is shown below. Figure 1 Approved Layout under SSD 8373



Source: TKD Architects

2.3. MODIFICATION 1

A Section 4.55(1A) modification was lodged with the DPIE in early April 2020 (MOD 1). The approved SSD application was to accommodate a maximum of 2,200 students (up to 1,000 primary school students and up to 1,200 secondary school students) by 2022. Subject to further demographic modelling post approval, a school with capacity for up to 1,200 high school students is no longer required by 2022.

This modification seeks to amend the construction phasing to enable the staged construction and use of the first three levels of the high school component (interim scheme/phase 2), and a final construction phase (phase 3) to deliver the general learning classrooms and collaborative learning spaces on level four.

Overall, the modification seeks to deliver the high school component of the project in three construction phases comprising outlined below:

- Interim Scheme – to accommodate 800 students and to be completed by 2022:
 - Construction Phase 1 – Demolition of the existing Park Road building and construction of the southern part of the new building, including new COLA and associated external works.
 - Construction Phase 2 – Demolition of Pop up School 1 and Pop up School 2, construction of the remaining part of the new building, up to level three of the High School Component, an interim roof to level three, carpark, two outdoor sport courts, new synthetic sports field and completion of the entry forecourt.
- Final development – to accommodate additional 400 students and to be completed when required:
 - Construction Phase 3 - Construction of level four classrooms and collaborative learning spaces and completion of the project.

As a result of the amended construction phases, design changes were also proposed as part of the modification to enable the construction of level four at a later date:

- Interim roof for level three.
- Subtle changes to the façade screen design to enable the introduction of the additional interim roof. This interim screening solution will be extended when the fourth level is constructed.

This modification application is currently under assessment by NSW Department of Planning, Industry and Environment (DPIE).

3. SITE AND SURROUNDING CONTEXT

The site is located at Park Road, Alexandria within the City of Sydney Local Government Area (LGA). It comprises six lots, legally described as:

- Lot 11 in DP 615964
- Lot 1 in DP 74696
- Lot 2 in DP 69494
- Lot 3 in DP 69494
- Lot A in DP 109038
- Lot B in 109038
- Park Road (the part subject to road closure by City of Sydney).

The site is irregular in shape, has an area of 2.632 hectares and has frontages to Park Road and Buckland Street (Figure 2). A 6m wide stormwater drainage easement traverses the site in a south-west to north-east direction. The drain is a covered concrete channel. This is identified within the Site Survey annexed to this report.

Figure 2 Site Aerial



Source: Six Maps

3.1. LOCAL CONTEXT

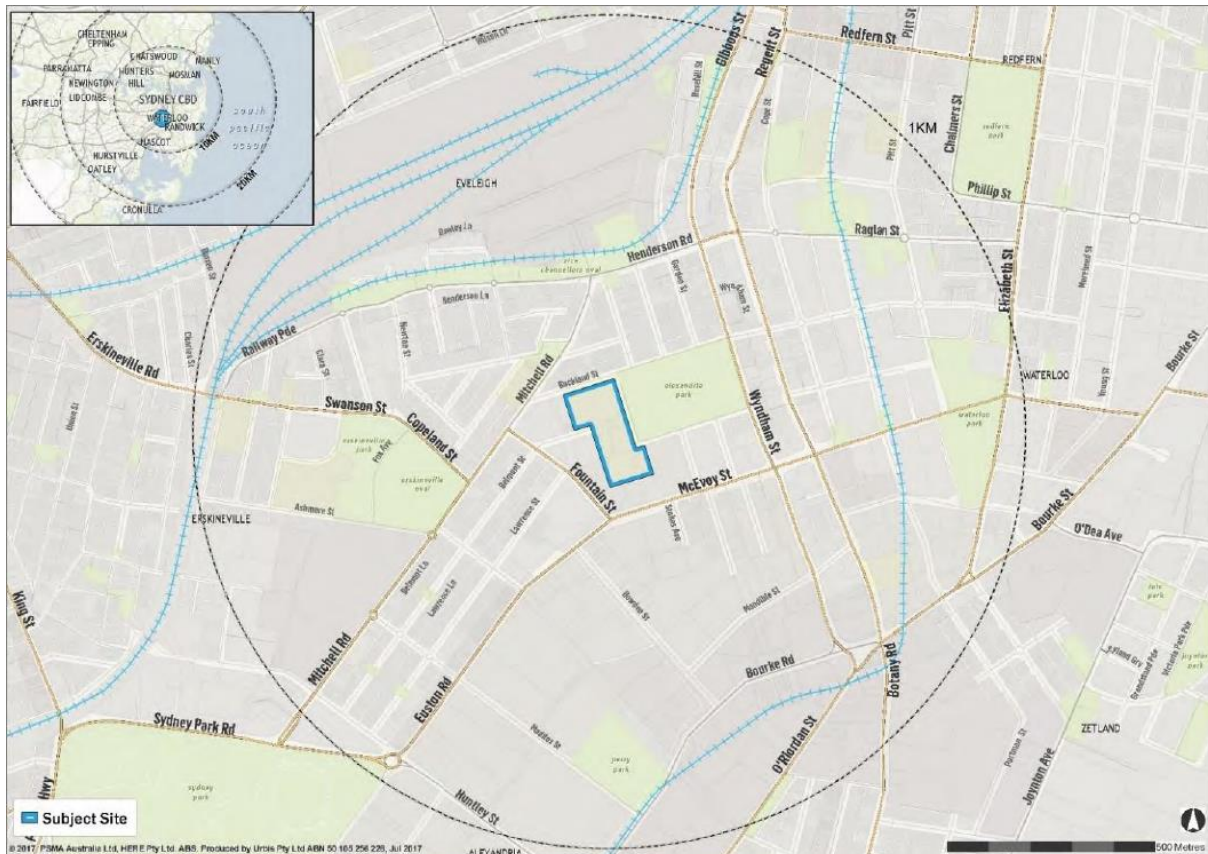
Alexandria is located within Central Sydney, approximately 2.5km from Sydney CBD and 3.1km from Sydney Airport. At a local level, the site is located within an established mixed-use precinct, surrounded by a range of residential, industrial and commercial land uses. Specifically, the site is surrounded by the following:

- To the north are multiple low-density terrace houses. Further north approximately 350m is the Australian Technology Park.

