

**Statement of
Environmental Effects**

Concept and Staged 1
Development Application

Emanuel School, 20 Stanley Street, Randwick

Submitted to Randwick City Council

On Behalf of Emanuel School

JANUARY 2020

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APPENDICES

Appendix	Document	Prepared by
1	Design Statement & Architectural Plans	Tanner Kibble Denton Architects
2	Landscape Plans	Context Landscape Architecture
3	Accessibility Report	Design Confidence
4	Arborist Report	Arbor Safe
5	BCA Report	Design Confidence
6	Stormwater Management Report & Civil Plans	M+G
7	Pre-DA Minutes	Randwick City Council
8	Infrastructure and Utilities Statement	Umow Lai
9	Geotechnical Report	JK Geotechnics
10	Phase 1 Preliminary Site Investigation Report	JK Environments
11	Hazardous Materials Survey	Asbestos Audit
12	Heritage Impact Statement	City Plan Heritage
13	Quantity Surveyor's Cost Report	MBM

Appendix	Document	Prepared by
14	Survey Plan	Rygate Surveyors
15	Traffic and Parking Assessment and Construction Traffic Management Plan	Traffix
16	Construction Waste Management Plan	Foresight
17	Operational Waste Management Plan	Foresight
18	Acoustic Report	Wilkinson Murray
19	Randwick DCP Table of Compliance	City Plan
20	View Analysis	Virtual Ideas
21	Sustainability Report	Umow Lai
22	Sydney Water Report	MGP Building and Infrastructure Services

1. EXECUTIVE SUMMARY

This Statement of Environmental Effects (SEE) has been prepared for Emanuel School, Randwick by City Plan Strategy and Development Pty Ltd (City Plan) to accompany a Concept and Staged 1 Development Application (DA) to Randwick City Council. The site is located at 18-20 Stanley Street, Randwick and is used as an education facility.

This SEE has been prepared pursuant to Section 4.12 of the Environmental Planning and Assessment Act, 1979 (EP&A Act) and Clause 50 of the Environmental Planning and Assessment Regulation, 2000. The purpose of this SEE is to:

- describe the proposed development and its context;
- assess the proposal against the applicable planning controls and guidelines; and
- assess the potential environmental impacts and mitigation measures

This Concept and Staged 1 DA seeks approval for staged development under Section 4.22 of the EP&A Act. Specifically, concept approval is sought for a new masterplan. The masterplan provides for the replacement of the existing two storey Adler Building in the south-western corner of the site with a new three storey learning building, and an increase in the maximum student numbers to 920. There are currently 827 students enrolled at the school and 60 students enrolled at the early learning centre (ELC).

Consent is also sought for Stage 1 and the detailed design of the redevelopment of the Adler Building within the development parameters of the masterplan. Stage 1 comprises:

- Demolition of the existing two-storey Adler Building;
- Construction of a new three-storey replacement building comprising thirteen (13) classrooms, three (3) breakout areas, two (2) external terraces, four (4) smaller meeting rooms and nine (9) W/C; and
- Landscaping works.

The growth in student numbers at the Emanuel School has tended to mirror the population growth of Randwick. The population of the Randwick LGA has grown from 139,836 in 2011 when the previous masterplan was developed, to 154,265 in 2018. The population is forecast to grow to 164,003 in 2026 – which is an increase of 17.1%.

The proposed redevelopment of the Adler Building and landscaping works will provide contemporary, high quality and flexible indoor and outdoor learning spaces improving the overall quality of the learning facilities provided at the school, without greatly increasing the student capacity.

The proposed development has a Capital Investment Value (CIV) of less than \$20 million and therefore the proposal will not trigger the State Significant Development provisions.

Pre-lodgement consultation has been undertaken with senior staff at Randwick City Council's Development Assessment Section in relation to the proposed development. Careful consideration has been undertaken by the project team to ensure all relevant matters raised by Council are adequately considered, justified or resolved in the submitted scheme.

The proposal has been assessed in accordance with the EP&A Act and is considered worthy of approval for the following reasons:

- The proposal satisfies the applicable local and state development controls. The proposal has been designed in accordance with the relevant objectives and development controls listed in State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017, the Randwick Local Environmental Plan 2012 and the Randwick Development Control Plan 2013.
- The site is zoned SP2 Infrastructure (Educational Establishment) and the proposal will continue the educational establishment use of the site. The proposal is permissible with consent and is consistent

with the zone objectives. There are no significant environmental constraints that would prevent the proposal from being delivered at the site.

- The proposal is supported by a suite of specialist consultant reports which confirm the proposal will not have any unacceptable impacts on adjoining or surrounding properties in terms of physical, environmental or social impacts, subject to mitigation measures being implemented.
- The design of the building will make a positive contribution to the wider School site and the adjacent street character. The proposed building is situated within the School site's south-western corner and responds to its setting by purposefully holding the corner of the site. The height of the proposed building is presented as three storeys when viewed from Chepstow and Stanley Streets, which is consistent with the height of the adjacent Design & Technology (D&T) building. The proposed development will provide an appropriate interface to the adjacent two storey residential flat buildings and dwelling houses.
- The School currently suffers from a lack of adequate facilities to meet their curriculum requirements. The site has a limited capacity for any new additions hence the replacement of the existing Adler Building with marginally increased bulk and scale is considered necessary.
- The proposal will provide a means to facilitate the upgrade of the site while meeting the current short fall of learning spaces the School requires. The proposal will provide a modern, contemporary learning facility which will incorporate high quality and flexible learning spaces to deliver the curriculum for contemporary teaching methods and practices.
- The proposal is not expected to have any discernible affects on the current parking and traffic characteristics of the locality.
- The proposal is in the public interest in that it will assist in meeting current and future demands for school places.

