



planning consultants

Statement of Environmental Effects

Alterations and Additions - Canterbury South Public School

20 High Street, Canterbury



Prepared for: School Infrastructure NSW
February 2019

Printed: 22 February 2019
File Name: S:\DFP Planning Pty Ltd\DFP Planning Pty Ltd - Documents\Projects\20050A Canterbury South Public School\Reports\20050A.SEE.docx
Project Manager: Stephen Earp
Client: School Infrastructure NSW c/- NBRS Architecture
Project Number: 20050A

Document Control

Version	Prepared By	Reviewed By	Issued To	Date
Draft	S. Watts	S. Earp	NBRS	18 February 2019
Final	S. Watts	S. Earp	Bankstown Canterbury Council	22 February 2019

Contents

1	Introduction	1
1.1	Commission	1
1.2	Purpose of this Statement	1
1.3	Material Relied Upon	1
2	Background	2
2.1	Previous Development Consents	2
2.2	State Significant Development	2
2.3	Pre-DA Meeting	2
3	Site Context	3
3.1	Location	3
3.2	Site Description	3
3.3	Surrounding Development	8
4	Proposed Development	11
4.1	Summary of Proposed Development	11
4.1.1	Proposal in Overall Site Development Context (Early Works)	11
4.2	Demolition and Site Preparation	12
4.3	Tree Removal	12
4.4	New 2-3 Storey Building – Block C	12
4.5	Landscaping and New Town Square	13
4.6	Stormwater Management	14
4.7	Vehicular Access, Car Parking and Signage	15
4.8	School Population	16
4.9	Signage	16
5	Environmental Planning Assessment	17
5.1	Planning Controls	17
5.1.1	State Environmental Planning Policy No. 19 – Bushland in Urban Areas (SEPP 19)	17
5.1.2	State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)	18
5.1.3	State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64)	18
5.1.4	State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)	20
5.1.5	State Environmental Planning Policy (Educational Establishments and Child care Facilities) 2017 (Education SEPP)	20
5.1.6	State Environmental Planning Policy (Coastal Management) 2018 (Coastal SEPP)	21
5.1.7	Canterbury Local Environmental Plan 2012	21
5.1.8	Draft State Environmental Planning Policy (Environment)	22
5.1.9	Canterbury Development Control Plan (DCP) 2012	22
5.2	Likely Impacts of the Development	24

Contents

5.2.1	Built Environment	25
5.2.2	Flora and Fauna	25
5.2.3	Tree Removal and Protection	26
5.2.4	Water Management	26
5.2.5	Air Quality	27
5.2.6	Heritage	27
5.2.7	Aboriginal Cultural Heritage	27
5.2.8	Visual and Acoustic Privacy	27
5.2.9	Solar Access	28
5.2.10	Views	29
5.2.11	Traffic and Parking	29
5.2.12	Waste Management	31
5.2.13	Social Impact	31
5.2.14	Economic Impact	31
5.2.15	Crime and Safety	31
5.3	Suitability of the Site for Development	32
5.3.1	Location	32
5.3.2	Land Stability	33
5.3.3	Acid Sulfate Soils	33
5.3.4	Contamination	33
5.3.5	Natural Hazards	33
5.3.6	Essential Services and Infrastructure	33
5.4	Public Interest	33
6	Conclusion	34

Figures

Figure 1	Site Location	3
Figure 2	Aerial Photograph	4
Figure 3	Building F (which fronts High Street).	5
Figure 4	Existing classrooms	5
Figure 5	Existing COLA and classrooms	6
Figure 6	Decking area surrounding mature trees (High Street frontage)	6
Figure 7	Existing Sports Court (to be retained) located on the corner of High and Napier Streets.	7
Figure 8	Play area (RE1 zoned land)	7
Figure 9	Staff car parking area (accessed from France Street)	8
Figure 10	View along High Street (school on the right)	8
Figure 11	View south-east, along France Street (school on the right)	9
Figure 12	View along Napier Street (school sports courts on the right)	9
Figure 13	Single dwellings along Napier Street	10
Figure 14	Extract of Site Plan	11
Figure 15	Photomontage of Block C as viewed from the southern end of Napier Street.	13
Figure 16	Napier Street Elevation (southern elevation).	13

Contents

Figure 17	Landscape Site Plan	14
Figure 18	Proposed Realigned Parking on Napier Street	15
Figure 19	Proposed Signage – Napier Street Entry	16
Figure 20	Proposed Signage – High Street Elevation	16
Figure 21	Shadow Diagrams for June Between 8am and 4pm	29

Tables

Table 1	Assessment under SEPP No. 64 – Advertising and Signage	19
Table 2	Assessment against Relevant Provisions of LEP	21
Table 3	Assessment against Relevant Provisions of Canterbury DCP	22

Appendices

1.	Site Survey
2.	Architectural Plans
3.	Landscape Plans
4.	Civil and Stormwater Management Plans
5.	Civil DA Design Report
6.	Stage 2 Environmental Site Assessment
7.	Remediation Action Plan (RAP)
8.	Architectural Design Statement
9.	Arborist Report
10.	Acoustic Report
11.	Parking and Traffic Assessment
12.	Green Travel Plan
13.	Biodiversity Constraints Assessment
14.	Waste Management Plan
15.	Geotechnical Report
16.	Disability Discrimination Act (DDA) Compliance Report
17.	BCA Compliance Report
18.	Aboriginal Heritage Assessment
19.	Clearance Certificate – Asbestos Removal
20.	Clause 4.6 Variation to Height
21.	Clause 4.6 Variation to FSR

Contents

Abbreviations

AADT	annual average daily vehicle trips
AHD	Australian Height Datum
AS	Australian Standard
ASS	acid sulfate soils
BC Act	Biodiversity Conservation Act 2016
BCA	Building Code of Australia
CC	construction certificate
CIV	capital investment value
COLA	covered outdoor learning area
Council	City of Canterbury Bankstown
DA	development application
DCP	development control plan
DFP	DFP Planning Pty Limited
DPE	NSW Department of Planning and Environment
DVT	daily vehicle trip
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPI	environmental planning instrument
ESCP	erosion and sedimentation control plan
ESD	ecologically sustainable development
FPL	flood planning level
FSR	floor space ratio
GFA	gross floor area
GSC	Greater Sydney Commission
HIS	heritage impact statement
IPC	Independent Planning Commission
LEP	local environmental plan
LGA	local government area
LPP	Local Planning Panel
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPWS	NSW National Parks and Wildlife Service
OEH	NSW Office of Environment and Heritage
PVT	peak hour vehicle trip
REP	regional environmental plan
RL	reduced level
RMS	NSW Roads and Maritime Services
SC	Subdivision Certificate
SCC	site compatibility certificate
SCI	site contamination investigation
SEE	Statement of Environmental Effects
SEPP	state environmental planning policy
SIS	species impact statement
SULE	safe useful life expectancy
vtph	vehicle trips per hour
WM Act	<i>Water Management Act 2000</i>
WSUD	water sensitive urban design

1 Introduction

1.1 Commission

DFP Planning Pty Ltd (DFP) has been commissioned by School Infrastructure NSW (SINSW) to prepare a Statement of Environmental Effects (SEE) for the proposed new school building and associated landscaping at Canterbury South Public School, 20 High Street, Canterbury (the site).

This report is to accompany a development application (DA) to the City of Canterbury Bankstown Council (Council) for a proposed development comprising the construction of:

- Minor demolition works to landscape areas/hardstand areas;
- Construction of a 3 storey school building on the southern side of the site to provide for 30 homebases;
- Landscape works to create a central “Town Square”;
- Playground area; and
- Re-arrangement of on-street parking on Napier Street, including changing from parallel to 90 degree parking along the school frontage, which will provide for a total of 40 parking spaces.

The proposal also seeks to increase student number to 690, and staff to 58.

The Site is zoned part R4 High Density Residential, part R3 Medium Density Residential and part RE1 Public Recreation under Canterbury Local Environmental Plan 2012 (CLEP 2012).

1.2 Purpose of this Statement

The purpose of this report is to provide Council and relevant NSW State Government Agencies with all relevant information necessary to assess the subject development proposal and to determine the DA in accordance with section 4.16 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *Environmental Planning and Assessment Regulation 2000* (the Regulation).

The proposed development is a *Crown development application* within the definitions and provisions of Part 4 Division 4.6 of the EP&A Act. Section 4.32 of the EP&A Act defines a crown development application as “a development made by or on behalf of the crown”. The proposed works are being undertaken on behalf of SINSW, which exists under the Department of Education.

1.3 Material Relied Upon

This SEE has been prepared by DFP based on information referred to herein and/or appended to this report and site inspections undertaken on 9 March 2018 and 10 October 2018.

2 Background

2.1 Previous Development Consents

Most of the school buildings on site were constructed in the 1970's, with the (current) administration building being constructed in the 1930's. A GIPA search of Council's property files for the School revealed the most recent application for the school was a Complying Development Certificate (CDC) for a classroom and covered outdoor learning area (COLA) in 2009 (PCD 58/2009). No other consents were identified or available on file.

The GIPA search indicates that there are no conditions of consent currently applying to the site which restrict the student or staff numbers at the site, or which require the provision of a specific number of car parking spaces.

2.2 State Significant Development

On 24 May 2018, DFP Planning submitted a written application to the NSW Department of Planning and Environment (DPE) to obtain the Secretary's Environmental Assessment Requirements (SEARS) for the proposed major redevelopment of Canterbury South Public School (CSPS). DPE issued SEARS on 22 June 2018 for the preparation of an Environmental Impact Statement (EIS).

However, to expedite the redevelopment of the school it has been determined that employing multiple planning pathways will deliver the redevelopment of the school in a more timely manner, in keeping with the project program. The scope of the project has not changed from the original project brief. It is considered that the key issues raised in the SEARs (for which Council provided written feedback), where relevant are still applicable to the proposed DA.