- Directly adjacent to the east of the site is Alexandria Park. Further east are multiple residential flat buildings and commercial buildings containing a range of varying shops and services.
- Directly adjacent to the south are multiple industrial sites and bulky goods stores. Further south approximately 750m is the Green Square Town Centre (currently under construction).
- To the west are a range of residential accommodation buildings, ranging from low scale terrace houses to high-density residential flat buildings. Further west approximately 500m is the Ashmore Precinct (currently under construction).

Figure 3 highlights the broader context of the subject site.

Figure 3 Surrounding Context



Source: Urbis

4. STRATEGIC PLANNING FRAMEWORK

The proposal's consistency with the relevant strategic planning documents and policies is included in the Table 2 below. This includes The Greater Sydney Regional Plan – A Metropolis of Three Cities, the Eastern City District Plan and Future Transport Strategy 2056.

Table 2 Strategic Context

Document	Consistency
Greater Sydney Regional Plan – A Metropolis of Three Cities	The proposal remains consistent with the key themes and directions of the Greater Sydney Regional Plan, as it will continue to deliver improved school facilities to meet the growing needs of the Sydney Metropolis. Further, the proposal will provide high quality community facilities in a co-location context, to enable improved efficiencies in the use of the site.
NSW Future Transport Strategy 2056	The proposed modification is consistent with the NSW Future Transport Strategy 2056 through the delivery of improved educational and community facilities in a highly accessible location. This will result in additional employment opportunities in close proximity to existing high frequency public transport such as Green Square and Redfern Train Stations. The proposal is also within walking distance (400m) to the proposed Waterloo Metro Station, which is currently in the final stages of design prior to lodgement of the details SSDs with the DPIE.
GSC's Eastern District Plan	The proposed modification does not alter the proposal's consistency with the Eastern District Plan in that the proposal will still enable increased enrolment capacities within the Eastern District. This capacity is clearly outlined as a requirement to facilitate the current need for conveniently located educational facilities. Further, the proposal will deliver enhanced co-share facilities benefiting the surrounding community.

5. JUSTIFICATION FOR THE PROPOSED MODIFICATION

Initial concept planning for the shared use of the sports field and other sporting components of the school project commenced early 2017 in parallel with the design of the new school buildings. This study was undertaken with the City of Sydney as a joint partner and it examined opportunities for the creation of a seamless transition of the outdoor playing and sporting zones of the school with the adjacent Alexandria Park, following the full closure of Park Road.

In mid-2017, the Lord Mayor of the City of Sydney wrote to the Minister of Education advising that the City had a preference for the closure of Park Road for the provision of an expanded synthetic multi use sports field over the former road as a shared facility for students and the broader community. The City of Sydney requested that this opportunity be progressed, and a joint use agreement should be established as soon as possible.

The proposed expansion of the sports field over the now partially closed Park Road was anticipated in the initial analysis of site opportunities. The concept has been driven by a desire to create an integrated community precinct with the site planning and formal arrangement of the buildings facilitating this outcome.

Documentation for the SSD application continued through 2017 and involved presentations with a specially convened Design Review Panel which was advised on the potential for this design opportunity. The SSD application was lodged in December 2017, however the sports field expansion and closure of Park Road did not form part of the application as further development of the functional requirements was required and the road reserve had still not been formally closed under the Roads Act.

The process for closure of Park Road progressed through 2018 with the road declared closed at City of Sydney Council meeting of 13 August 2018. The project approval received development consent on 11 February 2019, while the Joint Use Agreement between the Department of Education and the Council of the City of Sydney was executed in late 2019.

6. PROPOSED MODIFICATION

6.1. DESIGN APPROACH

As referenced in TKDs design summary, the expanded field responds to both the functional requirements and key principles of the project as follows:

1. *Fostering a stronger connection Alexandria Park. This core principle has been achieved through expanding the field in size and repositioning it further to the east so that there is a seamless relationship between this new multipurpose sports field and the other sporting fields of the park.*

The re-conceptualisation of Park Road that results from this arrangement results in a pedestrian friendly zone that promotes community use of the entire precinct.
2. *Provision of a FIFA grade sports field addresses community need within the local area and also fosters a deeper community connection to the school. The FIFA grade sports field is larger and of high quality than that normally provided to a school and includes:*
 - (a) *LED sports field lighting*
 - (b) *High quality synthetic surface and long term management and maintenance*
 - (c) *Protection stormwater inundation up to 1:100 ARI.*
 - (d) *Provision of high quality stormwater reuse strategies that will benefit the precinct as a whole*
3. *The public domain setting has been designed so the sports field has a strong connection between the school and the parklands adjacent. Through use of low level sporting type fences, sitting steps and planted edges the new field is integrated with the surrounding precinct and clearly a community facility for all.*
4. *The ancillary change room and storage facilities have been provided by rearranging existing facilities of the new school building so that there are no new additional amenities buildings within the precinct. The changes rooms of the school have necessitated minimal change to enable a managed approach to locking of doors to enable community use. The additional store rooms have been provided through a small increase in the enclosed space on the ground floor under high level balconies.*

6.2. KEY CHANGES

The proposed modification is for the following key design / drawing changes:

- The expanded sports field increases the width of the 'field of play' by 4m from 60m to 64m. The expanded sports field extends beyond the school boundary into the former Park Road reserve by approximately 9.4m – 9.5m leaving a 2m zone for planting and a 5m zone for a shared pedestrian and bike path.
- Provides additional 3m runoff space on the team bench side and provides an increased milling space and seating bleachers between the new school building and the sports field.
- Internal change room layout improvements.

