Statement of Environmental Effects

Saint John Paul College Redevelopment





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Executive Summary

It is proposed to construct three new buildings and undertake renovations to existing buildings at Saint John Paul College, Coffs Harbour, located at 421 Hogbin Drive (Lot 12 DP709701). It is also proposed to demolish two buildings and construct a 28-space car park.

The first of the proposed new buildings is a Personal Development, Health and Physical Education (PDHPE) block. It will have three large rooms, separated by openable walls, and will have a gross floor area of approximately 210 m². The second new building is also a PDHPE block, having the same internal and external design as the first, and the same gross floor area.

The third new building is a two-storey library, comprising approximately 750 m² of gross floor area, and having a height of approximately 7.2 m AHD. The library is modern in design and will contain general collection shelves, study rooms, seminary rooms and offices. There will be break out areas and study nooks. This building will have a rooftop terrace.

The site is zoned R2 Low Density Residential under the Coffs Harbour Local Environmental Plan 2013. The proposed development is defined as an Educational Establishment (School) which is permissible with consent in the R2 zone. State Environmental Planning Policy (Educational Establishments and Child Care Facilities) also provides that development for the purpose of a school may be carried out by any person with development consent in the R2 zone. Development consent is sought under Part 4 of the *Environmental Planning and Assessment Act 1979* via a Development Application submitted to Coffs Harbour City Council.

As the project value is approximately \$8.13 million, the project is classified as Regionally Significant Development and the application will be determined by the Joint Regional Planning Panel. Additionally, the project is Integrated Development pursuant to Division 4.8 of the *Environmental Planning and Assessment Act 1979* as the development requires authorisation under Section 100B of the *Rural Fires Act 1997* in respect to bushfire safety for development on bushfire prone land for special fire protection purposes.

All environmental, economic and social impacts of the Proposal have been considered and assessed. Overall, no significant adverse impacts have been identified.

1. Introduction

1.1 Purpose of this Report

GeoLINK has been engaged by The Trustees of the Roman Catholic Church, Diocese of Lismore to prepare a Statement of Environmental Effects (SEE) for alterations and additions within the Saint John Paul College (SJPC) in Coffs Harbour.

Illustration 1.1 shows the locality of the site and **Illustration 1.2** shows the location of the proposed development in relation to the existing site.

This report forms part of a Development Application (DA) to be submitted to Coffs Harbour City Council (CHCC) requesting development consent for the proposed educational development under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Architectural drawings of the Proposal are provided at **Appendix A**.

1.2 Overview

Site details 421 Hogbin Drive, Coffs Harbour

Lot 12 DP709701

Development type Educational Establishment

Development summary

New sealed open car park to accommodate 28 parking spaces Demolition of an existing agricultural building and yard (Block M) Demolition of an existing gymnasium and storage building (Block O)

New library building Two new PDHPE buildings

Additions and alterations to existing buildings

Development area Approximately 7.65 ha

Key planning matters Development area is located within the R2 Low Density Residential under

the Coffs Harbour Local Environmental Plan 2013 (LEP).

The proposed development is defined as an Educational Establishment

(School) which is permissible with consent in the R2 zone.

State Environmental Planning Policy (Educational Establishments and Child Care Facilities) also provides that development for the purpose of a school may be carried out by any person with development consent in the

R2 zone.

The proposed school alterations and additions comply with all State Environmental Planning Policies, the Coffs Harbour Local Environmental Plan 2013 and the Coffs Harbour Development Control Plan 2015.

Proposal is integrated development pursuant to Division 4.8 of the EP&A Act as the development requires authorisation under Section 100B of the *Rural Fires Act 1997* in respect of bushfire safety for development of land for special fire protection purposes on bushfire prone land.



Key constraints Bushfire

Applicant Trustees of the Roman Catholic Church

Development cost \$8.13 million (ex GST). Determination by the Joint Regional Planning

Panel will be required.

1.3 Structure and Scope of Report

The purpose of this Statement of Environmental Effects report (SEE) is to assess environmental impacts of the proposed school development (the Proposal) to assist determination of the DA. **Section 2** of this report identifies the site and its regional context and describes the physical characteristics of the land. **Section 3** provides a detailed description of the Proposal. **Section 4** discusses the planning approval pathway for the Proposal and provides an assessment of the Proposal as it relates to the statutory and non-statutory planning framework. The environmental assessment of the Proposal is contained in **Section 5**. **Section 6** provides justification and a conclusion for the Proposal.

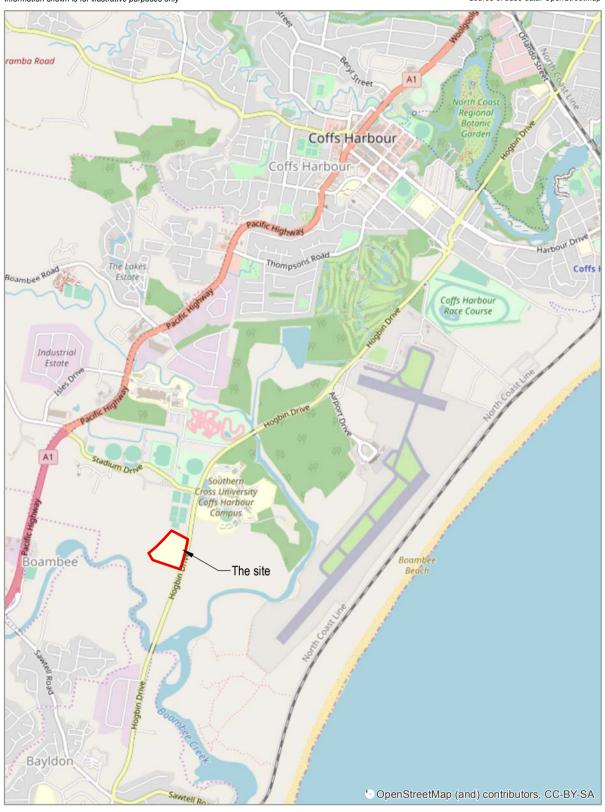
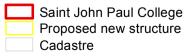




Illustration 1.1



LEGEND







2. Site Description and Analysis

2.1 Cadastral Description

The proposed school development is to be located on Lot 12 DP709701. An aerial image of the lot and the location of the school is shown on **Illustration 1.2**.

2.2 Site Context

The site is located on the western side of Hogbin Drive, approximately 5.5 km from the centre of Coffs Harbour on the Mid North Coast of NSW. The site is on the northern side of Boambee Creek. Other land uses in proximity to the site include the Coffs Coast Sport and Leisure Park and the Southern Cross University Coffs Harbour Campus. A locality plan is shown as **Illustration 1.1**.

2.3 Site Analysis

Saint John Paul College is approximately 7.65 ha in area. It currently contains the full range of buildings, structures, car parks etc associated with a large high school. This includes 15 classroom blocks, two major car parking areas and two smaller ones, a school bus drop off and pick up bay, maintenance sheds, storage sheds, sports fields, covered courtyards and gardens. The school has one access point on Hogbin Drive.

Within the school grounds there is a small amount of vegetation, consisting of planted shrubs and trees of varying size.

The site slopes from west (the rear of the site) to the east, from approximately four metres AHD (Australian Height Datum) down to two metres AHD. In the north-eastern corner of the site, there are some areas that reach six metres AHD. The site is affected by flooding, however the areas where new buildings are proposed to be located are above the modelled 100-year flood level.

The site contains other potential environmental and development constraints which are assessed as part of the environmental assessment of the site including:

- Bushfire.
- Proximity to a Coastal Wetland.
- Acid Sulfate Soils.
- Flooding.
- Coastal Zone.

Mapped Bushfire prone land is located on the adjoining properties to the west and south, and on the eastern side of Hogbin Drive.

The closest Coastal Wetland mapped areas are located on the adjoining lots to the south and west (Lot 1 DP524038, Lot 3 DP606876 and Lot 1 DP1189640). The mapped Coastal Wetland areas directly adjoin the site.

No Littoral Rainforest mapped areas occur within 1 km of the site and therefore the proposal would not impact on any areas of Littoral Rainforest.

The NSW Soil and Land Information System indicates that in this area of South Coffs Harbour, the site's physiography is hillslope under unknown on siltstone/ mudstone lithology. Soil type is Acidic Red Dermosol and Krasnozem. It is well drained; erosion hazard is moderate and there is no salting evident. According to Council's online mapping, the site is subject to Class 2, Class 3 and Class 5 acid sulfate soils.

Council's mapping indicates that the site is within the Coastal Zone and is considered a Coastal Environmental Area. The site also adjoins land that is mapped as Coastal Wetlands. Additionally, the vegetation on neighbouring land is classified as Koala habitat.

A site analysis plan is shown as **Illustration 2.1**.