In consideration of the above and the content provided in this SEE, it is considered that the proposal will deliver a suitable and appropriate development for the site and is worthy of approval.

2. SITE ANALYSIS

2.1. Site Description

The site, "Emanuel School", No 18-20 Stanley Street, Randwick, is legally described as Lots 1 and 2 in DP709332 and is located within the suburb of Randwick. The site lies on the northern side of Stanley Street at the corner of Stanley and Avoca Streets and on the eastern side of Chepstow Street.

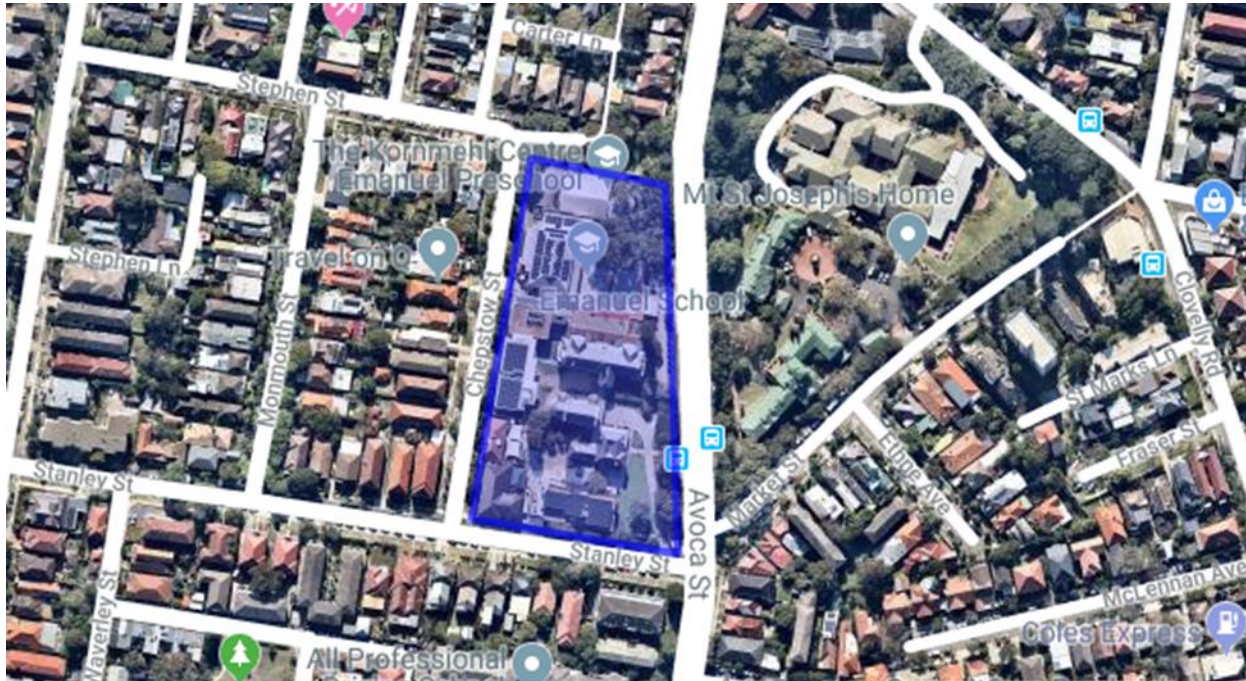


Figure 1: Aerial view, site shaded in blue (Source: Nearmap)

The site is irregular in shape and covers an area of 14.7m². The site is orientated in a north-south direction, with a southern boundary to Stanley Street (102 metres), western boundary to Chepstow Street (176 metres), northern boundary to Stephen Street (101 metres) and eastern boundary to Avoca Street (178 metres). The ground slopes steeply from the ridge line at the south of the site toward the north. The site is enclosed on all sides by a boundary wall.

2.2. Existing Development

Emanuel School has been located on the site since 1985 and the school are the current owners and purchasers of the land. The site was originally developed in the 1860s as a suburban villa estate and then from 1901 by the Roman Catholic Mendicant Order of the Little Sisters of the Poor. Since 1985, the School has progressively adaptively reused and adapted existing buildings on the site and constructed new purpose-built educational facilities. These buildings have been progressively rebuilt and redeveloped over the last 35 years to continually respond to changing educational needs.

The existing buildings are evenly dispersed across the subject site particularly along Avoca and Chepstow Street with a clustering across the ridge line at the southern end of the subject site. The site is enclosed by a high masonry wall.

The existing buildings provide approximately 57 classrooms for the school to accommodate the currently enrolled 887 students at the school (including 60 students enrolled at the ELC). The school has 138 full time equivalent staff employed at the school.

