



School Infrastructure NSW (SINSW)

Statement of Environmental Effects

Concord High School

5 Stanley Street, Concord

June 2023

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1 Executive Summary

Barker Ryan Stewart (BRS) has been engaged by School Infrastructure NSW, part of the NSW Department of Education, for the preparation and lodgement of a Crown development application affecting Concord High School. The site is located within the Canada Bay Local Government Area (LGA) at 5 Stanley Street, Concord.

Consent is sought for the demolition of some existing structures, construction of a new combined facility catering for administration, staff areas, General Learning Spaces, Support Classrooms, Specialty Classrooms, a new Gymnasium / Hall and Canteen, refurbishment of the existing library, landscaping and perimeter fencing as well as supporting parking infrastructure. An increase in students is proposed from 1,335 to 1,360. Staff numbers are proposed to increase from 89 to 95 full time equivalent.

The subject site is located within the R3 Medium Density Residential zone under Canada Bay Local Environmental Plan (CBLEP) 2013. The subject site is currently utilised for the purposes of an educational establishment, which is a development type permissible with consent in the R3 zone. The R3 zone under the CBLEP2013 lists 'schools' as a development type permitted with consent.

The site has access to reticulated water and sewer systems and electrical and telecommunications services. The site has pedestrian access from both Stanley Street and Crane Street. Vehicular access to the existing car parks is provided from Stanley Street.

Specialist advice has been sought in regard to assessment of potential flooding, heritage, traffic and parking impacts. These assessments are provided in the appendices to this report.

The site is capable of supporting the proposed development in a manner consistent with the zone objectives. It is the opinion of BRS that the development can satisfy legitimate need. The proposed development is permissible under the provisions of the Canada Bay LEP 2013, as well as other relevant planning instruments including State Environmental Planning Policy (Transport and Infrastructure) 2021. Variation to the LEP maximum building height standard has been addressed in a Clause 4.6 report included in Appendix H.

Following completion of the proposed development including landscape works, the site will provide a play space ratio per student of 10.04 square metres which is consistent with the NSW Education Facilities Standards and Guidelines (EFSG) requirement of 10 square metres per student. Confirmation of this is provided on the Site Plan attached in Appendix A.

This application is a Crown development application, which is a development application made by or on behalf of the Crown. School Infrastructure NSW (SINSW) is part of the NSW Department of Education and is a statutory body representing the Crown.

2 Introduction

This report has been prepared on behalf of School Infrastructure NSW (SINSW) as part of the NSW Department of Education which are public authorities. The proposal is lodged as a Crown development application (a development application made by or on behalf of the Crown).

This application seeks development consent for the demolition of some existing structures, construction of a new combined facility catering for administration, staff areas, General Learning Spaces, Support Classrooms, Specialty Classrooms, a new Gymnasium / Hall and Canteen, refurbishment of the existing library, landscaping and perimeter fencing as well as supporting car parking infrastructure.

A Pre-DA Meeting was held with Canada Bay Council on 16 March 2023. Council did not provide meeting minutes.

Design review meetings were also held with the State Design Review Panel, managed by the Government Architect NSW on 15 June 2022 and 25 August 2022.

A detailed description of the proposal is provided in Section 6 and development plans are included in the appendices to this report.

This report has determined that the proposal is generally compliant with relevant State and the various City of Canada Bay Council Planning Instruments. Variation to the LEP height standard has been addressed in a Clause 4.6 variation report (Appendix H).

Please note all cost related information associated with the DA submission is confidential and should be marked by Council as such. The NSW Department of Education have requested that no cost information is provided on the Council DA tracker.

3 Development Contributions

Works within the LGA are ordinarily subject to the City of Canada Bay Local Infrastructure Contributions Plan (7.12) for non-residential development with a cost of over \$100,000.

We note that the Department of Planning and Environment's practice note for Section 7.12 fixed development consent levies (February 2021) states that whilst it is at the discretion of council, educational establishments are listed as a regular type of development that is exempt from the payment of contributions.

Further, this approach is consistent with the advice from DPE in Circular D6 Crown Development Applications and Conditions of Consent. This circular notes that Crown activities provide facilities which lead to significant benefits for the public in terms of essential community services and employment opportunities, and the activities are not likely to require the provision of public services and amenities in the same way as development undertaken with a commercial objective. The circular recommends that, where the applicant is a Crown authority and the development is for educational services, no contributions should be collected for open space, community facilities, parking, and general local and main road upgrades.

As the proposal provides for social infrastructure on behalf of the Crown, it should not be subject to development contributions. The nature of the development means that the infrastructure which council typically seeks to levy for, will in part be provided by the school for use by students and staff.

For the reasons outlined above, exemption from the payment of development contributions is considered appropriate.

4 Consultation

Consultation has been undertaken with the following stakeholders which has assisted with the design of the proposed development. A summary of the consultation process, issues raised and where the design of the proposal has responded to these issues is included below. The main stakeholders include the following:

- Canada Bay Council;
- NSW Government Architect; and
- Students, staff and parents/ carers.

Project Reference Group (PRG) meetings occurred regularly from March 2022. Community representatives joined from July 2022 which included 3 parents.

Planning/Project updates were provided as follows:

- July 2022 – how SINSW upgrade schools.
- August 2022 – invitation to information session.
- 29 August 2022 – when will the upgrade be complete, proposed masterplan ready.
- September 2022 – the design process and identification that the project is in the concept design phase.
- November 2022 – key themes from the survey, accessibility, parking, connecting to country, covered areas, easy maintenance, effective space, green space and landscaping, modern technology rich and aesthetically pleasing.
- February 2023 – business case submitted, update on project.

An Information session was held on 18 August 2022 which included a presentation of the master plan and survey with approximately 100 students followed by a staff and parent session.

Information Boards were provided on 18 August 2022 identifying the proposed master plan and progress update, how we build schools, dotmocracy survey and survey link to provide opinions on the priorities for the school.

A Student Voice Survey was undertaken by the school which was focused on the following development questions:

1. Areas of the school that the students felt should be preserved.
2. Spaces in the school that could be added or would benefit from an upgrade.
3. Aspects of the school buildings/ spaces that should be removed.

Consultation with City of Canada Bay was also undertaken via a formal Pre-DA Meeting held on 16 March 2023 and other informal meetings in July and October 2022.

Design review meetings were held with the Government Architect on 15 June 2022 and 25 August 2022. Where relevant, any key planning and design stakeholder concerns and issues have been included in Table 1 below. Note Canada Bay Council did not issue Pre-DA Minutes and comments are provided from the SINSW external Project Management team.

Table 1: Consultation Responses

Stakeholder/ Concern	Comment
Canada Bay Council	
<u>Height variation</u> Noted that it was not uncommon for Council to review and provide dispensation for school developments to exceed planning height controls, given the nature of these types of developments. At this stage there were no noted impediments to the progression of a Clause 4.6.	A Clause 4.6 Report has been prepared and attached in Appendix H to justify the proposed variation to the LEP height control.
<u>Parking</u> Council queried the parking provision within the site.	The Transport and Traffic Assessment has guided the extension of the existing western car park and provision of 29 spaces and additional bicycle parking within the site.
<u>Flooding</u> Council queried whether a flood study was being prepared to support the DA.	A Flood Study/ Overland Flow Assessment has been prepared and attached in Appendix P.
<u>Contamination</u> Council queried if the DA would be submitted with a supporting RAP.	The DA is submitted with a supporting a Preliminary Site Investigation, Detailed Site Investigation and Remediation Action Plan (RAP). Note the RAP has been designed to facilitate further assessment of the site following the demolition of buildings and hard stand spaces.
State Design Review Panel	
The following elements of the design strategy are supported: <ul style="list-style-type: none"> Engagement with Aboriginal Knowledge Holders and beginning to employ designing with Country practices within the proposed Collaboration with Council to share parking allocations for the school A streamlined masterplan that focuses new built form along Stanley Street Allocating a portion of the budget to upgrading and refurbishing the existing facilities of the school 	Noted. No additional assessment required.
The engagement with Aboriginal Knowledge Holders is commended however consider how learnings from this engagement can move beyond the application of surface patterns, to a wholistic and embedded approach to the design development of the landscape and built form.	The Walk on Country with Darug Aboriginal elders provided the landscape architects with background learnings that facilitated wayfinding through the site in an attempt to open up views through the site to the 'country'. JDH have curated built spaces that have a close integration to the landscape and the project has adopted a design that enables country to be visible. The proposed landscape design also benefits from the inclusion of a traditional fire burning space which is dedicated to support living cultural practices. The use of first nations language for

Stakeholder/ Concern	Comment
	wayfinding is further imbedded in the overall design and will explain significance and teach students, staff and the community about the history of the site and surrounding.
<i>Demonstrate how overland flow and stormwater is dealt with on the site.</i>	A Flood Assessment has been prepared and attached in Appendix P confirming the proposal has been designed to avoid any impacts associated with overland flow. Stormwater design plans incorporates On Site Detention to appropriately capture site stormwater in accordance with Council requirements.
<i>Consider the tree protection zones for the heritage fig trees along Stanley Street and any impact construction will have on these trees.</i>	<p>The tree protection zones associated with the Stanley Street trees have been assessed in the Arboricultural Development Impact Assessment attached in Appendix L. The Arborist confirmed the trees can be retained, subject to mitigation measures as follows:</p> <p><i>The TPZ of Trees 123, 128, 130 and 131 are encroached by slightly greater than a minor encroachment. Based on consideration under Clause 3.3.4 of AS4970-2009 of these species' tolerance to root disturbance, these trees will remain viable to be retained. This assessment is based on all excavation for the proposed swale drain to be carried out by non-destructive excavation by means of manual excavation, air spade or vacuum truck operating at less than 1000 Psi under the supervision and direction of the Project Arborist. No roots with a diameter of 20mm or greater are to be damaged within the swale excavation.</i></p>

5 Site Analysis

5.1 Site Description

Table 2 below provides a description of the subject site and the relevant authorities to the proposed development.

Table 2: Site Description

Site Description	Comment
Lot & DP:	<ul style="list-style-type: none"> • Lot 1 DP1114919 • Lot 2 DP1114919 • Lot 3 DP1114919 • Lot 1 DP60167 • Lot 15 DP8687 • Lot 18 DP8687 • Lot 19 DP8687 • Lot 20 DP8687
Property Address:	5 Stanley Street, Concord NSW 2127
Registered Owners:	NSW Department of Education
Applicant:	NSW Department of Education, c/- Barker Ryan Stewart
Local Authority:	City of Canada Bay Council
Site Area:	32,625 m ² / 3.26 ha

Figure 1 below shows an aerial image of the subject site, outlined in red, and its surrounds.

Concord High School is located at 5 Stanley Street in Concord, on a site comprising multiple allotments, as detailed above. The site has existing vehicle access from Crane Street to the north and Stanley Street to the south. A laneway, Crane Lane, is also located to the north west of the site. The site as a whole is generally regular in shape and extends between these local roads.

The existing staff car parks, one located in the south west and one in the south east of the site, are currently accessible from Stanley Street. A servicing and waste storage area also exists with vehicular access from Crane Street.

The centre of the school has been largely developed for school buildings and outdoor learning spaces. The school oval and a number of sports courts are located in the east of the site.

The topography of the site features a gradual slope downhill from north-west to south-east of approximately 5-6 metres. The site is moderately vegetated along its boundaries with mature trees and clusters of vegetation scattered across the site.

The Concord High School grounds are local heritage listed and identified on the NSW Government Section 170 Register and the CBLEP 2013.



Figure 1: Aerial Photo of Site (Source: Nearmap 2023)

5.2 Locality

The suburb of Concord is located in the Canada Bay Local Government Area and is characterised by a mix of residential, small business, recreation (council parks and open space), school and hospital developments, as shown in Figure 2 below.

Specific development in the locality surrounding the subject site, include the following:

- North: Low density residential development and neighbourhood shops;
- East: Cintra Park and St Luke's Oval including car parking, numerous sporting courts, fields and ovals;
- South: Sporting courts, fields and clubs; and
- West: Low to medium density residential development, with Concord Public School and Concord Private Hospital further to the west and south-west respectively.



Figure 2: Aerial Photo of Locality (Source: Nearmap 2023)

5.3 Infrastructure

The existing site is currently serviced by water, sewer, telecommunication and power services.

Nearby public transport includes bus stops located along Burwood Road to the west and immediately outside the site along Stanley Street. Strathfield Railway Station is located approximately 1.4 kilometres to the south-west of the site.

5.4 Photographs

The following photographs identify the site and proposed development footprint.



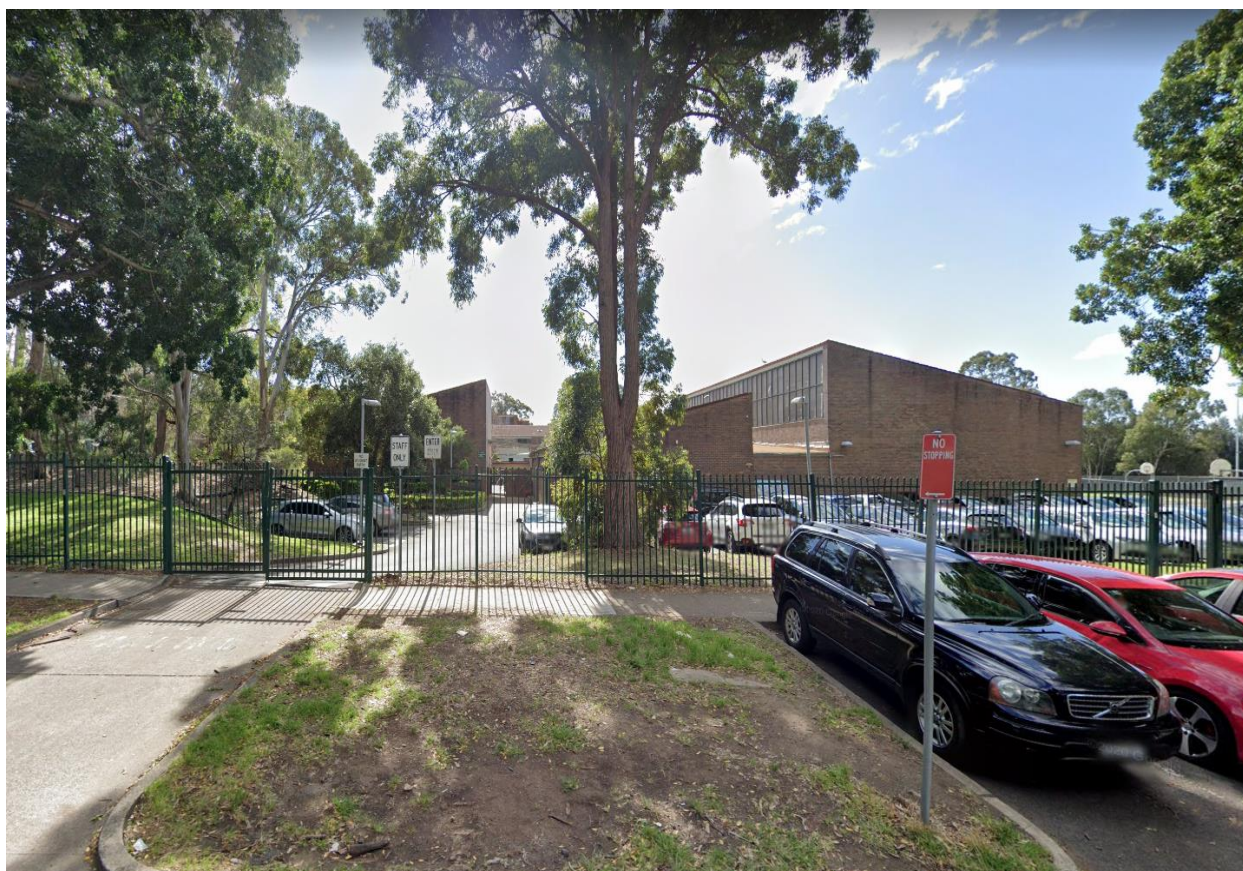
Photograph 1: Existing south western car park proposed for expansion. Modular Block I proposed for relocation is identifiable in the left of the frame



Photograph 2: Looking south to car park and Block E proposed for demolition



Photograph 3: Existing vehicular access from Crane Street and location for waste storage



Photograph 4: Looking north to Block E and proposed development footprint

6 Proposed Development

6.1 Demolition

It is proposed to demolish:

- The existing Block E and adjacent existing car park in the south east of the site; and
- Existing games courts in the south east of the site.

Note existing demountables in the north of the site will be decommissioned and removed from site following the construction handover of Blocks X, Y and Z. Refer to the Demolition Plan in Appendix A for further details.

Where possible, materials will be salvaged for recycling and reuse during the demolition process. The remaining waste will be transported to a recognised waste facility. A Construction and Demolition Waste Management Plan has been prepared and attached in Appendix J detailing demolition waste generation and associated management methods.

6.2 Proposed Built Form and Landscaping

As per the Site Plan extracted in Figure 3, the proposed development will generally involve:

- Construction of Block X, incorporating a new hall/ gymnasium;
- Construction of Block Y, including a canteen, movement studio, performing arts and physical education facilities;
- Construction of Block Z, which comprises a new four-storey building containing staff and administration facilities, support learning, visual arts workshop, and GLS;
- New games courts to the north east of the site adjacent to Crane Street;
- Western car park upgrade and extension to offset the loss of the existing car park referred to above within the development footprint;
- Landscape works including new tiered seating adjacent to the existing sports field;
- Light refurbishment of Block A library facilities; and
- The relocation of modular Block I to the west of the western car park.

Detailed architectural plans are included in Appendix A and a Survey Plan in Appendix C to this report. Detailed descriptions of the proposed works are provided in subsections below.

Within the design development phase JDH Architects and the Project Team facilitated a Walk on Country with Darag Aboriginal Elders to discuss the indigenous communities history and ongoing connection to the area. This Walk on Country guided the materials palette, colours and contextual selections in order to strengthen the developments Connection to Country.