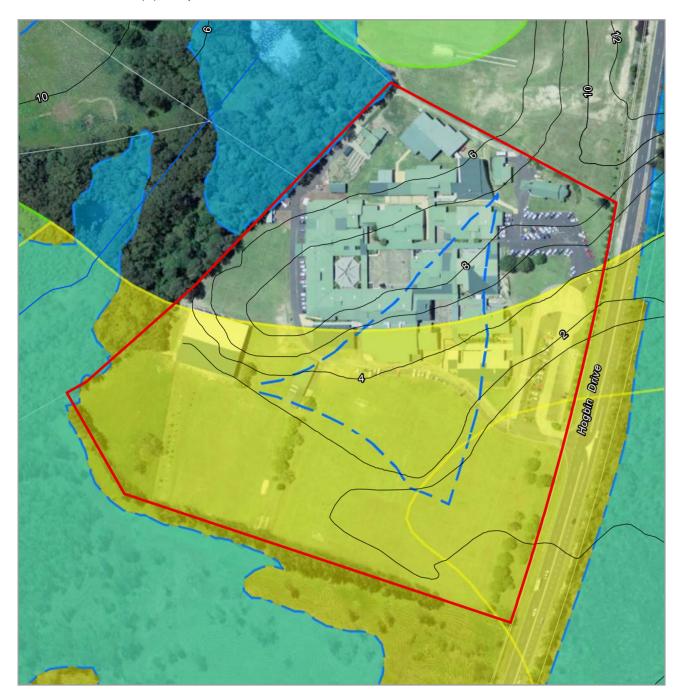
2.4 Climatic Data

The climate within the locality has an annual average rainfall of 1,699 millimetres (mm), with the wettest months from November to May. The locality has mean minimum temperatures of 14 degrees Celsius (°C) occurring in July and mean maximum temperatures of 23.4°C occurring in January. A summary of the climate data of the locality is shown in **Table 2.1**.

Table 2.1 Summary of Climate Data: Coffs Harbour Airport

Month	Mean Temperature (°C)	Mean Rainfall (mm)
January	23.9	187.5
February	23.4	224.8
March	22.5	234.6
April	20.5	178.4
May	17.3	160.8
June	14.5	120.8
July	13.8	72.5
August	15.4	79.5
September	18.5	59.9
October	20.6	96.3
November	21.9	144.7
December	23.4	144.9

Source: Bureau of Meteorology 2019 www.bom.gov.au



LEGEND

Saint John Paul College
Coastal wetland

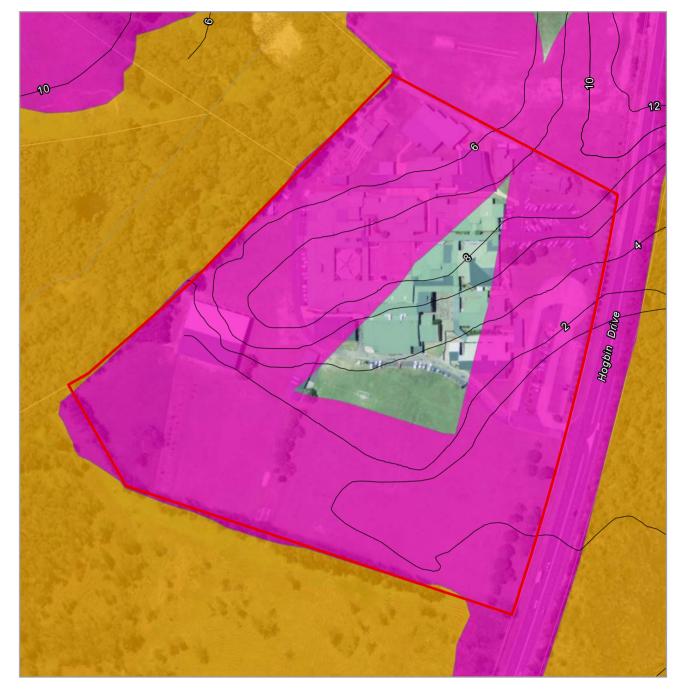
Proximity area for coastal wetland

High probability of acid sulfate soil occurrence Low probability of acid sulfate soil occurrence

Cadastre

— Contour at 2m intervals

- Drainage line



Bushfire Hazard

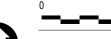
Saint John Paul College

Bushfire prone land 100m buffer
Category 1 bushfire prone vegetation

Cadastre

— Contour at 2m intervals

Drainage line



3. Proposal Description

3.1 Alterations and Additions to Existing Buildings

One aspect of the Saint John Paul College development is the renovation of several existing buildings. The proposed alterations and additions are described in **Table 3.1**. The development application design drawings are located at **Appendix A**.

Table 3.1 Overview of Alterations and Additions

Building	Proposed Change
Block A	 Convert staff room to general learning area.
Block B	 Convert staff room to two interview rooms. Remove two water closets (WC) and convert space to a corridor. Remove majority of existing internal walls and install new glazed sliding doors. Install new windows. Construct new outdoor covered breakout area. Construct new outdoor covered locker storage area.
Block C	 Convert staff rooms to a general learning area. Convert a general learning area to an indoor breakout area. Remove majority of existing internal walls and install new glazed sliding doors. Convert two WCs to one wheelchair accessible WC.
Block D	 Remove some internal walls and doors and replace with sliding glass doors. Convert a staff room to an indoor breakout area.
Blocks E and F (adjoining)	Block E is currently the administration block. Block F is currently the library. It is proposed to remove the library from Block F and into a new library building (see Section 3.2). The administration block can then expand into Block F, creating better and more useable spaces. Upon completion of the Block E and F conversion, some larger office spaces will be created, additional counselling rooms, interview rooms and new amenities. There will also be a new large staff workroom including meeting rooms and quiet spaces.
Block G	- Convert staff room to storage.
Block H	- Convert staff room to common area.
Block I	- Convert staff rooms to common area, corridor and drop in room.
Block K	 Convert staff room, corridor and staff kitchen to large bulk store Convert existing staff toilets to student toilets.
Block M	 Demolish. Block M is an agricultural block, containing animal pens, a machinery room, tool room and storage rooms.
Block O	- Demolish. Block O is a small gymnasium and storage building.

3.2 New Buildings

It is proposed to construct three new buildings at Saint John Paul College. Architectural drawings of the proposed new buildings can be found at **Appendix A**.

3.2.1 PDHPE Block 1

It is proposed to construct a new PDHPE block (Personal Development, Health and Physical Education). The proposed PDHPE block will have a gross floor area of approximately 210 m², made up of three general purpose learning areas, separated by operable walls. The building will be single storey and will have a ceiling height of 3 m. The building will have a skillion roof, the highest point of which will be approximately 5 m above the finished ground level.

The building will have large openings along both the northern and southern facades. Along the northern and western facades there will be outdoor covered areas. A new concreate concourse will surround the building, and there will be seating steps along the southern side, leading down to the sports fields.

As shown in **Figure 3.1**, along the northern façade of the building there will be some landscaped garden beds.



Source: DRA Architects
Figure 3.1 PDHPE Block 1

3.2.2 PDHPE Block 2

PDHPE Block 2 is the same in internal and external design as PDHPE Block 1. It will have a gross floor area of approximately 210 m², made up of three general purpose learning areas, separated by operable walls. The building will be single storey and will have a ceiling height of 3 m. The building will have a skillion roof, the highest point of which will be approximately 5 m above the finished ground level.

As can be seen in **Figure 3.1** above, PDHPE Block 1 neighbours PDHPE Block 2 (Block 1 in foreground and Block 2 perpendicular in background). The two buildings are linked by a covered concrete concourse.

This building will have seating steps along its southern façade.



Source: DRA Architects
Figure 3.2 PDHPE Block 2

3.2.3 Library

It is proposed to construct a two-storey library, comprising approximately 750 m² of gross floor area, roughly in the location of the existing M Block. As discussed above, M Block is to be demolished. The library will contain the following features:

- Ground floor reception.
- Office and staff room.
- Study rooms.
- Study booths.
- Book collection shelves.
- Seminar rooms.
- Large feature staircase to first floor, doubling as seating area.
- Large internal void creating an atrium style space in the north east corner.
- A lift and conventional stairwell.
- Rooftop terrace, including gardens and seating.

The proposed library will have a height of approximately 9.3 m above the finished ground level.

Externally, along the southern and eastern facades of the building there will be a concrete concourse and covered seating area.

The building's façades are to be a mix of rendered masonry and polycarbonate screening. Windows on the south, east and northern elevations will have large awnings.



Source: DRA Architects

Figure 3.3 Library – Southern Perspective



Source: DRA Architects
Figure 3.4 Library – Ground Floor Perspective



Source: DRA Architects

Figure 3.5 Library - Rooftop Terrace

Architectural drawings of the proposed library can be found at **Appendix A**.

3.2.4 Filling

The proposed PDHPE and library buildings will be constructed at the existing ground level. Standard excavations for the construction of footings and importation of material for the construction of slabs will occur.