The subject site comprises the following key buildings and features:

- Saunders Administration Building;
- The Wolanski Learning Centre;
- The Aron Klein-Lehrer Building;
- Science Block;
- Brender Moss Building;
- Kleinlehrer Linc Building;
- The D and T Building;
- The Adler Building;
- Kindergarten Building;
- Lehrer Building; and
- The Kornmehl Centre.

The existing buildings on the site are illustrated in **Figure 2**.

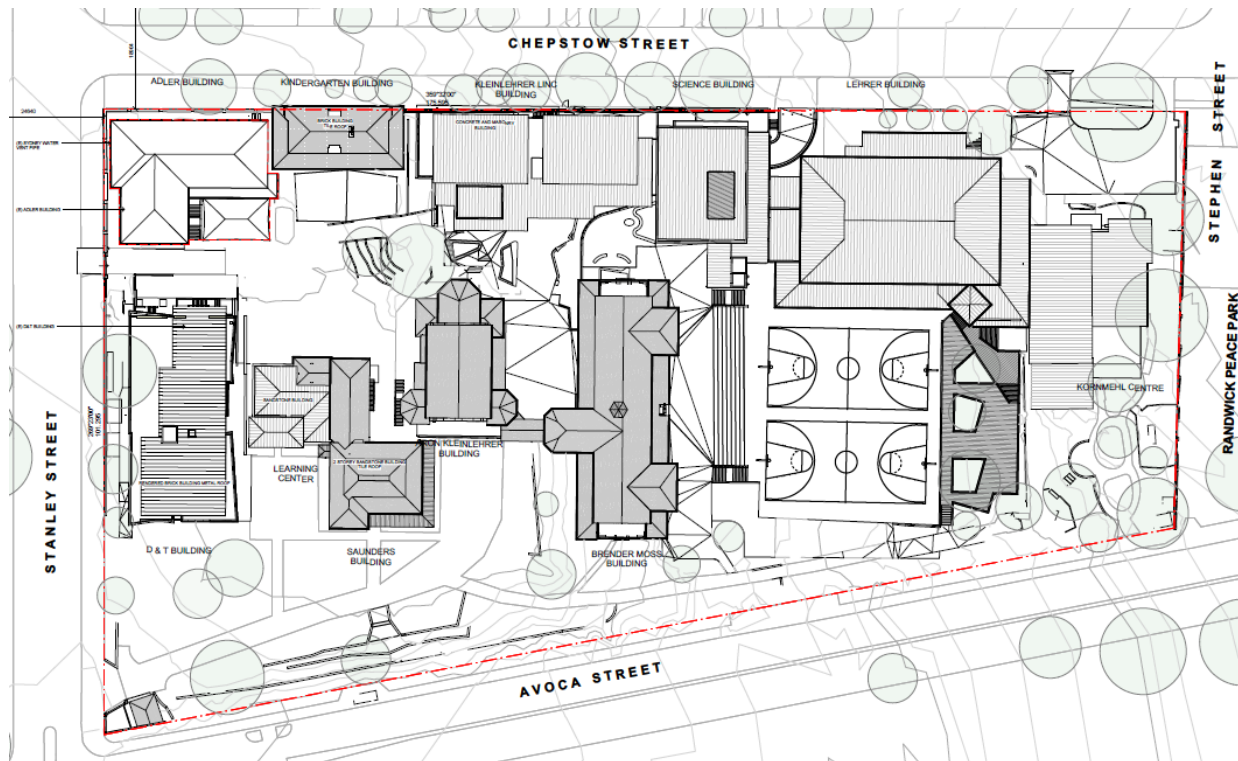


Figure 2: Existing Site Plan (Source: TKD Architects)

Aerial views of the site are provided at **Figure 3** to **Figure 5**.



Figure 3: Aerial view of existing School campus, view taken from corner of Avoca and Stanley Streets (Source: Sky Photography)



Figure 4: Aerial view of existing School campus, view taken from Stanley Street (Source: Sky Photography)



Figure 5: Aerial view of existing School campus, view taken from corner of Stanley and Chepstow Streets (Source: Sky Photography)

2.2.1. Existing Car Parking, Vehicular and Pedestrian Access

The subject site benefits from three (3) student pedestrian entry/exit points, including a gate on Avoca Street, a gate on Stanley Street (near Avoca Street) and a gate at the bottom of Chepstow Street at the Stephen Street intersection. The access point located on the corner of Avoca and Stanley Street functions as the main gate to the School grounds operating as the principal pedestrian access point to the school for staff, students and guests.

The school currently provides approximately nineteen (19) off-street parking spaces within the site including eleven (11) spaces under the science block and eight (8) spaces adjacent to the Kormehl Centre (pre-school). Access to these spaces is provided from two vehicular access points along Chepstow Street.

2.2.2. Vegetation

The site comprises extensive impervious surfaces used as passive recreation areas between buildings. Mature trees and shrubs are located along the site's boundaries and between the school buildings.

2.2.3. Heritage

The subject site is listed on the State Heritage Register (SHR) under the NSW Heritage Act, 1977. It is also as a heritage item under Part 1 of Schedule 5 of the Randwick Local Environment Plan (LLEP) 2012 as (item no. 1449).

The subject site is listed in the North Randwick Heritage Conservation Area and is located in proximity to a number of local heritage items.