Additional components of the resulting development include:

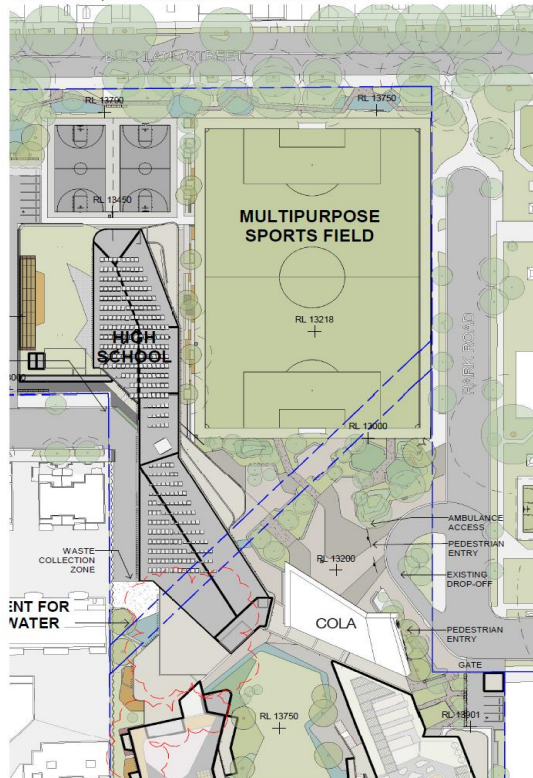
- FIFA quality multipurpose synthetic sports field – 90m x 64m. The playing surface is to be constructed above the 1:100 ARI to minimize damage to the playing surface.
- A 1.2m high perimeter fencing to the sports field commensurate with the status of the field as a community facility.
- Provision of goal posts for a range of sporting codes.
- Provision of end field (behind goals) barrier nets – 7m high x 25m wide.
- Stormwater collection and drainage to a CoS owned/funded storage tank.
- LED sports field lighting – to Australia Standards – community level.

- Trees 104-109 will need to be removed and replaced due to the extension of the multi-purpose sports field extending into Park Road.

A comparison between the approved and proposed development is provided in Figures 4 and 5. The proposed development at completion is shown in Figure 6.

Figure 4 Proposed Sports Field Layout Amendments

Site Plan | As Submitted December 2017



Source: TKD

Site Plan | Expanded Sports Field

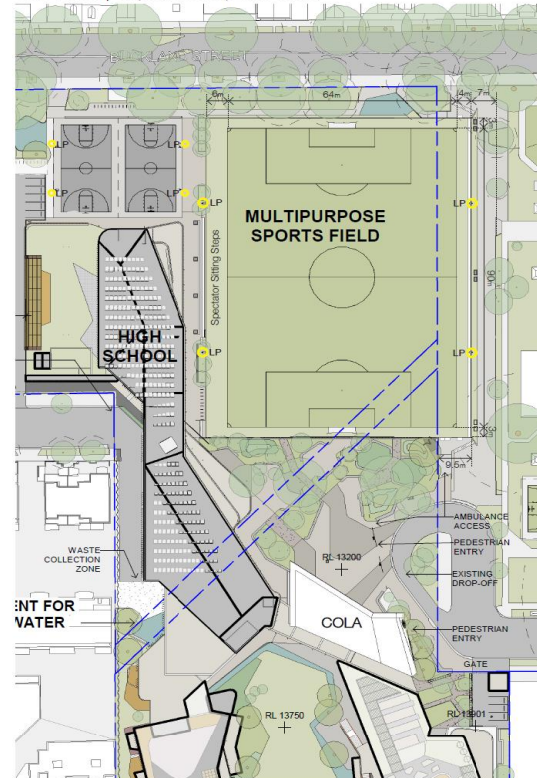
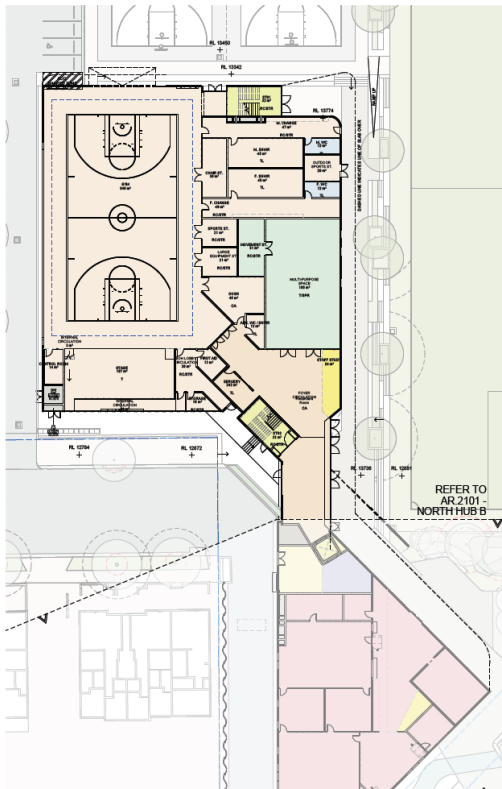