3.2.5 Vegetation Removal

To allow for construction of the proposed PDHPE buildings, one *Eucalyptus* sp. and one Cadaghi (*Corymbia torelliana*), located east of the existing games courts will be removed (refer to **Plate 3.1** and **Plate 3.2**).

Additionally, a row of established trees is located along the Hogbin Drive frontage of the site, to the south of the school entrance. Some of these trees are in proximity to the proposed new car park. The car park layout has been designed to ensure retention of the majority of these trees, however one Swamp Mahogany (*Eucalyptus robusta*) will be removed.



Plate 3.1 Eucalyptus sp. to be removed adjacent to PDHPE Block 1



Plate 3.2 Cadaghi to be removed adjacent to PDHPE Block 1



Plate 3.3 Swamp Mahogany to be removed within proposed car park area

3.2.6 Landscaping

Landscaped garden beds, totalling approximately 156 m², are proposed to be located directly in front of PDHPE Block 1. Architectural drawing DA20 provides an indication of the appearance of these garden beds.

Some small landscaped gardens are proposed for the concourse on the southern side of the library, and for the rooftop terrace.

3.2.7 Setbacks

Proposed PDHPE Block 1 will be set back around 190 m from the front property boundary and 70 m from the rear.

Proposed PDHPE Block 2 will be set back around 170 m from the front property boundary and 95 m from the rear

The proposed library will be set back around 160 m from the front property boundary and 10 m from the rear.

3.2.8 Services

Service infrastructure on site will be modified to connect the proposed new buildings. There will not be any additional students attending the school and therefore infrastructure upgrades are will not be necessary.

3.2.9 Stormwater

Stormwater from the roofs of the PDHPE and library buildings will be collected in the guttering and directed into the school's existing piped stormwater network. Stormwater will be discharged at the existing lawful point of discharge for the school.

3.2.10 Garbage

The existing waste collection arrangements will remain in place. The proposed development will not result in any increase in use of the site and therefore there will not be an increase in the creation of garbage.

3.2.11 Construction Waste

Full details of all construction waste will be determined upon detailed design stage of the development. It is anticipated that excess spoil and vegetation mulch not able to be accommodated within the site will be disposed of at a licensed waste facility. Waste (and spoil) disposal will be undertaken in accordance with the *Protection of the Environment Operations Act 1997*, the *Waste Avoidance and Resource Recovery Act 2001* and any specific conditions imposed by the development consent.

3.3 New Car Park

It is proposed to construct a new 28-space car park to the south of the entrance to the school. The purpose of this car park is to resolve the current shortage of spaces at the school provided for students. Over the past decade, the school has experienced an increase in the number of students driving their own private vehicles to school and there is insufficient parking to accommodate this.

The layout of the proposed car park has been designed to coordinate with the location of established trees along the Hogbin Drive boundary of the school. As shown on the proposed site plan (see **Appendix A**) most of these trees have been avoided and will remain, however one Swamp Mahogany will be removed.

The proposed layout also avoids the need to relocate a power pole which is located generally within the works area.

4. Planning Framework

4.1 Planning Approval Pathway

The site is zoned R2 Low Density Residential under the Coffs Harbour Local Environmental Plan 2013. The proposed development is defined as an Educational Establishment (School) which is permissible with consent in the R2 Low Density Residential zone.

Under Clause 35(1) of State Environmental Planning Policy (Educational Establishments and Child Care Facilities), development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone including new libraries, classrooms, car parks, demolition of existing buildings (excluding heritage listed buildings) and alterations (internal/ external) to existing buildings. Therefore, the planning approval pathway of the proposed school development would be Development with Consent. Therefore, a development application and this Statement of Environmental Effects (SEE) has been prepared for submission to Coffs Harbour City Council for assessment.

The authority that determines the development application would depend on the capital investment value of the project. Under Schedule 7 of State Environmental Planning Policy (State and Regional Development) 2011, the Proposal is classified as Regionally Significant Development as it is an educational establishment with a capital investment value of over \$5 m. As the proposal is Regionally Significant Development, application will be determined by the Joint Regional Planning Panel.

4.2 Environmental Planning and Assessment Act 1979

The EP&A Act is the primary legislation for environmental planning in NSW. It establishes the legislative framework that governs land use, development assessment and decision making. The Environmental Planning and Assessment Regulations 2000 create the required administration and allocate roles and responsibilities for land use and assessments. This section summarises the process for assessment and determination of the Proposal.

4.2.1 Integrated Development

The Proposal is integrated development pursuant to Division 4.8 of the EP&A Act as the development requires authorisation under Section 100B of the *Rural Fires Act 1997* in respect of bushfire safety for development of land for special fire protection purposes on bushfire prone land.

4.2.2 Site Suitability

The Proposal has addressed key environmental constraints including flooding, soil and bushfire impacts associated with the development. The development as proposed is considered suitable for the site.

4.2.3 Public Interest

The Proposal will provide for educational services within the community and does not present any significant environmental impacts. The proposed development is considered to provide a public benefit through the provision of educational services within the region.

4.2.4 Consent Authority

Development consent is sought under Part 4 of the EP&A Act via a Development Application submitted to Coffs Harbour City Council. As previously noted, the Proposal is classified as Regionally Significant Development as it is an educational establishment with a capital investment value of over \$5 m therefore the development application will be determined by the Joint Regional Planning Panel.

4.3 Biodiversity Conservation Act 2016 (BC Act)

The BC Act requires a test of significance (five-part test) when assessing whether an action, development or activity is likely to significantly affect threatened species or communities, or their habitats.

The proposed development is located outside areas mapped as biodiversity value land (BVL) under the BC Act. The assessment requirement for a Biodiversity Development Assessment Report (BDAR) under the BC Act does not apply to the proposed development.

Details of the potential impacts on biodiversity is provided at **Section 5.1**.



Figure 4.1 OEH BVL mapping

4.4 Fisheries Management Act 1994 (FM Act)

The FM Act requires an assessment of significance when there may be potential to impact on any species, populations and communities listed in the FM Act. Based on the habitat at the site and records within the locality, it is unlikely that the Proposal would impact on any species, populations or communities; as such an assessment of significance is not required.

4.5 Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)

The EPBC Act protects/ regulates matters of national environmental significance (MNES), including:

- World heritage properties.
- National heritage places.
- Wetlands of international importance.
- Nationally threatened species and ecological communities.
- Migratory species.
- Commonwealth marine areas.
- The Great Barrier Reef Marine Park.
- Nuclear actions (including uranium mining).
- A water resource, in relation to coal seam gas development and large coal mining development.

Based on the search results (refer to **Appendix B**) and site assessment, no significant impacts to any MNES would be likely to result from any future work within the site footprint (refer to **Table 4.1**), therefore referral to the Minister for the Environment and Energy is not required.

Table 4.1 Assessment of MNES

Matter	Impact	
Any impact on a World Heritage property?		
No World Heritage properties occur within 5 km of the site.	Nil	
Any impact on a National Heritage place?		
No National Heritage places occur within 5 km of the site.	Nil	
Any impact on a wetland of international importance?		
No wetlands of international importance (Ramsar Sites) occur within 5 km of the site.	Nil	
Any impact on nationally threatened species and ecological communities?		
Habitat for four threatened ecological communities, 76 threatened species (21 flora and 55 fauna species) and 55 migratory species is recorded within 5 km of the site. The vegetation present does not conform to the definition of any federally listed threatened ecological communities, and no threatened fauna species were directly observed. The proposal would result in a very minor reduction of potential Koala foraging habitat via the removal of one preferred Koala food tree.	Negligible	
Any impact on Migratory species?		
Habitat for 55 migratory species is identified within 5 km of the site. No migratory species were observed at the site. No significant habitat for migratory species is likely to be affected by the Proposal.	Nil	
Any impact on a Commonwealth marine area?		
No Commonwealth marine areas occur within 5 km of the site.	Nil	
Any impact on the Great Barrier Reef Marine Park?		
The Great Barrier Reef Marine park is distant from the site.	Nil	
Does the Proposal involve a nuclear action (including uranium mining)?		
The Proposal does not involve a nuclear action.	Nil	
Any impact on a water resource, in relation to coal seam gas development and large coal mining development?		
The Proposal does not involve any impact on a water resource, in relation to coal seam gas development and large mining development.	Nil	

4.6 State Environmental Planning Policies

4.6.1 State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017

Previously, planning provisions for schools and tertiary institutions were included in the State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP). The NSW Government has introduced changes to the planning system to stimulate more child care services and streamline approvals to deliver appropriately located and high-quality early education and care facilities. These improvements to the planning system were developed to ease the pressure on delivering new public and private school facilities, and upgrading existing facilities, as well as assisting TAFEs and universities to upgrade their campuses to cater for the growing number of tertiary students.