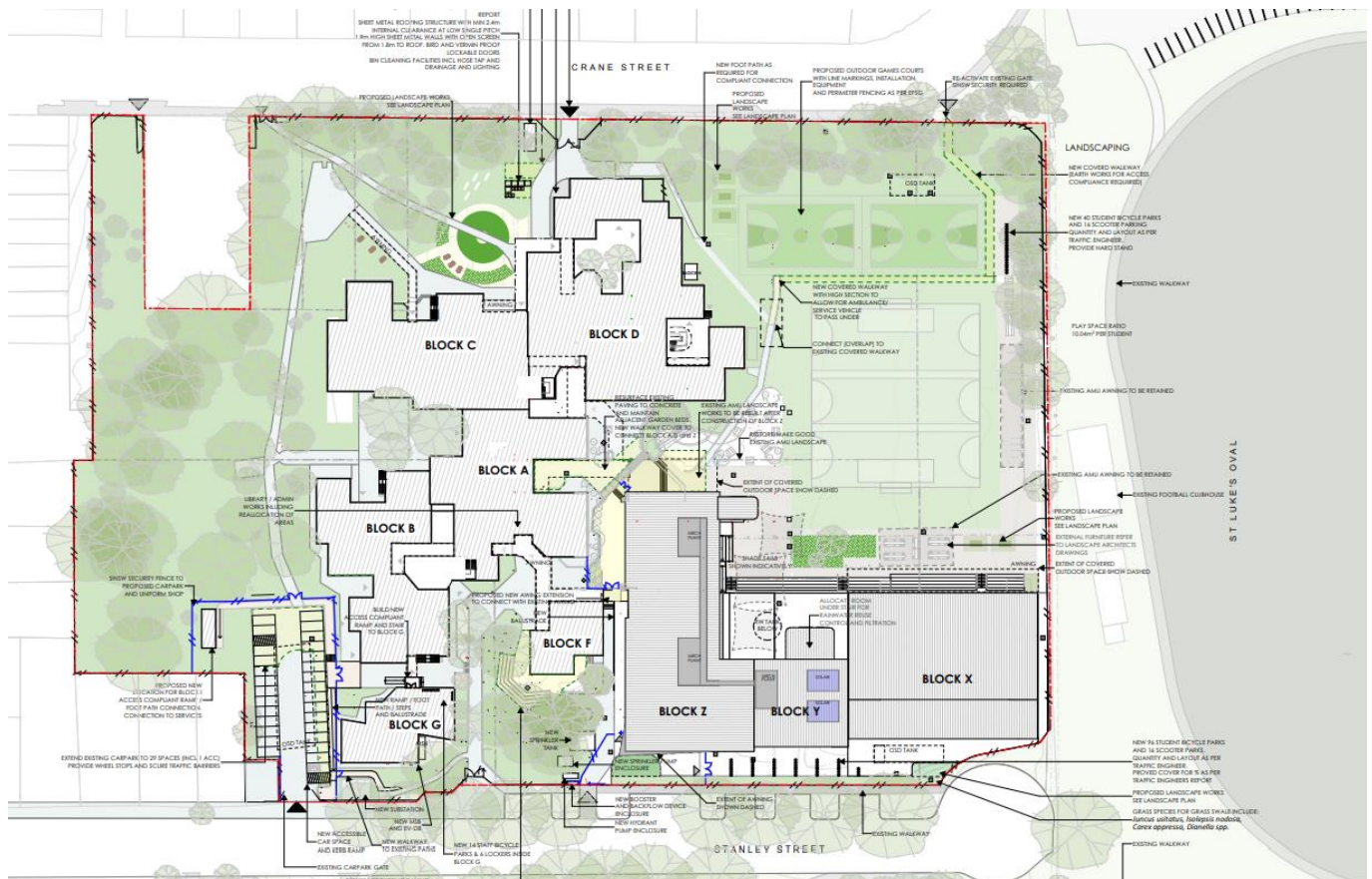


Figure 3: Extract from Site Plan (Source: JDH Architects, 2023)

6.2.1 Vegetation Removal

The proposed development requires the removal of vegetation within the development footprint which includes the built form, sports courts and the extension of the western carpark. A number of trees are proposed to be retained, subject to arborist advice.

An Arborist Report is attached in Appendix L documenting the proposed tree works. With respect to tree removal the report confirmed the following:

Tree 169 is dead with no visible fauna habitat. This tree is recommended for removal.

Trees 158, 162 and 163 are in poor and declining health with significant apical dieback and extensive deadwood. These trees have low retention value.

The Tree Protection Zones (TPZ) of Trees 7, 8, 11, 12, 13, 14, 15, 16, 17, 21, 22, 29, 35, 94, 95, 96, 97, 98, 100, 101, 102, 103, 104, 105, 114, 116, 120, 122, 128, 130, 131, 132, 133, 151, 152, 173, 174, 175, 185, 186, 187, 188, 189, 190, and 191 are encroached by the proposed construction, civil, stormwater and required earthworks by a major encroachment as defined by AS4970-2009 Protection of Trees on Development Sites. These trees will not be viable to be retained and will be required to be removed due to the proposed development.

Note the development proposes the removal of one tree outside the site boundary within the Stanley Street road reserve (Tree 191).

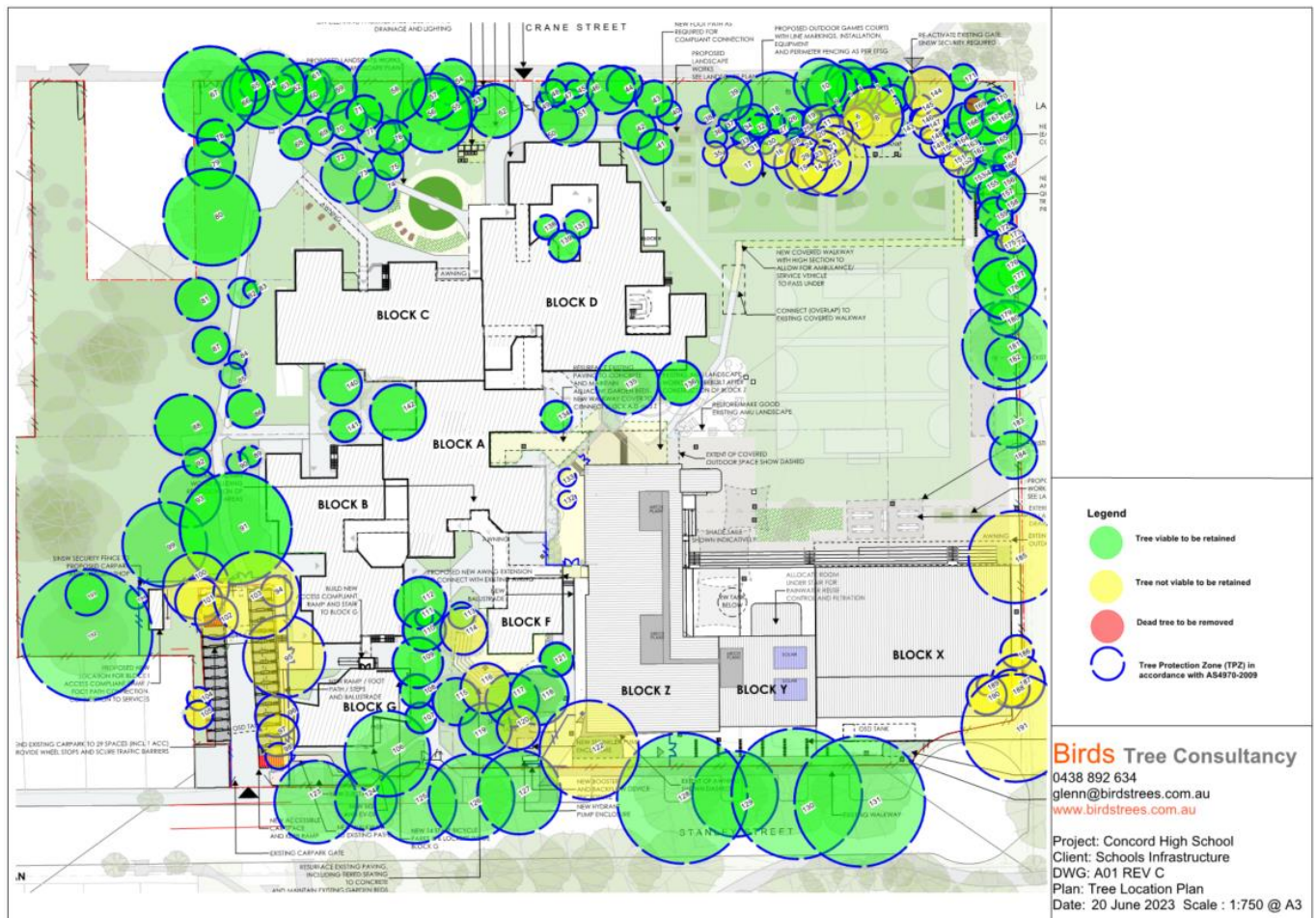


Figure 4: Tree Protection Plan (Birds Tree Consultancy, 2023)

6.2.2 Pedestrian/ Vehicle Access and Parking

The site will retain vehicular access from Stanley Street and Crane Street. Bicycle and scooter parking for staff and students will be provided across the site, as indicated in development plans. Bicycle spaces are proposed to cater for existing and future students and staff in the following locations:

- 14 x staff bicycle spaces within existing Block G.
- 96 bicycle spaces and 16 scooter spaces located adjacent to new Blocks X, Y, and Z; and
- 60 bicycle spaces and 16 scooter spaces located within the north east of the site adjacent to St Luke's oval.

The existing Crane Street vehicle access will retain entry to the site for service, waste, mini bus and Ambulance vehicles.

The south eastern car park will be demolished to facilitate construction of the proposed development.

The south western staff car park which is the subject of proposed additions will continue to be accessed from Stanley Street. The proposed development includes the modification of the existing staff car park to achieve a total of 29 spaces (including 1 accessible space). An extract from the Site Plan identifying car park works is provided in Figure 4 below. A Traffic Impact Assessment has been prepared and attached in Appendix M detailing design compliance with relevant Australian standards and School Transport Plan in Appendix T.

A covered walkway is proposed to provide access to a gate that will be reactivated within the north east of the site to Crane Street.

The existing Pick up/ Drop Off area provided on Crane Street will be retained. The existing on street drop off and pick up zone is approximately 88m in length accommodating 14 spaces and has been deemed sufficient to accommodate the target demand for the school site. The development proposes to improve the Crane Street drop-off/pick-up area to encourage more students to use this facility, with the following traffic calming measures proposed subject to Section 138 approvals:

- Installation of speed cushions, for controlling the speed of north-westbound traffic around the curve along Crane Street;
- Installation of regulatory and advisory signage, for clearer advisory of the area and advanced warning; and
- Implementation of additional road line marking, for guiding traffic away from the drop-off/pick-up area that may have vehicles stopping.

Refer to the Transport and Traffic Assessment for further details.

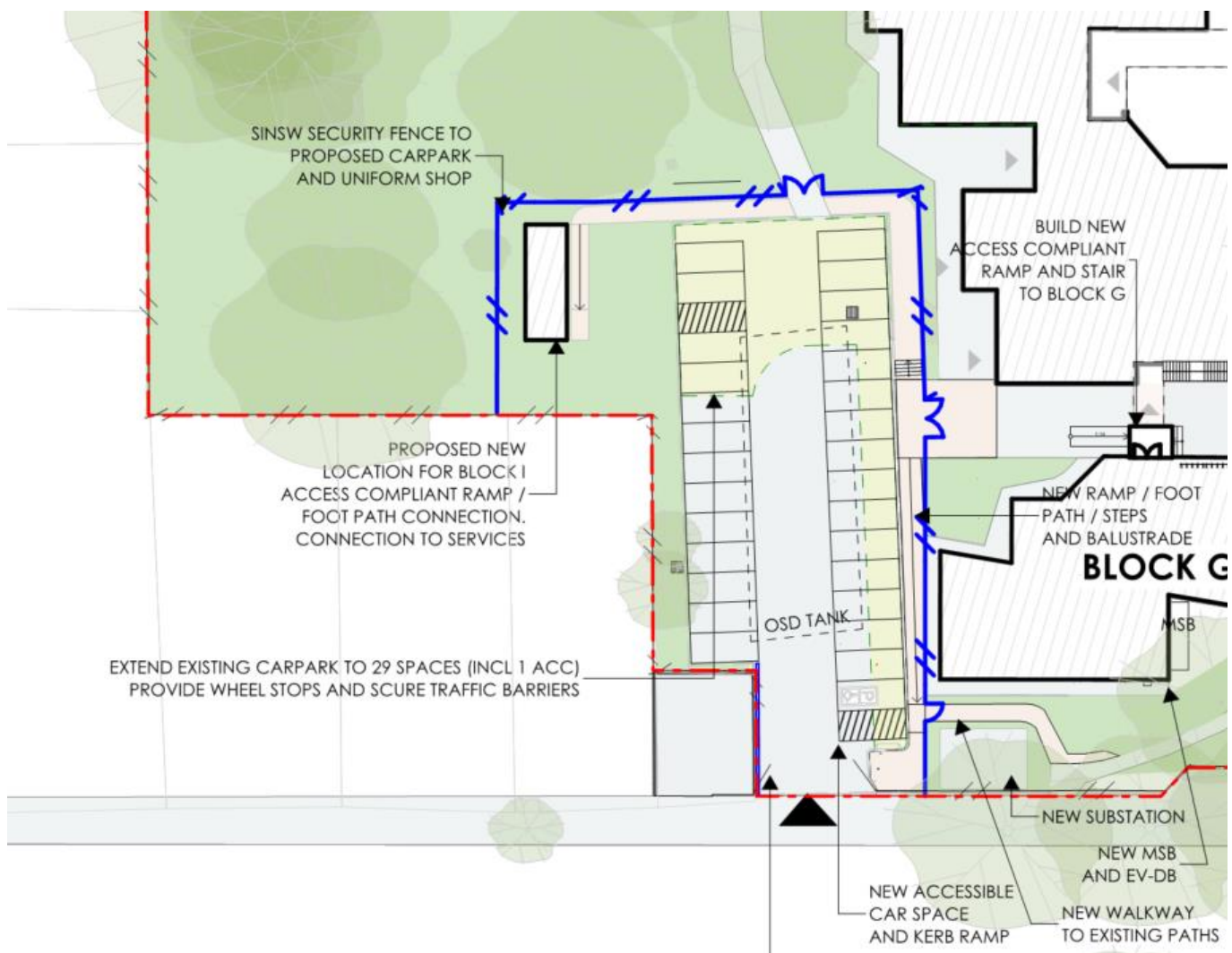


Figure 5: Extract from Site Plan identifying car park works (JDH, 2023)

6.2.3 Building Design

The proposed development includes the construction of three (3) additional school buildings: Blocks X, Y and Z, located within the south east of the site.

These include a number of new facilities as outlined above, including:

- New Gymnasium / Hall (Block X);

- Canteen, performing arts and physical education facilities (Block Y); and
- Staff and administration facilities, learning support, visual arts workshop, and a number of general learning spaces (GLS) in Block Z.

The proposed built form incorporates a contemporary and sustainable, high quality design which will utilise natural lighting and ventilation to maximise the amenity of the buildings. The development has been skilfully designed to maintain the privacy of the school and surrounding public domain. Works reflect the local character of the site and complement the design of the existing school environment.

Building height ranges from 8.87m to 18.29m. Block Z will accommodate four (4) levels of development as shown in the 3D montage identifying proposed built form from Stanley Street.

A Design Verification Statement has been prepared by JDH and attached in Appendix Q with 3D montages provided in Figures 6 and 7 depicting the high quality of architecture proposed.

Block X

Block X is proposed to accommodate a new gymnasium/ hall, change rooms, storage and amenities.

Covered outdoor space will be provided to the north adjacent to the proposed tiered seating.

Block Y

Block Y will accommodate the new movement studio, canteen and storage facilities at ground level with General Learning Spaces (2) and a performing arts workshop space at First Floor.

Block Z

Block Z will provide ground floor staff and office amenities with staff amenities, General Learning Spaces (4) and Visual Arts Workshops (2) provided at First Floor.

General Learning Spaces (24) and Learning Commons areas (6) will be accommodated within Levels 2 and 3.



Figure 6: 3D Montage – Stanley Street Main Entrance (JDH, 2023)



Figure 7: 3D Montage – Looking south to new built form(JDH, 2023)

Landscaping works are to be undertaken across the site, refer to the Landscape Plans in Appendix D for details with an extract from the Landscape Master plan provided in Figure 8.

Planting selection for the sensory garden has been carefully chosen to provide elements that appeal to the five senses - Sight, Sound, Smell, Touch and Taste. The selection provides plants that have a mix of colours and textures to stimulate the sight. Plants with weeping foliage will add swaying motion and gentle sound to the garden and fragrant species to stimulate the sense of smell. Plants are to be provided with a variety of textures to touch and edible herbs to sample.

Additional outdoor games courts are proposed within the north east of the site with orientation to Crane Street. Tiered seating is also proposed to provide viewing of the existing sports field.

[illegible]

Figure 8: Extract from Proposed Landscape Plan (JDH Architects)

6.2.5 Relocation of Block I

Modular Block I will be relocated to the west of the staff car park.

Refer to the Site Plan extracts in Figures 4 and 5 for location details.

6.2.6 Operational Increase to Staff & Student Numbers

The proposal will accommodate a minor operational increase in staff and student numbers at the school. This increase is proposed as follows:

- 1,360 students (increase of 25 students); and
- 95 staff (increase of 6 staff - full time equivalent).

6.2.7 Joint Share Facilities

The NSW Department of Education currently provide a number of Concord High School facilities to the local community for after-hours use. These organisations include Inner West Physie and Dance, United Volleyball, Junior Basketball Academy, St Alexander Nevsky Russian School, Heartbeat Church, Next Nuri Church, Bengali Association and Inner West Motivate Sports.

The proposed development will accommodate existing community uses with additional opportunities for other community uses in the future.

6.2.8 Waste Collection

Waste collection will be undertaken within the existing vehicular entrance to the site from Crane Street. As per the Operational Waste Management Plan, waste bins are to be provided as follows:

- General waste – 5 x 1,100L Mobile Garbage Bins (MGB's) to be collected 3 x weekly;
- Cardboard/ Paper Recycling – 31 x 240L MGB's collected 3 x weekly;
- Refundable Containers – 6 x 240L MGB's collected as required (approximately once per week); and
- Confidential paper destruction – 1 x 240L MGB's collected as required (approximately once per month).