2.2.4. Soil and Groundwater

The Geotechnical Investigation and Preliminary Site Investigation prepared by JK Geotechnics identifies the subsurface conditions at the site consist of moderate to high permeability (alluvial) soils overlying relatively deep bedrock. The site is not located in an acid sulphate soil area risk. In terms of groundwater, boreholes were 'dry' during, and on completion of, auger drilling. No longer-term groundwater monitoring has been carried out.

2.2.5. Stormwater

In relation to the current stormwater drainage of the Adler Building and adjacent D&T Building, at present, the roof runoff from the western portion of the existing Adler Building (which is to be demolished) drains via downpipes that connect directly into the kerb along Chepstow Street. The remaining portion of the roof drains into the existing School's piped drainage system. The roof of the D&T building (constructed in 2017) to the east of the Adler Building drains via downpipes into an OSD tank, which discharges into a kerb outlet on Stanley Street to the south.

Surface runoff for the adjoining paved areas around the existing Adler Building drains via overland flow into the existing school drainage system.

2.2.6. Services

The site currently contains and is connected to all necessary services including electricity, gas, water, communications, drainage and sewage.

2.3. Surrounding Development

2.3.1. Overview

To the north, the School grounds are separated from adjoining residential development in Stephen Street by the Peace Park which spans the width of the School boundary. To the north of the Peace Park lies residential development comprising single and two storey detached dwelling houses situated on small to medium size lots.

To the west of the School, medium density "walk up" residential flat buildings, semi-detached dwellings and single storey detached dwellings are located along the west side of Chepstow Street. Several well-established street trees are located on Chepstow Street and contribute to the landscaped character of the immediate vicinity and act to soften the impact of the School grounds from the view of the adjoining residential development.

The School is bound by Avoca Street to the east. Avoca Street is one of the principal arterial roads servicing Randwick.

Stanley Street to the south of the School grounds comprises new townhouse development, medium density "walk-up" residential flat buildings and several examples of semi-detached dwellings situated in moderate landscaped settings.

2.3.2. Photos of Surrounding Uses



Figure 6: Photograph of residential flat buildings fronting Stanley Street (Source: City Plan Heritage)



Figure 7: Photograph of two storey dwelling housing fronting the School on Stanley Street (Source: City Plan Heritage)



Figure 8: Photograph of two-storey dwellings and residential flat building development fronting Chepstow Street (Source: City Plan Heritage)



Figure 9: Photograph of Randwick Peace Park located to the south of School (Source: City Plan Heritage)



Figure 10: Photograph of Randwick Peace Park from Avoca Street (Source: City Plan Heritage)

2.4. Relevant Planning History

The site benefits from a series of previous development approvals. A summary of the previous planning approvals relevant to the site is provided in the table below.

Table 1: Relevant Planning History

DA Reference	Details
DA/698/2006	Proposed extension to the Emmanuel Pre-school known as the "Kornmehl Centre" to include a new play room adjacent to Avoca Street (Approved on 31/10/2006)
DA/889/2007	Demolition of 4 temporary classrooms on basketball courts, placement of 2 storey demountable building containing 8 classrooms in the same location as building to be demolished & provide associated landscaping (Approved 23/01/2008)
DA/608/2008	Demolition of the existing brick wall along the northern boundary of the school and reconstruct the wall with a concrete masonry base, brick piers, lapped and capped timber paling infill panels (Approved 05/12/2008)
DA/657/2008	Demolish the brick section of the boundary wall along Avoca Street boundary and construct a temporary lapped and capped timber fence (Approved: 05/12/2008)
DA/874/2008	Demolition of existing structures in service yard in centre of site and construction of single storey specialist learning facility at Emanuel School (Approved: 05/06/2009)
DA/891/2008	Construction of a 3 storey education building with basement car park for 12 vehicles, provision of a new driveway crossing, modification of masonry boundary wall and general landscaping (Approved: 12/05/2009)
DA/925/2008	Construction of 2 shade structures over existing outdoor seating area of Emanuel School, near Avoca Street frontage (Approved: 06/04/2009)