The Education and Child Care SEPP provides a range of tools to assist child care and education providers in constructing new facilities and upgrading existing facilities. These changes include:

- minor works such as landscaping, awnings, fences, and minor internal and external alterations can be done as exempt development;
- permitting certain low-impact early education and care facilities to be considered as exempt development:
- a range of new building works including classrooms, lecture theatres, libraries, halls, indoor recreational facilities and school-based child care facilities can be delivered as complying development.

More significant development proposals will require development consent.

Exempt development provisions identified in Schedule 1 of the Education and Child Care SEPP only apply to public authorities. Similarly, 'development permitted without consent' provisions of the Education and Child Care SEPP pursuant to Clause 36 only apply to a public authority.

Note 2 of Clause 39 of the Education and Child Care SEPP states development to which section 100B (1) of the *Rural Fires Act 1997* applies is not complying development under the Policy. As the proposed development is a special fire protection purpose under the provisions of the *Rural Fires Act 1997* it cannot progress as complying development. The development area is also mapped 'proximity area for coastal wetlands' under State Environmental Planning Policy (Coastal Management) 2018 and is therefore located within an environmentally sensitive area defined under State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Exempt and Complying SEPP); and cannot progress as complying development pursuant to clause 1.17A (e) of the Exempt and Complying SEPP.

Under Clause 35 (1) development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone including new libraries, classrooms, car parks, demolition of existing buildings (excluding heritage listed buildings) and alterations (internal/external) to existing buildings. The site is zone R2 Low Density Residential; a prescribed zone under the SEPP. The proposed development therefore seeks development consent from Coffs Harbour City Council under Part 4 of the EP&A Act 1979.

Clause 35 (6) states that 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 4, and
- (b) whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.

Table 4.2 addresses the Clause 35 (6) considerations.

Table 4.2 Education and Child Care SEPP Clause 35 (6) considerations

Consideration	Comment
Schedule 4 Schools—design quality principles	
Principle 1—context, built form and landscape Schools should be designed to respond to and enhance the positive qualities of their setting, landscape and heritage, including Aboriginal cultural heritage. The design and spatial organisation of buildings and the spaces between them should be informed by site conditions such as topography, orientation and climate. Landscape should be integrated into the design of school developments to enhance on-site amenity, contribute to the streetscape and mitigate negative impacts on neighbouring sites. School buildings and their grounds on land that is identified in or under a local environmental plan as a scenic protection area should be designed to recognise and protect the special visual qualities and natural environment of the area, and located and designed to minimise the development's visual impact on those qualities and that natural environment.	The proposed library and PDHPE buildings are of a high-quality architectural standard informed by site conditions such as topography, orientation and climate. Both buildings are located within the rear of the school site and present minimal impact to the visual amenity of the locality. The new buildings are not located within an area identified under a local environmental plan as a scenic protection area.
Principle 2—sustainable, efficient and durable Good design combines positive environmental, social and economic outcomes. Schools and school buildings should be designed to minimise the consumption of energy, water and natural resources and reduce waste and encourage recycling. Schools should be designed to be durable, resilient and adaptable, enabling them to evolve over time to meet future requirements.	The proposed library and PDHPE buildings are designed to utilise natural lighting and reduce energy use.
Principle 3—accessible and inclusive School buildings and their grounds should provide good wayfinding and be welcoming, accessible and inclusive to people with differing needs and capabilities. Note. Wayfinding refers to information systems that guide people through a physical environment and enhance their understanding and experience of the space. Schools should actively seek opportunities for their facilities to be shared with the community and cater for activities outside of school hours	Wayfinding information systems shall be updated throughout the school to account for the new school buildings. The new buildings are accessible for all needs and capabilities with ramps provided to both buildings and a lift providing access to the second level of the library.

Consideration	Comment
Principle 4—health and safety Good school development optimises health, safety and security within its boundaries and the surrounding public domain, and balances this with the need to create a welcoming and accessible environment.	This principle is not impacted during operation of the proposed development. During construction exclusion fencing and construction management plans will be developed to manage internal access arrangements to ensure health and safety of construction staff and school staff, students and members of the public.
Principle 5—amenity Schools should provide pleasant and engaging spaces that are accessible for a wide range of educational, informal and community activities, while also considering the amenity of adjacent development and the local neighbourhood. Schools located near busy roads or near rail corridors should incorporate appropriate noise mitigation measures to ensure a high level of amenity for occupants. Schools should include appropriate, efficient, stage and age appropriate indoor and outdoor learning and play spaces, access to sunlight, natural ventilation, outlook, visual and acoustic privacy, storage and service areas.	The proposed development has been developed to improve learning spaces within the school. Hogbin Drive fronts the school's eastern boundary. The buildings and proposed additions are located in the west of the school grounds to maximise the amenity associated with the school operation.
Principle 6—whole of life, flexible and adaptive School design should consider future needs and take a whole-of-life-cycle approach underpinned by site wide strategic and spatial planning. Good design for schools should deliver high environmental performance, ease of adaptation and maximise multi-use facilities.	The proposed development is consistent with the Principle
Principle 7—aesthetics School buildings and their landscape setting should be aesthetically pleasing by achieving a built form that has good proportions and a balanced composition of elements. Schools should respond to positive elements from the site and surrounding neighbourhood and have a positive impact on the quality and character of a neighbourhood. The built form should respond to the existing or desired future context, particularly, positive elements from the site and surrounding neighbourhood, and have a positive impact on the quality and sense of identity of the neighbourhood.	The proposed development includes internal additions to existing buildings, three new buildings and an uncovered car park. The three new buildings are of a high architectural standard. Nearby land uses include sporting fields, educational establishments and areas of coastal wetland. The proposed development is therefore considered consistent with the current character of the locality.
Clause 35 (6) (b)	
the development enables the use of school facilities (including recreational facilities) to be shared with the community	The development does not vary (or restrict) the ability of the school to be shared with the community.

4.6.2 State Environmental Planning Policy (SEPP) 44 – Koala Habitat Protection

State Environmental Planning Policy No. 44 – Koala Habitat Protection (SEPP 44) applies to all local government areas (LGAs) listed under Schedule 1, which includes the Coffs Harbour LGA. This SEPP encourages the conservation and management of natural vegetation areas that provide habitat for Koalas to ensure permanent free-living populations will be maintained over their present range. A Koala Plan of Management (KPoM) has been prepared for CHCC in accordance with the requirements of SEPP 44.

The site is not mapped as Primary Koala Habitat as per the CPoM, however it adjoins Primary Koala Habitat and some preferred Koala food trees (Swamp Mahogany) are located on site. **Table 4.3** demonstrates compliance with the requirements of Section 3.3 of Council's KPoM.



Figure 4.2 CHCC KPoM Koala Habitat Mapping (Primary)

Table 4.3 CHCC KPoM Requirements

Re	equired Management Actions	Relevance of the Proposal and Compliance with the KPoM
1.	The proposal will not result in barriers to Koala movement	The proposed development is located within the grounds of the existing school. The development proposed does not form a barrier to Koala movement.
2.	Boundary fencing does not prevent the free movement of Koalas	The proposed development does not propose barrier fencing.
3.	Lighting and Koala exclusion fencing is provided where appropriate on roadways adjacent to Koala habitat	The proposed development is located within the grounds of the existing school. The development proposed does not include exclusion fencing or additional lighting.
4.	Tree species listed (under Schedule 2) are retained, where possible	Based on the proposed site plan, one Schedule 2 Koala feed tree, a Swamp Mahogany is proposed to be removed from the car park area.
5.	New local roads are designed to reduce traffic speed to 40 kph in potential Koala blackspots	Not relevant to the proposal.

Required Management Actions		Relevance of the Proposal and Compliance with the KPoM
6.	Preferred Koala trees are used in landscaping where suitable	In accordance with the Coffs Harbour Development Control Plan CHDCP (2015), compensatory planting for removal of native vegetation or the use of Koala food trees in landscaping is not required (particularly if the site is to be securely fenced, plantings of Koala food trees would not be recommended).
7.	Threats to Koalas by dogs have been minimised (ie. banning of dogs or confining dogs to Koala proof yards)	Not relevant to the proposal.
8.	Fire protection zones, including fuel reduced zones and radiation zones, are provided outside the area of Primary Koala Habitat.	The school will be managed as an inner protection zone. No works are proposed outside the school property on Primary Koala Habitat.

4.6.3 State Environmental Planning Policy (Coastal Management) 2018 (Coastal SEPP)

State Environmental Planning Policy (Coastal Management) 2018 updates and consolidates into one integrated policy SEPP 14 (Coastal Wetlands), SEPP 26 (Littoral Rainforests) and SEPP 71 (Coastal Protection), including clause 5.5 of the Standard Instrument – Principal Local Environmental Plan. These policies are now repealed.