Refer to the Operational Waste Management Plan attached in Appendix I for further details.

7 Statutory Matters

7.1 State Environmental Planning Policies

The State Environmental Planning Policies (SEPPs) relevant to the proposed development are assessed in Table 3 below.

Table 3: Assessment of Relevance of SEPPs

State Environmental Planning Policy	Relevant	Comment
SEPP (Biodiversity and Conservation) 2021	Yes	
Chapter 2 Vegetation in non-rural areas	Yes	Vegetation removal is proposed. Refer to Section 6.1.1.
Chapter 3 Koala habitat protection 2020	No	
Chapter 4 Koala habitat protection 2021	Yes	Vegetation removal is proposed. Refer to Section 6.1.1.
Chapter 6 Water Catchments	Yes	Refer to Section 6.1.1.
SEPP (Industry and Employment) 2021	No	
SEPP (Planning Systems) 2021	Yes	Refer to Section 6.1.4.
SEPP (Precincts - Eastern Harbour City) 2021	No	
SEPP (Primary Production) 2021	No	
SEPP (Resilience and Hazards) 2021	Yes	
Chapter 2 Coastal management	No	The site is not located within or in proximity to the coastal zone.
Chapter 3 Hazardous and offensive development	No	
Chapter 4 Remediation of land	Yes	See Section 6.1.2 below.
SEPP (Transport and Infrastructure) 2021	Yes	
Chapter 2 Infrastructure	No	
Chapter 3 Educational establishments and childcare facilities	Yes	The subject site is an existing school. Refer to Section 6.1.3 below.
Chapter 4 Major infrastructure corridors	No	
Chapter 5 Three ports - Port Botany, Port Kembla and Newcastle	No	

7.1.1 State Environmental Planning Policy (Biodiversity and Conservation) 2021

SEPP (Biodiversity and Conservation) 2021 includes a range of sections aimed at protecting biodiversity values, koala habitat and the integrity of water catchments. Chapters 2, 4 and 6 apply to the proposed development.

Chapter 2 Vegetation in non-rural areas

Chapter 2 seeks to protect the biodiversity values of the State and to preserve the amenity of non-rural areas through the preservation of trees and other vegetation. The chapter applies to land in the Canada Bay LGA and the R3 Medium Density Residential zone, both of which apply to the proposal.

Vegetation removal forms part of this Crown development application, which requires development consent under the provisions of this chapter. No further assessment of Chapter 2 of the SEPP is required.

Chapter 4 Koala Habitat protection 2021

This Policy aims to encourage the conservation and management of areas of natural vegetation that provide habitat for koalas to support a permanent free-living population.

City of Canada Bay is not identified in Schedule 2 as a Local Government Area that requires assessment under this Chapter. No further assessment is required.

Chapter 6 Water Catchments

The site is located within the Sydney Harbour Catchment and Chapter 6 applies. Refer to an assessment of applicable controls in Table 4.

Table 4: SEPP (B&C) Chapter 6 Assessment

SEPP Control	Compliance
Chapter 6 – Water catchments	
Division 2 Controls on development generally	
6.6 Water quality and quantity	The proposed development incorporates On Site Detention to capture site stormwater. Additional run-off will not be generated to areas external to the site. The works will not impact water quality entering a waterway nor will the development have any impact on water flow into a natural waterbody. The works will not impact the level or quality of the watertable and no cumulative environmental impacts to the regulated catchment will occur.
6.7 Aquatic ecology	The proposal includes the removal of trees to facilitate the extension of the western car park, the built form and the construction of games courts in the north east of the site. Tree removal has been prioritised throughout the site and vegetation impacts are considered to be minor and supportable. The works will not be undertaken on waterfront land nor will any terrestrial, aquatic or migratory animals be impacted by the proposal.

SEPP Control	Compliance
	A Controlled Activity Approval or permit under the Fisheries Act is not required. The works will not generate any impact to a wetland or natural waterbody and further assessment is not required.
6.8 Flooding	The Flood Impact Assessment attached in Appendix P confirmed the site is not impacted by the 1%AEP event. Any PMF events are unlikely to result in pollutant generation that would impact a wetland or riverine ecosystem.
6.9 Recreation and public access	The site is not located in proximity to a waterbody used for recreational purposes and the works will not impact existing access to adjacent public open space areas at St Luke's Oval.
6.10 Total catchment management	The works will have no detrimental impact on downstream LGA's and further assessment is not required.
Division 3 Controls on development in specific areas	The site is not located within any of the following areas that would require further assessment: <ul style="list-style-type: none"> • Land within 100m of a waterbody; • Riverine scenic area; • Hawkesbury Nepean Conservation Area; or • Temporary use of land in the Sydney Harbour Catchment.
Division 4 Controls on development for specific purpose	Clauses 6.15 – 6.20 do not apply and assessment is not required. Stormwater management works are proposed however the design will not facilitate the discharge of untreated stormwater into a natural waterbody. Clauses 6.22 – 6.23 are not applicable and do not require assessment.

7.1.2 State Environmental Planning Policy (Resilience and Hazards) 2021

SEPP (Resilience and Hazards) 2021 contains planning provisions for the management of hazardous and offensive development and provides a state-wide planning framework for the remediation of contaminated land to minimise the risk of harm. Chapter 4 is applicable to the subject development.

Chapter 4 Remediation of land

Clause 4.6 of the SEPP requires the consent authority to consider whether land is contaminated during the development application process.

A Preliminary Site Investigation (PSI) was prepared by Environmental Australia on behalf of SINSW for contamination on the site. It was noted the site had historically been used as a tannery prior to 1967 when the land was purchased by the NSW Department of Education for the construction of Concord High School.

The PSI (refer Appendix F) confirmed the following:

Due to the historical site use as a tannery and the potential for groundwater contamination it is recommended that a detailed site investigation (DSI) be conducted at the site to determine the potential and extent of subsurface contamination and management requirements prior to, during and after redevelopment.

A Detailed Site Investigation (DSI) was prepared by Environmental Australia (refer Appendix G). The DSI included a soil investigation, groundwater monitoring well installation and groundwater sampling. The soil sampling fieldwork was conducted on 20 and 21 June 2022. Groundwater sampling was completed on 28 June 2022.

The DSI confirmed:

No visible or olfactory evidence of contamination was observed during soil and groundwater sampling and investigation. Groundwater is present at the site in level areas between 1.5 and 3 metres below ground surface (mbgs), and likely flows to the east or northeast toward a concrete-lined stormwater canal 150m east of the site which runs into Parramatta River, 600m northeast of the site.

A number of recommendations were provided in the DSI which prompted the preparation of a Remediation Action Plan by Environmental Australia, refer Appendix K. The RAP proposed recommendations as follows:

- *a licensed asbestos assessor (LAA) to create a construction-specific asbestos management plan (AMP) for the demolition of buildings and management of monitoring during development and management of any asbestos fragments on the surface or soil. The LAA or hygienist should be available to provide surface visual clearance and removal of any asbestos fragments if they are encountered on the surface or in soil under the construction- specific AMP;*
- *liming and managing ASS/PASS soil in the eastern boundary area (if excavated) in accordance with an Acid Sulfate Soil Management Plan (ASSMP);*
- *monitoring odour (particularly rotten egg gas) in the eastern boundary area of the site throughout construction and applying odour suppressants as required;*
- *placing excavated soil into stockpiles to assess if the soil can be reused or for waste classification before disposal offsite following the NSW Waste Classification Guidelines, and testing groundwater if required to dewater to dispose of liquid waste in compliance with Protection of the Environment Operations Act 1997;*
- *ensuring appropriate erosion and sediment controls are in place during construction in accordance with a construction environmental management plan (CEMP) and this RAP;*
- *monitoring groundwater before and after construction to detect any changes caused by oxidation of any encountered ASS/PASS soil and confirm PFAS concentrations and risk to offsite ecological receptors; and*
- *validating surface soil is free of asbestos by visual clearance by an LAA after remediation/earthworks and issuing of an asbestos visual clearance report;*
- *after remediation is concluded, a Validation Report should be prepared by an environmental consultant with CEnvP SC specialist accreditation in accordance with -NSW EPA Consultants reporting on contaminated land, Section 2.2, Checklist Table 2.6 Site remediation and validation (NSWEPA,2020) and submitted to SINNSW for review.*

An Acid Sulfate Soils Management Plan has also been prepared and is attached in Appendix O to address some of the recommendations identified in the RAP.

No further assessment of this SEPP is required.

7.1.3 State Environmental Planning Policy (Transport and Infrastructure) 2021

SEPP (Transport and Infrastructure) 2021 includes planning provisions for infrastructure in NSW, such as hospitals, roads, railways, educational facilities, significant infrastructure corridors, and the three major

shipping ports at Port Kembla, Port Botany and Newcastle. Chapter 3 is applicable to the proposed development.

Chapter 3 Educational establishments and child care facilities

Concord High School is an existing school. An assessment of the proposal under the provisions of Chapter 3 for development for the purpose of a school is provided in Table 5.

Table 5: Compliance with Chapter 3 of the T&I SEPP

SEPP Control	Compliance
Part 3.4 Schools – specific development controls	
3.34 Interpretation	The site is located in the R3 zone, which is a <i>prescribed zone</i> within the meaning of this Part.
3.36 Schools – development permitted with consent	
(1) Development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone.	The land is in a prescribed zone and school development is permissible with consent on the subject site.
(2) Development for a purpose specified in section 3.40(1) or 3.41(2)(e) may be carried out by any person with development consent on land within the boundaries of an existing or approved school.	The proposed works are provided for under section 3.40(1) of the SEPP and may be carried out with consent within the existing school site.
(3) Development for the purpose of a school may be carried out by any person with development consent on land that is not in a prescribed zone if it is carried out on land within the boundaries of an existing or approved school.	Noted. The subject site is both an existing school and within a prescribed zone.
(4) Subsection (3) does not require development consent to carry out development on land if that development could, but for this Chapter, be carried out on that land without development consent.	Noted.
(5) A school (including any part of its site and any of its facilities) may be used, with development consent, for the physical, social, cultural or intellectual development or welfare of the community, whether or not it is a commercial use of the establishment.	Noted.
(6) Before determining a development application for development of a kind referred to in subsection (1), (3) or (5), the consent authority must take into consideration— (a) the design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 8, and	A Design Verification Statement has been prepared by JDH and attached in Appendix Q. The Statement confirms the proposal is consistent with the design quality principles. The proposed development has been designed and sited with consideration and is consistent with the seven design quality principles for schools provided in Schedule 8 of the SEPP.

SEPP Control	Compliance
(b) whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.	School facilities will continue to be used by the community, refer to Section 5.2.6 for further details.
(7) Subject to subsection (8), the requirement in subsection (6)(a) applies to the exclusion of any provision in another environmental planning instrument that requires, or that relates to a requirement for, excellence (or like standard) in design as a prerequisite to the granting of development consent for development of that kind.	Noted. The proposal has considered the requirements of subsection (6) and any design prerequisites under any other applicable EPI do not apply.
(8) A provision in another environmental planning instrument that requires a competitive design process to be held as a prerequisite to the granting of development consent does not apply to development to which subsection (6)(a) applies that has a capital investment value of less than \$50 million.	Noted. The proposed development has a capital investment value (CIV) that does not trigger the \$50 million threshold. Note the Estimated cost of works document is submitted under separate cover confidentially and should not be available for public viewing. A CIV Report has been prepared to confirm the works do not meet the \$50 million threshold. This report can be provided to Council confidentially if required.
(9) A provision of a development control plan that specifies a requirement, standard or control in relation to development of a kind referred to in subsection (1), (2), (3) or (5) is of no effect, regardless of when the development control plan was made.	Noted. Notwithstanding, the applicable development control plan (DCP) has been considered and discussed in Section 5.4 of this report for completeness.
(10) Development for the purpose of a centre-based child care facility may be carried out by any person with development consent on land within the boundaries of an existing or approved school.	Noted. The proposal does not include the provision of a centre based childcare facility.

Part 3.7 General development controls

3.58 Traffic-generating development

<p>(1) This section applies to development for the purpose of an educational establishment—</p> <p>(a) that will result in the educational establishment being able to accommodate 50 or more additional students, and</p> <p>(b) that involves—</p> <p>(i) an enlargement or extension of existing premises, or</p> <p>(ii) new premises,</p>	Does not apply given student increase does not meet the 50 student threshold.
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SEPP Control	Compliance
on a site that has direct vehicular or pedestrian access to any road.	
<p>(2) Before determining a development application for development to which this section applies, the consent authority must—</p> <p>(a) give written notice of the application to Transport for NSW (TfNSW) within 7 days after the application is made, and</p> <p>(b) take into consideration the matters referred to in subsection (3).</p>	Noted.
<p>(3) The consent authority must take into consideration—</p> <p>(a) any submission that TfNSW provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, TfNSW advises that it will not be making a submission), and</p> <p>(b) the accessibility of the site concerned, including—</p> <p>(i) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and</p> <p>(ii) the potential to minimise the need for travel by car, and</p> <p>(c) any potential traffic safety, road congestion or parking implications of the development.</p>	Noted. A Transport and Traffic Assessment prepared by PTC is included in Appendix M.
(4) The consent authority must give TfNSW a copy of the determination of the application within 7 days after the determination is made.	Noted.

7.1.4 State Environmental Planning Policy (Planning Systems) 2021

Schedule 1 of SEPP (Planning Systems) 2021 provides that any alterations and additions to an existing school with a CIV of more than \$50 million is State Significant Development. The CIV does not meet the threshold and the DA is not classified as State Significant Development. A CIV Report has been prepared to confirm the works do not meet the \$50 million threshold. This report can be provided to Council confidentially if required.

The SEPP also includes provisions for Regionally Significant Development. Schedule 6 of this SEPP provides that any Crown Development with a CIV of more than \$5 million is Regional Significant Development. The CIV meets the \$5 million threshold and the DA will be assessed as Regionally Significant Development for determination by the Sydney Eastern City Planning Panel.

7.2 Regional Strategies

The subject land is identified in the Greater Sydney Regional Plan and associated Eastern City District Plan as being within an existing *urban area*, as shown in Figure 9 below. Concord is identified as a 'Strategic Centre' which indicates the area will be the subject of growing investment, business opportunities and additional population growth.

The proposed development, which comprises the alterations and additions to an existing school, is consistent with Chapter 2 – Infrastructure and collaboration - objectives. Planning Priority E1, 'Planning for a city supported by Infrastructure' promotes the alignment of growth and infrastructure within existing ageing sites. The proposed development seeks to maximise the use of existing site infrastructure with additional built form coordinating to provide a significantly upgraded educational establishment within a Strategic Centre.

The proposal will align infrastructure with forecasted growth (Action 3) and maximise the utility of existing infrastructure prior to wholesale demolition and redevelopment (Action 6). Accordingly, the proposal is consistent with the Regional Plan.

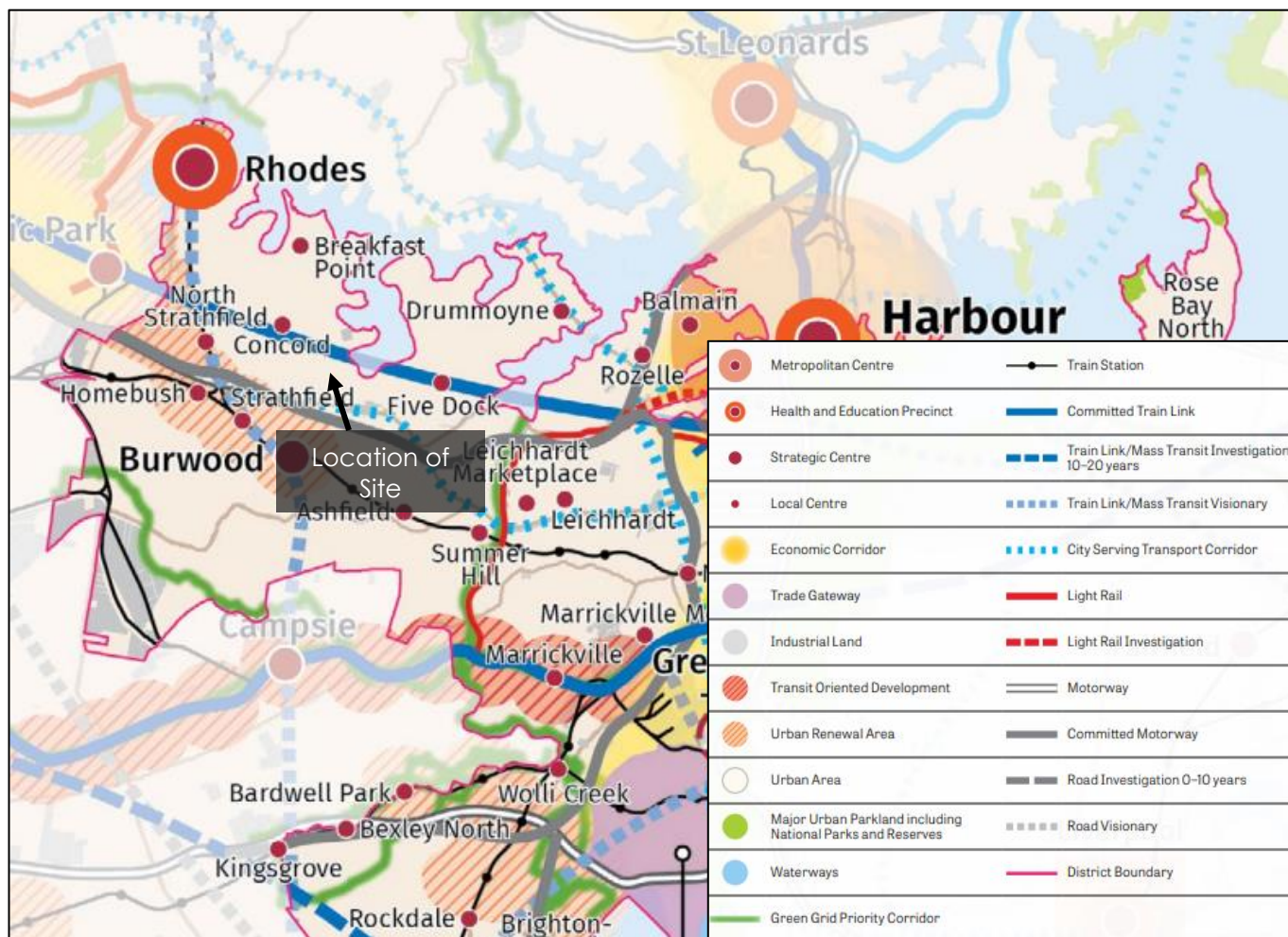


Figure 9: Eastern City Structure Plan (Source: Greater Sydney Commission 2018)

7.3 Canada Bay Local Environmental Plan 2013

7.3.1 Land Use Zoning and Objectives

Under the provisions of the CBLEP 2013 the site is zoned R3 Medium Density Residential as shown in Figure 10. The R3 zone objectives are as follows:

- To provide for the housing needs of the community within a medium density residential environment.
- To provide a variety of housing types within a medium density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents.