DA Reference	Details
DA/181/2009	Stage 1 concept application to set building envelopes and school uses for the Emanuel School
DA/608/2008A	Section 96(2) Modification of approved development by removal of 3 camphor laurel trees Original consent: Demolition of the existing brick wall along the northern boundary of the school and reconstruct the wall
DA/925/2008A	Section 96 modification of the approved development by deletion of Condition No.4 to allow existing shade structures to be retained permanently Original consent: Construction of 2 shade structures over existing outdoor seating area of Emanuel School, near Avoca Street frontage (Approved: 29/04/2011)
DA/891/2008A	Section 96 modification to replace the existing boundary wall along a portion of the Chepstow Street frontage with a new masonry wall to match existing (Heritage Item) Original consent: Construction of a 3 storey education building with basement car park for 12 vehicles, provision of a new driveway crossing, modification of masonry boundary wall and general landscaping (Approved: 12/02/2010)
DA/891/2008B	Section 96 modification of approved development by demolition of existing wall and reconstruction of wall. Original consent: Construction of a 3 storey education building with basement car park for 12 vehicles, provision of a new driveway crossing, modification of masonry boundary wall and general landscaping (Approved: 30/04/2010)
DA/514/2010	Removal of existing timber fence on Avoca Street frontage of Emanuel School and construction of new boundary wall on top of existing sandstone plinth (Approved: 23/09/2010)
DA/514/2010A	Section 96 modification for changing value of works from \$800,000 to \$542,905 Original consent: Removal of existing timber fence on Avoca St frontage of Emanuel School and construction of new boundary wall on top of existing sandstone plinth (Approved: 17/11/2010)
DA/484/2011	Construction of a new wall to the inside face of the existing masonry wall in the south-western corner of the Emanuel School site, remove stucco finish from existing wall and apply new render and paint finish to panels, capping and piers, replace existing ground floor windows with doors in the Chepstow Street elevation of the Adler Building (Approved: 14/11/2011)
DA/891/2008D	Section 96 modification of approved development by amendment to condition 6 to allow use of pedestrian gate to Chepstow Street by school security guards and maintenance staff Original consent: Construction of a 3 storey education building with basement car park for 12 vehicles, provision of a new driveway crossing, modification of masonry boundary wall and general landscaping (Approved: 14/02/2012)
DA/458/2012	Construction of a two level addition to the existing multi-purpose hall at the Emanuel School containing 4 music rooms and a rehearsal room with new decking and courtyard area adjacent to hall (Approved: 05/03/2013)
DA/702/2012	Removal of existing "Block D" demountable classrooms at Emanuel School, construction of new part 4, part 5 level building adjacent to Chepstow Street with classrooms, multi purpose and performance spaces, replacement of portion of Chepstow Street boundary wall, landscaping and associated works (Approved: 19/06/2013)

DA Reference	Details
DA/702/2012A	Section 96 modification of the approved development to modify condition 4 of the consent to allow the door to swing open over Council verge Original consent: Removal of existing "Block D" demountable classrooms at Emanuel School, construction of new part 4, part 5 level building adjacent to Chepstow Street with classrooms, multi purpose and performance spaces, replacement of portion of Chepstow Street boundary wall, landscaping and associated works (Approved: 22/04/2014)
DA/12/2015	Alterations and additions to the existing art building located on the south-western side of the Emanuel School campus including new internal sanitary facilities, acoustic wall and new balustrade to existing verandah (Approved: 17/03/2015)
DA/12/2015A	Section 96 modification of the approved development to correct error in condition 9 relating to Heritage Office conditions. Original consent: Alterations and additions to the existing art building located on the south-western side of the Emanuel School campus including new internal sanitary facilities, acoustic wall and new balustrade to existing verandah (Approved: 17/07/2015)
DA/884/2015	Construction of a new entry fence, gate and signage adjacent to the existing Stanley Street entry of the Emanuel School (Approved: 15/07/2016)
DA/941/2016	Integrated development for demolition of the Hanna Weisz Building at Emanuel School (Approved: 17/05/2017)

The most recent and relevant DA to this subject application is the approved Concept DA under DA/181/2009. This DA was approved on 13 January 2011 and approved a Stage 1 Concept DA to set building envelopes and uses for Emanuel School site. An extract of the approved Concept Site Development Plan is provided at **Figure 11**. We note, all subsequent staged DAs have been approved in accordance with the Concept DA and there are no further works to be carried out in accordance with this Concept DA.

Further, we note Condition 6 of the Concept DA requires *"The maximum number of pupils at the school must not exceed 725 at any time. Details of student numbers are to be provided with all future development applications for work on the site showing compliance with this limit"*. We note, this condition excludes the 60-place childcare centre which is also located on the Emanuel School site.

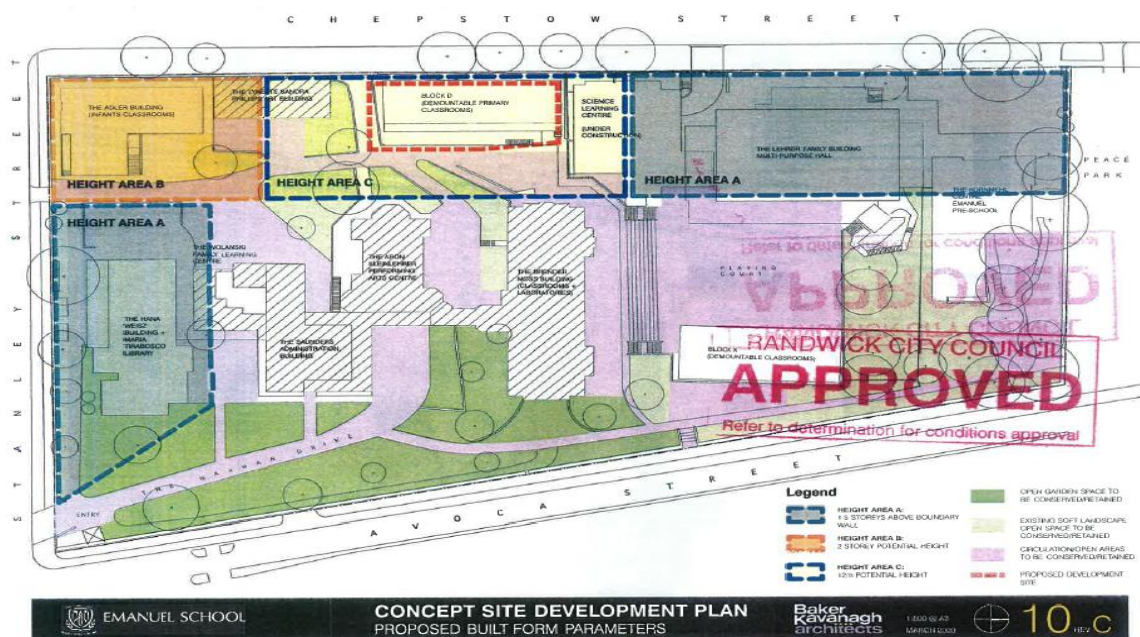


Figure 11: Concept Site Development Plan (Source: Baker Kavanagh Architects)