2.3 Pre-DA Meeting

An informal pre-DA meeting was held with Council staff on 10 October 2018 to update Council on the changed planning pathway (as discussed in **Section 2.2**) and to discuss any matters raised in Council's SEARs feedback of relevance to the proposed works. No minutes were issued from this meeting, however the matters discussed with Council at this meeting (in particular traffic, parking, height, and amenity impacts) have been addressed in detail within the body of this Report.

3 Site Context

3.1 Location

Canterbury South Public School (CSPS) is located in Canterbury, in the Canterbury Bankstown Local Government Area. The school is located 950m south west of the Canterbury Railway Station and town centre and approximately 400m south of the Cooks River.

A site location plan is included as **Figure 1**, which shows the site in relation to the surrounding local area and surrounding road and rail network. The school is located in a residential area and is bounded by High Street to the west, France Street to the north and Napier Street to the south. To the east is an open space area known as Pat O'Connor Reserve. Part of Pat O'Connor Reserve is on land owned by the Minister for Education and is used as a play space by the school.

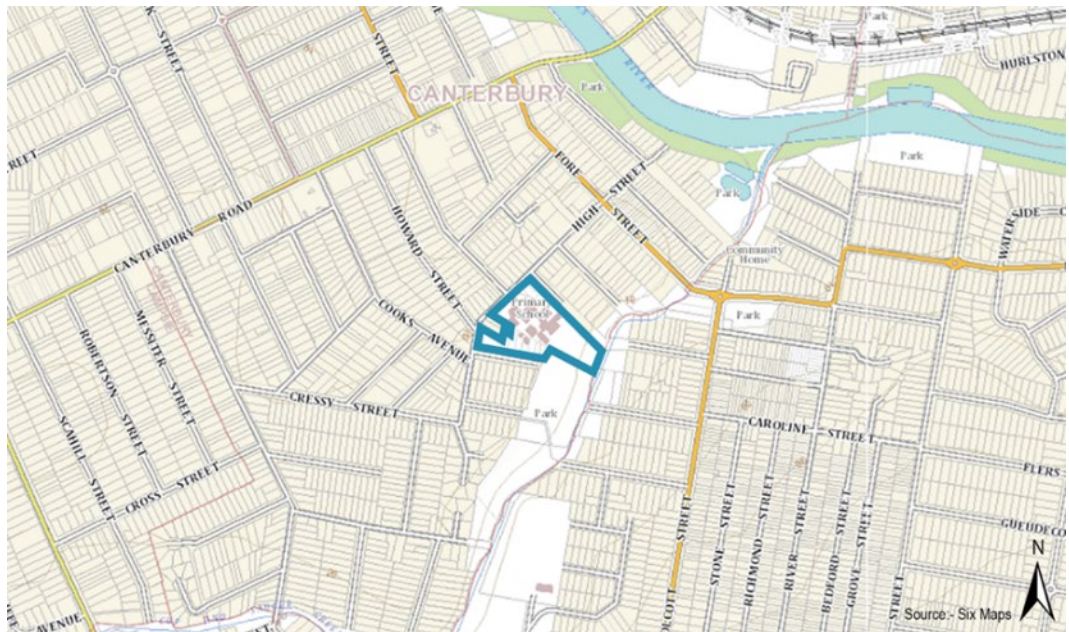


Figure 1 Site Location

3.2 Site Description

The school site has been recently consolidated (formerly 10 lots) and is now legally described as Lot 1 in Deposited Plan (DP) 1246001. A site survey has been prepared by Project Surveyors (**Appendix 1**). The school has three (3) street frontages, with France Street to the north-east, High Street to the north-west, and Napier Street to the south.

Figure 2 is an aerial photograph of the site.

3 Site Context



Figure 2 Aerial Photograph

The site is 1.802 hectares in area. The site is not identified as containing an item of environmental heritage nor does it comprise critical habitat and it is not bushfire prone land.

The site has a sloping topography and generally falls from the north to the south/ south east, with a steeper slope to the east at Pat O'Connor Reserve. The overall fall within the fenced school area (excluding Pat O'Connor Reserve) is approximately 4.5 metres. There are level changes through the site with several ramps providing equitable access to buildings and outdoor areas. Level areas are found within the school around sports courts, COLAs and open play areas.

There are currently 287 students enrolled at the school and 26 staff. Classes begin at 9.15am and finish at 3.15pm. The Canterbury South Out of School Hours Centre is open for After School Care from 3.15pm to 6.00pm. Before school care is not currently available.

The existing school has 11 buildings (including 1 demountable) and the facilities comprise:

- 12 classrooms;
- School hall;
- Canteen;
- Library;
- Offices and staff administration;
- 2 x COLAs;
- Sports court; and
- Play areas including raised decking and mature trees located in the northern corners of the site.

The majority of the school buildings were constructed during the mid-1970s, with the one newer classroom and COLA built approximately 8 years ago. Building J (administration building) was constructed in the 1930s and renovated in the 1970s. No buildings are heritage listed.

A staff car parking area is provided off France Street. School deliveries and waste collection also occur via France Street.

3 Site Context

The school has a shared play space with the adjacent Pat O'Connor Reserve to the south-east. Part of the reserve is on land owned by the Minister for Education and is used by the students during school times including for play during recess and lunchtime.

Photographs of the site are shown in **Figure 3 to Figure 9** below.



Figure 3 Building F (which fronts High Street).



Figure 4 Existing classrooms

3 Site Context



Figure 5 Existing COLA and classrooms



Figure 6 Decking area surrounding mature trees (High Street frontage)

3 Site Context



Figure 7 Existing Sports Court (to be retained) located on the corner of High and Napier Streets.



Figure 8 Play area (RE1 zoned land)

3 Site Context



Figure 9 Staff car parking area (accessed from France Street)

3.3 Surrounding Development

The surrounding land uses are predominantly residential uses. To the north east (France Street) is medium density residential development consisting of apartment buildings and town houses. The north west to south west areas are low density residential uses that comprise one and two storey residential dwellings. The school adjoins two residential properties being Nos.22 and 24 High Street.

To the east of the site is Pat O'Connor Reserve, a local park that generally follows Cup and Saucer Creek, running in a north-south direction and ultimately feeding into Cooks River.



Figure 10 View along High Street (school on the right)

3 Site Context



Figure 11 View south-east, along France Street (school on the right)



Figure 12 View along Napier Street (school sports courts on the right)

3 Site Context



Figure 13 Single dwellings along Napier Street

4 Proposed Development

4.1 Summary of Proposed Development

The proposed development comprises:

- Minor demolition works to landscape areas/hardstand areas;
- Construction of a 3 storey school building on the southern side of the site to provide for 30 homebases;
- Landscape works to create a central “Town Square”;
- Playground area;
- Re-arrangement of on-street parking on Napier Street, including changing from parallel to 90 degree parking along the school frontage, which will provide for a total of 40 parking spaces; and
- Increase school population to 690 students and 58 staff.

The following subsections provide a more detailed description of the proposed development. An extract of the Site Plan prepared by NBR Architecture is provided at **Figure 14**, with the orange hashed area identifying the areas of the site subject to works under this DA, and the greyed area identifying the areas of the site subject to separate planning pathways.

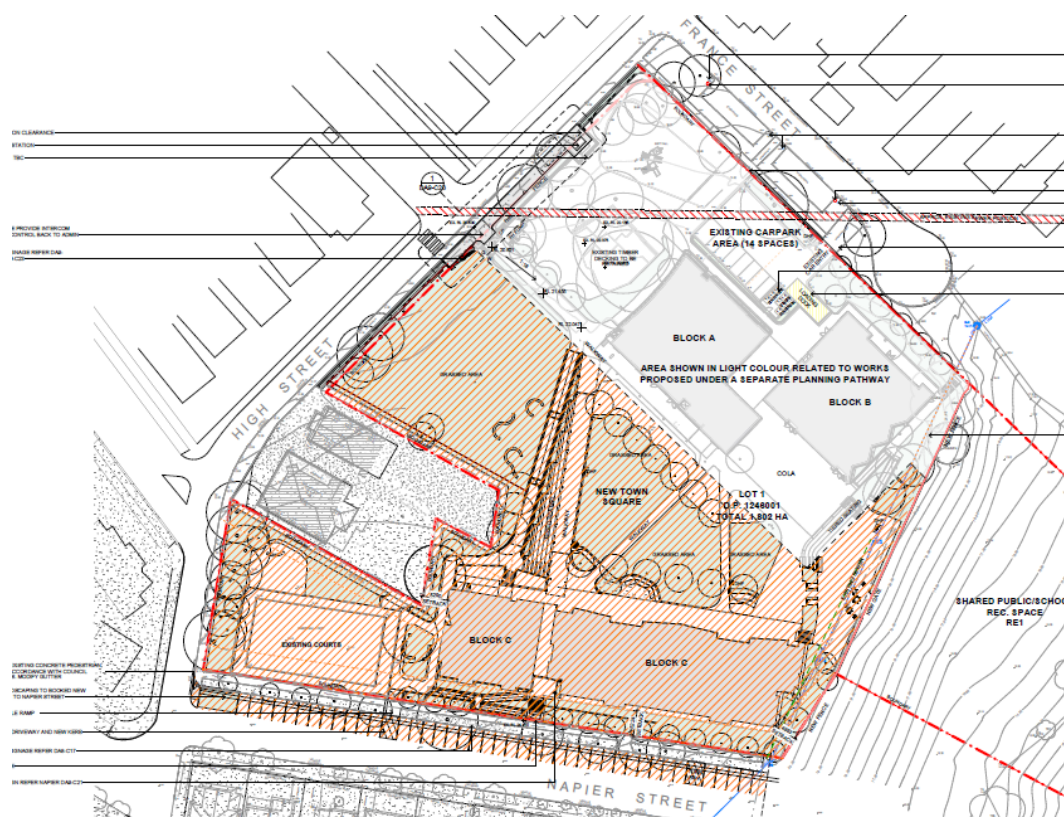


Figure 14 Extract of Site Plan

4.1.1 Proposal in Overall Site Development Context (Early Works)

In order to expedite the re-development of Canterbury South Public School, some of the works will be undertaken via the Exempt Development and/or Complying Development provisions of *State Environmental Planning Policy (Educational Establishments and Child care Facilities) 2017* (the Education SEPP) (refer to **Figure 14**).