The Coastal SEPP provides an integrated and coordinated approach to coastal land use planning. It defines the four coastal management areas through detailed mapping and specifies assessment criteria that are tailored for each coastal management area. Councils and other consent authorities must apply these criteria when assessing Proposals for development that fall within one or more of the mapped areas.

Figure 4.3 and **Figure 4.4** show Coastal SEPP mapping relevant to the development areas. Coastal Wetlands borders the school site to the west and south and along the eastern side of Hogbin Drive. The development area is located within the 'proximity area for coastal wetlands' and 'coastal environment area'. No Littoral Rainforest mapped areas occur within one kilometre of the site and therefore the proposal would not impact on any Littoral Rainforest areas. The development area is not mapped Coastal Vulnerability Area or Coastal Use Area under the Coastal SEPP.

The Policy states that:

development consent must not be granted to development on land identified as "proximity area for coastal wetlands" or "proximity area for littoral rainforest" on the Coastal Wetlands and Littoral Rainforests Area Map unless the consent authority is satisfied that the proposed development will not significantly impact on:

- (a) the biophysical, hydrological or ecological integrity of the adjacent coastal wetland or littoral rainforest, or
- (b) the quantity and quality of surface and ground water flows to and from the adjacent coastal wetland or littoral rainforest.

Clause 13 of the Policy details considerations required by the consent authority prior to granting approval within the coastal environment area. **Table 4.4** addresses these matters.

Table 4.4 Coastal SEPP Clause 13 considerations (coastal environment area)

Clause 13 Considerations	Comment
(1) Development consent must not be granted to development on land that is within the coastal environment area unless the consent authority has considered whether the proposed development is likely to cause an adverse impact on the following	
1(a) the integrity and resilience of the biophysical, hydrological (surface and groundwater) and ecological environment,	The proposed development will be undertaken with the implementation of soil and water quality measures during construction and appropriate stormwater design; protecting the adjoining coastal environments.
1(b) coastal environmental values and natural coastal processes,	The development is located within an existing school grounds located approximately 1.7 km west of the coastline and proposes measures to protect adjoining coastal environments.
1(c) the water quality of the marine estate (within the meaning of the Marine Estate Management Act 2014), in particular, the cumulative impacts of the proposed development on any of the sensitive coastal lakes identified in Schedule 1,	Due to the development location and environmental controls associated with the development the proposed development will not impact any Marine Estates or sensitive coastal lakes identified in Schedule 1,
1(d) marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms,	Due to the development location and environmental controls associated with the development the proposed development will not impact any marine vegetation, native vegetation and fauna and their habitats, undeveloped headlands and rock platforms
1(e) existing public open space and safe access to and along the foreshore, beach, headland or rock platform for members of the public, including persons with a disability,	Due to the development location and environmental controls associated with the development the proposed development will not impact access to any foreshore, beach, headland or rock platform
1(f) Aboriginal cultural heritage, practices and places,	The development is located within an existing school grounds and the development area is considered highly disturbed. The proposed development does not present risk to Aboriginal cultural heritage, practices and places.
1(g) the use of the surf zone	Due to the development location the proposed development will not impact use of the surf zone.
(2) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that:	
2(a) the development is designed, sited and will be managed to avoid an adverse impact referred to in subclause (1), or	The development is located within an existing school grounds located approximately 1.7 km west of the coastline and proposes measures to protect adjoining coastal environments. The development will not result in an adverse impact on the coastal environment.

Clause 13 Considerations	Comment
2(b) if that impact cannot be reasonably avoided—the development is designed, sited and will be managed to minimise that impact, or	See above response.
2(c) if that impact cannot be minimised—the development will be managed to mitigate that impact.	See above response.

The development area is not located within any Coastal Wetland and the proposed development will be undertaken with the implementation of soil and water quality measures during construction and appropriate stormwater design; protecting the adjoining coastal environments. The proposal is unlikely to impact on mapped coastal wetlands (either directly or indirectly). The proposal is unlikely to result in any significant impacts to sensitive coastal environments.



Figure 4.3 Coastal Wetland mapping

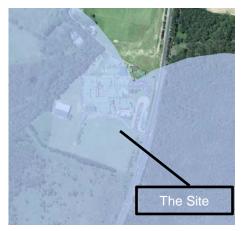


Figure 4.4 Coastal environment area mapping

General considerations required by the consent authority prior to granting approval within the Coastal Zone under Division 5 of the Coastal SEPP zone are provided within **Table 4.5.**

Table 4.5 Coastal SEPP Division 5 Considerations

Consideration	Comment
15 Development in coastal zone generally—development not to increase risk of coastal hazards. Development consent must not be granted to development on land within the coastal zone unless the consent authority is satisfied that the proposed development is not likely to cause increased risk of coastal hazards on that land or other land.	The development is located within an existing school grounds located approximately 1.7 km west of the coastline and is not susceptible to coastal hazard.
16 Development in coastal zone generally—coastal management programs to be considered Development consent must not be granted to development on land within the coastal zone unless the consent authority has taken into consideration the relevant provisions of any certified coastal management program that applies to the land	The are no CZMP relevant to the development area.

Consideration	Comment
17 Other development controls not affected Subject to clause 7, for the avoidance of doubt, nothing in this Part: (a) permits the carrying out of development that is prohibited development under another environmental planning instrument, or (b) permits the carrying out of development without development consent where another environmental planning instrument provides that the development may be carried out only with development consent.	Not relevant to this proposal
If a single parcel of land is identified by this Policy as being within more than one coastal management area and the development controls of those coastal management areas are inconsistent, the development controls of the highest of the following coastal management areas (set out highest to lowest) prevail to the extent of the inconsistency: (a) the coastal wetlands and littoral rainforests area, (b) the coastal vulnerability area, (c) the coastal environment area, (d) the coastal use area.	Council to note. The development area is located within the 'proximity area for coastal wetlands' and 'coastal environment area'.

4.6.4 State Environmental Planning Policy (55) Remediation of Land (SEPP 55)

SEPP 55 – Remediation of Land applies to development requiring consent and therefore applies to this development. The gymnasium and agricultural buildings and structures proposed to be demolished consists of steel/ concrete structures with tin roofs. The buildings and adjoining yards were used to house animals, grow plants and store basic farm machinery and farm equipment. No chemicals have been stored in the buildings or adjoining yards. The previous uses of these facilities were restrictive due to being located within a school and no land uses occurred that present risk of soil contamination through use of chemicals within the agricultural learning environment. This is supported through visual inspection of this area and discussions with school staff. Searches of the DPI's Cattle Dip Site Locator tool and the EPA's Contaminated Land register did not return any results for this site.

It is therefore concluded that the development of the site is not considered to be constrained by past land use activities that may have resulted in contamination.

4.7 Coffs Harbour Local Environmental Plan 2013

4.7.1 Zone and Permissibility

The site is zoned R2 Low Density Residential under the Coffs Harbour LEP (refer to Illustration 4.1).

The proposed development is defined as an Educational Establishment (School) which is permissible with consent in the R2 Low Density Residential zoning under State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.

Consideration of the proposal against the objectives of the R2 Low Density Residential is provided within **Table 4.6**.

Table 4.6 Zone Objectives

Zone Objective	Comment
R2 Low Density Residential	
To provide for the housing needs of the community within a low-density residential environment.	The proposal is not directly consistent with this objective but will provide educational services to the community
To enable other land uses that provide facilities or services to meet the day to day needs of residents.	The proposal is consistent with this objective through provision of educational services to the community.

As detailed above, the Proposal is generally consistent with the objectives of the R2 Low Density Residential.

4.7.2 Provisions

The relevant clauses of Coffs Harbour LEP 2013 are discussed in **Table 4.7**.

 Table 4.7
 Coffs Harbour LEP 2013 General Controls and Special Controls

Local Planning Instruments and Controls	
Clause 4.3 Height of Buildings	The school site has a maximum height control of 8.5 m. The proposed PDHPE buildings have skillion rooves. At the highest point of the rooves, PDHPE buildings are approximately 5 m in height. The proposed library building has a maximum height of approximately 10 m. As this exceeds the maximum height provisions, an exemption to the development standard is sought under Clause 4.6.
Clause 4.4 Floor Space Ratio	There is no maximum floor space ratio on the site.
Clause 5.9 Preservation of Trees or Vegetation	The objective of this clause is to preserve the amenity of the area, including biodiversity values, through the preservation of trees and other vegetation. To allow for the proposed development, three mature trees will be removed. Assessment of this vegetation removal is provided in Section 5.1 of this report.

