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# INTRODUCTION

This Statement of Environmental Effects (SEE) accompanies a Development Application (DA) to Inner West Council and is made on behalf of the Department of Education (DOE). The application seeks consent to adapt and refurbish the existing Petersham TAFE site on the corner of West and Gordon Streets, Petersham. The proposal includes an internal refurbishment and BCA upgrades of the existing buildings to accommodate the Open High School (relocated from Randwick). This DA seeks consent for the following works:

- Minor internal refurbishment of existing Blocks A, B, C, D and E to suit the school use including services upgrades;
- Upgrades to the site and buildings to comply with BCA requirements, including but not limited to equitable access; and
- New signage and security fence.

This SEE includes a description of the site and proposed development and an assessment of the proposed development pursuant to Section 79C of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

#### 1.1. PROJECT CONTEXT

The Open High School provides language teaching to students that cannot access these courses at their local school. The current site in Randwick is to be demolished as part of a development application to Randwick Council. The Open High School will be relocated to Petersham, which provides better teaching and administration outcomes for the staff and students.

The relocation will increase the number of staff on site when compared to the TAFE campus. However, the number of students at the school will be less than the TAFE, notwithstanding that the enrolment capacity is higher because the school generally operates distance education courses.

The site is identified as a heritage item pursuant to *Marrickville Local Environmental Plan 2011* (MLEP), being Petersham Girls' High School (former), including interiors. The proposal has been developed in consultation with heritage Architects TKD to conserve the heritage significance of the heritage item, including associated fabric.

## 1.2. CROWN DEVELOPMENT APPLICATION STATUS

Part 4 Division 4 of the EP&A Act allows for DAs to be made by, or on behalf of the Crown. Among other persons, Clause 226 of the EP&A Regulations prescribes that a public authority (not being a Council) is the Crown for the purposes of Part 4 Division 4 of the EP&A Act. The Department of Education and Communities is a public authority and is therefore a Crown authority for the purposes of the DA and Clause 89 of the EP&A Act.

## 1.3. DA DOCUMENTAITON

The proposal is supported by the following information:

- Survey
- Heritage Impact Statement
- Architectural Drawings
- BCA and Access Compliance Statement
- Waste Management Plan

# 1.4. STRUCTURE OF THIS REPORT

This report is structured as follows:

- Section 1: Introduction to the project and its context.
- Section 2: Description of the existing site conditions and surrounding area.
- Section 3: Description of the proposed development.
- Section 4: Assessment of relevant planning considerations arising from Section 79C of the EP&A Act.
- Section 5: Assessment of the key planning impacts arising from the development.
- Section 6: Conclusion and summary of the proposed development.

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# 2. SITE CONTEXT

## 2.1. SITE LOCATION AND DESCRIPTION

The subject site is known as Petersham College Sydney TAFE, located at West and Gordon Streets, Petersham. The site is legally described as Lot 1 in DP 835049 and has an area of approximately 1 hectare. The site is bound by Gordon Street to east and West Street to the west (Figure 1).

Figure 1 - Site Location



Source: Six Viewer

## 2.2. EXISTING DEVELOPMENT

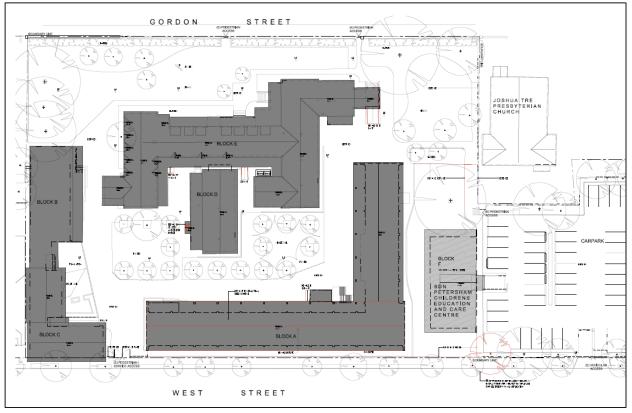
The site is occupied by Petersham TAFE, which includes permanent classrooms and ancillary uses in six main buildings (Figure 2). TAFE is in the process of relocating from the site to another site in the area. The buildings on site include:

- Block A 1964 original Girls' High School building, presently used for classrooms;
- Block B 1964 canteen and WCs:
- Block C 1897-8 original Girls' School with 1906 Domestic Economy addition, presently classrooms;
- Block D 1890 Infants School, presently classrooms;
- Block E 1878 original Public School, presently classrooms and offices; and

• Block F 1993 Petersham Children's Educational and Care Centre (no works are proposed to the child care).