DFP Planning is assisting SINSW to undertake exempt and complying development assessments in relation to the works, as described below:

- Demolition of existing school buildings;

4 Proposed Development

- Installation of 11 temporary demountable classrooms to accommodate students during construction work of the redevelopment of the school site. Classrooms will be removed upon the completion of works;
- Construction of a Canteen, Block A (administration and library) and Block B (multi-purpose hall); and
- General earthworks associated with the above.

It is prudent to detail these early works which do not form part of this application so as to provide an overall view of the development of the site. As detailed throughout this report, supporting documentation (where appropriate/relevant) has considered the development as a whole (i.e. early and main works) to demonstrate that applicable environmental planning matters for consideration have been factored into the overall design of the development.

Early works demolition is demonstrated on architectural drawing DA—C03 titled 'Site Demolition Plan' found in **Appendix 2**.

4.2 Demolition and Site Preparation

Demolition of the existing structures on site will be undertaken under a separate planning approval. Remediation of the site is to occur once building works commence.

4.3 Tree Removal

Mackay Tree Management (a Level 5 Consulting Arborist) has prepared an Arborist Report (**Appendix 9**) which provides assessment of the trees impacted by the proposed works. 9 trees are proposed to be removed as part of the subject development application, and the remaining trees in the vicinity of the works are proposed to be protected throughout the construction phase.

Landscape drawing L-003 titled "Site Demolition Plan" (**Appendix 3**) shows the trees proposed to be removed. Tree removal, tree protection and flora and fauna impacts are addressed in detail within **Section 5.2.2** of this report.

4.4 New 2-3 Storey Building – Block C

A new 2 and 3 storey rectangular shaped building is proposed to be constructed at the southern end of the site, to the east of the existing courts fronting Napier Street. The building is setback a minimum of 5.122 metres from the Napier Street boundary and has a minimum side setback of 4.003 metres to Pat O'Connor Reserve to the south-east.

The building is 2 storeys in height at the western end (closest to High Street) and maintains two floor levels to become 3-storeys in height with the fall of the site at the eastern end (closest to Pat O'Connor Reserve). The length of the building is approximately 77 metres and has a depth of 23 metres (including external walkway on the northern elevation). Refer to **Figure 15** which provides a photomontage of Block C as viewed from the southern end of Napier Street, looking north towards the school.

4 Proposed Development



Figure 15 Photomontage of Block C as viewed from the southern end of Napier Street.

The ground floor is to consist of the following:

- Subfloor space;
- Amenities;
- Arts and music storerooms;
- 8 homebases and associated withdrawal rooms;
- 2 centrally located practical activities areas (PAA);
- Entry from Napier Street.

The first and second floor is to consist of the following:

- Amenities;
- 18 homebases with 9 associated withdrawal rooms;
- 3 centrally located practical activity areas (PAA).

The building incorporates a skillion roof form with clerestory pop-up window features to provide additional solar access into learning spaces. All classrooms will be air conditioned, with plant for the whole building centrally located above the vertical circulation area so as to reduce the RL of the plant below that of the RL for the clerestory window features.

The proposal incorporates a mixture of finishes and materials and is well articulated along the Napier Street frontage. See **Figure 16** below.



Figure 16 Napier Street Elevation (southern elevation).

4.5 Landscaping and New Town Square

The redevelopment project presents a significant opportunity to improve the landscaping and play areas of the site through the consolidation of open space areas and classrooms, clear

4 Proposed Development

delineation between facilities and centralised access points to each point of access. The proposal will rectify site planning/layout issues and provide students with a significantly improved amenity, access network and functionality of open spaces.

The proposal involves landscaping works around Block C, perimeter landscaping, a landscaped 'Town Square' (as a 'heart' to the school activities) and an amphitheatre/soft-fall play area in the south-eastern corner of the site. The new Town Square incorporates a covered walkway joining Building C to the northern portion of the site.

An extract of the Landscape Plans prepared by NBRs Architecture: Landscape (**Appendix 3**) is provided at **Figure 17**.



Figure 17 Landscape Site Plan

The Town Square is a large, centrally located open space for multi-purpose activities and a gathering space for students. It provides an opportunity for trees and structures to provide shade to students and staff.

The amphitheatre has long stepped seating for gathering or spectating and provides a visual connection to Pat O'Connor Reserve. The amphitheatre can be used for classroom breakout activities and outdoor learning.

Overall, the landscaping will incorporate the existing mature vegetation (where possible) and will be sympathetic to the surrounding established landscape, providing a mixture of environments for play, interaction, learning, or staff meetings/breakout. Tree-lined paths will provide shade to the main areas of movement.

4.6 Stormwater Management

Jones Nicholson has prepared a Stormwater Design Report (**Appendix 5**) which provides details of the stormwater management measures proposed under this DA. The Report notes

4 Proposed Development

that following discussion with Council Engineering staff, the requirement for OSD can be omitted given impervious areas are less than 70% (increasing from 39% to only 41% overall), drainage will still run to Cup and Saucer Creek, and no major changes to existing car parking/sports court areas are proposed.

The proposed stormwater drainage design involves a similar drainage layout to that already existing on the site with the majority of the site discharging via a Water Sensitive Urban Design (WSUD) chamber to Cup and Saucer Creek.

The proposal will be subject to erosion and sediment control measures to be implemented prior to undertaking any earthworks and in line with the requirements of “The Blue Book”, so as to prevent sediment from entering the downstream stormwater network.

4.7 Vehicular Access, Car Parking and Signage

The proposal does not involve any changes to the existing vehicular access to/from the site.

No changes are proposed to the existing staff car parking area that is accessed from France Street, which provides parking for 14 vehicles. A new loading dock and enlarged waste storage facility is to be locating within the existing staff car parking area.

As part of the application, it is proposed to install 90-degree parking on Napier Street along the school frontage (**Figure 18**), which will provide approximately 40 spaces (currently caters for 25 vehicles). To maintain two-way traffic along Napier Street, the parallel parking along the northern side of Napier Street (in front of the dwellings) will need to be removed.



Figure 18 Proposed Realigned Parking on Napier Street

SECA Solution has prepared a Traffic Impact Assessment (**Appendix 11**) which provides a number of recommendations for signage to improve the pick and drop off demands of the school development, including:

- *Install signage and line marking along the school frontage in Napier Street to provide 90 degree parking, including parking restrictions of “5 minute Parking 9.00am to 9.30am and 2.30pm to 4.00pm School Days”; (additional 15 spaces)*
- *Install “No Stopping” linemarking (yellow line adjacent to kerb) along the southern side of Napier Street to maintain two-way traffic flow in conjunction with the 90 degree parking;*
- *It is also recommended that the existing twelve 90 degree parking spaces in France Street should be signposted as “5 minute Parking 9.00am to 9.30am and 2.30pm to 4.00pm School Days”. This will not increase the number of parking spaces but will assist in reserving these spaces for drop-off and pick up before and after school.*

These recommendations are included as part of this proposal, and are detailed/notated in the Architectural Plans (**Appendix 2**) and Landscape Plans (**Appendix 3**).

4 Proposed Development

4.8 School Population

The proposed development is intended to facilitate a school population increase of 425 students (265 currently, accommodate up to 690) with an increase additional 36 staff (22 currently, accommodate up to 58). The increased school population is a reflection of increased residential densities and population in the locality/catchment. Therefore CSPS has been identified as requiring upgrades to accommodate this forecast increase in enrolments.

With reference to Planning Circular PS 17-004, it is not the purpose of this DA to establish a 'cap' on the number of students or staff within this School site and it is requested that Council recognise the need for flexibility in this regard. As noted in the Planning Circular, "*Public schools are legally required to accommodate all children within their local catchment, and intake can fluctuate considerably between years and may be hard to predict*". To this end, it is expected that the proposed development (should it be granted consent) will not be the subject of a condition of consent limiting the number of students or staff, or requiring the provision of a fixed amount of car parking.

4.9 Signage

The proposed development will include the installation of two (2) new business identification signs, including:

1. School name on entry frame from Napier Street (**Figure 19**); and
2. School name on building exterior fronting High Street (**Figure 20**).

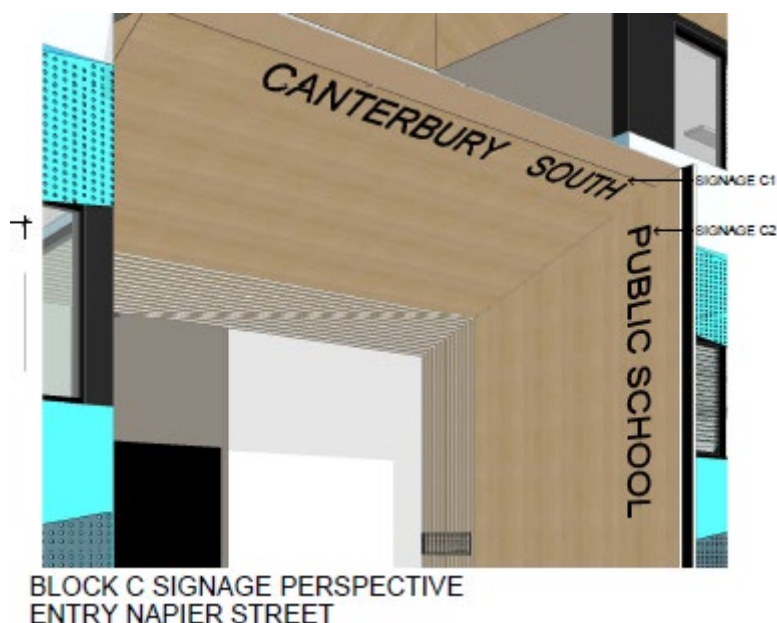


Figure 19 Proposed Signage – Napier Street Entry

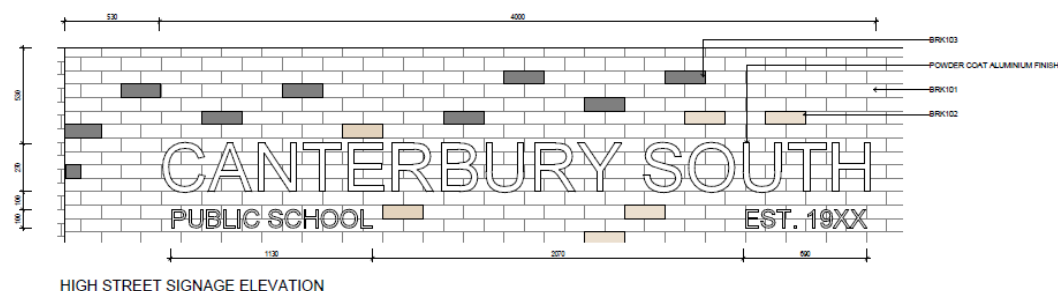


Figure 20 Proposed Signage – High Street Elevation

5 Environmental Planning Assessment

This section provides an environmental assessment of the proposed development in respect of the relevant matters for consideration under section 4.15(1) of the Environmental Planning and Assessment Act, 1979 (EP&A Act).