The proposal is consistent with the zone objectives given the alterations and additions will provide high quality facilities and services that will meet the day to day needs of residents, contributing to improved educational and socio-economic outcomes for the community.

The proposed development can be defined as alterations and additions to an existing school. Schools are permissible in the R3 zone. Further, Clause 3.36 of State Environmental Planning Policy (Transport and Infrastructure) 2021 confirms that development for the purpose of a school may be carried out with development consent on land in a prescribed zone. The R3 zone is a prescribed zone in Clause 3.34 of the SEPP and the works can be undertaken, subject to development consent.

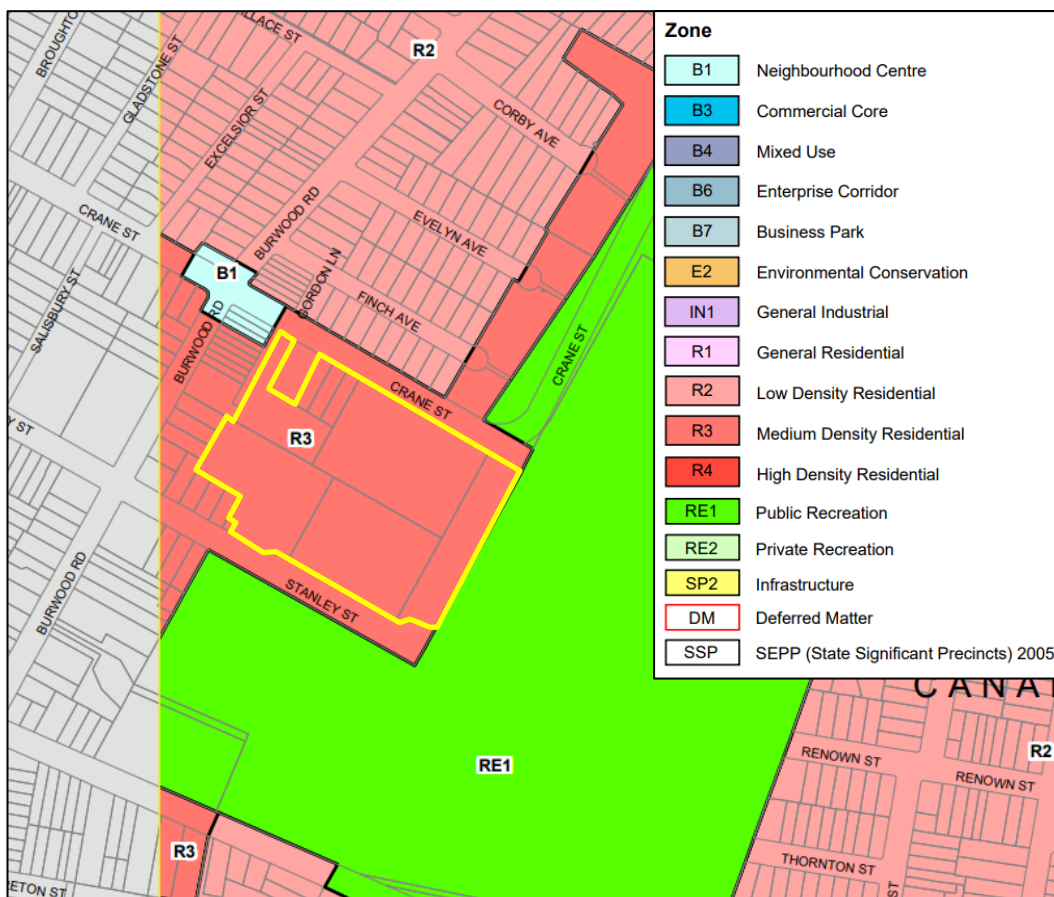


Figure 10: Extract Land Zoning Map (Source: CBLEP 2013, Sheet LZN_005)

7.3.2 Additional LEP Provisions

Additional LEP provisions are discussed in Table 6.

Table 6: Additional LEP Provisions

Relevant Provisions / Development Standards			
Control	Required	Proposed	Compliance
Part 4 Principal development standards			
4.1 Minimum subdivision lot size	The site has a minimum subdivision lot size of 450m ²	No subdivision proposed.	N/A
4.3 Height of Buildings	Maximum building height of 8.5m	The proposed development contravenes the LEP height control with a maximum height of 18.29m proposed. Note the proposed building height varies from 8.87m to 18.29m, as discussed in the Clause 4.6 Report prepared to detail the variation control.	No (refer to justification provided in Appendix H)
4.4 Floor space ratio	The site has a maximum FSR of 0.5:1	The proposal incorporates an FSR of 0.5:1. Refer to notations provided on the Site Plan for confirmation.	Yes
4.6 Exceptions to development standards	Justify the contravention of the development standard by demonstrating – (a) that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and (b) that there are sufficient environmental planning grounds to justify contravening the development standard.	A Clause 4.6 Variation Report has been prepared for the proposal's non-compliance with Clause 4.3 Height of buildings. Refer to Appendix H.	-
Part 5 Miscellaneous provisions			
5.10 Heritage conservation	Consider potential heritage impacts	The site is identified in Schedule 5 of the LEP as local heritage listed under the CBLEP 2013. A summary of the site's heritage significance and the findings of a Heritage Impact Assessment prepared by Extent (see Appendix E) is provided in Section 7.3.3 below.	Yes
5.21 Flood planning	Consider potential flood risk and impacts	A Flood Study prepared by Woollacott's is included in	Yes

Relevant Provisions / Development Standards			
Control	Required	Proposed	Compliance
		Appendix P. The assessment confirms the proposal is consistent with the LEP objectives and the works can be undertaken without any unacceptable flood risk to life or property. Refer to discussion in 7.3.3 below for further details.	
5.23 Public bushland	Protect and ensure the ecological viability of bushland, including rehabilitated areas in urban areas	The site does not contain public bushland and further assessment is not required.	N/A
Part 6 Additional local provisions			
6.1 Acid sulfate soils	Ensure that development does not disturb, expose or drain acid sulfate soils and cause environmental damage	The site is subject to Class 5 and Class 2 acid sulfate soils (ASS), as shown in Figure 11 below. An Acid Sulfate Soils Management Plan has been prepared by Environmental Australia and attached in Appendix O. No further assessment is required.	Yes
6.2 Earthworks	Ensure any earthworks will not have a detrimental impact on environmental functions and processes, neighbouring uses or heritage items and features of the surrounding land	Earthworks have been minimised where possible and the development has been designed to generally follow the natural topography of the site. Significant cut and fill is not required.	Yes
6.3 Environmentally sensitive land	Protect environmentally sensitive land by: (a) protecting native fauna and flora, and (b) protecting the ecological processes necessary for their continued existence, and (c) encouraging the conservation and recovery of native fauna and flora and their habitats.	The site is not identified in the CBLEP 2013 mapping as being located within or adjoining environmentally sensitive land.	N/A
6.14 Design excellence	Deliver the highest standard of sustainable	The site is not identified in CBLEP 2013 mapping as being within a "Design Excellence Area".	N/A

Relevant Provisions / Development Standards			
Control	Required	Proposed	Compliance
	architecture and urban design		

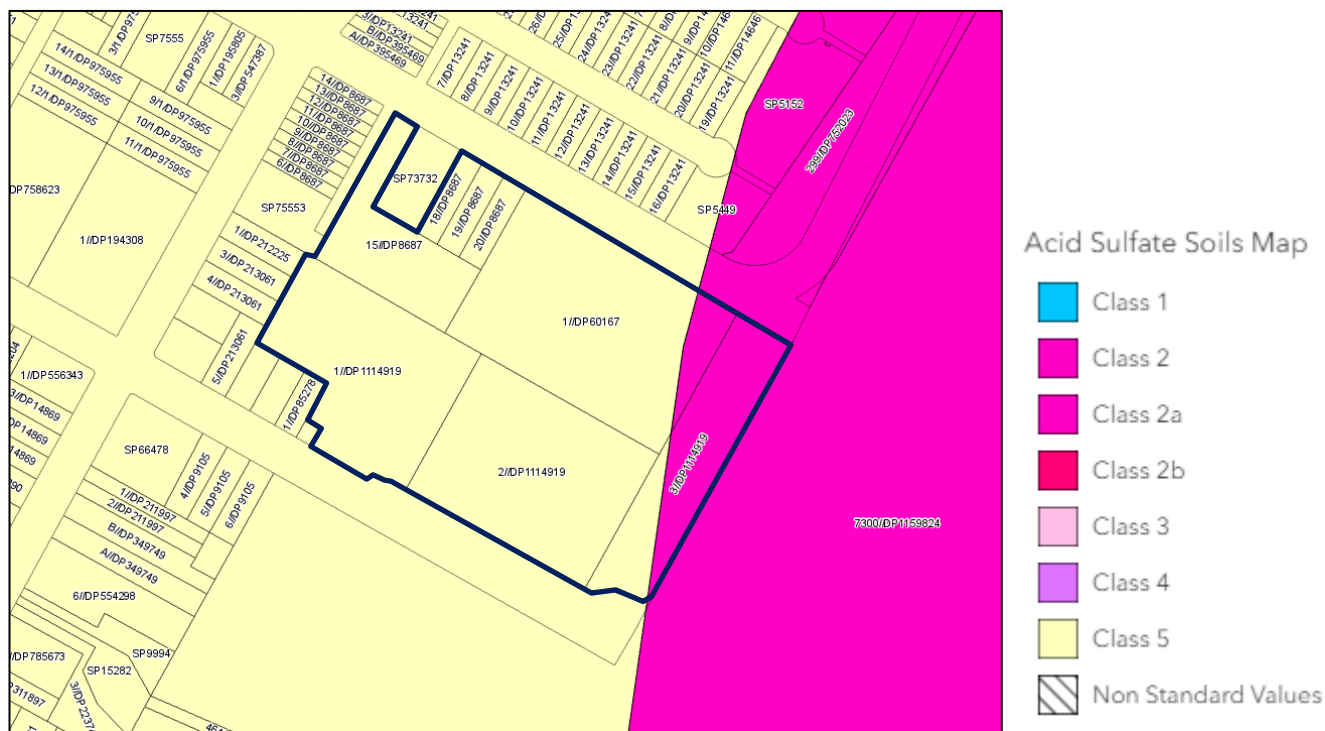


Figure 11: Acid Sulfate Soils Map (Source: ePlanning 2023/CBLEP 2013)

7.3.3 Further Discussion of LEP Clauses

Clause 5.10 Heritage conservation

The site is listed with local heritage significance, as shown in Figure 12 below. The 'Concord High School grounds' comprising the site at 5 Stanley Street, Concord, are listed under Schedule 5 of the Canada Bay LEP 2013 as item I411. This item is also mapped as including the site's frontage within the road reserve along Stanley Street.

A Statement of Heritage Impact (SoHI) has been prepared by Extent to assess the proposed works and is attached in Appendix E. Extent Heritage carried out a physical assessment of Concord High School and surrounds on 5 July 2022. The assessment involved an investigation into the built form and landscape setting. The SoHI subsequently confirmed the following:

Concord High School is listed as a local landscape heritage item on Schedule 5 of the Canada Bay Local Environmental Plan 2013. The heritage item is identified as 'Concord High School – grounds' (Item No. 421) within this schedule. It contains cultural plantings dated to the late 1930s associated with the former Farleigh Nettheim Tannery, a collection of indigenous trees, and a consciously designed entry landscape from c.1978 associated with the inception of Concord High School. The former heritage assessment recorded on the State Heritage Inventory database assessed the item as having aesthetic and representative significance at the local level.

Cultural plantings were observed from c.1930's and c.1970's with planned gardens also identified from c.1970's. A number of contemporary landscape features have been constructed after the 1970's including sporting fields and associated seating and a concrete plaza.

The SOHI concluded the following in relation to proposed impacts on the heritage significance of the site.

This Statement of Heritage Impact has considered the potential heritage impacts of the 100% Schematic Design on the heritage significance of Concord High School. It is considered that the new buildings and landscaping proposed in the 100% Schematic Design constitute works that complement and respect the existing character and qualities of the school. The new buildings utilise architectural forms and language inspired by the existing context, and the new landscaping will provide a continuation of the existing historic landscaping that exists throughout the school buildings.

The significance of Concord High School predominately lies in the designed relationship between the built form and landscape setting which together make a collective contribution to the planned landscape heritage values of the site. The proposed development will retain a significant portion of the landscaping and will allow for the continued appreciation and interpretation of the original design intent. Tree removal is limited to areas within the construction footprint of the new building, carpark areas and relocated basketball courts.

The wider landscape values of the site will be retained and celebrated through the implementation of new landscaping elements. The landscaping vision aims to create meaningful spaces to allow for students, teachers and visitors to connect to Country. The new landscaping has been designed to complement the new buildings, providing a contemporary historical layer to the site. This is a sympathetic and appropriate response to mitigate the loss of trees and some garden beds within the construction footprint through the activation of additional passive and active spaces.

The southern side of the Stanley Street road reserve is also heritage listed as item I422 and described as 'Street trees'. The works will generate no impact to the heritage significance for these trees.

Detailed recommendations have been provided in the SoHI to guide construction. This also includes recommendations for test excavations to determine the extent, nature and level of preservation of archaeological relics that may survive at the site. These test excavations will inform decisions on how to manage the archaeological resources in the remaining portions of the site.



A Flood Impact Assessment Report has been prepared and included in Appendix P which confirmed the site is not impacted by the 1%AEP event as follows:

The finished floor levels for the proposed new buildings at the south-eastern corner of The Site are 5.70m AHD and 5.90m AHD. The finished floor levels of the new buildings comply with the minimum freeboard requirement of 0.5m above 1% AEP flood levels within channels, creeks and rivers for educational development as outlined in the City of Canada Bay Council's Specification for the Management of Stormwater, Section 3.2.

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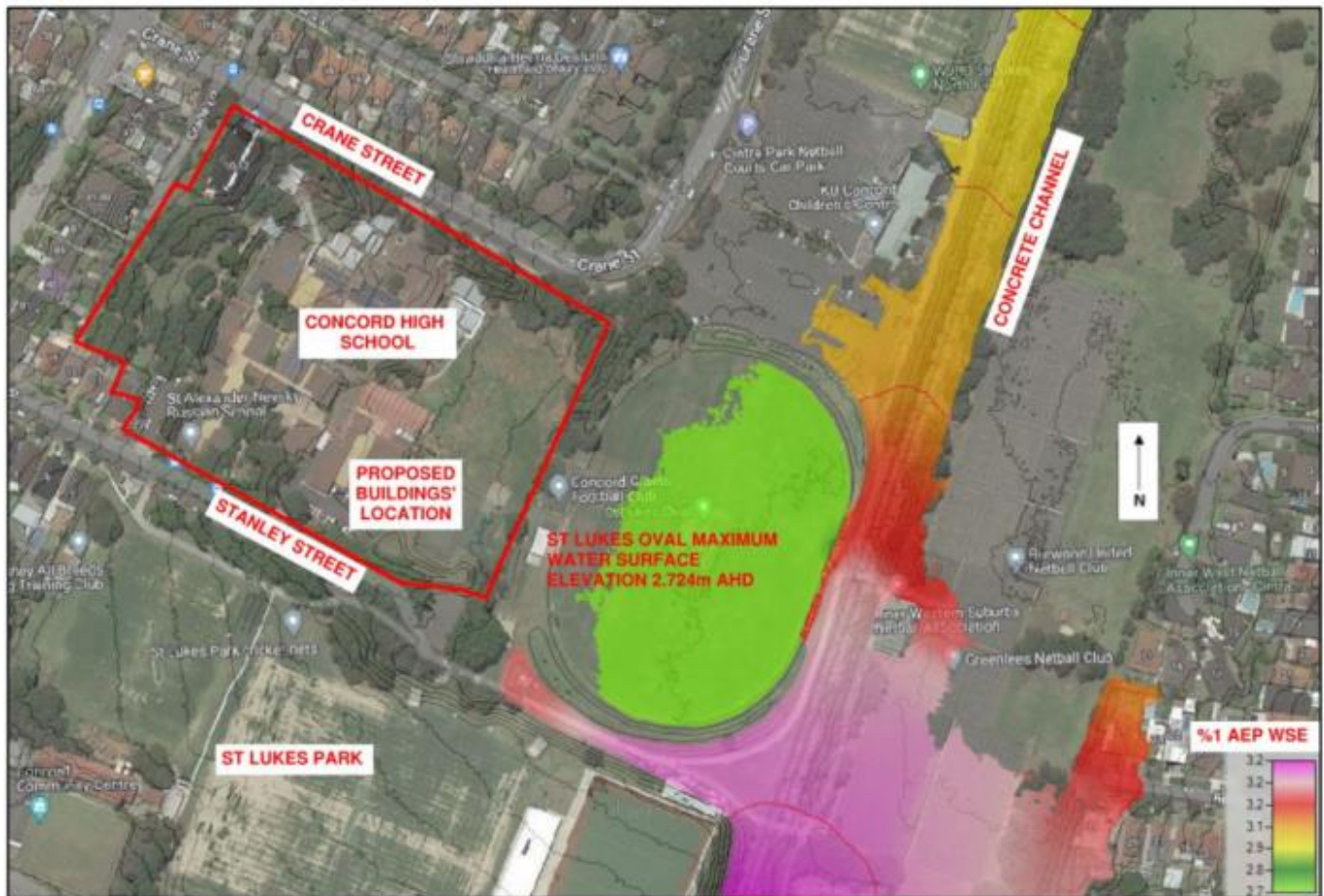


Figure 13: Extract from Flood Mapping – Extent of 1% AEP- Concrete Channel (Woolacotts, 2023)

The proposed site is partially impacted by riverine flooding from the PMF event based on HEC-RAS analysis. The maximum PMF top water level within the site is 4.70m AHD approximately. The finished floor levels for the proposed new buildings at the south-eastern corner of The Site are 5.70m AHD and 5.90m AHD.