3. DESCRIPTION OF DEVELOPMENT

3.1. Background

Emanuel School is a unique contributor to the existing educational mix in Randwick. Emanuel School is a co-educational, Jewish Day School, which caters to students from pre-school to Year 12.

Emanuel School nurtures a commitment to Jewish community, heritage, ethical living and the State of Israel. The School optimises the facilities on the site to provide a safe, happy and secure environment to meet the needs of students and staff.

The NAPLAN results as shown on the "My School" website indicate the school's achievement in literacy and numeracy. Consistent with all previous years of state-wide and national testing, in 2018, Emanuel School performed extremely well, both in absolute terms and, in comparison with other schools. The School is therefore proud to be an asset to the Randwick community.

Emanuel School has been the subject of a number of historical planning applications. The majority of these applications have been for additional building works to upgrade school facilities to ensure that the students of the school have the best teaching environment possible for their educational developments.

In line with the population growth of the Randwick LGA, the School has identified there is a need to increase student enrolments at the school to meet the current and future educational demands of the local Jewish community. The School proposes a maximum student enrolment of 920 students (an increase of 135 students from DA/181/2009, however, an increase of only 33 students compared to the 2019 enrolment) which has been carefully considered having regard to population and enrolment forecasts and the maximum operating capacity of the site. The School does not anticipate there will be an increase in current staff numbers (138 full-time equivalent (FTE)) at the School to support the student enrolment increase.

The School has also identified an opportunity to redevelop the existing and outdated Adler Building located in the southwestern corner of the site. The proposed redevelopment of the Adler Building and landscaping works will provide contemporary, high quality and flexible indoor and outdoor learning spaces improving

the overall quality of the learning facilities provided at the school, without greatly increasing the student capacity. The new building will also assist the School to decant parts of their main school campus in order to allow them to upgrade and improve their facilities.

3.2. Planning Approval Pathway

As discussed above, the primary motives of this development application are twofold.

Firstly, this development application seeks to regularise the existing student enrolments at the school which currently exceed the 725-cap imposed by Condition 6 of DA/181/2009. As detailed in **Table 2**, as of January 2020, 827 students are currently enrolled at the School (excluding the 60 children enrolled in the childcare centre), with an additional 10 students enrolments proposed in 2020 and an additional 23 student enrolments proposed in 2021. It is noted the School does not anticipate there will be any further increase in student enrolments at the School from 2021.

The growth in student numbers at the Emanuel School has tended to mirror the population growth of Randwick. The population of the Randwick LGA has grown from 139,836 in 2011 when the previous masterplan was developed, to 154,265 in 2018. The population is forecast to grow to 164,003 in 2026 – which is an increase of 17.1%.

Table 2: Existing and Proposed Student Numbers (Source: Emanuel School)

Year	ELC	Kind –Y 6	Y7-Y12	Total
2019	60	370	457	887
2020	60	380	457	897
2021	60	390	470	920

Secondly, this development application seeks to replace the dated Adler Building with a modern three-storey building which provides new and modern teaching facilities aligned with contemporary teaching standards and methodologies. The proposed redevelopment will provide replacement high-quality, flexible teaching spaces to meet the growing demand for educational facilities within the locality.

At the pre-lodgement meeting with Randwick City Council on 6 November 2019, it was discussed the preferred planning approval pathway would be the preparation of a modification application to the existing concept DA (DA/181/2009) to amend Condition 4 of the consent relating to the Concept Site Development Plan and Proposed Built Form Parameters and to amend Condition 6 of the consent relating to the restriction of 725 students at the school and the lodgement of a concurrent staged DA for the redevelopment of the Adler Building.

Since meeting with Council, alternative planning approval pathways have been reviewed and considered. The proposed approval pathway for the above scope of works is to submit a Concept DA under Section 4.22 of the EP&A Act 1979 which comprises a Masterplan for the school. Approval will be sought from Council for a Concept for the site and an increase in student enrolments from 725 to 860 (noting there is no change is proposed for the approved 60-child place childcare centre). In accordance with the Concept DA, detailed approval is sought under this subject DA for the detailed design of Stage 1 of the Masterplan.

We note the Masterplan only includes Stage 1 (the redevelopment of the Adler Building) as the School has not identified any further development works to be included in the Masterplan at this stage.

3.3. Concept Plan Overview

Concept approval is sought for a new Masterplan. The Masterplan provides for the replacement of the existing two storey Adler Building in the south-western corner of the site with a new three storey learning building, and an increase in the maximum student numbers to 920. There are currently 887 students enrolled at the school (including 60 students enrolled at the ELC). An extract of the Masterplan is provided at **Figure 12**.