The key environmental planning issues associated with the proposed development are:

- Compliance with planning controls
- Built environment
- Flora and fauna
- Tree removal and protection
- Water management
- Air quality
- Climate change
- Heritage
- Aboriginal cultural heritage
- Visual/Acoustic Privacy and Internal Acoustics
- Solar access
- Views
- Parking and Traffic
- Environmental and Construction management
- Waste management
- Social impacts
- Economic impacts
- Crime and safety

An assessment of these issues is provided in the following subsections.

5.1 Planning Controls

The following subsections assess the proposal against the relevant provisions of applicable Environmental Planning Instruments (EPIs), Draft EPIs, Development Control Plans (DCPs), Planning Agreements and matters prescribed by the Regulation in accordance with section 4.15(1)(a) of the EP&A Act.

5.1.1 State Environmental Planning Policy No. 19 – Bushland in Urban Areas (SEPP 19)

The general aim of SEPP 19 is to protect and preserve bushland within the urban areas of the Local Government Areas (LGA's) referred to in Schedule 1 of the SEPP because of:

- its value to the community as part of the natural heritage,
- its aesthetic value, and
- its value as a recreational, educational and scientific resource.

SEPP 19 generally applies to land zoned or reserved for public open space. The school site is partially zoned RE1 Public Recreation. This land is owned by the Department of Education, and forms part of the Pat O'Conner Reserve which is a maintained open parkland. No works are proposed on the RE1 zoned land to the south-east of the school as part of this DA. Notwithstanding, the proposed development will not create any disturbance to the RE1 zoned

5 Environmental Planning Assessment

land within the school site, or adjoining RE1 zoned land. The proposal is consistent with the requirements of SEPP 19.

5.1.2 State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)

The proposed development will entail ground disturbance through the construction of footings for the proposed new building, and the proposed landscape works. The site has been used for the purposes of the school since 1930. A Stage 2 Environmental Site Assessment for the proposed development was undertaken by Environmental Investigation Services (EIS) (**Appendix 6**).

The Stage 2 report recommended that a Remediation Action Plan (RAP) be undertaken to address the CoC (contaminants of concern) and risk posed to site receptors. A Remediation Action Plan was undertaken by EIS (**Appendix 7**) which concludes that the site can be made suitable for the proposed development, as concluded below:

EIS are of the opinion that the site can be made suitable for the proposed development described in Section 1.1 provided this RAP is implemented accordingly. A site validation report and EMP should be prepared on completion of remediation activities and issued to the consent authority.

The Stage 2 Environmental Site Assessment also identified several fibre cement fragments (FCF), which were tested and asbestos was detected in all of the FCF samples. The report recommended the following:

EIS are of the opinion that the risk posed by asbestos should be addressed as a priority considering the sensitive nature of the land use (primary school). As a duty of care, we recommend raking and picking of asbestos from the surface to be undertaken as soon as possible. This should be followed by a surface clearance from an Asbestos Assessor.

Asbestos removal was undertaken by WSP on 25 January 2019, which also included air-monitoring and performance of a clearance inspection following the removal of asbestos containing fibre cement fragments from the visible and accessible surface portions of the delineated impact areas. A Clearance Certificate – Asbestos Removal was issued on 31 January 2019 (**Appendix 19**).

In regard to the above, Council can be satisfied that the contamination status of the site has been considered and appropriately managed. When the RAP is implemented, and a validation report and environmental management plan prepared on completion, it is considered that the site is suitable for the proposed development and the requirements of SEPP 55 have been satisfied. Remediation is to occur once building works on the site commence, and this may involve 'early works' being pursued under other planning pathways.

5.1.3 State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64)

SEPP 64 applies to all signage that can be displayed with or without development consent and is visible from any public place or public reserve.

The proposal includes two (2) business identification signs comprising the school name, one located at the Napier Street entry and the other on the High Street elevation of the new building as described in **Section 4.9**. The proposed signage is required to comply with the aims of clause 3(1) of SEPP 64 and the assessment criteria in Schedule 1 to the SEPP.

An assessment of the proposed signage against these objectives and assessment criteria is provided in **Table 1**.

5 Environmental Planning Assessment

Table 1 Assessment under SEPP No. 64 – Advertising and Signage

Provision	Assessment
Clause 3 – Aims, Objectives	
(a) to ensure that signage (including advertising): (i) is compatible with the desired amenity and visual character of any area, and (ii) provides effective communication in suitable locations, and (iii) is of high quality design and finish, and	The character of the locality in the vicinity of the site is varied, comprising a mixture of low and medium density housing, parkland and other supporting land uses. The proposed signage identifies the name of the new school at the Napier Street and High Street frontage, providing effective communication in a suitable location for both these street frontages. The signage is of a high-quality design and will utilise a high-quality finish.
(b) to regulate signage (but not content) under Part 4 of the Act	An assessment of the proposed signage in respect to Part 4 of the EP&A Act, in particular the relevant matters for consideration under Section 79C(1) is provided within this Report.
(c) to provide time-limited consents for the display of advertisements in transport corridors, and	N/A
(d) to regulate the display of advertisements in transport corridors, and	N/A
(e) to ensure that public benefits may be derived from advertising in and adjacent to transport corridors.	N/A
Schedule 1 Criteria	
Character of the Area	The character of the locality in the vicinity of the site is varied, comprising a mixture of low and medium density housing, parkland and other supporting land uses. The proposed signage identifies the name of the new school at the Napier Street and High Street frontage, providing effective communication in a suitable location for both these street frontages. The signage is of a high-quality design and will utilise a high-quality finish.
Special Areas	The site is not located in a special area, such as a heritage conservation area or the like. The proposed signage will have no impact upon any 'special areas'.
Views and Vistas	The signage is not of a scale or content that would detract from the significance of any views or vistas in the locality.
Streetscape, Setting or Landscape	The proposed signs are of a scale which is considered suitable for the length and height of the building, the size of the site and the road frontages and will not dominate the streetscape of either Napier Street or High Street.
Site and Building	The extent of the signage is reasonable having regard to the scale and street-front distribution on the Site. In terms of area, the signage will comprise an almost negligible proportion of the street frontage of the site, in this case to Napier Street and High Street.
Associated devices and logos with advertisements and advertising structures	No associated devices are proposed.
Illumination	The signage is not proposed to be backlit.
Safety	The proposed building signage will be a powder coated aluminium fixed lettering to the building facades and therefore there will be no adverse public safety concerns for pedestrians, cyclists or motorists. Therefore, the proposed signs will not obscure or interfere with road traffic signs and signals.

5 Environmental Planning Assessment

5.1.4 State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

Schedule 1 by virtue of clause 8 of the SRD SEPP establishes that any proposed development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school is state significant development (SSD). Schedule 7 by virtue of clause 20 of the SRD SEPP establishes that an educational establishment development with a value of more than \$5 million is regionally significant development (RSD).

The capital investment value of the project is greater than \$5m and less than \$20m as determined by the quantity surveyors report prepared by Altus Group accompanying the development application form. As such the proposal is classified as RSD and will be determined by the Sydney South Planning Panel, does not meet the SSD threshold.

5.1.5 State Environmental Planning Policy (Educational Establishments and Child care Facilities) 2017 (Education SEPP)

Clause 35 'Schools—development permitted with consent' provides that development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone. The proposed works are located on land zoned R3 Medium Density Residential and R4 High Density Residential. The R3 and R4 zones are prescribed zones for the purposes of the Education SEPP.

Clause 35(6) requires the determining authority to take into consideration the design quality of the development against the design quality principles in Schedule 4 of the SEPP. A design statement has been prepared by NBRS Architecture (**Appendix 8**) which addresses each of the following 7 design principles:

- Principle 1—context, built form and landscape
- Principle 2—sustainable, efficient and durable
- Principle 3—accessible and inclusive
- Principle 4—health and safety
- Principle 5—amenity
- Principle 6—whole of life, flexible and adaptive
- Principle 7—aesthetics

As per clause 57, as the school will be able to accommodate 50 or more additional students, written notice of the application (within 7 days) is to be provided to the Roads and Maritime Services (RMS). The Council must take into consideration any submission that the RMS provides. As part of a traffic-generating development, the Council and RMS must take the Clause 57(3) into consideration which states the following:

(3) The consent authority must take into consideration

(a) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, RMS advises that it will not be making a submission), and

(b) the accessibility of the site concerned, including:

(i) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and

(ii) the potential to minimise the need for travel by car, and

(c) any potential traffic safety, road congestion or parking implications of the development

Please refer to **Section 5.2.11** which discusses parking and traffic.