Flood engineers further confirmed the following in relation to overland flow:

Stanley Street along the southern boundary of The Site appears to be an overland flow path and the proposed site may be impacted by overland flow flooding through Stanley Street. Currently, there are stormwater pits and pipes along Stanley Street to collect stormwater from the surrounding residential areas, St Lukes Park, and The Site for storm up to 5% AEP and discharge to the existing concrete channel on the eastern side of St Lukes Oval. For 1% AEP storms, stormwater flows through Stanley Street along the southern boundary of The Site as surface runoff before discharging to the concrete channel via St Lukes Oval.

Further to the above, the Flood Impact Assessment also confirmed that the finished floor levels of the proposed new buildings are over 300mm above the 1% AEP top water levels within Stanley Street. The proposed development will not worsen the existing flood condition downstream and upstream of the site as OSD systems have been proposed to limit the post-development peak stormwater flow rates to pre-development flow rate.

No further assessment was deemed necessary.

7.4 Development Control Plan

7.4.1 City of Canada Bay Development Control Plan 2023

Our assessment of the development in Table 7 confirms that the proposal generally satisfies Council's relevant development controls. Notwithstanding the inclusion of DCP assessment in Table 7, Section 3.36 (9) of State Environmental Planning Policy (Transport and Infrastructure) 2021 confirms that any requirement, standard or control included in a DCP is of no effect when related to a school.

It is noted that Canada Bay have no specific controls for educational establishments in the DCP. General controls, where applicable, have been addressed in Table 7.

Table 7: Development Control Plan Matrix

DCP Requirement	Compliance	Comment
Part B – General Controls		
B1 Accessibility	Yes	A BCA and Access Report has been prepared and attached in Appendix R.
B2 Telecommunications and radiocommunications	N/A	Not applicable.
B3 Vehicle and bicycle parking access		
B3.1 Vehicle parking	Yes	Additional car spaces have been designed in accordance with the minimum dimensions identified in C6. Additional parking infrastructure in the west of the site will not detract from the streetscape qualities or create unnecessary visual impacts.
B3.4 Car Parking Rates	Yes	No parking rates provided in the DCP for educational establishments. Refer to the Traffic Impact Assessment in Appendix M for discussion of proposed parking provision. Accessible parking rates are applicable to educational establishments as per Table B-D. The DCP requires the provision of 1 space for every 100 car parking spaces. The proposal includes the provision of one (1) accessible spaces which is consistent with the control.
B3.6 Bicycle Parking and storage facilities	Yes	No specific DCP parking rates are provided for schools. Bicycle facilities are proposed as follows: <ul style="list-style-type: none"> • 14 x staff bicycle spaces within existing Block G. • 96 bicycle spaces located adjacent to new Blocks X, Y, and Z; and • 60 bicycle spaces located within the north east of the site adjacent to St Luke's oval.

DCP Requirement	Compliance	Comment
B4 Waste Management	Yes	<p>A Demolition and Construction Waste Management Plan (Appendix J) and Operational Waste Management Plan (Appendix I) has been prepared to manage site waste. The WMP's have been prepared to minimise, recycle and dispose of waste only as a last resort.</p> <p>Ongoing waste collection will continue to be undertaken from the existing vehicle access point at Crane Street. Waste collection will be undertaken within the site. Bins will be stored in an external location adjacent to existing Block D. An assessment of vehicle turning paths is provided in the Transport and Traffic Assessment (refer to Appendix 3 of the TaTA).</p>
B5 Water conservation	Yes	<p>BASIX is not applicable to the development. Water conserving landscape practices will be implemented such as mulching, limited turf areas and sustainable irrigation.</p>
B6 Urban Forest		
B6.1 Tree maintenance	Yes	<p>The removal of trees is proposed as identified in the Arborist Report attached in Appendix L.</p> <p>The Tree Protection Zones (TPZ) of Trees 7, 8, 11, 12, 13, 14, 15, 16, 17, 21, 22, 29, 35, 94, 95, 96, 97, 98, 100, 101, 102, 103, 104, 105, 114, 116, 120, 122, 132, 133, 151, 152, 173, 174, 175, 185, 186, 187, 188, 189, 190, and 191 are encroached by the proposed construction, civil, stormwater and required earthworks by a major encroachment as defined by AS4970-2009 Protection of Trees on Development Sites.</p> <p>These trees will not be viable to be retained and are proposed for removal.</p> <p>Further to the above, Tree 169 is dead with no visible fauna habitat and is also proposed for removal.</p> <p>All other trees on site are viable for retention and will be protected during construction in accordance with the recommendations provided in the Arborist Report.</p> <p>The site is heritage listed for its landscape and tree works have been assessed in the Statement of Heritage Impact (refer Appendix E).</p>
B6.2 Assessment of trees	Yes	<p>As above, an Arborist Report has been prepared to document proposed tree</p>

DCP Requirement	Compliance	Comment
		removal. Refer to Appendix L for further details.
B6.3 City of Canada Bay tree species	Yes	Recommended tree species have been implemented within proposed landscape design where suitable. Refer to Appendix C for details.
B6.4 Biodiversity	Yes	The site does not contain mapped biodiversity values nor is it zoned E2 or identified on the Environmentally Sensitive Land Map. Further assessment is not required.
B6.5 Habitat connectivity	Yes	The site is located within a mapped DCP Biodiversity Corridor and tree retention has been prioritised throughout design development. Retention of trees along the Crane Street road frontage will ensure the mapped east-west corridor linkages are maintained.
B6.6 Plants suitable for corridors and restoration planting		Planting selection includes native trees to provide additional shade and sense of scale with a range of underplanting to provide texture and interest. Refer to the Landscape Plans attached in Appendix D for design and planting mix details.
B6.7 Replacement planting		A diverse mix of trees (Blueberry Ash, Luscious Watergum), shrubs (Callistemon, Banksia Spinulosa, Native mint bush and Westringia Fruticosa) and grasses/ groundcovers will appropriately replace the vegetation proposed for removal. The proposed landscape represents a significant upgrade for the site and the planting proposed will strengthen the biodiversity values of the site. Refer to the Landscape Plans in Appendix D for further details.
B6.8 Wetlands and waterways	Yes	The site does not contain any wetlands or waterways.
B6.9 Threatened and migratory species	Yes	Tree species proposed for removal are identified in the Arborist Report attached in Appendix L. No threatened species are proposed for removal. Further the site is not located within the threatened and migratory species buffer area and works will not impact any threatened or migratory species.
B6.10 Urban tree canopy	Yes	The site retains a significant number of canopy trees that contribute to the maintenance and retention of the urban canopy. Tree removal is confined to the

DCP Requirement	Compliance	Comment
		western car park footprint and north eastern and south eastern flanks of the site, including one tree to be removed outside the site boundary within the Stanley Street road reserve. The design development has consistently prioritised tree retention where possible.
B7 Engineering Requirements for DA	Yes	Stormwater design documentation has been prepared in accordance with the requirements of Section B7 and attached in Appendix B.
B8 Flooding Control	Yes	A Flood Impact Assessment has been prepared and attached in Appendix P. The Flood Impact Assessment confirmed that the finished floor levels of the proposed new buildings are over 300mm above the 1% AEP top water levels within Stanley Street. The proposed development will not worsen the existing flood condition downstream and upstream of the site as OSD systems have been proposed to limit the post-development peak stormwater flow rates to pre-development flow rate. No further assessment was deemed necessary.
B9 Contaminated Land	Yes	A PSI (Appendix F), DSI (Appendix G) and RAP (Appendix K) have been prepared to detail land contamination within the site. Implementation of the RAP is proposed to ensure the development footprint is suitable for the intended use.
B10 Crime Prevention through environmental design	Yes	Refer to Section 8 of this SEE which incorporates a detailed CPTED assessment of the proposed development. The assessment confirms the design is appropriate and will assist in the management and mitigation of opportunistic crime.
B11 Energy Efficiency	Yes	Photovoltaic panels will be installed within proposed roof forms. Refer to the Architectural plans attached in Appendix A for further details. The school's buildings are designed to maximise energy efficiency through the use of passive heating and cooling systems, energy-efficient lighting, and insulation. The building's orientation also takes advantage of natural light, which reduces the need for artificial lighting and further reduces energy consumption. The school also features a rainwater harvesting system that collects and stores

DCP Requirement	Compliance	Comment
		rainwater, which is then used for irrigation. Combined with drought tolerant planting selections this reduces the school's reliance on municipal water supplies and helps to conserve water resources.
B12 Subdivision and allotment size	N/A	No subdivision proposed.
Part C - Heritage		
c1 Heritage reports to accompany development applications	Yes	A Statement of Heritage Impact has been prepared for the proposed development by Extent, and is included in Appendix E.
C2 Development of heritage items	Yes	A comprehensive assessment of the DCP heritage requirements are provided in Section 10.5 of the SoHI confirming the development is consistent with Part C of the DCP. Refer to Appendix E for further details.
C3 Development in the vicinity of heritage items	Yes	As above, refer to Section 10.5 of the SoHI in Appendix E for a comprehensive assessment of DCP heritage controls.
C4 Development in Heritage Conservation Areas	N/A	The site is not in the vicinity of a HCA and this section is not applicable.

7.5 Water Management Act 2000

Under Part 3 of Chapter 3 a person must obtain a permit for water use approval, water management work approval or activity approval.

No building works are proposed in close proximity to a water course and the integrated approval of the Natural Resources Access Regulator (NRAR) is not required in this instance.

7.6 Rural Fires Act 1997 & Planning for Bushfire Protection

The subject site is not located within a designated bushfire prone area, as observable in Figure 14. The application will not require referral to the NSW RFS for concurrence.

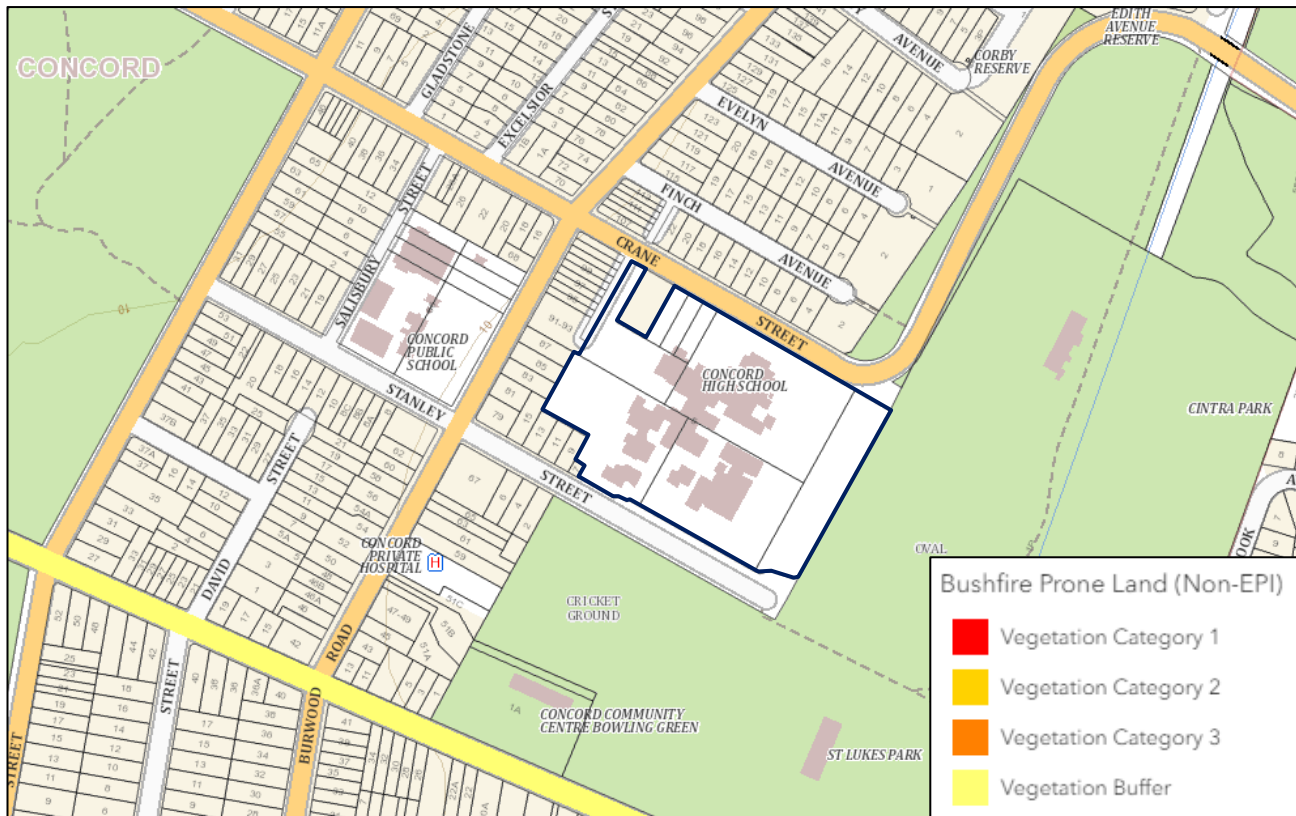


Figure 14: Bushfire Prone Land (Source: ePlanning 2023)

7.7 Biodiversity Conservation Act 2016

The site does not contain any mapped NSW Biodiversity Values, as shown in Figure 15 below. As the site has a minimum lot size of 450m², an area of clearing of 0.25 hectares or more is required to exceed the Biodiversity Offsets Scheme (BOS) threshold.

In accordance with Part 7 of the Biodiversity Conservation Act, the proposal does not require a supporting biodiversity development assessment report because:

- (a) the development is not likely to significantly affect threatened species or ecological communities, or their habitats,
- (b) the development does not trigger any biodiversity offsets schemes with respect to area clearing thresholds; and
- (c) the development is not proposed in a declared area of outstanding biodiversity value.

No further assessment is required.



Figure 15: NSW Biodiversity Values Map (Source: ePlanning 2023)

7.8 Heritage Act 1977

A Statement of Heritage Impact was prepared for the proposed development on behalf of SINSW, referred to above in Section 7.3 and included in Appendix E.

The SoHI confirmed the site is not State heritage listed however it is identified on the Department of Education State Agency Section 170 Heritage and Conservation Register as 'Concord High School grounds' (5064185). Refer to the SoHI for assessment details which confirm the works are supportable and will generate no significant or unacceptable impact to the heritage significance of the site that is identified on the s170 register.

7.9 National Parks & Wildlife Act 1974

The National Parks and Wildlife Act aims to facilitate the conservation of objects, places or features of cultural value within the landscape, including Aboriginal heritage sites.

A Preliminary Indigenous Heritage and Impact Assessment has been prepared (refer Appendix N) to identify whether there is potential for Aboriginal cultural heritage to be impacted by the proposed development at Concord High School. The report outlines the results of a Preliminary Indigenous Heritage and Impact Assessment and meets the requirements of Heritage NSW's Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW.

The assessment confirmed the site is heavily disturbed and further Aboriginal heritage assessment is not required as follows:

The Subject Area has been heavily disturbed as a result of earthworks associated with the construction and demolition of Farleigh Nettheim & Co Tannery, as well the establishment and ongoing use of the school (refer to Section 3.3 of the report). No previously recorded or unrecorded Aboriginal objects, PADs or archaeologically sensitive landforms were identified as a result of the background research or survey of the Subject Area.

In consideration of previous disturbance, the archaeological context, and the significance of the identified Aboriginal sites within the Subject Area, it has been determined that no further investigation is required to inform the Development Application for the proposed works (refer to Section 1.2 of the report).

Notwithstanding the above, the project team must implement the recommendations identified in Section 7 of the assessment including implementation of a chance find procedure for the appropriate management of undiscovered Aboriginal objects or relics.

7.10 Roads Act 1993

The development proposes to improve the Crane Street drop-off/pick-up area to encourage more students to use this facility, with the following traffic calming measures:

- Installation of speed cushions, for controlling the speed of north-westbound traffic around the curve along Crane Street;
- Installation of regulatory and advisory signage, for clearer advisory of the area and advanced warning; and
- Implementation of additional road line marking, for guiding traffic away from the drop-off/pick-up area that may have vehicles stopping.

These works will require consent subject to Section 138 of the Roads Act 1993. Concurrence of the relevant roads authority, in this circumstance being City of Canada Bay Council, is required.

8 Section 4.15 Assessment

8.1 (a)(i) The provisions of any Environmental Planning Instrument

As outlined in Section 7, the proposal has been prepared in light of the relevant environmental planning instruments.

8.2 (a)(iii) The Provisions of any Development Control Plan

The proposal has been prepared having regard for relevant DCP requirements, refer to Section 7.4.

8.3 (b) The Likely Impacts of That Development

Environmental Responsibility and Land Capability

Ecological Values

Vegetation removal is proposed to facilitate the extension of the western car park and development within and surrounding the works footprint. The site does not contain mapped LEP or NSW biodiversity values and tree retention has been prioritised throughout design development stages.

The design has considered and sought to retain and limit the removal of trees where possible, based on the arborist advice provided in Appendix L and heritage advice provided in Appendix E. The proposed landscape design provides a positive connection with the natural environment and will assist in strengthening the ecological values of the site.

Scenic Values

The Design Verification Statement attached in Appendix Q provides a comprehensive response to the design quality principles in the T&I SEPP. The Statement confirms the development is well designed and will contribute to the scenic values of the site:

The built form of the school has been designed with meticulous attention to detail, resulting in an aesthetically pleasing composition of elements that enhance the surrounding neighbourhood and create a positive impact on the quality and character of the locality.

One of the key elements of the school's design is its proportion. The buildings are designed to be in harmony with each other and the surrounding landscape, creating a sense of balance and coherence. The use of scale and proportion has been carefully considered to ensure that the buildings do not overwhelm the surrounding area, but rather blend in seamlessly with the environment.