The Gordon Street setback is landscaped within a picket and hedge fence. The remainder of the site is hard surface with a central paved and bitumen courtyard. A play area is attached to Blocks B and C. The site also contains a car park with 67 parking spaces for the TAFE and childcare centre.

Figure 2 - Site Plan



Source: TKD Architects

## 2.3. SURROUNDING DEVELOPMENT

The site is predominantly surrounded by residential and education uses. Development in the surrounding area is summarised as:

- To the north is low density residential, an RMS owned car park and reserve;
- To the east is low density residential, the railway line and Transport for NSW assets;
- To the south is a Presbyterian Church and low density residential; and
- To the west is Petersham Primary School.

The site is also in close proximity to Petersham Station (400m) and Lewisham Station (450m), which operates frequent and regular services on the Inner West Railway line.

## 2.4. ACCESS AND PARKING

Vehicular access is available from West Street to the car park on site via a driveway and boom gates. The car park provides drop off and pick up for the TAFE and child care and 67 parking spaces.

Pedestrian access is provided from a main entrance on Gordon Street, as well as secondary entrances along Gordon Street. A primary entry is also provided of West Street.

# 3. THE PROPOSAL

### 3.1. OVERVIEW

The application seeks consent to adapt and refurbish the existing Petersham TAFE. The proposal includes an internal refurbishment and BCA upgrades of the existing buildings to accommodate the Open High School (relocated from Randwick). This DA seeks consent for the following works:

- Minor internal refurbishment of existing Blocks A, B, C, D and E to suit the school use including services upgrades;
- Upgrades to the site and buildings to comply with BCA requirements, including but not limited to equitable access;
- ESD upgrades with solar panels; and
- New signage and security fence.

No change is proposed to the use as the existing education establishment (TAFE) will be replaced with another education establishment (high school). No changes are proposed to the built form and envelope. There are also no works proposed to the child care centre and car park.

The site is in an established location with access to services such as electricity, gas, telecommunications and water. There is no change to surface areas and the proposal will connect to the existing stormwater system.

### 3.2. MINOR INTERNAL REFURBISHMENT

The internal refurbishment will facilitate the Open High School use and improve the administration, staff and classroom facilities (Figure 3). By block, the refurbishment includes:

- Block A demolition of internal partition walls and upgrades to create quiet rooms, meeting rooms, storage, mail room, offices and staff breakout spaces over three levels.
- Block B demolition of internal partition walls and upgrades to improve existing canteen and student breakout space;
- Block C demolition of internal partition walls and upgrades to improve class room spaces for high school students;
- Block D one change to internal partition wall to improve class room spaces for high school students;
- Block E demolition of internal partition walls and upgrades to provide administration areas, common areas, reception, waiting area, meeting rooms and sick bay. The recording studios and majority of Block E will remain as existing.

## 3.3. BCA UPGRADES

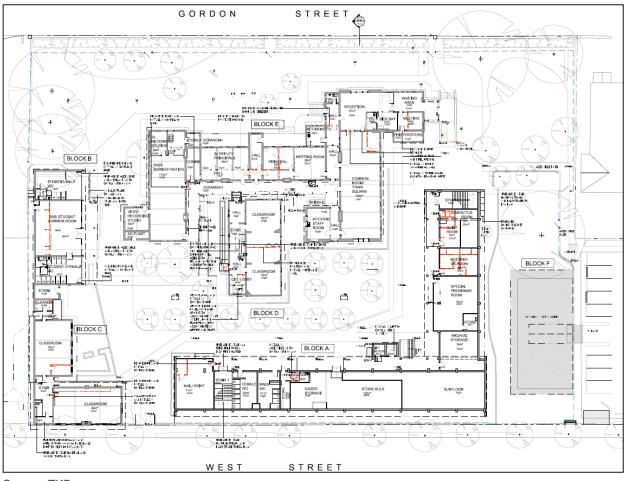
As indicated on the plans, the following works are proposed to the existing buildings to ensure BCA compliance and equitable access is provided for staff and students:

- Upgrades to accessible toilets;
- Upgrades to lifts and new lifts;
- Updated handrails, treads and balustrades for internal and external stairs;
- New handrails and ramps;

- Widening of door openings;
- Fire safety upgrades.

A BCA Report has been prepared and the buildings upgraded in accordance with its recommendations.

Figure 3 - Ground Floor Plan



Source: TKD

#### 3.4. **SOLAR PANELS**

The proposal includes metal tray deck roofing and photovoltaic cells on the roof of Building A for solar power.

#### 3.5. **SIGNAGE AND SECURITY FENCE**

The proposal includes new graphics within the existing sign on the Gordon Street frontage. A new steel palisade security fence and gates are proposed around the perimeter of the site. On the Gordon Street frontage the fence sits behind the existing fence and hedging.

#### 3.6. **SCHOOL USE**

The Open High School offers students the opportunity to students in Years 9 to 12 from all education sectors to study one or more of 12 languages. The school offers courses in Chinese, French, German, Indonesian, Italian, Japanese, Korean, Latin, Modern Greek, Portuguese, Russian and Spanish.

Student learning is supported through a diverse program of written materials, telephone lessons, video conferencing, online activities and forums, email, teacher visits to the student's home school and study days at the school (to meet with other students and staff). Students are drawn from over 400 schools across the greater Sydney metropolitan area and other rural regions across New South Wales. The use of the telephone, video conferencing and connected classrooms ensure that students have close connections with their teachers, despite the fact that they are not in the same physical space.

The following table is a comparison of the TAFE and the high school (numbers are approximate, as provided to us).

Table 1 – Student and Staff Figures

Staff/Student	TAFE	Open High School
Enrolment	1,170	2,020
Staff on site	62	113
Students on site	940	90

While approximately 2,000 students are enrolled in the school, approximately 90 students are on site at any one time given distance education courses are offered. The enrolment and staff numbers are higher than the TAFE but students on site are considerably less.

The Open High School operates classes from 9.00am to 3.30pm on weekdays (except school holidays and public holidays). Staff will be on site outside these hours and there will be times where students are on campus outside core school hours.

# 4. PLANNING CONTROLS ASSESSMENT

The following planning policies are relevant in the assessment of the proposal:

- State Environmental Planning Policy No. 55 Remediation of Land
- Marrickville Local Environmental Plan 2011:
- Marrickville Development Control Plan

### 4.1. STATE ENVIRONMENTAL PLANNING POLICY 55 – REMEDIATION OF LAND

State Environmental Planning Policy No 55—Remediation of Land (SEPP 55) provides a state-wide planning approach to the remediation of contaminated land. SEPP 55 requires the consent authority to consider whether the subject land is contaminated.

The site has been used as education establishment since 1884. Given the past and present use for education, it is unlikely that the site is contaminated. Further the scope of work is minimal and does not involve any excavation of the land. On this basis, the site is considered suitable for the education use and investigation under the SEPP is not required. This has been discussed and confirmed with Council officers (Jamie Erkin, Acting Manager Planning Services, Marrickville).

### 4.2. MARRICKVILLE LOCAL ENVIRONMENTAL PLAN 2011

## 4.2.1. Zoning and Permissibility

*Marrickville Local Environmental Plan (MLEP) 2011* is the principle statutory planning instrument applying the site. Under the MLEP the site is zoned SP2 Infrastructure (Education Establishments). The education establishment use proposed is therefore permissible with consent. The objectives of the SP2 zone are:

- To provide for infrastructure and related uses.
- To prevent development that is not compatible with or that may detract from the provision of infrastructure.
- To protect and provide for land used for community purposes.