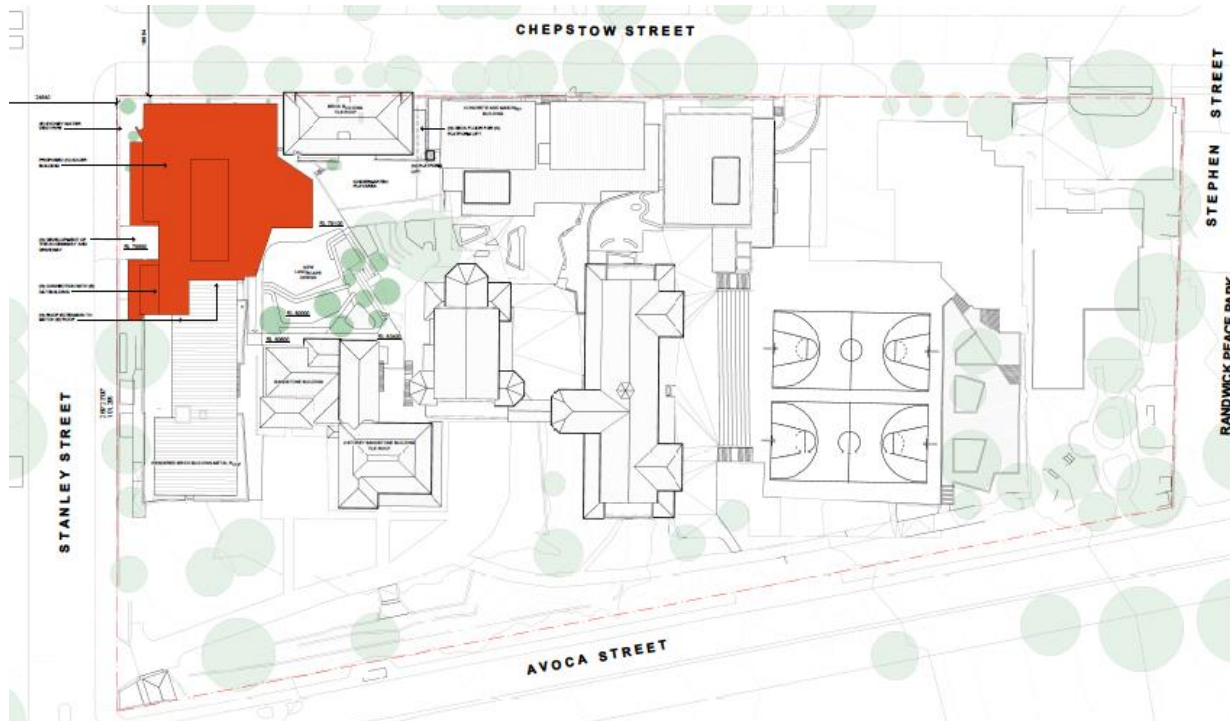


Figure 12: Masterplan illustrating the location of the Adler Building in the southwestern extent of the site (Source: TKD Architects)

3.4. Stage 1 Development - Detailed Design

This DA seeks consent for the detailed design of the redevelopment of the Adler Building within the development parameters of the Masterplan.

Stage 1 comprises:

- Demolition of the existing two-storey Adler Building located in the south-western corner of the site;
- Construction of a new three-storey replacement building comprising thirteen (13) classrooms, three (3) breakout areas, two (2) external terraces, four (4) smaller meeting rooms and nine (9) W/C; and
- Landscaping works.

The location of the replacement building can be seen in the extract below.