The outdoor spaces have been carefully planned to ensure that they are functional, comfortable, and aesthetically pleasing. The combination of the buildings and the landscape creates a sense of unity that is both visually appealing, practical and inclusive for all. Particular attention has been paid to strengthening the Connection to Country through the design process.

The use of materials such as brick and fibre cement sheeting adds warmth and texture to the buildings and reinforces the connection between the school and its natural surroundings.

Streetscape Character Analysis

Stanley Street is largely defined in the west by single dwelling residential development of one to two storeys in height which extends to three storeys within the residential flat building on the corner of Burwood Road and Stanley Street. The eastern end of Stanley Street supports single dwelling development, Concord High School and public open space elements including St Luke's Oval and Cintra Park. A row of mature heritage listed Fig trees line the southern sides of Stanley Street with figs also retained along the northern side which will be retained as a result of the proposed works. The prevailing character of Stanley Street is identified in Figure 16.

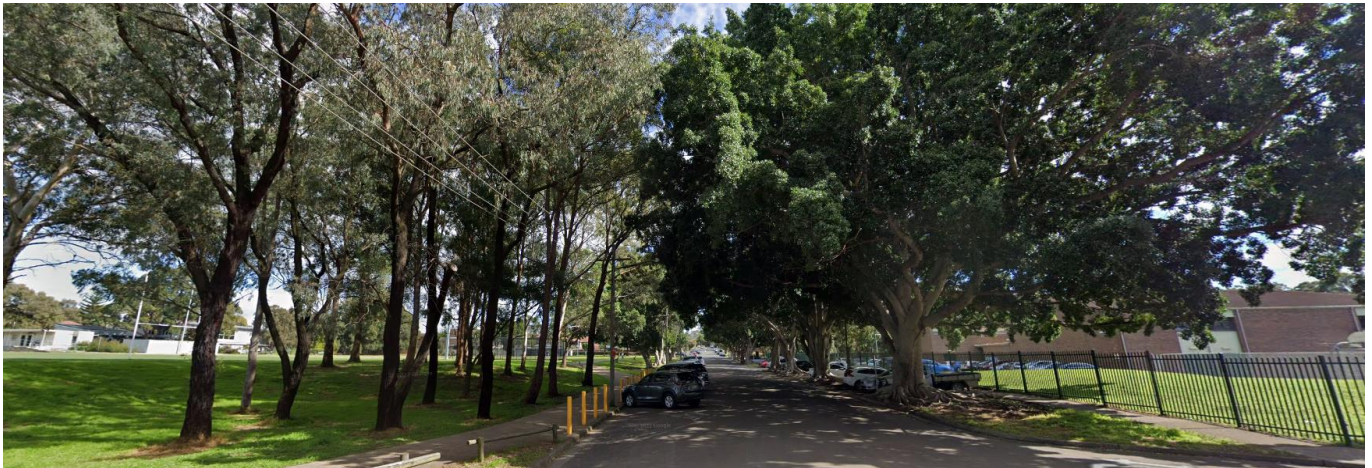


Figure 16: Looking west on Stanley Street – Concord High School to the right of frame (Google Streetview, 2020)

Crane Street to the north of the site supports a mix of single dwelling residential development and taller residential flat buildings of three storeys in height. A defined tree canopy is evident along the northern boundary of the school site with mature street trees also scattered along the northern side of the Crane Street road reserve. A large at-grade car park exists to the north east of the site servicing St Luke's Oval and surrounds. The prevailing streetscape character of Crane Street is identified in Figure 17.



Figure 17: Looking west on Crane Street – Concord High School to the left of frame (Google Streetview, 2020)

The development design has been undertaken with consideration of the site context and surrounding development. The development footprint is suitably separated from the nearest residential development in Stanley Street and will be screened by mature street trees located within the road reserve. This is illustrated in street view images above which identify the defined tree lines that largely obscure the site from surrounding development.

Views of the site and proposed new buildings from development to the north of the school site will be almost entirely obstructed by dense, existing boundary vegetation along Crane Street. The proposed vegetation removal in the north east of the site will not impact the existing line of vegetation along Crane Street and therefore visual obscurity of the southern fringe of the site will largely be retained. Given the level of visual obscurity from development to the north, the development will generate no adverse impacts to the scenic values of the site or the streetscape character.

Additionally, the high quality design responds to the character and scenic landscape of the area, utilising suitable articulation and a materials palette that is consistent with existing site aesthetics. Accordingly, it is considered that the architectural design will assist with high quality improvements to the scenic values of the school and the locality.

Acoustic Impact

A Noise and Vibration Impact Assessment has been prepared by Acoustic Studio and attached in Appendix S. The assessment sought to identify noise sensitive receivers and confirm the construction and operation of the development can achieve relevant noise criteria.

An extract from the Noise Sensitive Receivers Map from Appendix S is provided at Figure 18. Attended measurement locations are identified as A, B, C and D. Noise loggers were installed in the north of the site adjacent to Crane Street and the south west of the site adjacent to Stanley Street. Residential development is identifiable in the map to confirm the sensitive receivers surrounding.

The assessment confirmed that noise emissions from proposed Blocks X, Y and Z are predicted to comply with the relevant project noise emission criteria and therefore the development is not expected to generate adverse noise impact on noise sensitive receivers surrounding the site. Notwithstanding, where the Hall is used for Out of Hours Use when the adjacent St Luke's Oval is also used, it was recommended that windows and doors to the hall are to be kept closed to mitigate noise impact.

Mechanical plant and equipment associated with the operation of the development will be controlled to ensure external noise emissions are not intrusive and do not impact on the amenity of neighbouring receivers in accordance with the relevant criteria.

Acoustic engineers confirmed that no potentially sensitive receivers at or surrounding the site have been identified as having particularly vibration sensitive equipment. Final details of the vibration management controls required for the works would be determined when a CEMP is prepared by the Contractor.

Detailed mitigation measures are provided in the assessment to mitigate acoustic impacts to surrounding receivers. A Construction Environmental Management Plan will need to be prepared by the engaged contractor at Crown Certificate stage to further detail development and plant specific acoustic mitigation measures.

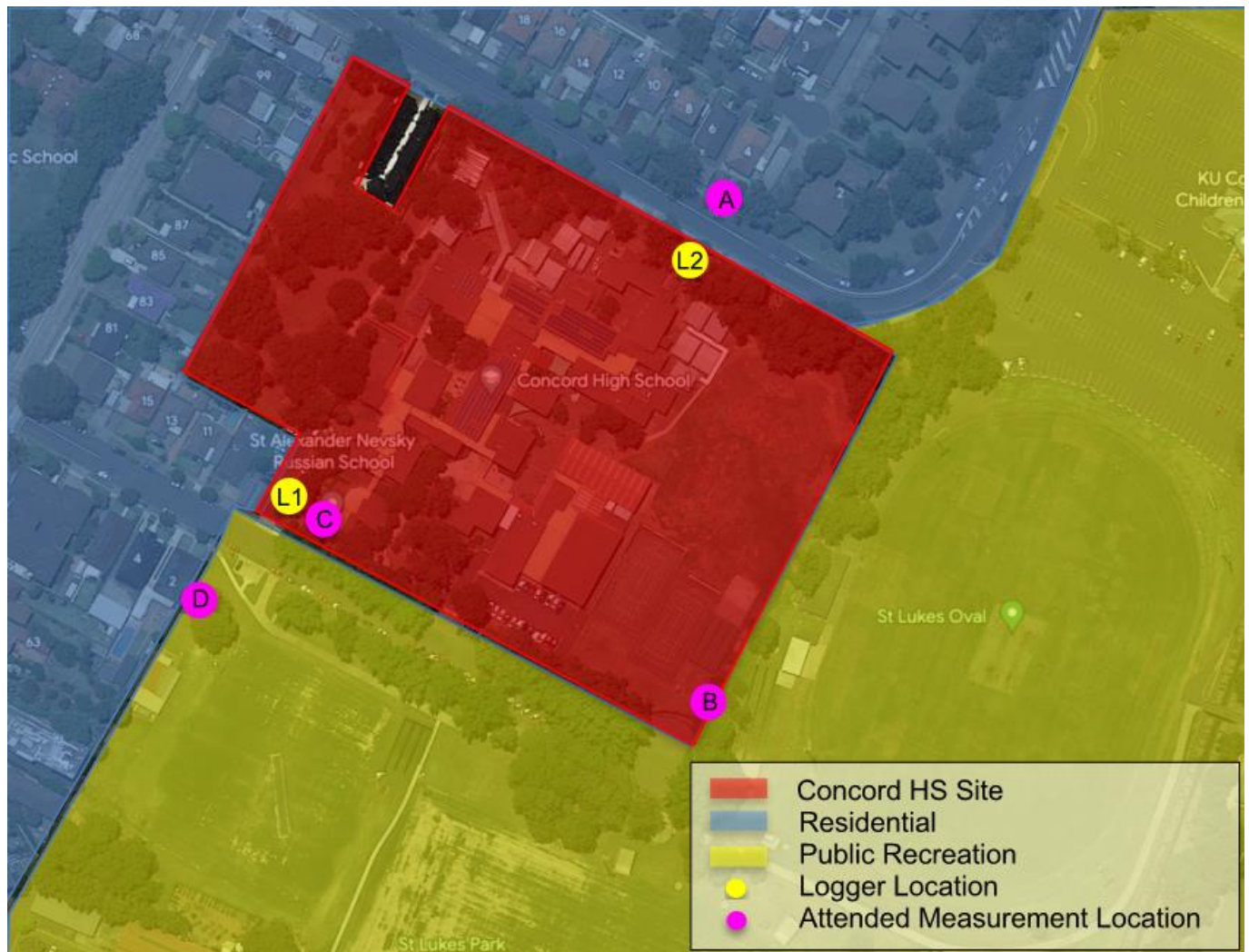


Figure 18: Extract from Noise and Vibration Impact Assessment Mapping (Acoustic Studio, 2023)

Erosion Prevention and Sediment Control

Appropriate erosion and sediment control measures will be in place during construction.

Refer to the civil engineering documentation attached in Appendix B for further details.

Energy Efficiency / Sustainability

The proposed design utilises a range of energy efficient and sustainable features, including utilisation of natural sunlight and ventilation through building design, material choices, encouragement of sustainable transport choices through bicycle storage infrastructure, and the implementation of photovoltaic panels atop the roof of the new Block Y school building.

The facilities have been designed to minimise energy and water consumption, reduce waste and encourage recycling. The design also incorporates durable and sustainable materials and finishes to extend the design life of the built form.

Overshadowing

Shadow diagrams have been prepared and included in the architectural package attached in Appendix A and reproduced in Figures 19- 21 below.

At 9am shadows are cast to the south within Stanley Street and a small portion of St Luke's Oval as shown in Figure 19. Note the proposed works are unlikely to exacerbate shadowing of St Luke's Oval given the existence of mature street trees that already cast shadows in this area. The proposal does not generate shadowing of any residential or commercial development.

At midday the development casts shadows almost wholly within the Stanley Street road reserve as evident in Figure 20. The proposal does not generate shadowing of any residential or commercial development.

At 3pm the proposal shadows are accommodated within the Stanley Street road reserve and a small portion of St Luke's Oval to the east of the site (refer to Figure 21). This afternoon shadowing of the western fringe of St Luke's Oval is considered to be appropriate given the public open space achieves full sun through to the early afternoon. The minor additional shadowing will not jeopardise the use or amenity of the public open space and it is considered that the proposed design represents a considered response to the site and surrounding development.

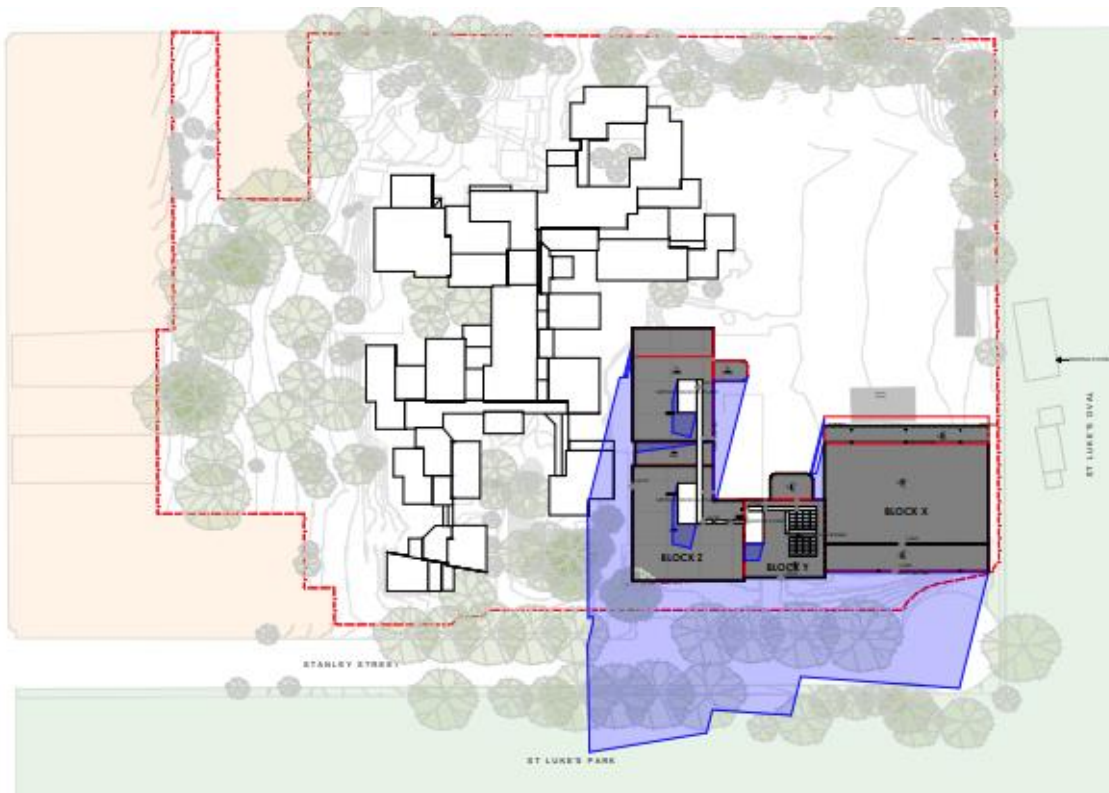


Figure 19: Shadows (9am – 21 June)

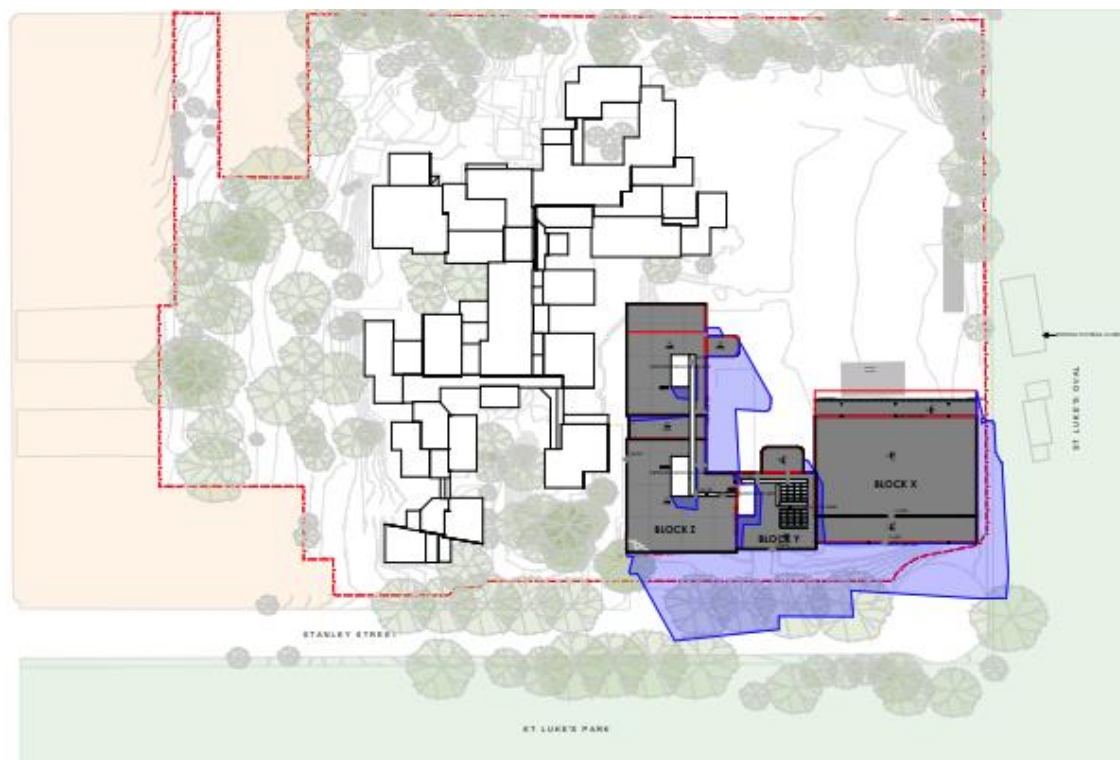


Figure 20: Shadows (12pm – 21 June)

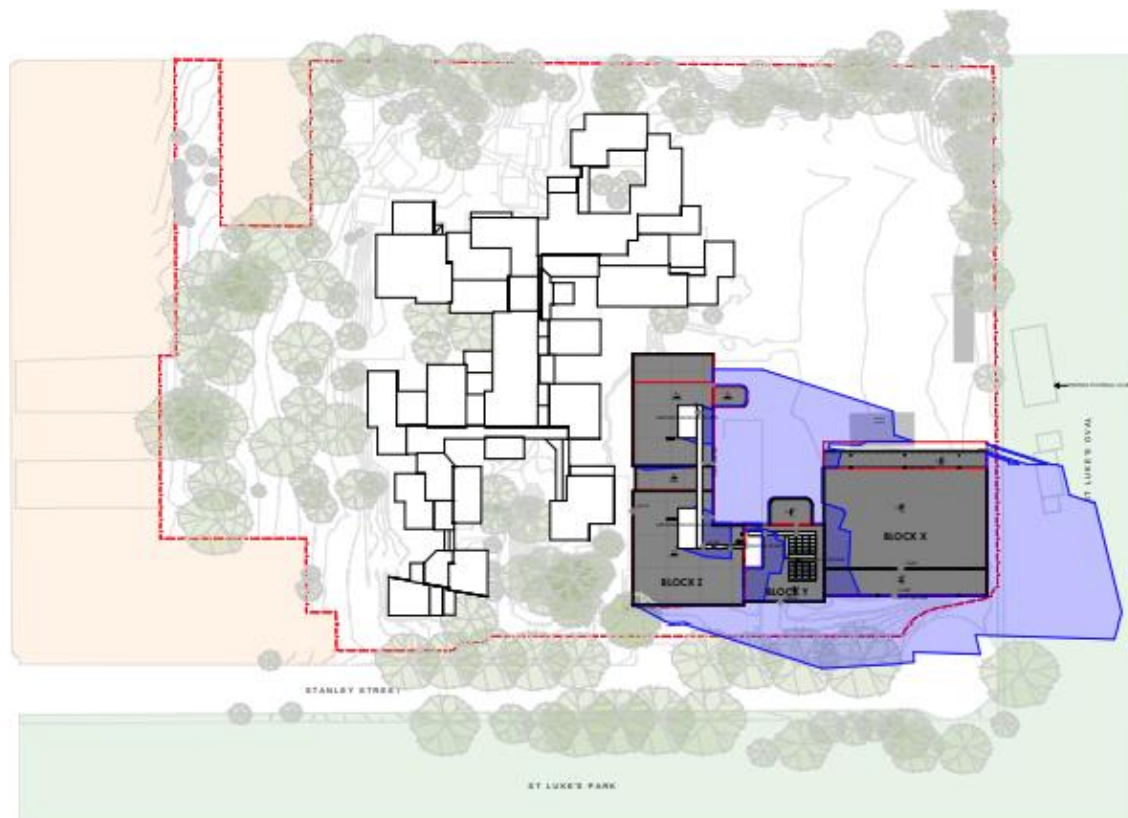


Figure 21: Shadows (3pm – 21 June)

Privacy

Proposed new buildings (Blocks X, Y and Z) are located in the south east of the site in an area that bounds Stanley Street and St Luke's Oval. The nearest residential development is located approximately 90m from the building footprint at No 2 Stanley Street. The proposed development will be almost entirely obscured from this residential dwelling due to the mature tree line that exists on either side of Stanley Street.