Local Planning Instruments	s and Controls
Clause 7.1 Acid Sulfate Soils (ASS)	The development area is located within land mapped as Class 2, 3 and 5 ASS soil:
	 Car park area: Class 2 PDHPE Building: Class 3 Library and agricultural building demolition: Class 5.
	An acid sulfate soils management plan will be prepared prior to the commencement of construction of the proposed works.
Clause 7.3 Flood Planning	The Flood Planning Map identifies the southern portion of the site being affected by flooding. The proposed library building is approximately 100 m north of land affected by flooding and is above the Flood Planning Level.
	The proposed PDHPE building is located outside of the 100-year ARI Flood Extent but is below the Flood Planning Level.
	The proposed car park is located within the 100-year ARI Flood Extent.
	Figure 5.1 and Figure 5.2 show the extent of flooding on the site.
	As such, Council cannot grant development consent to the proposal unless it is satisfied that the development:
	 a. is compatible with the flood hazard of the land, and b. is not likely to significantly adversely affect flood behaviour resulting in detrimental increases in the potential flood affectation of other development or properties, and c. incorporates appropriate measures to manage risk to life from flood, and d. is not likely to significantly adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses, and e. is not likely to result in unsustainable social and economic costs to the community as a consequence of flooding.
	As the proposed PDHPE building is above the 100-year ARI level, it is not likely to affect flood behaviour. It will not impact on any river banks or watercourses. It will not exacerbate flooding. Exits from the building are located on the northern side, ensuring that safe evacuation from the building is possible in the 100-year flood.
	Regarding the proposed car park, it will be constructed at the existing ground level and as such it will not affect flood behaviour and will not increase flood levels. It is considered that the car park land use is compatible with flood hazard. Erosion and sediment controls will be installed throughout construction and the disturbed areas will be rehabilitated at the completion of construction.
7.4 Biodiversity	Refer to Section 5.1 of this report.
7.8 Koala Habitat	The site is not mapped as Primary Koala Habitat, however it can be considered as land adjoining Primary Koala Habitat, as shown in Figure 5.1 .
	Detailed assessment of the impact of the development on biodiversity can be found in Section 5.1 .

Local Planning Instruments and Controls	
7.9 Air space operations	The site is located within the Airport Height Limitations map. All development would need to be below 48 m AHD or the development would be referred to the relevant Commonwealth body for concurrence. The proposed development will be well below this requirement.
7.11 Essential Services	All essential services are available to the site.
7.12 Design excellence	The new PDHPE and Library are located at the rear of the school site. The architectural designs are provided at Appendix A .

4.7.3 Request to Vary LEP Development Standard Pursuant to Clause 4.6 of the LEP

The proposed library is a two-storey building, with a roof top garden and lift shaft, stairwell and covered foyer on the third level. A variation to the provisions of Clause 4.3 (Height of Buildings) of the Coffs Harbour LEP 2013, facilitated by Clause 4.6 (Exceptions to Development Standards) of the Coffs Harbour LEP 2013, is sought in regard to the proposed building height. This is because the proposed maximum building height of 10 m (along the northern side of the building) exceeds the 8.5 m height control that applies to the site, as shown on the Coffs Harbour LEP 2013 Height of Buildings Map. Such a variation would have no unreasonable or adverse impact on the surrounding area or adjoining properties, and the objective of Clause 4.3 of the Coffs Harbour LEP 2013 would still be achieved.

Clause 4.6 of the Coffs Harbour LEP 2013 allows for a level of flexibility and therefore variation/ contravention of the development standards on the basis of a written request from the applicant that seeks to justify the variation/ 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.

This section outlines the variation request and provides justification as to why it is acceptable and supported by sound planning principles.

What is the name of the environmental planning instrument that applies to the land?

Coffs Harbour Local Environmental Plan 2013

What is the zoning of the land?

R2 Low Density Residential

What are the objectives of the zone?

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

What is the development standard and clause being varied?

Height of Buildings - pursuant to Clause 4.3 of the Coffs Harbour LEP 2013.



What are the objectives of the development standard?

- (a) to ensure that building height relates to the land's capability to provide and maintain an appropriate urban character and level of amenity,
- (b) to ensure that taller development is located in more structured urbanised areas that are serviced by urban support facilities,
- (c) to ensure that the height of future buildings has regard to heritage sites and their settings and their visual interconnections,
- (d) to enable a transition in building heights between urban areas having different characteristics,
- (e) to limit the impact of the height of a building on the existing natural and built environment,
- (f) to encourage walking and decreased dependency on motor vehicles by promoting greater population density in urban areas.

What is the numeric value of the development standard in the environmental planning instrument?

Maximum Building Height of 8.5 m (Height of Building Map, Sheet HOB 006B).

What is the proposed numeric value of the development standard in the development application?

The proposed maximum building height (along the northern façade of the building) is 10 m (refer to plans at **Appendix A** of SEE). It is the roof over a small portion of the rooftop terrace, including the lift and stairwells that reaches 10 m.

What is the percentage variation (between the proposal and the environmental planning instrument)?

The maximum height proposed is equivalent to a 17.6 per cent variation to the development standard and is not significant. Furthermore, the area of the building that exceeds the maximum height is approximately 30%. The remaining area of the proposed building is approximately 8.1 m in building height, further lessening the proportion of variation overall.

How would strict compliance hinder the attainment of the objects specified in Clause 1.3 of the Act?

- (a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,
- (b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,
- (c) to promote the orderly and economic use and development of land,
- (g) to promote good design and amenity of the built environment

The proposed construction of a new library at SJPC, with two storeys of general collection shelves, break out spaces, study nooks, meeting rooms and a landscaped roof top terrace represents an important and worthwhile opportunity for the revitalisation of the school, that will have socio-economic benefits, with minimal environmental impact.

The proposal will significantly enhance the amenity of the school, maximising use of the already disturbed portion of the grounds. The proposed library has been designed by architects that are highly experienced in school building design. The library will be modern in design, highly functional and have

a high level of visual amenity for students and staff. The proposed rooftop terrace will have landscaped gardens and seating, offering an important breakout space.

The proposed library is located at the rear of the site and will only be visible to users of the adjoining sports fields to the north (Geoff King Motors Oval).

These aspects contribute toward the achievement of the objectives of the EP&A Act. The design has taken into account the relevant matters to be addressed and sought to resolve them in the most effective and suitable manner, which results in the proposed building height. Whilst the height exceeds a development standard of the Coffs Harbour LEP 2013, this is not significant. The height has been restrained as much as practical and as discussed, the proposed variation will not result in any adverse impacts.

Is the development standard a performance-based control?

No, it is prescriptive.

How and why would strict compliance with the standard, in this particular case, be unreasonable or unnecessary?

It would be both unreasonable and unnecessary to pursue strict compliance with the building height standard for the proposed development. It has been determined that in order to provide the best possible library for students and staff of SJPC, given the limitations of the space available for the building within the school grounds, a variation to the development standard would be necessary. Complying with the height limitation would result in a lost opportunity for a roof-top terrace and given that the variation will not have any adverse impact on visual amenity, strict compliance is considered unnecessary.

The objectives of the building height development standard include *ensuring that building height* relates to the land's capability to provide and maintain an appropriate urban character and level of amenity and to limit the impact of the height of a building on the existing natural and built environment. Strict compliance with the 8.5 m standard is not necessary to achieve the objective, and the proposed maximum height is not a significant departure from the standard and this element is toward the rear of the site. No unreasonable amenity impacts, such as overshadowing of private open space or visual bulk, would result.

Approving the height variation is considered a socially and economically responsible decision and is consistent with objectives of the height standard under the Coffs Harbour LEP 2013.

Are there sufficient environmental planning grounds to justify contravening the development standard?

There are sufficient environmental planning grounds to justify contravening the height development standard for this Proposal. Approval of a variation to the building height standard is integral to its success and the functional design needs of the building. In this instance, a variation is justified as the objectives of the standard would still be achieved notwithstanding noncompliance with the standard. The standard's primary objective relates to ensuring building height preserves the character and amenity of the area. The development would revitalise the site, and appropriately integrates into the school grounds in terms of height, massing and character as assessed within the SEE.

There would be no significant environmental, heritage, visual or off-site amenity impacts. The objective of the building height standard would be upheld by the Proposal. The development will achieve positive outcomes for the school community and locality in terms of economic investment.

Considering the objectives of the R2 Low Density Residential zone in which the Proposal is located, the Proposal and height variation are further justified as it would attain the objective for this zone to enable other land uses that provide facilities or services to meet the day to day needs of residents.

Based on these considerations, the Proposal and associated variation remain consistent with the objectives and intent of the Coffs Harbour LEP 2013. The variation is acceptable and supported by both the physical and environmental planning context of the site. It is a reasonable request that would on balance result in a positive development outcome and one that would be in the public interest. Approval of such a variation would not result in undesirable outcomes or cumulative impacts and is justified on its merits and sound planning grounds.

4.8 Coffs Harbour Development Control Plan 2015

The Coffs Harbour Development Control Plan (DCP) 2015 supports the provisions of Coffs Harbour LEP 2013 and provides a set of development objectives and provisions for development within the Coffs Harbour LGA. There are various provisions that apply to the proposed school development.