The relocation of the Open High School to Petersham will provide important infrastructure for over 400 schools across the greater metropolitan area. The school will benefit the community by offering language courses not provided in individual school curriculums. The school is compatible with the existing education use and will enhance education infrastructure through building and services upgrades.

#### 4.2.2. Height and Floor Space Ratio

There are no height and FSR provisions that apply to the site. Regardless, the proposal does not alter the existing height of buildings or internal areas. The existing envelope is unchanged.

#### 4.2.3. Heritage Conservation

Clause 5.10 of the MLEP identifies the objectives for heritage conservation and identifies where the consent is required for heritage items. The site is identified as local heritage item, being Petersham Girls' High School (former), including interiors (I230).

The consent authority must, before granting consent under this clause, consider the effect of the proposed development on the heritage significance of the item or area concerned. A Heritage Impact Assessment has been prepared by TKD Architect. The Report concludes:

"Proposed works to the buildings and site – required as part of the Department of Education's relocation of the Randwick Open School to the Petersham TAFE site – aim to provide contemporary school classrooms, staff administrative offices and associated amenities while minimising impacts on significant original fabric and spaces. The proposed new school use is compatible and consistent with the historic use of the site.

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The proposed adaptation of the historic buildings necessarily involves the removal of some original fabric, mostly associated with the requirement to achieve BCA compliance. These works include the installation of external ramps (Blocks D and E), installation of a new lift (Block D) and removal of original doors (Blocks C, D and E) to achieve accessibility compliance. Potential adverse impacts arising from these works are minimised as far as possible through their location and design. Overall the extent of modification and removal of original fabric is minor in extent and nature.

Assessed as having little or no heritage significance in the Conservation Management Plan, no adverse impacts are associated with the adaptive re-use works proposed for Blocks A and B.

Visual impacts of the proposed perimeter steel security palisade fence are minimal, as it will be largely concealed by existing dense vegetation when seen from public vantage points on Gordon Street.

Considered overall, the proposal has appropriate regard for the heritage values and fabric of the former Petersham Public School buildings and the site generally. Works have been designed and detailed to avoid, minimise or mitigate potential adverse impacts on the heritage significance of the former school buildings as far as feasible. The proposal achieves an appropriate balance between the retention of heritage fabric and values while providing compatible new uses for the buildings to ensure their continued maintenance and use into the long term."

Accordingly, the proposed works are supported on heritage grounds and are consistent with clause 5.10 of MLEP.

#### 4.2.4. Terrestrial Biodiversity

The site is identified on the "Biodiversity" Map in MLEP. The consent authority must therefore consider whether the development is likely to have any adverse impact on fauna and flora, vegetation on the land, habitat and the biodiversity structure, function and composition of the land.

The DCP identifies the site as being a Bandicoot Protection Area. The development does not alter the existing building layout and does not require the removal of any trees on site that could potentially be a habitat for the Bandicoot. The proposal will therefore not impact on any potential biodiversity in the area.

#### 4.3. MARRICKVILLE DEVELOPMENT CONTROL PLAN 2011

Marrickville Development Control Plan (MDCP) 2011 came into force on 15 December 2011, soon after the gazettal of Marrickville Local Environmental Plan (MLEP) 2011. The DCP does not contain specific provisions relating to education establishments. Further, the majority of the provisions in the DCP relate to envelope and design matters, which are less relevant for the proposal. An assessment against the key relevant provisions of the DCP has been undertaken in the table below. The table demonstrates compliance with the key provisions of the DCP.