Figure 5 Proposed Change Room Layout Amendments

Detail Plan | As Submitted December 2017



Source: TKD

Detail Plan | Amended Design April 2020

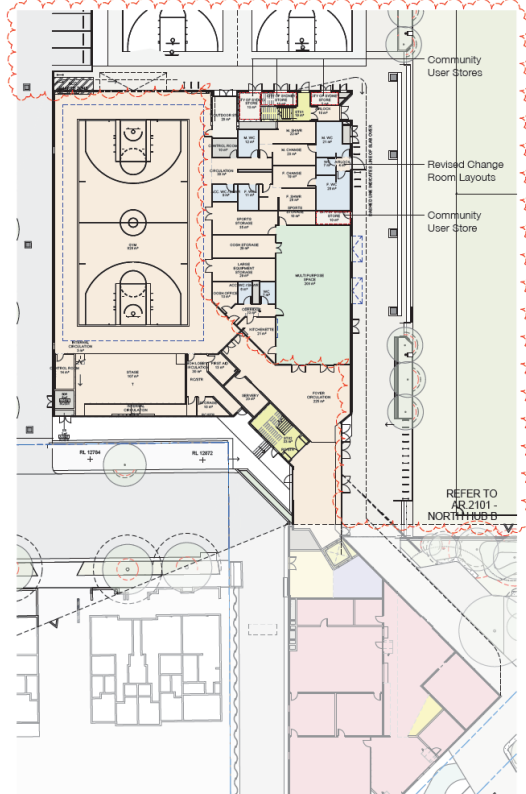
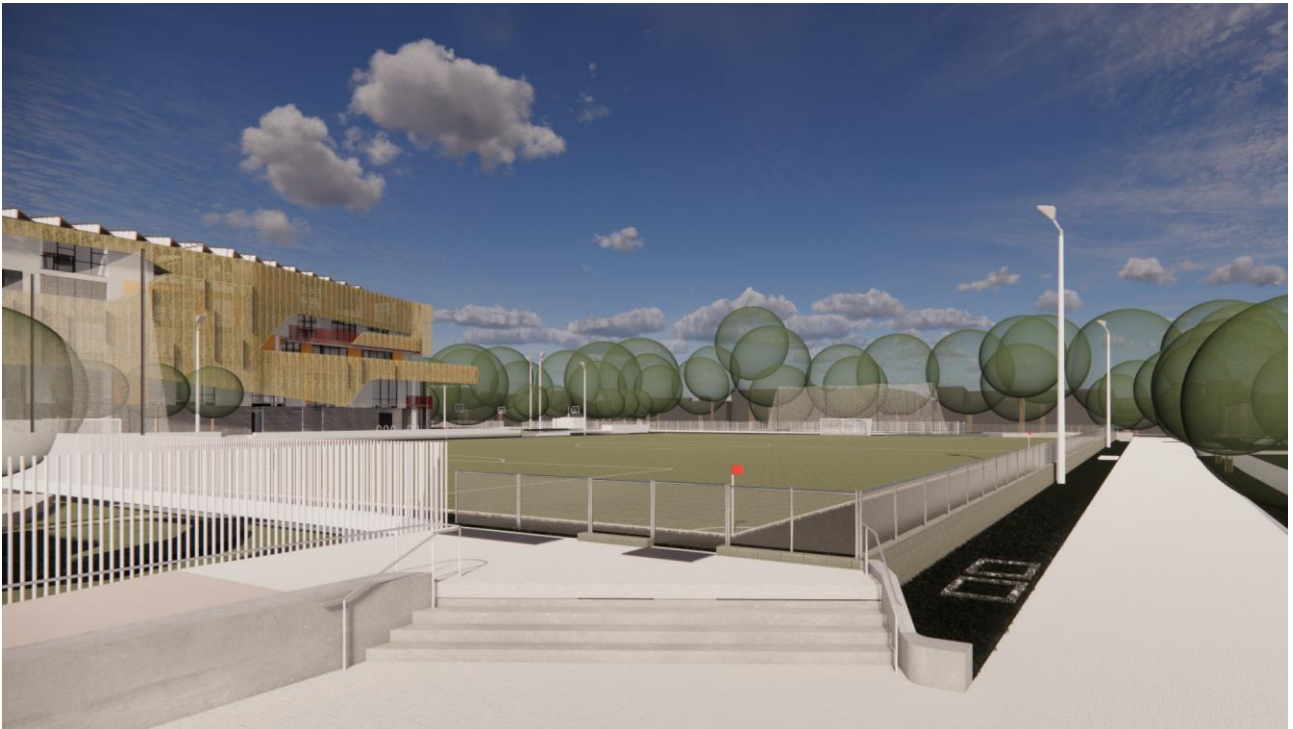


Figure 6 Field Entry View from Power Avenue & Field Entry View from Buckland Street



Source: TKD Architects



Source: TKD Architects

7. AMENDED CONDITIONS

The proposed amendments to the Concept and Stage 1 approval necessitate certain changes to the conditions of the SSD 8373 consent. These are detailed below. For ease of reference, all amendments required are shown in **red text**.

It is noted that these condition amendments are noted on the assumption that MOD 1 is approved.

The Development Consent is proposed to be modified as follows:

7.1. SITE DESCRIPTION

Site: Lot 11 DP 615964; Lot 1 DP74696; Lots 2 and 3 DP69494 and Lots A and B DP109038; 7-11 Park Road, Alexandria; **part of Park Road (that part subject to closure by City of Sydney)**

7.2. TERMS OF CONSENT

- A2. *The development may only be carried out:*
- (a) *in compliance with the conditions of this consent*
 - (b) *in accordance with all written directions of the Planning Secretary*
 - (c) *generally in accordance with the EIS and Response to Submissions*
 - (d) *in accordance with the approved plans in the table below:*

Architectural Drawings prepared by Tanner Kibble Denton Architects			
Dwg No.	Rev.	Name of Plan	Date
AR.DA. 1001	P1	Existing Site Plan	08.12.17
AR.DA. 1101	B	Proposed Site Plan	06.04.20
AR.DA. 1102	B	Proposed Site Plan - Phase 2 Completion	06.04.20
AR.DA. 1201	B	Existing and Proposed Site Plans	06.04.20
AR.DA. 1202	A	Phase 1 - Construction Extent	12.03.20
AR.DA. 1203	B	Phase 2 - Construction Extent	06.04.20
AR.DA. 1204	A	Phase 3 - Construction Extent	06.04.20
AR.DA. 1205	A	Existing and Proposed Site Plans - Phase 2 Completion	12.03.20
AR.DA. 2001	PS	Campus Plans - Ground and First Floors	06.04.20
AR.DA. 2002	P4	Campus Plans - Second and Third Floors	06.04.20
AR.DA. 2003	B	Campus Plans - Fourth Floor and Roof	06.04.20
AR.DA. 2004	A	Roof Plan - Completed Project	12.03.20
AR.DA. 2010	A	Key Plan	12.03.20
AR.DA. 2011	A	Key Plan - Building References	12.03.20
AR.DA. 2101	A	Ground Floor Plan - Northern Hubs	06.04.20
AR.DA. 2102	P3	Ground Floor Plan - Southern Hubs	20.04.18
AR.DA. 2201	A	First Floor Plan - Northern Hubs	06.04.20
AR.DA. 2202	P4	First Floor Plan - Southern Hubs	24.04.18