Further the architectural design utilises features on the western and southern elevations such as louvres which will maintain an aesthetically pleasing building façade and allow natural lighting and ventilation, whilst minimising privacy issues between the school, nearby residences, and the public domain.

Street view images from Stanley Street and Crane Street are provided in Figures 22 and 23 respectively below depicting views to the development footprint. Figures confirm the school is bordered by a mature tree canopy that will ensure the works will not generate any privacy impacts to surrounding development.



Figure 22: Google streetview image – looking east to the development footprint on Stanley Street



Figure 23: Google streetview image – looking east to the site on Crane Street. Note development footprint in the south west of the site will be entirely obscured.

Social Impact & Economic Impact

The proposed development is likely to generate both positive social and economic impacts for the local and wider community. The upgrades to the school will both expand its staff and student capacity and enhance the quality of its educational outcomes. This will accommodate a growing population in the local area in line with relevant strategic policies and plans, which anticipates growth in the number of families with children in the Canada Bay area.

Upgraded school facilities and diverse outdoor environments will provide for a high quality of learning and allow for future development opportunities. These benefits are likely to generate positive social and socio-economic benefits for students, staff and the wider community who will continue to have the opportunity to utilise joint share facilities within the site.

The demolition and construction works will provide short-term employment opportunities to those in the construction industry and qualified tradespeople, benefitting those in the local area and beyond. The operational increase in staff will provide new employment opportunities for those working in the education sector.

Refer to Section 10 for further social impact assessment.

Heritage

The Concord High School grounds are identified as heritage listed in Schedule 5 of the LEP. The site is also identified on the NSW Government Section 170 heritage register. Refer to Section 7.3.3 of this report and Appendix E for detailed assessment of heritage significance and impacts.

A Preliminary Indigenous Heritage and Impact Assessment has been prepared (refer Appendix N) to identify whether there is potential for Aboriginal cultural heritage to be impacted by the proposed development at Concord High School. The report outlines the results of a Preliminary Indigenous Heritage and Impact Assessment and meets the requirements of Heritage NSW's Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW.

The assessment confirmed the site is heavily disturbed and further Aboriginal heritage assessment is not required as follows:

The Subject Area has been heavily disturbed as a result of earthworks associated with the construction and demolition of Farleigh Nettheim & Co Tannery, as well the establishment and ongoing use of the school (refer to Section 3.3 of the report). No previously recorded or unrecorded Aboriginal objects, PADs or archaeologically sensitive landforms were identified as a result of the background research or survey of the Subject Area.

In consideration of previous disturbance, the archaeological context, and the significance of the identified Aboriginal sites within the Subject Area, it has been determined that no further investigation is required to inform the Development Application for the proposed works (refer to Section 1.2 of the report).

Notwithstanding the above, the project team must implement the recommendations identified in Section 7 of the assessment including implementation of a chance find procedure for the appropriate management of undiscovered Aboriginal objects or relics.

Infrastructure and On-site Services

The site is serviced by power, telecommunication, reticulated sewer and water services.

The proposed development includes upgrades to stormwater drainage and the construction of additional on-site stormwater detention. The Stormwater Management Plan provides details on proposed stormwater drainage and detention (refer to Appendix B).

OSD 1 will be installed adjacent to Block X and discharge to an existing pit in Stanley Street.

OSD 2 will be installed adjacent to new sports courts in the north of the site. OSD 2 will discharge to an existing pit in Crane Street.

OSD 3 will comprise an above ground basin within the existing western car park proposed for extension.

Design engineers have provided certification that the proposal complies with:

1. The NSW Department of Education's Educational Facilities Standards and Guidelines (EFSG), excluding the departures listed in the EFSG departures schedule.
2. Australian Rainfall and Runoff (ARR): A Guide to Flood Estimation, 2019, Commonwealth of Australia.
3. Managing Urban Stormwater: Soils and Construction Vol 1, 4th Edition, dated March 2004.
4. Australian standard AS3500.3-2021 Plumbing and Drainage, Part 3: Stormwater Drainage.
5. City of Canada Bay Council's Specification for The Management of Stormwater, Appendix 2 - Engineering Specifications, and Rainwater Reuse Policy.
6. Accepted engineering practice and principles.

The site is not located within the Oil and Gas Pipeline Corridor nor is it within the notification zone (approximate 66m buffer from notification zone). Refer to Figure 24 below for confirmation.



Figure 24: Extract from Oil and Gas Pipeline Mapping

Transport, Access and Parking

A Transport and Traffic Assessment (TaTA) has been prepared in support of the development (refer to Appendix M). The assessment quantified projected traffic impacts and parking requirements and confirmed the proposed development, inclusive of the demolition of the existing south eastern car park

and extension of the existing western car park, could suitably accommodate the parking needs of the school.

To understand the existing transport conditions and behaviours on the surrounding road network servicing the school, pedestrian and traffic surveys were undertaken around the school on Tuesday, 30 March 2023 (outside of school holidays). As part of the surveys, pedestrian counts were obtained around the School access gates and intersections to inform the recommendations provided in the School Transport Plan (refer Appendix T). Further, to understand the utilisation of public on-street and off-street parking around the school, PTC Traffic Engineers facilitated a parking occupancy survey between 10-11am (and 4-5pm in Cintra Park Netball Court car park) on 8th (Tuesday) 9th (Wednesday) and 10th (Thursday) November 2022. Key findings are summarised as follows:

- *The combined average occupancy rate at the Cintra Car park is 10%, leaving 90% of the car park (approximately 325 spaces) available for use during school hours.*
- *Stanley street is close to being fully occupied during our survey hours.*
- *The surrounding roads (Burwood Road, Finch Avenue & Gipps Street) have space capacity, which could be utilised by staff.*
- *Cintra Hockey Complex car park has been found to be fully occupied during the morning hours, though it is noted that the vehicles seem to be related to the Concord Oval construction. It is therefore possible that following the construction, this car park would become more vacant.*
- *Concord Community Centre car park is about 50% occupied; however parking at this car park is restricted for authorised vehicles only.*

The TaTA identified four primary changes that will assist with traffic or access that are proposed or will be implemented:

- *Changes to the enrolment catchment for Concord High School which will see the catchment area reduced by approximately 40-50%. This will influence student travel behaviour as students will reside closer to the school with active transport more likely to be adopted.*
- *Removal of driveways and the south eastern car park accessed from Stanley Street;*
- *Reactivation of a pedestrian gate providing access to Crane Street in the north east of the site. This will increase connectivity options and assist in dispersing students across the school grounds to avoid crowding in Stanley Street.*
- *Bicycle (136 spaces) and scooter (32 spaces) parking for students and 16 bicycle spaces for staff will significantly reduce the reliance on vehicle travel and allow the school to better manage vehicle pick up/ drop offs.*

The TaTA confirmed the Canada Bay DCP 2023 contains no bicycle or parking rates for educational establishments. Accordingly, and with respect to parking requirements, the assessment confirmed the following:

- *When applying the current staff to car parking number ratio, 29 spaces would be required to be provided on-site, while 33 staff vehicles would seek to park within the surrounding parking spaces.*
- *It should be noted that based on the off-site car parking occupancy surveys (refer to Section 3.5 of the TaTA), there is some availability of unrestricted parking for staff within the surrounding parking areas.*
- *As per the School Transport Plan, the school will implement measures to encourage staff to use active and public transport to travel to and from school.*

Section B3.4 of Part B – General Controls within the DCP stipulates that a Class 9b School building as defined within the BCA is to provide parking spaces for people with disabilities at the rate of at least one car space per 100 car spaces.

The proposed staff car park accommodates 1 accessible car parking space, which is in accordance with the DCP requirement.

Based on all the above, it is considered that the proposed provision of 29 car parking spaces on-site, in combination with the off-site space availability, will be sufficient to service the staff car parking demand.

Note provision of additional parking on the site would also impact compliance with the 10m² requirement for each student as defined in the NSW Education Facilities and Standards Guidelines.

A School Transport Plan (STP) has been prepared and attached in Appendix T. The STP has been prepared based on the new School enrolment catchment and capacity and outlines measures to promote active and sustainable transport. It also sets out the active and public transport methods as well as drop-off / pick-up arrangements for daily school operations.

The Transport Actions identified in Section 5 of the STP will guide the implementation of sustainable travel modes within the catchment and assist in the management of car dependant students and staff. School transport operations are defined in Section 4 of the TSP which will guide day to day operational measures within the site.

Amenity

The proposal uses an integrated architectural and landscaping design which will make a positive contribution to the desired streetscape and amenity of the area.

The unique location of the site and development footprint, bounded by local roads and the open space precinct to the south and east, ensures the proposal will not generate overshadowing or privacy impacts to surrounding development.

8.4 (c) The Suitability of the Site for the Development

The Statement of Environmental Effects has determined that there are no constraints that would restrict the development proposed. The existing school site is therefore suitable to accommodate the alterations and additions proposed.

8.5 (e) Public Interest

The public interest is best served by promoting sustainable development that is rational, orderly and economic. The proposal will generate positive social, environmental and economic benefits.

Accordingly, the proposal is considered to be in the public interest.

9 Crime Prevention Through Environmental Design Review

The purpose of this Crime Prevention Through Environmental Design (CPTED) Review is to consider the potential crime risk caused by the proposed alterations and additions to Concord High School, and to identify proactive and preventative building design measures to minimise opportunities for crime. This CPTED Review has considered the NSW Department of Education Scope of Works for the Security System at Concord High School and provides recommendations consistent with the Departments standards.

The sections below have been prepared in accordance with the CPTED guidelines prepared by the NSW Police in conjunction with the Department of Planning.

CPTED provides a clear approach to crime prevention and focus on the '*planning, design and structure of cities and neighbourhoods*'. The main aim of the policy is to:

- limit opportunities for crime; and
- manage space to create a safe environment through common ownership and the encouraging of the general public to become active guardians; and
- increase the perceived risk involved in committing crime.

The guidelines provide four key principles in limiting crime. These are:

1. Surveillance;
2. Access control;
3. Territorial re-enforcement; and
4. Space/activity management.

BRS has inspected the site and undertaken a preliminary review of the proposed architectural design against these guidelines. The assessment of the development considers these principles to recommend preferred design outcomes.

9.1 Crime Statistics

Table 8 shows the threat levels in Concord and City of Canada Bay, for crimes relevant to the school alterations and additions. BOCSAR data ranks crime rates out of 5 levels, from one being the lowest and five being the highest. Table 8 identifies all crimes as having lowest level rates in Concord and Canada Bay LGA, with the exception of motor vehicle theft and steal from motor vehicle which is identified as a low rate in the City of Canada Bay LGA.

Table 8: Rates of certain crimes within Concord and City of Canada Bay

Level of Crime	Crime Type by Location	
	Concord	City of Canada Bay
HIGHEST LEVEL CRIME	No relevant crimes	No relevant crimes
HIGH LEVEL CRIME	No relevant crimes	No relevant crimes
MEDIUM LEVEL CRIME	No relevant crimes	No relevant crimes
LOW LEVEL CRIME	No relevant crimes	Motor vehicle theft Steal from motor vehicle
LOWEST LEVEL CRIME	Steal from motor vehicle Robbery Steal from person Assault (non-domestic) Break and Enter (non-dwelling) Motor vehicle theft Malicious damage to property	Assault (non-domestic) Robbery Break and Enter (non-dwelling) Steal from person Malicious damage to property

9.2 CPTED Principles

9.2.1 Surveillance

Natural surveillance opportunities are created through the provision of areas from where people (students, staff or the general public) can overlook public / communal areas and identify out of the ordinary or anti-social behaviour. This will be important after school hours when teaching staff will not be present.

Crime targets can be reduced by providing opportunities for effective surveillance, both natural and technical'.

From a design perspective, 'deterrence' can be achieved by:

- clear sightlines between public and private places;
- effective lighting of public places; and
- landscaping that makes places attractive, but does not provide offenders with a place to hide or entrap victims.

Positive surveillance features of the development include:

- Proposed buildings X, Y and Z are orientated to Stanley Street and glazing will provide high quality natural surveillance of the street frontage;
- The car park extension in the west of the will be visible from the streetscape; and
- Installation of CCTV in accordance with the NSW Department of Education standards.

Table 9 lists potential 'surveillance' issues and recommended strategies to minimise crime risk.

Table 9: Surveillance issues and recommendations

Surveillance Issues	Recommendation
Perimeter	<ul style="list-style-type: none"> • Minimise density of planting around the perimeter of the site to maintain clear sightlines.
Entrances	<ul style="list-style-type: none"> • All entrances should have the ability to be well lit at night especially in alcoves and corners.
Landscaping	<ul style="list-style-type: none"> • The planting proposed in the Landscape Plan should not obstruct surveillance along road frontages and site perimeters. • Landscaping should be free from obstructions and allow clear sightlines along designated pedestrian paths. • Clear sightlines should be maintained within areas of mature tree planting. • Vegetation should be low (below 700mm) in areas where offenders could easily hide. • Landscaping should not impede opportunities of natural surveillance of lobby and building entries. • Foliage density should be effectively maintained to promote active surveillance from residents. • Any vegetation or debris on pathways must be removed to maintain the sightlines required for crime preventing surveillance.
Car Parking	<ul style="list-style-type: none"> • Minimise density of planting in areas surrounding car park entries to maintain clear sightlines. • The car park and access points should have the ability to be well lit at night.

Surveillance Issues	Recommendation
Lighting	<ul style="list-style-type: none"> • Lighting should be vandal resistant. • Lighting should satisfy the relevant Australian standard. • Effective illumination at ground level should reduce any opportunity for shadowing along pedestrian access points. • Identification/ numbers on buildings should have the ability to be illuminated to promote site identification.
CCTV cameras	<p>As per the NSW Department of Education CCTV Systems Specification, CCTV will be installed at the following locations:</p> <ul style="list-style-type: none"> • Sick bay (clinic) where it is deemed necessary to provide for effective supervision of the clinic from Administration. • Public Reception. A camera will monitor the reception desk and display to a dedicated monitor in the Public Reception area to discourage inappropriate behaviour. • External areas, to provide wide angle vision of any gates or external doors fitted with electronic access controls which include a video intercom unit if necessary.
General Recommendations	<ul style="list-style-type: none"> • Signs should be erected in areas which are restricted prohibited or under surveillance to discourage criminal or anti-social activity.

9.2.2 Access Control

Access Control can be defined as physical and symbolic barriers that are used to '*attract, channel or restrict the movement of people*'.

Effective access control can be achieved by creating:

- landscapes and physical locations that channel and group pedestrians into target areas;
- public spaces which attract, rather than discourage people from gathering; and
- restricted access to internal areas or high-risk areas (like car parks or other visited areas). This is often achieved through the use of physical barriers.

Positive access control aspects of the design include:

- Security fencing and gates will be implemented in accordance with NSW Department of Education standards to maximise control of access; and
- An Intruder Alarm System will be installed as per the Department of Education SSU Specifications & Installation Guidelines.

Table 10 lists potential 'access control' issues and recommended strategies to minimise crime risk.

Table 10: Access control issues and recommendations

Access Control Issues	Recommendation
Perimeter	<ul style="list-style-type: none"> • Secure fencing should be constructed to prevent access from neighbouring properties. • These areas should be regularly inspected by maintenance staff to ensure fencing remains fit for purpose. • Tubular Steel Security Fencing and gates must be manufactured

Access Control Issues	Recommendation
	and installed to comply with the fencing specifications as per Education Facilities Standards & Guidelines - SG242.3.11 unless specified otherwise. The spacing between the palisades is not to exceed more than 100mm.
Intruder Alarm System	<ul style="list-style-type: none"> The new alarm system must be installed as per the NSW Department of Education SSU Specifications & Installation Guidelines.
Landscaping	<ul style="list-style-type: none"> Avoid planting large trees adjacent to buildings to prevent use of 'natural ladders' for access to roofs.
General Matters for Consideration	<ul style="list-style-type: none"> Ensure all doors and windows are secured after hours. All glass should be reinforced. Predetermine and designate escape routes and safe areas for staff and students to move to when required. Ensure that staff members are aware of security and armed robbery procedures and what to do in the case of such an event. This routine should be regularly practiced as with any other type of emergency drill. Make use of signage and stickers promoting security measures such as: CCTV surveillance. Fully secure all external doors and windows with good quality locking devices. Make sure they are regularly maintained. All doors should be of solid construction and well fitted.