5 Environmental Planning Assessment

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

The Coastal SEPP commenced on 3 April 2018 and combines into one policy the following now repealed state environmental planning policies:

- SEPP 14 (Coastal Wetlands),
- SEPP 26 (Littoral Rainforests), and;
- SEPP 71 (Coastal Protection).

Clause 3 of the Coastal SEPP specifies that:

The aim of this Policy is to promote an integrated and co-ordinated approach to land use planning in the coastal zone in a manner consistent with the objects of the Coastal Management Act 2016, including the management objectives for each coastal management area, by:

- (a) managing development in the coastal zone and protecting the environmental assets of the coast, and*
- (b) establishing a framework for land use planning to guide decision-making in the coastal zone, and*
- (c) mapping the 4 coastal management areas that comprise the NSW coastal zone for the purpose of the definitions in the Coastal Management Act 2016.*

Upon review of the Coastal SEPP maps, the site is not within areas identified as coastal wetlands or littoral rainforest. The nearest coastal environmental area is the Cooks River environmental area which is over 350m to the north-east, therefore it is considered that there will not be any impacts arising on coastal environmental areas. Accordingly, the development is considered to be consistent with the aims of the Coastal SEPP.

5.1.7 Canterbury Local Environmental Plan 2012

Table 2 provides a summary assessment of the proposed development against the relevant provisions of the LEP.

Table 2 Assessment against Relevant Provisions of LEP		
Provision	Assessment	Consistent
Clause 2.2 – Zoning - R3 Medium Density Residential - R4 High Density Residential	Under both zones, Educational Establishments are prohibited, however these zones are prescribed zones under Education SEPP and is permissible. No works are proposed in the RE1 zoned land.	Yes
Clause 4.3 - Height of Buildings R3 & R4 - 8.5m	Maximum height – 13.586m Refer to Clause 4.6 Variation (Appendix 20)	No
Clause 4.4 - Floor Space Ratio R3 - 0.5:1 R4 - 0.75:1	R3 zoned land – 0.82:1 Overall site (excluding RE1 zoned land) - 0.40:1 Refer to Clause 4.6 Variation (Appendix 21)	No
Clause 5.1A - Development on land intended to be acquired for public purpose.	The southern side of the site (which is zoned RE1 Public Recreation) has been identified on Council's Land Reservation Acquisition Map as land to be acquired for Local Open Space by Council. No works are proposed on this land as part of the development application, and no proposal is made by SINSW to commence acquisition of the land by Council.	Yes
Clause 5.10 – Heritage Conservation	The site is not identified as an item of environmental heritage within schedule 5 of the CLEP nor is it identified as being within a heritage conservation area. Please refer to additional heritage comments in Section 5.2.6 of this report.	Yes
Clause 6.1 - Acid sulfate soils	The site is identified as Class 5 acid sulfate soils under CLEP 2012. The Stage 2 Environment Site Assessment prepared by EIS (Appendix 6) stated that "the risk posed to the environment by acid sulfate soils to the development is relatively low." The report	Yes

5 Environmental Planning Assessment

Table 2 Assessment against Relevant Provisions of LEP

Provision	Assessment	Consistent
	provides justification for these findings. It is considered that an Acid Sulfate Soils Management Plan is not required in this instance.	
Clause 6.2 - Earthworks	Earthworks will be required for the proposed building and landscape works. There is no excessive cut and fill required as a result of the building stepping down with the topography of the site.	Yes
Clause 6.3 - Flood planning	The site is not identified as a flood planning area under the CLEP 2012 flood planning map.	N/A
Clause 6.4 - Stormwater Management	A Stormwater Management Plan and accompanying report has been prepared by Jones Nicholson Consulting Engineers (Appendix 4) which confirms the proposal has been designed in accordance with Canterbury DCP 2012 and relevant Australian Standards.	Yes

5.1.8 Draft State Environmental Planning Policy (Environment)

The Department of Planning and Environment exhibited the proposed draft SEPP (Environment) until 31 January 2018 which seeks to protect and management the natural environment and proposes to simplify the planning rules for a number of water catchments, waterways, urban bushland, and Willandra Lakes World Heritage Property

It proposes consolidating the following seven existing SEPPs:

- *State Environmental Planning Policy No. 19 – Bushland in Urban Areas*
- *State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011*
- *State Environmental Planning Policy No. 50 – Canal Estate Development*
- *Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment*
- *Sydney Regional Environmental Plan No. 20 – Hawkesbury-Nepean River (No.2-1997)*
- *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005*
- *Willandra Lakes Regional Environmental Plan No. 1 – World Heritage Property.*

It is considered that the previous SEPP assessments within this report and the environmental assessment within **Section 5.2** satisfactorily considers relevant matters and that the proposal is acceptable in these regards.

5.1.9 Canterbury Development Control Plan (DCP) 2012

Table 3 provides a summary assessment of the proposed development against the relevant provisions of the DCP.

Table 3 Assessment against Relevant Provisions of Canterbury DCP

Provision	Assessment	Consistent
Part B – General Controls		
B1 Transport and Parking		
B1.3.1 General Parking Rates		
Primary School		
1 space per 2 staff		
Visitors: Adequate provision on-street for the dropping off and picking up of students.	No change is proposed to the existing parking area which provides for 14 car spaces. 58 staff are proposed, which would require 29 car parking spaces. No additional parking on-site is proposed, however additional street parking along Napier Street is proposed, which would provide 15 additional parking spaces. The existing parking spaces	Justified Inconsistency, refer Section 5.2.11
Adequate bus parking facilities		

5 Environmental Planning Assessment

Table 3 Assessment against Relevant Provisions of Canterbury DCP

Provision	Assessment	Consistent
Bicycle – 1 per 10 staff, adequate student bike facilities.	<p>together with the additional parking spaces on Napier Street would provide a total of 29 spaces for staff parking. The variation to parking is supported by a Traffic Impact Assessment (Appendix 11) and by a Green Travel Plan (Appendix 12) prepared by SECA Solutions.</p> <p>Refer to Section 5.2.11 for further details.</p> <p>Bike and Scooter racks are proposed on the southern side of Block C which accommodate 8 bikes.</p>	Yes
B1.3.2 Accessible Parking Rates Class 9 building – 1 for every 25 spaces	An existing accessible car parking space is providing within the existing car park on the northern side of the site.	Yes
B1.4.1 General Design Requirements Compliance with relevant Australian Standards	No changes to the existing on-site car parking facilities are proposed as part of the subject development application.	N/A
B1.4.7 Grade Parking	Refer above – no changes to the on-site at grade parking are proposed as part of the subject DA.	N/A
B2 Landscaping B2.2 Landscape Plan	A detailed landscape plan has been prepared by NBRSLandscape (Appendix 3).	Yes
2.3.1 Existing Vegetation and Features	<p>The proposed landscaping has been designed to complement the existing streetscape whilst satisfying the needs of the school.</p> <p>An erosion and sediment control plan has been prepared (Appendix 4).</p>	Yes
2.3.2 Design and location of landscaping	The proposed landscaping has been designed to create a “town square” for the site, by providing a central meeting space for the school children with shading and seating, as well as a large open space. Overall, the landscape theme aims to integrate with future built form of school as well as the existing streetscape and surrounding area. Planting along the adjoining boundaries of Nos. 22 and 24 High Street includes continuous evergreen planting including shrubs and trees which will have a mature height of 5-15m.	Yes
2.3.3 Trees and Canopy Coverage	<p>A total of 9 trees are proposed to be removed as part of the development application.</p> <p>Where possible, existing trees are to be retained, and tree canopy has been considered. Appropriate tree protection measures are to be implemented during construction works to ensure the survival of these trees.</p>	Yes
B2.4 Environment and Biodiversity	A Biodiversity Constraints Assessment has been prepared by Travers Bushfire & Ecology (Appendix 13) which provides further details in relation to the biodiversity of the site. Section 5.2.2 of the report also provides further details.	Yes
B3 Tree Preservation	The proposal has sought to retain existing vegetation where possible. However, a total of 9 trees are proposed to be removed as part of the development application. An arborist report has been prepared by MacKay Tree Management (Appendix 9) which provides assessment of the trees impacted by the proposed works.	Yes
B4 Accessible and Adaptable Design	A Disability and Discrimination Act (DDA) Compliance report has been prepared by Metro Building Consultants (Appendix 16) which confirms that the	Yes

5 Environmental Planning Assessment

Table 3 Assessment against Relevant Provisions of Canterbury DCP

Provision	Assessment	Consistent
	proposed development been assessed in respect to the deemed to satisfy requirements of Part D3 and F2 of the Building Code of Australia 2016, the Disability Access to Premises Standards 2010, the Disability Discrimination Act (DDA) 1992 and the relevant parts of AS1428.1 2009 and AS1428.4.1 2009.	
B5 Stormwater and Flood Management	A detailed stormwater drainage plan (Appendix 4) and design report (Appendix 5) has been prepared by Jones Nicholson demonstrating how stormwater will be managed on the site. A rainwater tank has been included as part of the proposed development to ensure adequate stormwater management, as well as water re-use where possible. Council advised that OSD was not required in this instance. The site is not flood affected.	Yes
B6 Energy and Water Conservation	Energy efficiency and water conservation has been incorporated into the design, construction and use of the proposed development. Refer to Appendix 8 , design principle 2 which goes into further detail with respect to the environmental sustainability components of the development, and the measures employed to provide an energy efficient development.	Yes
B7 Crime Prevention and Safety	Refer to Section 5.2.15 which details the crime prevention and safety aspects of the proposed development.	Yes
B8 Heritage	The site does not contain a heritage item, nor its it within a heritage conservation area. An Aboriginal Heritage Assessment report has been prepared by Cultural Heritage Connection (Appendix 18) which provides an assessment of the environmental and archaeological contexts, and discusses the findings of the due diligence reporting, including feedback from the Metropolitan Local Aboriginal Land Council (MLALC). The Report provides recommendations including an unexpected finds protocol	Yes
B9 Waste Management	A waste management plan prepared by MRA Consulting Group (Appendix 14) which outlines the construction and on-going waste management for the site. The proposal and the increase in student number will result in increased waste management needs, including facilities to waste storage. The existing waste storage facility is to be increased to cater for the additional need. Waste is collection by a private contractor.	Yes
Part F Specific Land Uses and Specific Sites F1 Signage	Signage is proposed in the form of two (2) business identification signs, identifying the school name to the Napier Street and High Street frontages. Details of the signs are provided in the Architectural Plans (Appendix 3) and comply with the matters set out under Part E of the DCP. Further assessment of the signage is provided against SEPP 64 at Section 5.1.3 .	Yes
F8 Non-resident Development in Residential Zones	The re-development of the existing school, located in a residential zone has been designed to minimise unreasonable amenity impacts on surrounding residents. Refer to Section 5.2.8 for further details in relation to amenity impacts.	Yes

5.2 Likely Impacts of the Development

The following subsections assess the likely impacts of the development in accordance with section 4.15(1)(b) of the EP&A Act.