AR.DA. 2301	P3	Second Floor Plan - Northern Hubs	20.04.18
AR.DA. 2302	P4	Second Floor Plan - Southern Hubs	24.04.18
AR.DA. 2401	P3	Third Floor Plan - Northern Hubs	20.04.18
AR.DA. 2402	P3	Third Floor Plan - Southern Hubs	20.04.18
AR.DA. 2501	A	Fourth Floor Plan - Northern Hubs	12.03.20
AR.DA. 2504	A	Fourth Floor Plan - Level 04 as Temporary Roof	12.03.20
AR.DA. 2601	A	Roof Plan - Northern Hubs	12.03.20
AR.DA. 2602	A	Roof Plan - Southern Hubs	12.03.20
AR.DA. 3001	A	Elevations 1 - Completed Project	12.03.20
AR.DA. 3002	A	Detailed Elevations 1 - Completed Project	12.03.20
AR.DA. 3003	A	Detailed Elevations 2 - Completed Project	12.03.20
AR.DA. 3004	A	Detailed Elevations 3- Completed Project	12.03.20
AR.DA. 3005	A	Detailed Elevations 3 - Screen - Completed Project	12.03.20
AR.DA. 3011	A	Elevations 1 - Phase 2	12.03.20
AR.DA. 3012	A	Detailed Elevations 1- Phase 2	12.03.20
AR.DA. 3013	A	Detailed Elevations 2 - Phase 2	12.03.20
AR.DA. 3014	A	Detailed Elevations 3 - Phase 2	12.03.20
AR.DA. 3015	A	Detailed Elevations - Screen - Phase 2	12.03.20
AR.DA. 3101	A	Sections 1 - Completed Project	12.03.20
AR.DA. 3102	A	Sections 1 - Phase 2	12.03.20
AR.DA. 3111	A	Detailed Section Sheet 1 - Completed Project	12.03.20
AR.DA. 3112	A	Detailed Section Sheet 1 - Phase 2	12.03.20
AR.DA 4001	P1	External Material Finishes	08.12.17
AR.CD 1002	A	Sports Field Plan	18.06.20
AR.CD 1003	A	Sports Field Sections	18.06.20
AR.CD 1004	A	Sports Field Elevations Sheet 01	18.06.20
AR.CD 1005	A	Sports Field Elevations Sheet 02	18.06.20
AR.CD 1006	A	Sports Field Detailed Section	18.06.20
AR.DA 1007	A	Modes of Change	18.06.20
AR.DA 1008	A	Sports Filed Perspective Sheet 01	18.06.20
AR.DA 1009	A	Sports Filed Perspective Sheet 02	18.06.20
Landscape Drawings prepared by Context Landscape Design Pty Ltd			
Dwg No.	Rev.	Name of Plan	Date
L-SD-101-00	P8	Overall Landscape Plan Ground Floor	03.12.18
L-SD-200-00	P6	Landscape Detail Plan - Entry Plaza	03.12.18

L-SD-201-00	P4	Landscape Section - Entry Plaza	30.11.17
L-SD-210-00	PS	Landscape Detail Plan - Learning Lawn	23.04.18
L-SD-211-00	P4	Landscape Section - Learning Lawn	30.11.17
L-SD-220-00	PS	Landscape Detail Plan - Canopy Classroom East	19.04.18
L-SD-221-00	P4	Landscape Section - Canopy Classroom East	30.11.17
L-SD-230-00	PS	Landscape Detail Plan - Canopy Classroom West	19.04.18
L-SD-231-00	P4	Landscape Section - Canopy Classroom West	30.11.17
L-SD-2S0-00	P4	Landscape Detail Plan - Northern Roof	30.11.17
L-SD-2S1-00	P4	Landscape Detail Plan - Southern Roof	30.11.17
L-SD-260-00	P7	Fencing Strategy Plan	23.04.18
L-SD-261-00	P7	Fencing Strategy Plan School Hours	23.04.18
L-SD-262-00	P7	Fencing Strategy Plan After Hours + Weekends	23.04.18
L-SD-263	PS	Fencing Strategy Sports Fence (Park Rd Interface) Elevation	09.03.18
L-SD-301-00	P6	Existing Tree Plan and Schedule Sheet 1 of 2	03.12.18
L-SD-302-00	P6	Existing Tree Plan and Schedule Sheet 2 of 2	03.12.18
L-SD-303-00	P6	Proposed Trees	03.12.18
L-SD-304-00	P3	Indicative Planting Palette	30.11.17
L.COS.9001	C	Finishes & Levels Plan 1 of 8	17/06/2020
L.COS.9002a	C	Finishes & Levels Plan 2a of 8	17/06/2020
L.COS.9002	C	Finishes & Levels Plan 2 of 8	17/06/2020
L.COS.9003	C	Finishes & Levels Plan 3 of 8	17/06/2020
L.COS.9004	C	Finishes & Levels Plan 4 of 8	17/06/2020
L.COS.9004a	C	Finishes & Levels Plan 4a of 8	17/06/2020
L.COS.9005	C	Finishes & Levels Plan 5 of 8	17/06/2020
L.COS.9006	C	Finishes & Levels Plan 6 of 8	17/06/2020
L.COS.9007	C	Finishes & Levels Plan 7 of 8	17/06/2020
L.COS.9008	C	Finishes & Levels Plan 8 of 8	17/06/2020
L.COS.9100	C	Section Sheet 1	17/06/2020
L.COS.9101	C	Section Sheet 2	17/06/2020
L.COS.9102	C	Section Sheet 3	17/06/2020

8. EP&A ACT 1979 – SECTION 4.55(1A) ASSESSMENT

Section 4.55 of the Act 1979 provides a mechanism for the modification of development consents. This section of the Act sets out the statutory requirements and heads of consideration for the assessment of such a modification application, depending on whether the application is made under section 4.55(1), 4.55(1A) or 4.55(1A).

As is relevant to this application, pursuant to section 4.55(1A), a consent authority may, subject to and in accordance with the Regulations, modify a development consent if:

- a) *it is satisfied that the proposed modification is of minimal environmental impact, and*
- b) *it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and*
- c) *it has notified the application in accordance with—*
 - I. *the regulations, if the regulations so require, or*
 - II. *a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and*
- d) *it has considered any submissions made concerning the proposed modification within any period prescribed by the regulations or provided by the development control plan, as the case may be.*

Subsections (1), (2) and (5) do not apply to such a modification.

Further, subsection (3) requires that the consent authority must take into consideration such of the matters referred to in section 4.15 (1) as are of relevance to the development the subject of the application, and the reasons given by the consent authority for the grant of the consent that is sought to be modified.

These heads of consideration are addressed below.

8.1. MINIMAL ENVIRONMENTAL IMPACTS

The environmental impacts have been assessed in Section 9.5 of this report and in the appended consultant reports. The proposal will have minimal environmental impacts in terms of light spill, noise, traffic, parking, heritage and vegetation. Any minor impact can be managed with the mitigation measures proposed by the technical consultants and DPIE's conditions of consent.

8.2. SUBSTANTIALLY THE SAME

The NSW Land and Environment Court (L&E Court) has established several precedents as to what may be considered as being 'substantially the same development', and what should be factored into the consideration of this threshold test.