The proposal is located within land zoned R2 Low Density Residential. It should be noted that there are different development controls over the land depending on the built form including commercial, residential, industrial, rural or tourism forms and the proposed educational establishment does not neatly fit into any of these development forms. Given the uniqueness of the proposed use (educational establishment), it is considered that built form consideration will be subject to a merit-based assessment. **Table 4.8** contains an assessment of the proposal against the remaining requirements of the DCP.

Section 5 outlines the additional information requirements stipulated in Coffs Harbour DCP 2015.

Table 4.8 DCP Consideration

DCP Chapter	Comment
Part B – Public Consultation	Educational establishments are considered advertised development and therefore public notification will need to occur.
Part D – Built Form Controls	Part D of the DCP contains built form controls for commercial, industrial, residential, rural and large lot residential and tourist development. The proposed use is not directly consistent with any of these development types and as such, a merit-based assessment is recommended.
Part E – Environmental Controls	Parts of this chapter are applicable to the Proposal and are commented on within Section 5 of this SEE.
Part F – General Development Controls - Access and Parking - Heritage Conservation - Landscaping	The proposed car park has been designed in accordance with AS 2890.1:2004 Parking facilities - Off-street car parking. Traffic is discussed in more detail in Section 5.4 .

DCP Chapter	Comment
SignageWaste Management	There are no identified aboriginal heritage items within the site. Heritage is discussed in Section 5.5 .
	There are no landscaping requirements that are directly applicable to the school land use.
	No additional signage is proposed.
	There will not be any change to the existing arrangements for waste management.
Part G – Special Area Controls	SJPC is located in the South Coffs Special Area and is included in the South Coffs DCP Masterplan. This Masterplan does not contain any controls applicable to SJPC.

4.9 Developer Contributions Plan

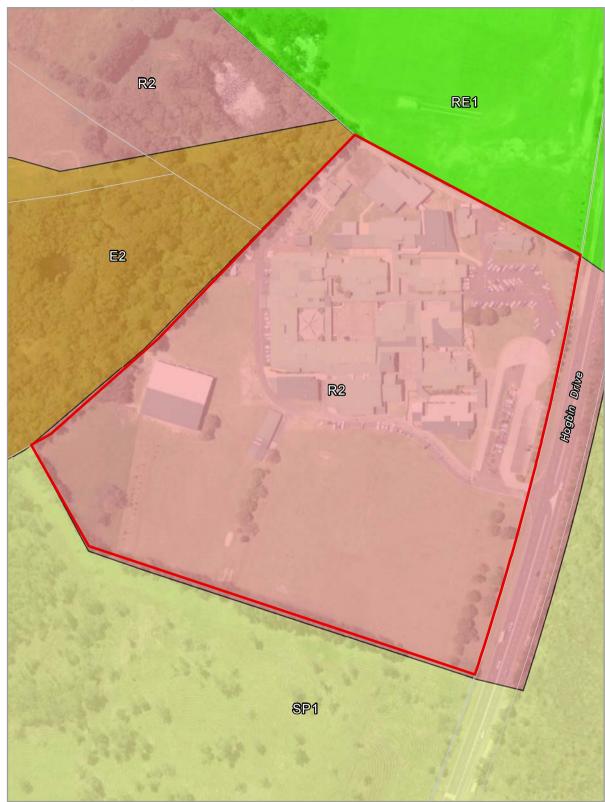
Section 7.11 of the *Environmental Planning and Assessment Act 1979* allows councils to levy contributions towards the cost of providing local infrastructure. Contributions plans set out the local infrastructure required to meet the demand from new development, and the contributions a council can levy on developers to fund the necessary land and works.

There are several developer contributions plans that apply to development within the Coffs Harbour LGA. Those contributions plans require contributions towards the provision of public amenities and services that will be required as a consequence of a development.

The proposed development does not increase the number of students or staff attending SJPC, and therefore it will not increase the load on Council's infrastructure, public amenities or services. As such, developer contributions should not be applied to the proposed development.

4.10 NSW Coastal Design Guidelines

Part 1 of the NSW Coastal Design Guidelines distinguishes Coffs Harbour as a Coastal City. 'Desired Future Character' provisions are set out for Coastal Cities, relating to the environment, visual sensitivity, edges to the water and natural areas, streets, building and, heights. None of these character provisions are relevant to the proposed school development. Part 2 of the Guidelines contains Design Principles. Again, these do not relate to the development of a new building within an existing school, on a site that is not visually prominent.



LEGEND



R2 Low Density Residential

RE1 Public Recreation

SP1 Special Activities

Cadastre



Site Zoning



5. Environmental Assessment

The following sections provide a description of the existing environment and potential impacts associated with the Activity. A site analysis plan is provided at **Illustration 2.1**.

5.1 Biodiversity

The site predominantly comprises a managed area of buildings, landscaped gardens, mown sporting fields and isolated mature trees. Vegetation to the south comprises freshwater wetland and to the east and west comprises swamp sclerophyll forest.

5.1.1 Ecological Constraints

The site does not contain any significant ecological constraints. Key findings include:

- No threatened flora species occur at the site.
- No threatened ecological communities occur at the site.
- No significant habitat features occur at the site.
- The site is not mapped Primary Koala Habitat as per the Coffs Harbour CKPoM, however it adjoins Primary Koala habitat and several preferred Koala food trees are located within the site. No visual observations of Koala or evidence of recent Koala presence was determined.
- No Biosecurity Act 2015 listed weed species for the NSW Mid North Coast region occur at the site.

5.1.2 Potential Impacts of the Proposal

The Proposal would require removal of three mature trees; one *Eucalyptus* sp., one Cadaghi (*Corymbia torelliana*) and one Swamp Mahogany (*Eucalyptus robusta*).

5.1.3 Mitigation Measures

To minimise ecological impacts, the following mitigation measures are recommended:

- Vegetation would be inspected for fauna (particularly Koalas) prior to removal. If fauna are present, works in the vicinity of the fauna would stop and a suitably licenced and experienced wildlife carer would be contacted to relocate the animal (e.g. WIRES Mid North Coast (02) 6652 7119).
- Buildings (including under flooring and roof cavities) would be inspected prior to demolition to ensure they are free of fauna. If fauna are present, a suitability licenced and experienced wildlife carer would be contacted to relocate the animal (e.g. WIRES Mid North Coast (02) 6652 7119).
- Vegetation with weed propagules (including Biosecurity Act 2015 listed weed species) would be appropriately disposed of during clearing works at a licenced waste facility.

5.2 Bushfire

The site is mapped as bushfire prone land. The proposed alterations and additions to a 'school' are regarded as 'special fire protection purposes' (SFPP). A Bushfire Hazard Assessment has been prepared in accordance with Planning for Bushfire Protection (PBP) 2006 and Addendum 3 to PBP with reference to PBP 2018 (refer to **Appendix C**).

The Bushfire Hazard Assessment has taken into consideration the proposed alterations and additions within the existing educational facility, proposed new buildings, landscaping, vegetation, effective slope and FDI detailed within PBP 2006 with reference to PBP 2018. Adequate and appropriate bushfire hazard protection measures are available and can be implemented to facilitate the proposed works. Recommendations have been provided regarding asset protection zones and construction standards. It is therefore recommended that the proposed development is approved and conditioned in accordance with the recommendations provided within the assessment (refer to **Appendix C**).

5.3 Flooding

Coffs City Council flood mapping identifies that the site is flood prone land. Approximately half of the site would be inundated in the 100-year ARI flood event. That area of the school that would be inundated is utilised for playing fields. **Figure 5.1** below shows the 100-year ARI flood extent and **Figure 5.2** shows the Flood Planning Level.

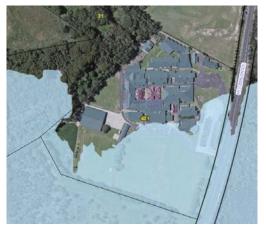


Figure 5.1 Coffs City Council 100-year ARI Flood Extent



Figure 5.2 Coffs City Council Flood Planning Level

The proposed library is situated in the north of the site and is outside of the mapped Flood Planning Level Area. The proposed PDHPE buildings are situated above the 100-year ARI level, but is within the Flood Planning Level Area. As such, the provisions of the Coffs Harbour DCP 2015 Part E4 Flooding apply. The proposed car park is located below the 100-year ARI level, therefore the provisions of Part E4 apply. **Table** 5.1 provides an assessment of the proposal against the requirements of Part E4.