5 Environmental Planning Assessment

5.2.1 Built Environment

The site-planning principles that have been implemented for this development have enabled a significant improvement to the amenity of the built environment within the School site through consolidating and maximising open space areas into a 'Village Centre'. This area serves as a central connection and 'heart' of the school campus, providing a focus on areas for learning and play.

This has been achieved through the replacement of aging facilities and consolidation of classrooms into a single building of contemporary design which has been positioned on the southern site frontage, helping to create a clear line between facilities, and providing a 'book end' to the central play areas of the site.

In locating the new building at the southern end of the site, the design has been able to respond to the built environment and topography of the land through a part two (2) and part three (3) storey built form that maintains floor levels which step down with the land to create the third level. This approach minimises site works and ensures the building responds appropriately to its setting and surrounds.

The primary considerations for the built environment arising from the proposed development relate to overshadowing (refer **Section 5.2.9**), privacy (refer **Section 5.2.8**) and visual impacts arising from the building height. These considerations have all been assessed in this Report and it is considered the proposal will not give rise to unacceptable adverse impacts.

In terms of building height, the proposal will result in a maximum building height of 13.586m, constituting a variation of 5.086m (59.8%) above the 8.5m building height development standard under CLEP 2012. A written request for exception to the building height development standard has been prepared pursuant to Clause 4.6 of CLEP 2012 (**Appendix 20**).

The Clause 4.6 variation request provides an assessment of the element of the building that exceeds the building height development standard, concluding that strict compliance is considered to be unreasonable and unnecessary as the proposal is consistent with the relevant objectives of the development standard.

Further, strict compliance (i.e. to remove the top floor so the building complies with the height control) would result in an inefficient use of the land and reduce at grade playground space. Compliance with the building height development standard would result in an inferior design where additional buildings with a larger footprint would occupy more of the site.

The building will present as two (2) storeys when viewed from High Street and the northern end of Napier Street, and will only read as a three (3) storey building when viewed part-way down Napier Street. The high quality design and use of varying materials and finishes presents a positive contribution of public school facilities to the adjacent streetscapes, and represents a significant improvement to the learning facilities at Canterbury South Public School.

As the proposed building represents a good planning outcome for the use of the site, and does not result in unacceptable adverse built form impacts, it is considered that the proposed building is supportable in terms of built form outcomes.

5.2.2 Flora and Fauna

A Biodiversity Constraints Assessment has been prepared by Travers Bushfire & Ecology (**Appendix 13**) which has addressed the Biodiversity Offset Scheme and the flora and fauna on the site. It is noted that since the completion of this report, the site is no longer mapped as Sensitive Biodiversity Values Land and is not located on the current Biodiversity Values Map. Furthermore, the estimated tree removal (or native vegetation) is less than the threshold, therefore offsetting is not required.

The report makes the following recommendations to minimise the adverse ecological impacts:

5 Environmental Planning Assessment

1. Aim to retain fruiting and flowering trees to provide feeding habitat for Grey-Headed Flying-fox.
2. If any microbats emerge from building during the demolition process a contact fauna ecologist should be contacted immediately and prior to any further works proceeding.

The site contains no Endangered Ecological Communities (EECs) as listed under the NSW BC Act (2016) or the Commonwealth EPBC Act (1999).

Three (3) threatened tree species currently existing on site, which are *Eucalyptus nicholii*, *Eucalyptus scoparia* and *Syzygium paniculatum*. These trees on site are considered to be planted as these species have restricted distribution and/or habitat requirements and would not naturally occur within the site. It is therefore considered these individuals within the site are not important for the preservation of the naturally occurring populations of these species and are not of high conservation priority.

Of the 9 trees proposed to be removed, 2 of the trees are threatened tree species, being Trees 28 and 32 identified in the arborist report (**Appendix 9**). The other two trees (28 and 32), both *Eucalyptus nicholii* are located within the footprint of the building and are unable to be retained.

Overall, the proposal does not trigger biodiversity offsets under the threshold tests. It is considered that the proposal is not likely to cause a serious or irreversible impact upon any threatened entities most at risk of extinction.

5.2.3 Tree Removal and Protection

Tree removal:

As part of the subject development application, 9 trees have been identified for removal, including:

- Tree 25 – Peppermint Gum – native tree with medium retention value that will be impacted by the new building;
- Trees 26 and 27 – Bracelet Honey Myrtle – Trees located within the footprint of the new building. Tree 26 has defects warranting its removal regardless of the development;
- Tree 28 – Narrow Leaf Peppermint – Native tree with medium landscape significance, located within footprint of building;
- Trees 29 and 30 – Grey Gum – Native tree with medium landscape significance, located within footprint of building;
- Tree 31 – Lilly Pilly – Native tree with high landscape and environmental significance, located within footprint of new building;
- Tree 32 – Narrow Leaf Peppermint – Native tree with high landscape and environmental significance, located within footprint of new building; and
- Tree 33 – Lilly Pilly – Native tree with high landscape and environmental significance, located within footprint of new building.

The Arborist Report (**Appendix 9**) shows a tree location plan, as well as the Site Demolition Plan included in the architectural package found in **Appendix 2**. This DA seeks consent for the removal of these 9 trees, and anticipates tree protection measures will form part of the conditions of consent to protect the remaining trees proximate to the works.

5.2.4 Water Management

A stormwater management report (**Appendix 5**) has been prepared by Jones Nicolson Consulting Engineers with accompanying stormwater design drawings (**Appendix 4**). The report addresses flooding, existing stormwater, stormwater detention, WSUD in relation to the proposed development, as well as the overall redevelopment on the site as a whole.

5 Environmental Planning Assessment

It is considered that the proposed development will provide for a significant improvement to the overall capture, treatment and disposal of stormwater from the site with appropriate erosion and sediment controls installed and maintained throughout the construction period.

5.2.5 Air Quality

Some dust is anticipated during the construction period, this impact however can be managed through measures such as wetting down work areas/stockpiles, stabilising exposed areas, preventing material tracking out onto public roadways, covering loads on all departing trucks and working to weather conditions. The proposal is otherwise not expected to give rise to any long term or adverse impacts on local or regional air quality.

5.2.6 Heritage

The site is not identified as being an item of environmental heritage nor is it located within a heritage conservation area. There are two local heritage items at Nos. 15 and 19 High Street, located approximately 50 metres to the north-east from the school boundary. The heritage items are located over 150 metre from the proposed Block C and therefore are not considered to be 'in the vicinity' of the works. It is considered that there will not be any significant impacts arising on natural or built heritage as a result of the proposal.

5.2.7 Aboriginal Cultural Heritage

An Aboriginal Heritage Assessment has been prepared by Cultural Heritage Connection (**Appendix 18**) which makes the following conclusions:

"On the basis of the documented disturbance it is concluded that the project area has low archaeological potential. It has been subject to construction, landscaping and filling during its period of use as a school. Based on the geotechnical assessment, all horizon soils have been completely removed in much of the project area. Elsewhere soil strata have been disturbed and fill has been introduced. The ridgeline landform also suggests that erosion and shallow soils would have reduced the potential for intact archaeological deposit to be preserved.

The extent of the disturbance to the ground surface is considered likely to have removed any pre-existing evidence of past Aboriginal occupation."

Furthermore, the report recommends that the development can 'proceed with caution' as outlined in the due diligence guidelines within the report, and that if any cultural and or aboriginal materials are uncovered during the development works that the MLALC and OEH be contact immediately, and any culturally significant items on site be cared for, respected and recorded in the correct way. Notwithstanding, during construction the building contractors will follow the latest OEH unexpected finds protocol should any relics, artefacts or the like be disturbed.

5.2.8 Visual and Acoustic Privacy

Visual Privacy

Visual privacy for properties adjoining to the south of the site, along Napier Street is maintained through the design of the proposed main building and presence of existing and proposed vegetation along the southern boundary of the site. The building has been setback 5 metres from the southern boundary which provides the opportunity for screen planting.

Planting along this southern boundary is to consist of *Elaeocarpus reticulatus* 'Prima Donna' (Blueberry Ash Prima Donna), in 100 litre pot sizes, which has a mature height of 8-10 metres and a width of 3-4 metres. These trees, at their mature height will provide a natural vegetation screen, as well as the existing street trees. The dwellings to the south along Napier Street are approximately 25 metres (minimum) from the proposed new school building, which provides a further buffer.

The building outlook (including internal layout) is generally oriented to the north, overlooking the "Town Square", with circulation of students along the external walkways on the northern elevation. Whilst there are opening along the southern elevation, towards Napier Street, these

5 Environmental Planning Assessment

windows in the class rooms have a sill height of 1.2m which limits overlooking from students. It is also noted that these classrooms are occupied during school hours only, Monday to Friday. In light of all the above, it is considered that the proposal will not result in significant adverse impacts relating to visual privacy for residential properties along Napier Street.