Principles drawn from the judgments include that:

- The term 'substantially' means 'essentially or materially having the same essence'.
- When a consent authority makes a determination as to whether a development is substantially the same it is a question of fact and degree and is not a question of law.
- The term to 'modify' means to 'alter without radical transformation'.
- In comparing the approved development and the development as proposed to be modified it is necessary to undertake a qualitative and quantitative assessment of the developments in their proper context, and
- To undertake a numeric or quantitative assessment of the modification only in the absence of a qualitative assessment would be flawed.

- Moreover, of relevance to this application, the L&E Court has ruled that the extension or enlargement of a DA area is within the scope of Section 4.55¹.

The modified proposal is substantially the same as the original development. The use of the site will not substantially alter or radically transform from what it is currently being used for, being educational and sporting in nature. While some built form and operational parameters of the proposal are changing, the general appearance and functionality of the site remains consistent with the nature of the development originally approved. While the site will slightly increase in size, this does not result in a substantially different development

8.3. NOTIFICATION AND SUBMISSIONS

DPIE will notify the application and the application will consider any submissions received following notification.

¹ Scrap Realty Pty Limited v Botany Bay City Council [2008] NSWLEC 333

9. EP&A ACT 1979

The following environmental planning instruments, policies and guidelines have been considered in the assessment of this modification proposal:

- State Environmental Planning Policy (State and Regional Development)
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017
- State Environmental Planning Policy No 55 – Remediation of Land
- Sydney Local Environmental Plan 2012

9.1. ASSESSMENT OF ENVIRONMENTAL PLANNING INSTRUMENTS

The proposed modifications to SSD 8373 are such that it is considered there will be no material alteration to the level of compliance achieved with the above EPIs, as shown in Table 3 below.

Table 3 Statement of Consistency with Environmental Planning Instruments

Schedule/Clause	Provision	Consistency
SEPP (State and Regional Development)		
Schedule 1	<p>Schedule 1 of the SRD SEPP identifies development for the purposes of ‘educational establishments’ to be SSD if it:</p> <p><i>(1) Development for the purpose of a new school (regardless of the capital investment value).</i></p> <p><i>(2) Development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school.</i></p> <p><i>(3) Development for the purpose of a tertiary institution (within the meaning of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017), including associated research facilities, that has a capital investment value of more than \$30 million.</i></p> <p>The works which comprised SSD 8373 exceeded the threshold \$20 million dollars, and was subsequently considered SSD.</p>	The proposed modification to the approval of SSD 8373 will remain consistent with this SEPP and is appropriately characterised as SSD.
State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017		
Schedule 4	Schedule 4 of the Education SEPP outlines the design quality principles that are proposed for consideration of applications for school developments.	The proposed modification does not alter the overall developments ability to achieve good design in line with the Design Quality Principles of the Education SEPP. Of particular relevance is Principle 4 – whereby the proposal will deliver an improved high

Schedule/Clause	Provision	Consistency
		grade sports field for use by the school and community.
State Environmental Planning Policy No. 55 (Remediation of Land)		
Clause 7- Contamination and remediation to be considered in determining development application	<p>SEPP 55 seeks to provide a State-wide planning approach to the remediation of contaminated land.</p> <p>Clause 7(1)(a) of the SEPP requires that the consent authority, when assessing a development application, consider whether the land is contaminated and whether it is suitable for the proposed use.</p> <p>It also requires that consent authority review a report specifying the findings of a preliminary contamination investigation of the land concerned when considering an application which involves a change of use of the land.</p>	<p>The original ESA findings apply consistently to the proposed modifications.</p> <p>The proposed development does not result in a change of use to the land from that approved under SSDA 8373.</p> <p>As confirmed by Coffey's contamination comment annexed to this report, the contamination risks of the additional land pose no adverse issue or constraint on the develop, and the site remains suitable for the intended future use.</p>
Sydney Local Environmental Plan		
Clause 4.3 – Height of Buildings	15m	The proposal will not result in any non-compliances to building height.
Clause 5.9 – Preservation of Trees or Vegetation	<i>A person must not ringbark, cut down, top, lop, remove, injure or wilfully destroy any tree or other vegetation without consent.</i>	As per the updated Arborist comment annexed to this report, an additional six trees are required to be removed. The trees are supportable to be removed on the grounds that suitable replacements are proposed.
Clause 5.10 - Heritage Conservation	The site is located directly adjacent to an item of local heritage significance (I11 – Alexandria Park including entrance gates, landscaping and grounds) and is surrounded by 3 heritage conservation areas.	The proposed expansion to the existing sports field and internal change rooms will not result in a detrimental heritage impact. The proposal will cover a road with landscaping which better integrates with Alexandria Park and the

Schedule/Clause	Provision	Consistency
		heritage conservation area. The proposal improves the outcome in heritage terms.

9.2. PROPOSED ENVIRONMENTAL PLANNING INSTRUMENTS

There are no draft environmental planning instruments relevant to the assessment of this modification.

9.3. PLANNING AGREEMENTS

There are no planning agreements in place that will be affected by the proposed modification.

9.4. REGULATIONS

The application has been prepared and assessed in accordance with the relevant provisions of the Environmental Planning and Assessment Regulation 2000.

9.5. LIKELY IMPACTS OF THE DEVELOPMENT

9.5.1. Lighting

The proposed lighting scheme at Alexandria Park Community School shall conform to Football NSW standards of performance. This performance standard is more onerous than the existing installation's performance but despite the greater lighting output, the proposed lighting design also significantly improves the obtrusive effect of lighting on surrounding buildings, and light pollution.

The impact which results from changes to lighting of the pitch extension has been assessed against the Australian standards outlined in condition Part B (818) of the overarching SSDA approval, noting this condition is a requirement prior to occupation certificate. This condition notes the following:

"Prior to commencement of construction, all outdoor lighting within the site must comply with AS 1158.3.1:2005 Lighting for roads and public spaces - Pedestrian area (Category P) lighting - Performance and design requirements and AS 4282-1997 Control of the obtrusive effects of outdoor lighting. Details demonstrating compliance with these requirements must be submitted to the satisfaction of the Certifying Authority."

AS:4282 recommends limits to obtrusive light as a benchmark of what a person living in an urban environment can reasonably expect to tolerate because of an adjacent external lighting installation. For the purposes of these calculations, the light loss factor is taken as 1. This is to ensure that the day 1 obtrusive lighting is calculated.