9.2.3 Territorial Reinforcement

Territorial reinforcement can be achieved by enhancing 'community ownership of public space' as it sends positive signals and reduces opportunities for crime.

Effective territorial reinforcement and community ownership can be achieved by creating:

- design that encourages people to gather in public space and to feel some responsibility for its use and condition;
- design with clear transitions and boundaries between public and private space; and
- clear design cues on who is to use space and what it is to be used for.

Care is needed to ensure that territorial reinforcement is not achieved by making public spaces private spaces, through gates and enclosures.

Positive territorial reinforcement aspects of the proposal include:

- Security fencing and signage acts to provide an observable definition between the public road reserve and the school site; and
- The staff car park is easily identifiable and signage will be retained to confirm this area is accessible by staff only.

Table 11 lists potential 'territorial reinforcement' recommendations to minimise crime risk

Table 11: Territorial reinforcement issues and recommendations

Territorial Reinforcement Issues	Recommendations
Perimeter and paving	<ul style="list-style-type: none"> Clear distinction between street footpath and internal site landscape treatment should be achieved to ensure the boundaries of the site are observable.
Neighbouring properties	<ul style="list-style-type: none"> Maintain quality fencing to restrict access from neighbouring properties.
Way Finding	<ul style="list-style-type: none"> Provide clear signage for pedestrians and motorists. Clearly identify entry and exit points. Maintain the public address system to assist with security and management of emergencies.
General Recommendations	<ul style="list-style-type: none"> Install the monitored security alarm system discussed above. Prominently display any signs indicating the presence of a security system, the continual surveillance of the premises and any other security measures present. Consider installation of security bars or roller shutters to vulnerable windows and / or skylights, subject to BCA compliance.

9.2.4 Space Management

Space management 'ensures that space is appropriately utilised and well cared for'. Strategies include activity coordination, site cleanliness, rapid repair of vandalism and graffiti and the replacement of decayed physical elements.

Table 12 lists potential 'space management' recommendations to minimise crime risk. The objective should be to minimise the perception of urban decay by maintaining clean and undamaged areas to minimise the fear of crime and avoidance behaviour.

Table 12: Space management issues and recommendations

Space Management Issues	Recommendations
Waste storage	<ul style="list-style-type: none"> Garbage bins and waste storage receptacles should be regularly emptied to prevent overflowing rubbish.
Graffiti	<ul style="list-style-type: none"> Remove graffiti as quickly as possible to minimise potential for cumulative graffiti and vandalism actions. Shrub planting to prevent graffiti on blank walls.
Toilets	<ul style="list-style-type: none"> Toilets should be regularly maintained and kept clean at all times. Install vandal resistant lighting where applicable. Lighting should be consistent and even to maximise visibility. Consider installing vandal proof lighting.
Lighting Repair	<ul style="list-style-type: none"> The management regime should ensure that lighting is repaired as soon as possible after any lighting failure or damage.
Cleanliness and Maintenance	<ul style="list-style-type: none"> The site is kept clean and tidy at all times. Clear all building perimeters including fences of rubbish and

Space Management Issues	Recommendations
	potential climbing aids.

9.3 CPTED Conclusion

Our review of the proposal in accordance with the CPTED principles confirms that the development can be managed to minimise the potential risk of crime and a re-design of the proposal is not required.

Note the recommendations provided above can be relied on as guide for security management across the site.

10 Social Impact

10.1 Demographic and Overview

10.1.1 Population and Households

Figure 25 identifies anticipated changes to population, households and dwellings in the Canada Bay LGA from 2021 to 2041. The table confirms the following:

- Population is expected to increase by over 35%.
- An additional 15,908 households are expected to be seeking housing in the LGA by 2041.
- An Additional 16,161 dwellings are expected to be constructed by 2041 to service anticipated population growth.

City of Canada Bay Council	Forecast year				
Summary	2021	2026	2031	2036	2041
Population	89,640	100,126	111,473	119,400	126,691
Change in population (5yrs)	--	10,486	11,347	7,927	7,291
Average annual change	--	2.24%	2.17%	1.38%	1.19%
Households	36,033	40,737	45,863	49,046	51,941
Average household size	2.46	2.43	2.40	2.41	2.41
Population in non private dwellings	1,122	1,207	1,292	1,377	1,377
Dwellings	39,080	43,314	48,844	52,200	55,241
Dwelling occupancy rate	92.20	94.05	93.90	93.96	94.03

Figure 25: Extract from Forecast ID – Population, households and dwellings (2023)

10.1.2 Population Forecast

As evident in Figure 26, Forecast ID confirms the population of the Canada Bay LGA is expected to increase from 93,369 in 2023 to 126,691 in 2041 which represents an increase of 35.69%

Forecast population

export 

City of Canada Bay Council

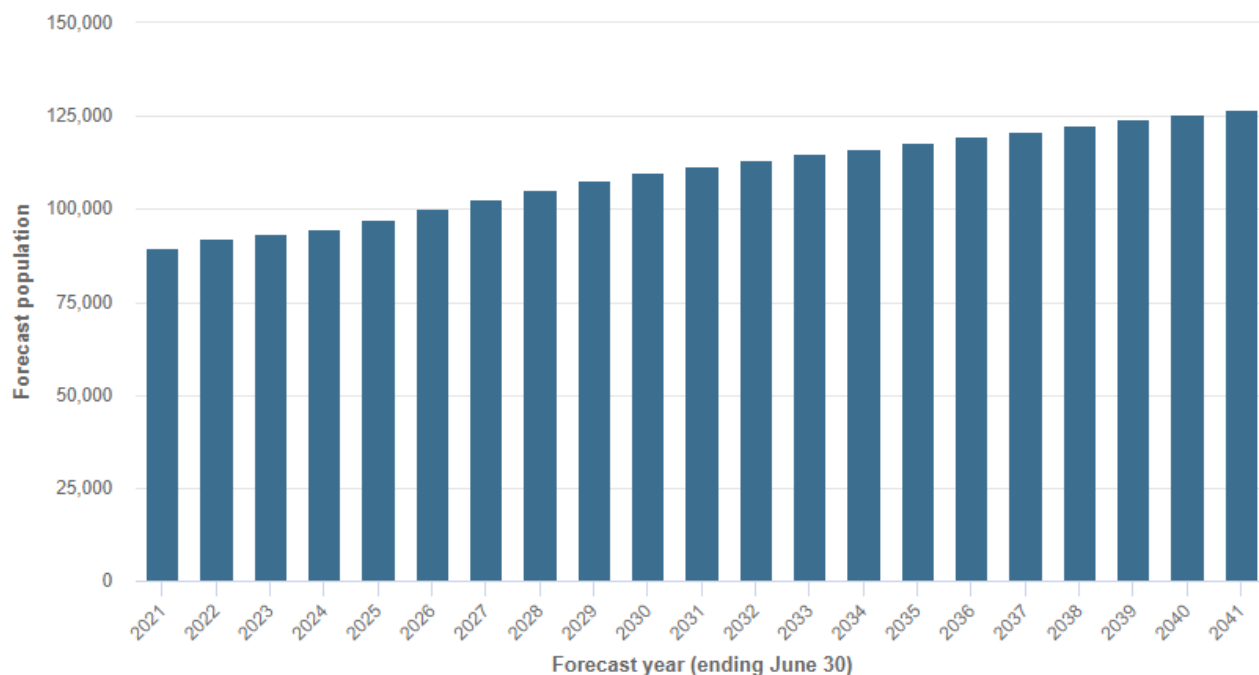


Figure 26: Extract from Forecast ID – Canada Bay LGA Population (2023)

10.2 Stakeholder Consultation

Consultation has occurred with a number of stakeholders including the following:

- Students, teachers and principal at the school;
- Parents, guardians and carers of children at the school;
- City of Canada Council within the formal Pre-DA Meeting and other informal meetings.

Project Reference Group (PRG) meetings occurred regularly from March 2022. Community representatives joined from July 2022 which included 3 parents.

Planning/Project updates were provided as follows:

- July 2022 – how SINSW upgrade schools.
- August 2022 – invitation to information session.
- 29 August 2022 – when will the upgrade be complete, proposed masterplan ready.
- September 2022 – the design process and identification that the project is in the concept design phase.
- November 2022 – key themes from the survey, accessibility, parking, connecting to country, covered areas, easy maintenance, effective space, green space and landscaping, modern technology rich and aesthetically pleasing.
- February 2023 – business case submitted, update on project.

An Information session was held on 18 August 2022 which included a presentation of the master plan and survey with approximately 100 students followed by a staff and parent session.

Information Boards were provided on 18 August 2022 identifying the proposed master plan and progress update, how we build schools, dotmocracy survey and survey link to give opinions on the priorities for the school.

A Student Voice Survey was undertaken by the school which was focused on the following development questions:

1. Areas of the school that the students felt should be preserved.
2. Spaces in the school that could be added or would benefit from an upgrade.
3. Aspects of the school buildings/ spaces that should be removed.

Consultation with City of Canada Bay was also undertaken via a formal Pre-DA Meeting held on 16/03/2023 and other informal meetings in July and October 2022.

10.3 Social Impact Assessment

10.3.1 Location and Land Use

The site is zoned R3 Medium Density Residential and meets the objectives for the council's future planning character for this area. The addition of new facilities will provide for an increase of 25 students and 6 staff in an area experiencing significant population growth.

The location of the school allows opportunities for private car usage and public transport options for students and parents. The site is primarily accessed by Crane and Stanley Streets, with several public bus stop locations situated in immediate walking distance.

Potential adverse impacts on neighbouring properties are limited due to the site's location adjacent to a significant public open space precinct to the south and south east. The works will generate no overshadowing or privacy impacts and the changes introduced by the minor increase in student numbers is unlikely to generate any unacceptable acoustic or additional amenity impacts.

The proposal will generate beneficial effects on the public domain through significant improvements to landscaping and site access with the future removal of demountables noted as a significant benefit for the site.

10.3.2 Access to Educational and Social Infrastructure

The current school has the ability to cater for 1,335 students and 89 staff. With the population expected to increase in the Canada Bay LGA by 35.69% from 2036 to 2041 and associated adjustments to the catchment area, there are clear signs that existing educational infrastructure will need to be modified and expanded to cater for existing and additional students. The minor increase in student numbers will assist in meeting future demand.

10.3.3 Demographic and Population Change

The redevelopment is not expected to have a significant impact on demographic or population change. ABS statistics indicate that the area is already a highly diverse local government area with 36.1% of residents born overseas.

According to ABS Census 2016 data, high levels of households with children (52.1% of all households) indicate a distinct family demographic in the Concord area, and an increase in educational facilities and opportunities will facilitate this.

10.3.4 Economic Impacts

It is expected that local trade professionals will be utilised in the construction phase of the development where possible to create a positive outcome in the short to medium term. It has been estimated that sixty (60) construction jobs and six (6) full time equivalent positions will be generated by the works. Potential opportunities for further teaching and support staff recruitment in the future will also have a positive economic impact for the local community following construction.

No attributed negative economic impacts are expected from the additional school buildings and redevelopment.

10.3.5 Accessibility

The development will be required to be designed in accordance with the relevant Building Code of Australia (BCA) standards for accessibility. An Access Report has been prepared and attached in Appendix R. The opportunity for additional accessibility measures in the new development will have a positive impact on the local community.

Existing public access to the school along Crane and Stanley Streets will be maintained. Minor impacts are expected to the access of the site during the construction phase however will be mitigated through the implementation of a construction management plan and continued communication channels between contractors, school management, parents and the local community.

10.3.6 Amenity of Local Area

Concord is a well-established suburb with a distinct character and amenity, including access to public transport, open spaces, and community facilities. Over time the suburb has had to adapt to population, demographic, and regulatory changes. Some of the catalysts for change include:

- Intensification of housing;
- Significant population growth;
- Identification of Concord as a Strategic Centre in the Eastern City District Plan; and
- Increased diversity and cultural backgrounds of new residents.

The current built form incorporates older style brick and demountable buildings. The works are proposed to facilitate the removal of demountable buildings following completion of permanent buildings.

Visual impacts will be minimised through landscaping and quality architectural design. Considering the scale and density of the existing school and nearby residential and community development, the proposal will integrate well with the neighbourhood. The vegetated site perimeter further ensures the works will not create any unacceptable visual impacts for the occupiers of surrounding development.

Mature trees will be retained within the site wherever possible to maintain the amenity for surrounding neighbours. Any potential amenity loss due to tree removal will be short term, and additional trees and landscaping will be undertaken and embellished to account for any removal.

10.3.7 Transport

Buses are an important method of transport to school and there is a designated school bus drop-off and pick up area on Stanley Street that will be retained in addition to the vehicle pick up/ drop off area along Crane Street. Bicycle parking for staff and students is to be provided on site. A staff car park is proposed to provide 29 spaces on site. Further the site is also within walking distance of bus stops on Burwood Road, and Burwood Train Station is approximately 1.7km away.

Minor increases in traffic along Stanley and Crane Streets could be experienced due to the minor increase of 25 students and 6 staff. Notwithstanding, a large portion of school students use bus transport to and from school, thus negating the addition of larger scale vehicle use around the school entrances.

The Transport and Traffic Assessment (Appendix M) considered the impacts of traffic as well as the impacts on the pedestrian circulation through and surrounding the site. The assessment confirmed the proposed development will not generate any unacceptable impacts on surrounding development.

In addition, during construction, traffic and access to the school will need to be managed along with the construction traffic. A construction management plan will be needed to ensure that this occurs at Crown Certificate stage.

10.4 Mitigation of Impacts

Table 13 below outlines the potential social impacts, the potential level of impact and the measures proposed to mitigate any possible negative effects.

Table 13: Mitigation of Social Impacts

Social Impact	Comments	Level	Measures
Location and Land use	The site is located in close proximity of essential services, recreational opportunities and public transport.	Low Positive	N/A
	Potential for impacts on heritage landscape.	Medium Negative	The development has been designed to ensure impacts are reduced wherever possible. A heritage impact assessment has been prepared which provided recommendations for heritage. No further social impact recommendations are required.
Demographic and population change	Increased population will put increased pressure on school.	Medium Negative	Department of Education will need to monitor population growth in proximity to school to ascertain if future expansions are required.
Economic Impacts	It can be expected that local trade professionals will be utilised in the construction phase of the development, creating a positive outcome in the short to medium term.	Low Positive	N/A
	It can also be expected that the increased servicing needs of the development will require local businesses to fill the void. The cleaning, maintenance and other services required by the future students and staff will	Medium Positive	N/A

Social Impact	Comments	Level	Measures
	generate long term employment.		
	Increased employment for teachers and support staff following the minor expansion.	Medium Positive	N/A
Crime and Safety	The development encourages passive surveillance, through visible sightlines to promote the safety of students.	Medium Positive	N/A
	Proposal has been designed to be fully accessible.	High Positive	N/A
Accessibility	Access to the site may be impacted during the construction phase.	Low Negative	School management and construction contractors should communicate the expected impacts to staff, parents, and the local community to mitigate any potential access issues. A Construction Management Plan will need to be prepared during the construction phase to minimise access impacts to students, staff and the community.
Transport	Perceived increase in traffic along street frontages.	Low Negative	A traffic impact assessment has been undertaken and included with the development application that confirms there will not be a significant increase in traffic as a result of the proposed development. Mitigation measures have been included in both the Transport and Traffic Assessment (Appendix M) and the School Transport Plan (Appendix T) to further mitigate impact to neighbouring development and users of the local road network.
Amenity of local area	Proposed development includes significant improvements for the amenity and character of the local area.	High Positive	N/A
Community Facilities and Services	The school facilities will continue to be used for community events and by local groups who have existing contracts with the Department of Education.	Medium Positive	N/A

11 Conclusion

The Statement of Environmental Effects has been prepared addressing relevant matters outlined in section 4.15 of the Environmental Planning and Assessment Act 1979 and satisfies all relevant planning legislative requirements.

Our assessment of the proposal confirms:

- The proposed development is permissible with consent and generally compliant with the applicable legislation, development controls and environmental planning instruments. Any variations to the controls have been appropriately justified;
- The subject site is suitable for the proposed development and will not result in any significant or adverse overshadowing, acoustic, privacy or amenity issues;
- The works have been designed to limit impact to heritage and the taller built form results in a smaller footprint and fewer trees needing to be removed. This results in the retention of heritage landscape and ecological significance within the site;
- The proposed development is unlikely to generate any significant adverse impacts and relevant measures have been undertaken in the preparation, risk assessment and design of the development to mitigate potential environmental impacts where identified;
- The design and built form of the proposed development has been articulated to complement the streetscape and surrounding locality;
- The design of the additional built form will contribute to visual interest and overall amenity of the area, particularly from Stanley Street and St Luke's Oval to the east of the site;
- The development is supported by a Transport and Traffic Assessment which confirms the works will generate no unacceptable impact to traffic or off-site parking;
- The proposed alterations and additions to the existing school are consistent with the relevant strategic policies and objectives and will provide positive social and economic benefits to the community and local area; and
- The development will facilitate additional employment opportunities during and after construction.

The proposal represents rational, orderly, economic, and sustainable use of the land and the proposed upgrades to Concord High School should therefore be supported.

Appendix A – Architectural Plans

Appendix B – Civil and Stormwater Management Plans

Appendix C – Survey Plan

Appendix D – Landscaping Plan

Appendix E – Statement of Heritage Impact

Appendix F – Preliminary Site Investigation (Contamination)

Appendix G – Detailed Site Investigation (Contamination)

Appendix H – Clause 4.6 Variation Report

Appendix I – Operational Waste Management Plan

Appendix J – Demolition and Construction Waste Management Plan

Appendix K – Remediation Action Plan

Appendix L – Arboricultural Development Impact Assessment Report

Appendix M – Transport and Traffic Assessment

Appendix N – Preliminary Indigenous Heritage and Impact Assessment

Appendix O – Acid Sulfate Soils Management Plan

Appendix P – Flood Study / Overland Flow Assessment

Appendix Q – Design Verification Statement

Appendix R – BCA and Access Report

Appendix S – Noise and Vibration Impact Assessment

Appendix T – School Transport Plan