Screen planting is also proposed along the western boundary of the school, adjacent to the residential dwellings at Nos. 22 and 24 High Street. Trees proposed along this boundary include *Olea europaea* "Monher" (European Olive) and *Banksia integrifolia* (Coastal Banksia) which have a mature height of approximately 10 metres and 10-15 metres respectively. Shrubs with a mature height of approximately 5 metres (Sublime Lilly Pilly) are also proposed along of the adjoining boundary to these properties which will provide further landscape buffers. Opening along the western elevation, closest to the neighbouring dwelling are mainly limited to highlight windows. It is considered that the proposal will not result in significant adverse impacts relating to visual privacy for residential properties at Nos. 22 and 24 High Street.

Acoustic Privacy

Operational Matters

A Noise Impact Assessment (NIA) has been prepared by Resonate (**Appendix 10**). In terms of the assessment of potential acoustic impacts on external sensitive receptors (acoustic privacy) resulting from school activities, the report concludes the following:

To support a Development Application for Canterbury South Public School's redevelopment, Resonate Consultants prepared an acoustic report addressing specifically operational noise requirements of Block C. Site-specific noise criteria that are applicable to the entire project have been established in accordance with the requirements of the NSW Noise Policy for Industry (NPI).

An operational noise assessment has been conducted for the activities associated with the redevelopment to determine the potential for noise impact at surrounding receivers. The assessment has considered the potential noise impact to the community from the public address system/school bell, and mechanical services.

This noise impact review of operational noise sources associated with the new Block C, has shown that with careful attention during the detailed design stages, that the project noise criteria can be met using typical and practical noise control methods.

Construction Noise

Consideration of construction noise has taken into account for the entire development of the site (i.e. early works as described in **Section 4.1.1** of this report as well as the proposed Block C works). Whilst the 'early works' do not relate to this proposal it is prudent to demonstrate that the potential construction noise impacts are not considered in isolation from each other as they will generally be consistent. It is likely that a Construction Noise and Vibration Management Plan (CNVMP) will be developed at a later stage of the project, prior to the commencement of site works and once a contractor has been appointed and a programme of construction activities confirmed. The report is to outline recommendations for construction noise management and mitigation measures to minimise the impact of the development on neighbouring properties.

Overall, it is considered that acoustic privacy for neighbouring sensitive receptors will not be adversely affected.

5.2.9 Solar Access

NBRS Architecture has prepared shadow diagrams as part of the Architectural Plan set (**Appendix 2**), as required by Council's DA guide and DCP requirements. An extract of the shadow diagrams for June is provided at **Figure 21**.

5 Environmental Planning Assessment

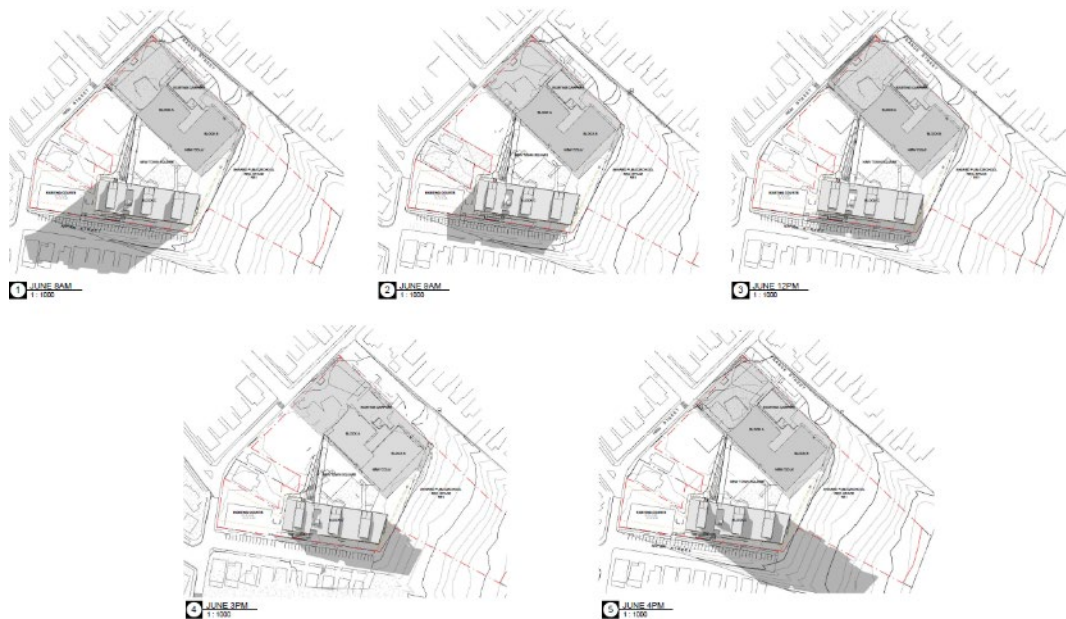


Figure 21 Shadow Diagrams for June Between 8am and 4pm

Generally, shadows resulting from the proposed development will be contained within the bounds of the site, on Napier Street or within the Pat O'Conner Reserve with the exception of minor overshadowing on the front yard of Nos. 15 and 17 Napier Street in the morning during the Winter Solstice (between 8am and approximately 8:30am), and a small corner of the rear yard of 24 High Street in the morning during the Summer Solstice.

The level of overshadowing impact resulting from the proposal has been identified as confined to brief sections of the day, generally outside of the relevant assessment benchmark commonly used – that being the hours of 9am through to 3pm at the winter solstice¹. Therefore, the proposal is not considered to result in an unacceptable impact upon solar access.

5.2.10 Views

The proposal will not compromise any scenic views or vistas within the locality.

5.2.11 Traffic and Parking

A detailed Traffic Impact Assessment prepared by SECA Solution has submitted to accompany this development application and is included as **Appendix 11**. Details of the Assessment are discussed further below.

Access

All vehicular access to and from the school is via a gated driveway in France Street which provides access to an on-site parking area for staff as well as access for emergency vehicles, deliveries and for waste collection. No changes to the existing access arrangements along France Street is proposed. The main pedestrian access is via High Street, with pedestrian access also available via France Street and Napier Street.

In Council's feedback to the earlier request for SEARs, a range of "potential measures to be investigated/assessed" included:

"consideration for the provision of a connecting road between the ends of Napier Street and France Street, to provide a one-way northbound traffic flow with drop-off/pick-up bays. The configuration of the access street would be a single traffic lane, a parking lane and a concrete footpath area to provide an all-weather set down area."

¹ *The Benevolent Society v Waverley Council* [2010] NSWLEC 1082 at 131.

5 Environmental Planning Assessment

Despite the overall size of the site, CSPS is largely contained to the western area of the site, determined generally by the slope of the site as it falls down towards Cup and Saucer Creek. The potential for a connecting road between Napier Street and France Street was considered, however given the large area of the site this would take up, the alignment it would need to follow given the topography of the land, and the overall cost of this recommendation, it was determined that this change to access was not feasible or realistic.

Traffic

As described in the Traffic Impact Assessment, the major impact of the additional 102 peak hour trips estimated to be generated by the school redevelopment will be on the environmental capacity of High Street which is the main access route to and from the school.

The traffic surveys conducted at the school have indicated AM peak hour traffic volumes of 267 vehicles per hour and PM peak volumes of 303 vehicles per hour in High Street. The additional 102 trips would increase these to 369 vehicles per hour in the AM and 402 vehicles per hour in the PM respectively. However, High Street is regarded as functioning as part of a local collector route, therefore its maximum environmental capacity is 500 vehicles per hour. It is considered that High Street would still be operating within its environmental capacity and would not require to be upgraded.

Nevertheless, the Traffic Impact Assessment recommends and concludes the following:

“No Stopping” or “No Parking” signs be installed along High Street opposite the school frontage to discourage drivers from parking in this area as the narrow pavement is wide enough for two-way traffic movements only. Any vehicles stopping along High Street block traffic flow in that direction and create unnecessary congestion.

Parking

Canterbury DCP requires 1 parking space per 2 staff. The proposal seeks to increase student numbers to 690, and staff to 58 which would require 29 parking spaces. No additional on-site parking is proposed as part of the development. The existing parking area caters for 14 vehicles which are used by staff. Therefore, the proposal has a shortfall of 15 car parking spaces. In order to provide the additional parking spaces and to cater for pick up and drop off demands, the following actions are recommended:

- Install signage and line marking along the school frontage in Napier Street to provide 90 degree parking, including parking restrictions of “5 minute Parking 8.00am to 9.30am and 2.30pm to 4.00pm School Days”; (additional 15 spaces);
- Utilise the spare parking capacity in Howard Street (25 spaces);
- The existing twelve 90 degree parking spaces in France Street to be signposted as “5 minute Parking 8.00am to 9.30am and 2.30pm to 4.00pm School Days”. It is noted that this will not increase the number of parking spaces but will assist in reserving these spaces for drop-off and pick up before and after school.

Napier Street

Currently, Napier Street provides parallel parking along both sides with the capacity to cater for 25 vehicles. As part of the proposal, it is recommended to install 90-degree parking along the school frontage, which will provide approximately 40 spaces. However, to achieve this arrangement, the parallel parking along the northern side of Napier Street (in front of the dwellings) will need to be removed to maintain two-way traffic flow in the street. With this proposal Napier Street has the capacity to provide an additional 15 car parking spaces, which caters for the shortfall of on-site car parking.

Furthermore, it is noted that the peak demand for parking associated with the school occurs only for short periods of time around 30 minutes during the morning and afternoon school zone times. For the clear majority of the time parking demand in the streets surrounding the school is very low and parking for residents and visitors is readily available.

5 Environmental Planning Assessment

Green Travel Plan

A Green Travel Plan has been prepared by SECA (**Appendix 12**) in conjunction with support of the school to cater to additional traffic and parking demands that will result with the re-development of the school. The plan aims to identify and implement measures that will increase active transport and the use of public transport while reducing the dependence of car-based travel.