The purpose of undertaking an obtrusive lighting calculation is to assess the effect of the pitch lighting on the surrounding buildings outside and within the campus shown in

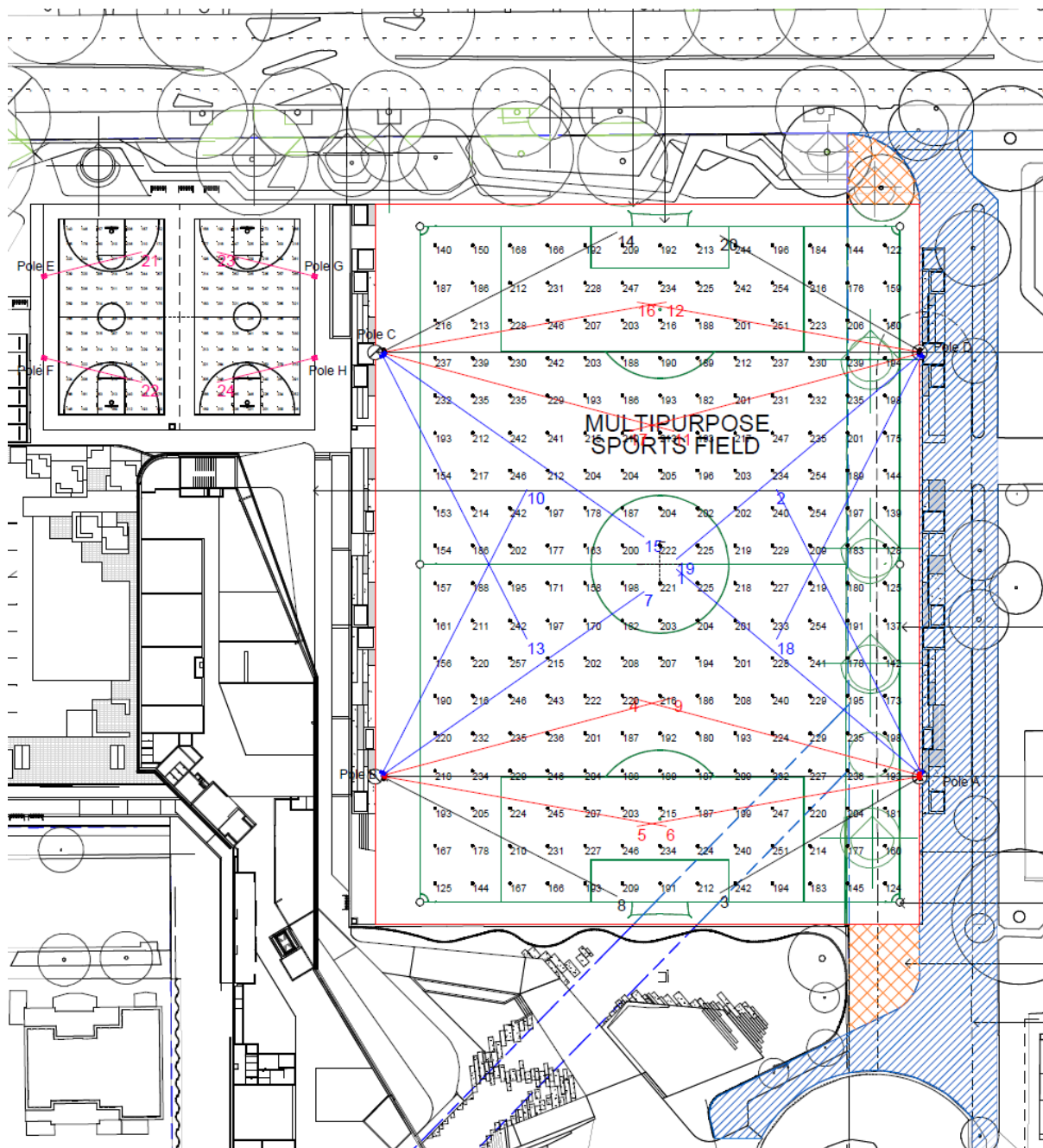
Desktop analysis was undertaken using the AGI software package. AS:4282 recommends differing levels based on time of day and ambient lighting. There are different criteria for before and after a curfew time of 11pm. As the sports pitch lighting will cease to operate prior to 11pm, the assessed design based on the pre-curfew criteria for sports lighting and landscape lighting combined and post-curfew for landscape lighting only.

The impact which results from changes to lighting of the pitch extension has been assessed against the Australian standards outlined in condition Part B (818) of the overarching SSDA approval, noting this condition is a requirement prior to occupation certificate. The proposal does not seek to change or amend this condition, noting the Certifying Authority will still need to provide details demonstrating compliance prior to occupation certificate.

No trees or obstacles have been included in any of the documented calculations. It is inevitable that the levels presented in this document are worst case and will be greatly improved on given the significant quantity and size of trees. The limiting values specified for horizontal illuminance, luminous intensity, threshold increment, and upward light ratio are differentiated according to the environment type. The

differentiation takes account of land use zoning which, in part, reflects the function of the lighting, and the level of night time activity to be expected in the area.

Figure 7 External Lighting Levels



Source: Zumtobel Group

9.5.2. Acoustic

A supplementary assessment confirms that the assessment undertaken within the Wilkinson Murray report dated April 2018 includes an acoustic assessment and mitigations which remain suitable for the mitigation of noise from the use of the proposed sporting fields.

Providing suitable acoustic mitigations are included in the use of the sporting fields then the resulting noise impact on surrounding residential receivers will not appreciably change as a result of the proposed sporting courts. Accordingly, the proposal is not anticipated to result in a change to the acoustic impact previously considered appropriate for the site by virtue of SSD8373.

A supplementary Noise Impact Assessment has been prepared by White Noise Acoustics and is annexed to this report and has assessed the proposed sporting field extension at Alexandria Park Community School.

The supplementary assessment confirms that the assessment undertaken within the Wilkinson Murray report dated April 2018 includes an acoustic assessment and mitigations which remain suitable for the mitigation of noise from the use of the proposed sporting fields.

Providing suitable acoustic mitigations are included in the use of the sporting fields then the resulting noise impact on surrounding residential receivers will not appreciably change as a result of the proposed sporting courts.