Table 2 - DCP Compliance

Provision	Requirement	Proposal	Comment
Equity of access and mobility	Provide equitable and dignified access for all people, including people with a disability, by providing a continuous accessible path of travel through the built environment.	The proposal has upgraded the development in accordance with the BCA requirements to provide equitable access for all persons.	Complies
Acoustic and visual privacy	Provide adequate visual and acoustic privacy for the residents and users of surrounding buildings.	The site is primarily surrounded by road and education uses. Nearby residents will not be impacted in terms of	Complies

Provision	Requirement	Proposal	Comment
		visual privacy. While staff numbers slightly increase when compared to the TAFE, the number of students on site will be significantly less. It is likely that privacy would be improved.	
Community safety	Incorporate CPTED principles.	The proposal maintains similar safety measures as the existing education use. The school will:  Have CCTV surveillance  Use teacher/staff supervision  Fencing to control access  Landscaping and signage to reinforce territory  Surveillance to manage space and reduce opportunities for vandalism or crime.	Complies
Car parking	School - 1 per 4 staff for staff plus + drop off & pickup facility for parents & carers  Childcare - 1/40m² GFA.	Based on staff numbers of 113, the parking requirement is 29. The site has 67 spaces so the demand can easily be accommodated within the existing car park.  Based on a child care GFA of approximately 385m², this is a demand for 10 spaces. The car park can accommodate both the school and the child care.	Complies
bike parking and racinities	Bike - 1 per 20 staff for staff + 1 per 10 students for students Lockers - 1 per 3 staff spaces + 1 per 3 student spaces	Provision will be made for bike parking and facilities to comply with the DCP.	Complies

Provision	Requirement	Proposal	Comment
	Showers - 1 + extra on merit for staff & students		
Waste Management	Ensure adequate and appropriate provision of site facilities.	A Waste Management Plan has been prepared that estimates waste and recycling generation and demonstrates that adequate provision has been made for facilities and management of waste.	Complies

# 5. KEY IMPACTS ASSESSMENT

This section assesses the key impacts of the proposal that have not been addressed elsewhere in this SEE. The key impacts have been identified as traffic and noise.

## 5.1. TRAFFIC

The RMS 'Guide to Traffic Generating Developments' is typically used for estimating traffic generation. However, the Guide does not specifically contain traffic generation rates for schools. As indicated previously, enrolment numbers and staff numbers of the Open High School exceed the existing TAFE. However, the TAFE is adult education and would attract a much higher vehicle trip generator than the high school use. Importantly, the number of students on site will be considerably less than the TAFE. The increase in staff is not likely to impact on the surrounding road network and the parking generation can easily be accommodated on site.

Further, the site has excellent access to public transport which will assist in deterring private vehicle use. The site is 400m from Petersham Station and 450m from Lewisham Station which service the Inner West & South Line between the CBD, Central, Ashfield and the southern Sydney suburbs.

## 5.2. NOISE

There are not anticipated to be any noise impacts. Construction will be undertaken during standard construction hours and in accordance with the conditions of consent. While staff numbers increase slightly, the number of students on site will be considerably less than the existing TAFE and so noise is likely to improve.

Mechanical plant is not likely to have noise impacts as proposed condensers have purposely been located on the eastern elevation of Block A away from residential development.

## 5.3. PUBLIC INTEREST

The proposal is entirely in the public interest. It will facilitate the relocation of the Open High School, which will in turn facilitate the redevelopment of Randwick Public School. The upgrades to the TAFE building for the high school use will improve the facilities for students and ensure ongoing language education for schools across Sydney. This is an important piece of community infrastructure and it is important that the highest quality of educational resources, including teaching and learning spaces, be provided. The proposal retains the heritage significance of the building and ensures the character of the area is maintained.

# 6. CONCLUSION

This SEE accompanies a DA which seeks consent for internal works to accommodate the Open High School. The proposal should be supported by Council for the following reasons:

- It provides an upgrade to teaching and learning spaces to benefit students and teachers
- It ensures the continuation of language courses not offered at all high schools in Sydney;
- The increase in staff is balanced by the reduction in adult students on site and therefore there will be no operational traffic impacts;
- The design has considered and mitigated impacts in relation to heritage, acoustic and biodiversity; and
- The site is suitable for the proposed development and it is entirely in the public interest.

The proposed development is therefore in the public interest and should be approved by Council.

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