Table 5.1 DCP Part E4 Assessment

Requirement	Assessment	Complies?
Development is to be designed and located so that it is free	The proposed PDHPE buildings are located so that it is free from any land that is at or	Yes

Requirement	Assessment	Complies?
from any land that is at or	below the 100-year ARI flood level.	
below the 100-year Average Recurrence Interval flood level.	The proposed car park is located on land that is below the 100-year ARI flood level.	No
Development is to be designed and located so that it is free from any floodways.	The PDHPE buildings and car park are not located within a floodway.	Yes
Development is not to comprise the external storage of any materials below the 100- year Average Recurrence Interval flood level that are potentially hazardous or that may cause pollution.	The PDHPE buildings and car park developments do not involve the storage of any hazardous or polluting materials.	Yes
Development is not to result in an increase in flood levels on adjoining or surround land.	As the PDHPE buildings will be located above the 100-year ARI, they will not cause any increase in flood levels.	Yes
	The proposed car park will be constructed at the current ground level and does not involve any filling of the land. As such, it will not result in an increase in flood levels.	Yes
Operational access to the development is to provide a level of service commensurate with the zoning and proposed use with consideration to both on-site and off-site access.	SJPC is impacted by large floods in Coffs Harbour. In particular, the entrance to the site is inundated in the 100-year ARI flood event. The current proposal will not worsen this situation, and it is considered that improvements to the school are acceptable despite the flood hazard.	Yes

Additionally, Council cannot grant development consent to the proposal unless it is satisfied that it complies with Clause 7.3 of the Local Environmental Plan. An assessment of the proposal against Clause 7.3 is provided in **Table 5.2**.

Table 5.2 LEP Clause 7.3 Assessment

Requirement	Assessment	Complies?
Council must be satisfied that the development:		
a. is compatible with the flood hazard of the land	The proposed PDHPE buildings are located above the 100-year ARI flood level.	Yes
	The proposed car park is compatible with the flood hazard as it will be constructed to withstand inundation and should not require repair after a flood event.	Yes
b. is not likely to significantly adversely affect flood behaviour resulting in	The PDHPE buildings are located above the 100-year ARI flood level and therefore will not affect flood behaviour.	Yes

Requirement	Assessment	Complies?
detrimental increases in the potential flood affectation of other development or properties	The car park will be constructed at the existing ground level and therefore will not result in any increase in flood levels at other properties.	Yes
c. incorporates appropriate measures to manage risk to life from flood	SJPC have measures in place to manage risk in the event of a flood. Those measures will remain in place. There will not be any increase in use of the site as a result of the development.	Yes
d. is not likely to significantly adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses	The potential risk of erosion and siltation as a result of the construction works, particularly the car park, will be managed through the implementation of an erosion and sediment control plan.	Yes
e. is not likely to result in unsustainable social and economic costs to the community as a consequence of flooding.	The development will not cause an increase in the social and economic costs of flooding on the community.	Yes

5.4 Traffic and Parking

The proposed car park has been designed in accordance with AS 2890.1:2004 Parking facilities - Off-street car parking. All aspects of the proposed car park comply with the standard.

Regarding traffic impacts, the proposed development will not result in any increase in student or staff numbers at the school. As such, there will not be any traffic impacts once the construction works are complete.

If required, a Traffic Management Plan will be prepared and submitted to Council prior to the issue of any Construction Certificate.

5.5 Aboriginal Heritage and Non-Aboriginal Heritage

Section F2.1 of Coffs Harbour DCP 2015 requires that development applications for development and subdivision proposals are to be accompanied by an Archaeological Assessment prepared by an appropriately qualified person where a Preliminary Aboriginal Heritage Assessment identifies that such an assessment should be undertaken.

The Activity is located within the Coffs Harbour and District Local Aboriginal Land Council (LALC) area. The proposed new buildings will be constructed on a highly disturbed site, that has been subject to previous construction activities. Aboriginal Heritage Information Management System (AHIMS) searches were undertaken for the site. Search results indicate that there are no registered sites within the works area or within 200 m of the works area (refer to **Appendix D**).

Based on the above information and with consideration of a Preliminary Aboriginal Heritage Assessment (see **Table 5.3**), there are no known Aboriginal objects within the development area and there is low probability of Aboriginal objects occurring in the area of the proposed development. As such, an Archaeological Assessment is not required.

Table 5.3 Preliminary Aboriginal Heritage Assessment

Consideration	Comment
Will the activity disturb the ground surface?	The Activity would require some excavation of previously disturbed land.
AHIMS database	An AHIMS search was undertaken for the development area. The results of the AHIMS search determined that no known items or objects of Aboriginal cultural heritage were identified within the development area (refer to Appendix D).
Is the activity: – within 200m of waters.	The development area is within 200 m of a mapped coastal wetland.
 located within a sand dune system. located on a ridge top, ridge line or headland. located within 200m below or above a cliff face. within 20m of or in a cave, rock shelter, or a cave mouth. is on land that is not disturbed land. If after completing steps 2a and 2b it is reasonable to conclude that there are no known Aboriginal objects or a low probability of objects occurring in the area of the proposed activity, you can proceed with caution without applying for an AHIP. 	As stated above, the development area is considered disturbed land.
Can you avoid harm to the object or disturbance of the landscape feature	This consideration only applies if the development is on land that is not disturbed land or contains known Aboriginal objects.
Desktop assessment and visual inspection	Only applies if the activity is on land that is not disturbed land or contains known Aboriginal objects.
Further investigations and impact assessment	Based on the above, it is not considered that further investigations and impact assessment is required.

Searches of the DoEE Australian Heritage database, the OEH State Heritage Branch database and Schedule 5 of the LEP were undertaken in relation to the Activity (refer to **Appendix D**). There are no heritage items located within 500 m of the site.

5.6 Soils



According to Coffs Harbour City Council mapping, the development area is located within land mapped as having Acid Sulfate Soils (see **Figure 5.3**).

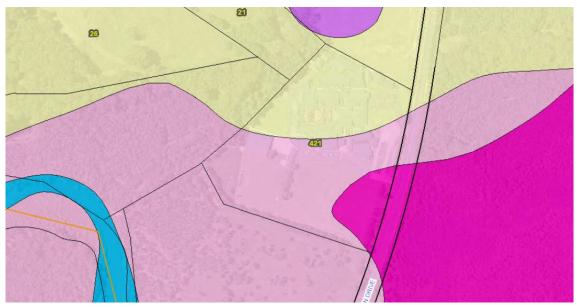


Figure 5.3 Coffs City Council Acid Sulfate Soils Mapping

The area where the library is proposed to be built is mapped as having Class 5 acid sulfate soils. The area where the PDHPE buildings are proposed to be built is mapped as having Class 3 acid sulfate soils. And, in the location of the proposed car park, the mapping indicates there are Class 2 acid sulfate soils.

Prior to the carrying out of site works further investigations, including soil sampling, will need to be carried out to determine the exact extent of the acid sulfate soils and whether they pose a risk to the environment. It is likely that an Acid Sulfate Soils Management Plan will be required in this instance.

Searches of the NSW Department of Primary Industries Cattle Dip Site Locator and NSW Environment Protection Authority Contaminated Land Record have been conducted (see **Appendix E**). There are no known sources of contamination on the site or nearby the site. The closest registered contaminated land is located approximately 2 km north-west of the site, at the Coffs Harbour Airport.

5.7 Visual Amenity

The proposed PDHPE and library buildings are not in prominent locations on the site. The PDHPE buildings will be visible from Hogbin Drive, whereas the library will not. Views of the PDHPE buildings are consistent with the existing visual landscape of the school.

The proposed car park will be visible from Hogbin Drive. It is considered that the impact on visual amenity will be minor as the car park has been designed to ensure the retention of all but one of the established trees along the Hogbin Drive frontage of the site.

5.8 Noise and Vibration

The proposed development will not result in any increase in student or staff numbers at Saint John Paul College. As such, the noise and vibration impacts would be limited to the construction phase of the development. The site is surrounded by land that is zoned E2 Environmental Conservation, SP1 Special Activities and RE1 Public Recreation. There are no noise sensitive receivers in proximity to the site. The closest dwelling to the site is approximately 300 m away to the north-west. As such, an acoustic assessment is not required.

The use of heavy machinery/ plant and construction vehicles represent the main noise emitters during the construction period. If deemed required, a Noise Management plan will be prepared and lodged with subsequent Construction Certificate documentation.

No significant long-term adverse noise impacts are expected to result from the Proposal as a result of the development.

6. Conclusion

The proposed development at Saint John Paul College includes internal renovations to existing buildings, two new PDHPE buildings, new library and new car park. The Proposal is considered appropriate and is consistent with the normal improvements expected for a school. All environmental, economic and social impacts have been assessed to determine the potential impacts of the proposed development. Overall, no significant adverse impacts have been identified, nor are any anticipated.

The proposed school renovations and additions are consistent with both the local and State planning framework. The exception is the proposed height of the library, which is 10 m above the finished ground level in one area of the building. An assessment of this variation to the Coffs Harbour LEP has been carried out, and it considered that the proposal will not have any adverse impacts and will still meet the objectives of the zone, and objects of the Act. It is considered that the proposal deserves favourable consideration by the Joint Regional Planning Panel.

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