Suitable acoustic mitigations include the following:

- Any building services or plant/equipment to be designed to ensure noise levels detailed in section 4.1 of this report are achieved.
- Restrict the use of the sports courts prior to include the approved hours of use, including:
 - Between the hours of 7am and 10pm Mondays to Friday for training and social recreation activities.
 - Between 8am and 6pm Saturdays and Sundays for organised events and competitions; and
 - No organised events on public holidays.
- Minimise PA use and ensure speakers are appropriately located and limited to achieve acceptable levels.
- The L_{Amax} noise level from the PA system operation shall not exceed 56 dB(A) at the nearest residential boundary.
- The PA system should use small low-powered horn-type speakers oriented in such a manner to fire away from residential premises.
- Speakers should be mounted at a downward angle of 45° and as close to ground level as possible.
- Only nominated persons, trained in the appropriate use of the system, should be permitted to operate the PA system.
- A sound limiter is to be installed to ensure that the maximum limiting criterion at residential boundaries is not exceeded.

Providing the acoustic mitigations detailed above are included within the design and operation of the proposed sports fields then the resulting noise impact on surrounding residential receivers will be similar to those experienced prior to the development of the school and will therefore be acoustically acceptable.

9.5.3. Traffic and Parking

A Transport Assessment has been prepared by Arup and is annexed to this report. The assessment concludes that any trips generated by the community use of the football pitch will occur outside school peak hours and would therefore not have a cumulative impact on the 2017 assessment approved under the SSDA 8373. It is noted that when the football pitch is in use on weekday evenings staff may still be using the school car park and this has been considered in the assessment.

A large section of Park Road has already been closed to accommodate a play zone for the school. To accommodate the revised extents of the football pitch a further section of Park Road will need to be closed removing all kerbside provision north of the bus turnaround. 'No parking' restrictions currently on the further section of Park Road to be closed so it is not expected to have a negligible impact of parking supply in the local area.

Accordingly, following the submission of Modification 2, a Traffic Management Plan would need to be lodged with Council to confirm the additional road closure of Park Road. The remaining footpath to the west of the football field would be converted to a shared pedestrian zone.

The changes to the existing transport arrangement of the site and surrounding network are negligible, and do not result in a substantially different development.

9.6. TREES

The expansion of the sports field necessitates the need to remove an additional 6 trees from the site, listed as trees 104-109 on the updated Arboricultural Impact Assessment annexed to this report. The trees are a

mixture of London Plane Trees and a curtain fig. All trees are recommended to be removed and replaced within the site with new planting of advanced species.

While it is acknowledged that the removal of the trees results in an impact to the site, it is considered that on balance the loss is offset by the community benefit of the field to the school and surrounding community. The removal will result in additional plantings within the site boundary, ensuring the overall number of trees within the site remains consistent or increased.

9.7. ABORIGINAL ARCHAEOLOGICAL HERITAGE

AMAC Group has reviewed the proposed expansion of the playing field and updates to the change rooms. They conclude that the proposed expansion has a nil – low potential of impacting any intact Aboriginal objects and/or features of archaeological and cultural significance.

Justification for this is because the area subject to expansion is situated within a highly disturbed context consisting of Park Road and subsequent roadside infrastructure and landscaping. Further it is noted that the expansion does not warrant any changes to the current protocols sent out in the ACHMP. This area has already been identified as holding low potential with shallow subsurface activities being proposed and works mainly to consist of filling.

Accordingly, from an aboriginal archaeological perspective the proposal does not result in any additional environmental impacts and is considered to be substantially the same as that previously approved.

9.8. SUITABILITY OF THE SITE

As demonstrated within this report and the original EIS in respect to the approved SSD 8373, the proposed development as modified is expected to provide positives for the surrounding community and broader residents through improved facilities and functionality of the site.

9.9. SUBMISSIONS

This Section 4.55(1A) application may be notified. Any submissions received in response to the public exhibition will be reviewed as part of the assessment process.

9.10. PUBLIC INTEREST

The proposal is in the public interest for the following reasons:

- The proposal will result in a truly integrated community development sought by both the City of Sydney and the Department of education.
- The update of the field will result in a high grade sports facility which will not only benefit the school, but the surrounding community and professional sporting clubs alike.
- The proposed expansion will utilise a portion of Park Road, resulting in a more efficient use of the site and additional integration into Alexandria Park.
- The proposal does not generate adverse environmental impacts or impact the amenity of the adjoining properties or the public domain.

10. CONCLUSION

This Environmental Assessment Report is submitted to the Department in support of a Section 4.55(1A) application to modify SSD 8373, as it relates to the Alexandria Park Community school which was approved by the Minister for Planning on 11 February 2019.

This Section 4.55(1A) application seeks approval for the expansion of the Alexandria School sports field and changes to the school change rooms and amenities.

The changes proposed result in an amendment to a condition of consent as detailed within this report.

A detailed assessment of the proposed changes has been included within this report. An assessment of the proposal against the requirements of section 4.55(1A) of the EP&A Act has been undertaken, which is supported by various technical studies annexed to this report. This assessment has concluded that on balance, and in the context of the entire site, the changes proposed remain consistent in nature and impact with the development originally approved by SSD 8373.

Further, an assessment against the requirements of section 4.15 of the EP&A Act has been undertaken to address the impacts resulting from the proposed changes. This assessment concludes that the proposed changes do not result in an unreasonable increase to known impacts, nor result in additional impacts.

Consideration of the proposal against Section 4.15 and Section 4.55(1A) of the EP&A Act has concluded that the proposed modification is acceptable for the following reasons:

- The proposed modification will not result in a substantially different development, noting use and additional land remain consistent with that previously approved.
- The proposal does not result in an unreasonable increase of known, nor create new adverse amenity impacts for the surrounding environment.

For these reasons outlined in this planning assessment, the proposal is in the public interest. The proposed modification should be supported and approved by DPIE.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A

AMENDED ARCHITECTURAL DRAWINGS

APPENDIX B

SITE SURVEY

APPENDIX C

AMNEDED LANDSCAPE DRAWINGS

APPENDIX D

AMENDED STORMWATER REPORT AND PLANS

APPENDIX E

CONTAMINATION COMMENT

APPENDIX F

LIGHTING DRAWING

APPENDIX G

NOISE IMPACT ASSESSMENT

APPENDIX H

TRANSPORT ASSESSMENT

APPENDIX I

ABORICULTURAL ASSESSMENT

APPENDIX J

ABORIGINAL CULTURAL HERITAGE STATEMENT

APPENDIX K

ACCESSIBILITY DESIGN STATEMENT