The Green Travel Plan provides alternative and sustainable travel plans for staff and students, including encouraging the utilisation of public transport, promoting walking and cycling to school, car pooling and car sharing and operating a “walking school bus”. The aim of the Green Travel Plan is to increase the proportion of the school community regularly travelling to and from school other than by a car by 10%.

5.2.12 Waste Management

A Waste Management Plan (WMP) has been prepared by MRA Consulting Group which is found in **Appendix 14**. The WMP is to be read in conjunction with the architectural drawing titled ‘Waste Area Plan’ prepared by NBRS Architecture, drawing no. DA9-C22 (**Appendix 2**). It should be noted that the upgrading of the waste area and loading dock is proposed under a separate planning pathway.

The excess waste demands from the additional student and staff population are considered to be appropriately managed.

5.2.13 Social Impact

The re-development and improvements to Canterbury South Public School provide for a positive social impact within the area and more broadly across the greater City of Bankstown Canterbury LGA. The replacement of aged facilities with new and improved school facilities with capacity for a total of 690 students results in a ‘built for purpose’ school which will better service the existing school community, provide additional local school opportunities for nearby families and contributes to a high-quality and more accessible spread of social services across the LGA, designed to current standards. The development proposal is seen to also respect the character of the area and will not impact on the quality of life for residents surrounding the site or in nearby residential precincts.

5.2.14 Economic Impact

During construction, the proposal will provide for construction industry employment which will result in a local economic benefit during the construction period. Upon completion of the development, additional teaching opportunities, as well as support staff to cater for the increased student population will also be available within the school which flows onto an overall positive economic impact for the area through employment opportunities and students being able to remain and be part of the local community. Overall the economic impacts of the proposal are positive.

5.2.15 Crime and Safety

Crime Prevention through Environmental Design (CPTED) is a recognised model which provides that if development is appropriately designed it can reduce the likelihood of crimes being committed. By introducing CPTED measures within the design of the development, it is anticipated that this will assist in minimising the incidence of crime and contribute to perceptions of increased public safety. The proposal has been designed to take into consideration these principles as follows:

Surveillance: This principle provides that crime targets can be reduced by effective surveillance, both natural and technical. In this regard, the development has frontages to France, High and Napier Streets with direct surveillance from the public domain (Pat O’Connor Reserve) and surrounding residential land uses. Security patrols by the schools preferred security contractor after school hours will also provide for additional surveillance.

5 Environmental Planning Assessment

Access Control: This principle provides that barriers to attract/restrict the movement of people minimises opportunities for crime and increases the effort required to commit crime. Like all schools, the site will be fenced with delineated access points for student and vehicular entry. After school hours, access to the site will only be available to school staff. Overall access control to the site is considered to be appropriate.

Territorial Reinforcement: This principle provides that well-used places reduce opportunities for crime and increase risk to criminals. During school days and hours, the school will be heavily used by staff and students. After hours and during school holiday periods, the school's surrounding barrier will be located and security patrols by the schools preferred security contractor after will also provide for additional surveillance during these periods.

Space Management: This principle provides that space which is appropriately utilised and well cared for reduces the risk of crime and antisocial behaviour. Strategies to implement this principle include, site cleanliness, rapid repair of vandalism and graffiti, the quick replacement of broken light fixtures/globes and the removal or refurbishment of decayed physical elements.

Presentation of the school will be managed by the school itself, with general repairs and maintenance of the site occurring when needed. The proposed works will assist in improving the presentation of the premise, which will improve the amenity, casual surveillance and ultimately public safety and sense of security within the site and surrounding area.

5.3 Suitability of the Site for Development

The following subsections assess the suitability of the site in accordance with section 4.15(1)(c) of the EP&A Act.

5.3.1 Location

In the assessment of site suitability, there are two key questions to consider:

Does the proposal fit within the locality?

The school development proposed is considered to fit well within the locality. Consideration of the compatibility of the proposal and its surroundings can be undertaken with regard to the Land Environment Court Planning Principle on "compatibility with context" in *Project Venture Developments v Pittwater Council [2005] NSWLEC 191*. In order to test whether a proposal is compatible with its context, the following two questions can be asked:

Are the proposal's physical impacts on surrounding development acceptable? The physical impacts include constraints on the development potential of surrounding sites.

The proposed development will not create any significant physical impacts on adjoining land or established developments. The building separation to the neighbours to the south ensures neighbouring properties along Napier Street maintain solar access. Due to the siting of the school site, there will not be any reduction in the development potential of surrounding properties as a result of the proposal, the school is a long-term use within the area and as such land use conflict matters are negligible.

Is the proposal's appearance in harmony with the buildings around it and the character of the street?

The proposed development of the site has been designed in consideration of surrounding properties and will contribute positively to the streetscape. As there is no established building line along the northern side of Napier Street, a minimum 5 metre setback is proposed, which is generally equal to (or greater) than the front setbacks of the dwelling along the southern side of Napier Street. Overall, the built form represents a high-quality architectural design, sympathetic to the residential character of the area whilst being aesthetically pleasing and improving visual amenity of the locality. Materials and colours are considered to be in harmony with the residential and natural character of the street and locality.

5 Environmental Planning Assessment

Are the sites attributes conducive to the proposed development?

The site is able to physically cater for the proposed development without detriment to the natural or built environment. The site is not subject to flooding, bushfire or a high degree of acid sulfate soil risk (see assessment further below). All relevant essential services and infrastructure are understood to be existing and/or available to the site. The site attributes are therefore considered to be more than conducive to accommodating the proposed development.

5.3.2 Land Stability

A Geotechnical Investigation Report prepared by JK Geotechnics (**Appendix 15**) classifies the site for the purpose of future footing and building engineering designs and makes additional recommendations. In summary there are no obvious features of the site identified which would preclude the development from a land stability perspective.

5.3.3 Acid Sulfate Soils

The site is identified as Class 5 acid sulfate soils under CLEP 2012. The Stage 2 Environment Site Assessment prepared by EIS (**Appendix 6**) concluded that the risk posed to the environment by acid sulfate soils to the development is relatively low.

5.3.4 Contamination

The Stage 2 Environmental Site Assessment prepared by EIS (**Appendix 6**) recommended that a remediation action plan (RAP) be prepared. This was undertaken by EIS (**Appendix 7**). Council can be satisfied that the contamination status of the site has been considered and appropriately managed. When the RAP is implemented, and a validation report and environmental management plan prepared on completion, it is considered that the site is suitable for the proposed development and contamination of the site has been managed accordingly.

5.3.5 Natural Hazards

The site is not identified as land prone to flooding and is not identified as land mapped as comprising bush fire prone.

5.3.6 Essential Services and Infrastructure

An existing disused sewer line is located on the southern end of the site. Approval from Sydney Water has been obtained for the disuse of a section of the sewer line on site. The site has adequate water and sewer services.

The proposed development will require the installation of a new substation to cater for the additional energy demands for the redevelopment of the school. The new substation will be fronting High Street in the north-western corner of the site. This work will be undertaken under a separate planning approval.

Overall, the site, and the proposed development is considered to have adequate essential services and infrastructure.

5.4 Public Interest

In accordance with section 4.15(1)(e) of the EP&A Act, the consent authority is required to consider the public interest. The public interest is an overarching requirement, which includes the consideration of the matters discussed in this report. The proposed development is considered to generally meet the provisions of relevant environmental planning instruments and subsequently, as these instruments have been created having regard to the objects of the Act following community consultation, they are considered to express planning controls that seek to protect the public interest. Accordingly, it is considered that the proposal is not prejudicial to the public interest.

6 Conclusion

The proposed development for alterations and additions at Canterbury South Public School located at 20 High Street has been assessed in accordance with the requirements of the EP&A Act and other relevant legislation.

The key environmental planning issues relating to the proposal are:

- Tree removal and protection;
- Traffic and Parking;
- Building Height; and
- Floor Space Ratio.

Tree Removal and Protection:

The detailed AIA provides detailed impact mitigation measures for all vegetation to be retained, in particular for identified significant trees. All recommendations will be followed throughout construction.

Traffic and Parking:

Existing on-site parking for the school and surrounding street parking has been determined to be satisfactory to cater for staff and drop off and pick up of students. With recommendations from the Parking and Traffic Impact Assessment and Green Travel Plan implemented, the shortfall of on-site parking can be justified and it is considered that there will not be significant adverse impacts arising which would prevent approval from being issued for the development.

Building Height

The proposal has a building height that exceeds the development standard under CLEP 2012, being an exceedance of 5.086m (or 59.8%). The proposal is supported by a Clause 4.6 variation request, which concludes that strict compliance with the building height development standard would limit the ability to provide high quality learning spaces and result in an inefficient use of the land. A compliance development would result in an inferior design outcome where additional smaller buildings would occupy more of the site, limiting pervious areas and reducing outdoor spaces.

Overall, it is considered that the proposal contributes positives to the streetscape and visual amenity of the area, whilst also providing a high quality educational establishment.

Floor Space Ratio

The proposal has an FSR that exceeds the development standards under CLEP 2012, being an exceedance of 0.32:1 (or 64%). The proposal is supported by a Clause 4.6 variation request which concludes that strict compliance with the FSR would result in an inefficient use of the land or alternatively, result in an inferior design outcome where additional smaller buildings (located in the R4 zoned land which allows for a greater FSR) would occupy more of the site, and reduce outdoor play areas. Furthermore, when taking into account the R3 and R4 zoned land of the school, and the proposed gross floor area across the site, the re-development of the school will have an FSR of 0.40:1, which is well below the 0.50:1 FSR rate stipulated for the R3 zoned land.

Overall, the bulk and scale of the development is considered appropriate in this instance, and that the proposal contributes the streetscape and visual amenity of the area. The building has been designed to provide an efficient built form responding to contemporary teaching techniques without resulting in adverse impacts.

Accordingly, the proposal is considered to satisfactorily respond to the opportunities and constraints of the site and the relevant legislation, is unlikely to result in adverse impacts in the locality and is worthy of Council approval.