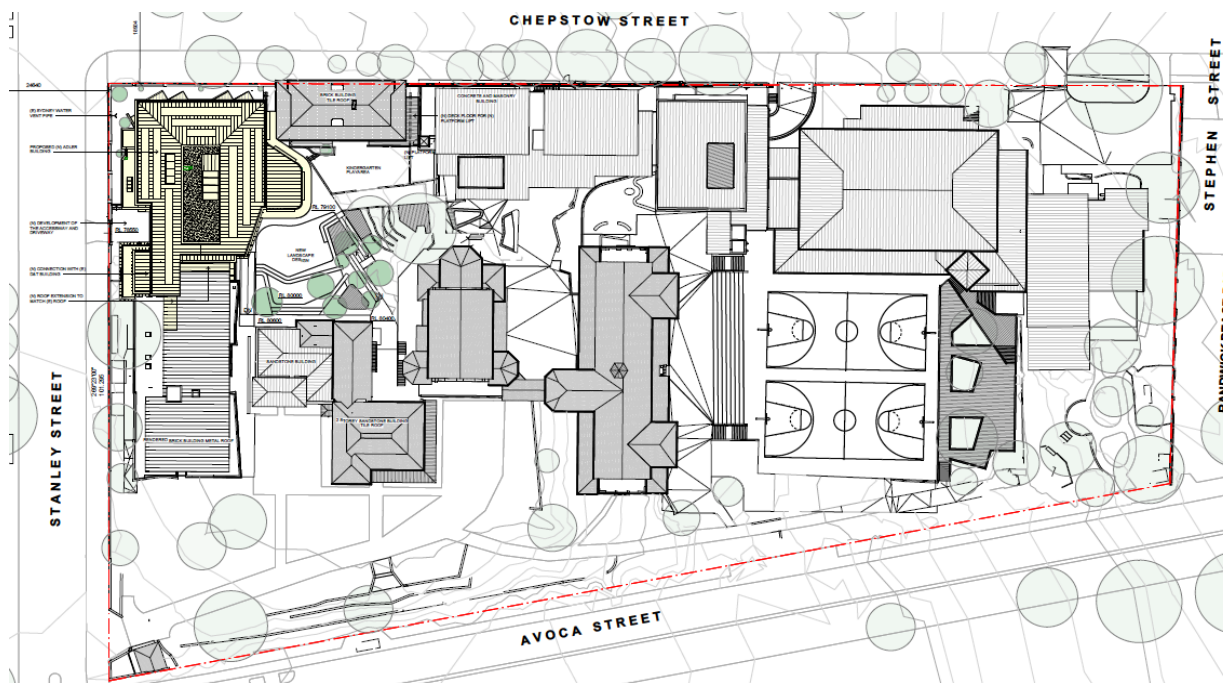


Figure 13: Proposed Site Plan (Source: TKD Architects)

3.5. Future Stages

As noted in **Section 3.2**, excluding the redevelopment of the Adler Building, the School has not identified any future stages of work at the school to be included in this Concept DA.

3.6. Staffing

Current staff numbers at the school have been calculated on a pro-rata approach and equate to 138 FTE employees. It is noted that the School does anticipate there will be any further increase in current staff numbers to facilitate the increase to 920 student enrolments.

3.7. Car Parking

There are currently nineteen (19) car parking spaces on site. No additional car parking spaces are proposed.

3.8. Tree Removal

An Arboricultural Impact Assessment has been prepared by ArborSafe and is provided at **Appendix 4**. Four (4) trees were inspected which are located within the grounds of Emanuel School and on the neighbouring Chepstow Street Council roadside verge. The assessment concludes that the proposed development will impact none of the trees. Three of the trees will be retained with generic protection measures during the development, one tree will be retained with specific protection measures during the development and one tree will require minor reduction pruning within the eastern aspect of its crown to facilitate the development works.

3.9. Materiality and Façade Treatment

The articulation of the proposed façade assists in reducing the expanse of walls and perceived height by articulating the façade horizontally through the use of expressed floor edges and parapets. The articulation of the façade includes the use of different high-quality materials, window fenestration and vertical blades. The main extent of façade is a light, neutral colour and will use off-form concrete and integrally coloured fibre cement panels.

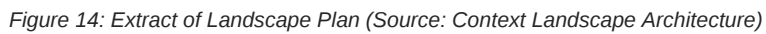
In relation to materials and finishes, the new building has been designed with low maintenance and durable external materials that will complement the character of the existing campus. Existing heritage buildings on the campus feature a dominance of golden coloured sandstone and painted render and both will be referenced in the new building. External materials consist of off form and painted concrete to the lower levels of the building providing a robust and grounding material.

3.10. Landscaping

A Landscape Plan has been prepared by Context Landscape Architecture and is provided at **Appendix 2**. New landscaped areas will be provided adjacent to the Adler Building and will enhance the learning experience provided by the development. The proposed landscaping contains the following key elements:

- Breakout space adjacent to Adler Building;
- Flexible active/ passive play adjacent to Adler Building;
- Flexible covered space with covered seating and imaginarium breakout space;
- Outdoor classroom;
- Multi-functional stage decking;
- Sandstone amphitheatre/ bleacher seating;
- Upper synthetic lawn terrace;
- Outdoor learning space - "The Treehouse"; and
- Planters and climbing planting on site boundary and façade of new building.

Figure 14 provides an extract of the proposed landscape design.



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3.11.4. Service Access

There is no change to current service access arrangements at the School.

3.11.5. Construction Access

It is envisaged that construction vehicles would travel along Avoca Street and Stanley Street to access the site.

3.12. Infrastructure and Utility Works

3.12.1. Civil Engineering

The proposed replacement Alder Building essentially occupies the same site as the existing building which is to be demolished and therefore the total impervious areas remain essentially the same with the roofed area slightly increasing and the paved areas slightly decreasing. The overland flow paths will remain largely the same as the existing routes.

The piped drainage system and infiltration system have been designed for the twenty (20) year average recurrence interval (ARI) rainfall events. The above ground overland flow paths remain as the existing and are sized for the one hundred (100) year average recurrence interval (ARI) rainfall event.

An underground rainwater re-use tank is proposed to be provided. This rainwater tank is proposed to be attached to the infiltration tank and will overflow into the infiltration system. At least 60% (exact area to be confirmed during the detailed design) of the roof water is collected and piped to this tank

3.12.2. Hydraulic Services

Potable Water Supply

Potable water is supplied to the site via a connection to the 100mm water main in Chepstow Street. The new building will be supplied from the potable water reticulation within the school campus. Potable water demand is not expected to change with the proposed development and therefore the existing potable water supply will not be affected.

Fire Fighting Water Supply

Firefighting water is supplied to the site via a 100mm connection to the 150mm water main in Stanley Street. Hydrant coverage to the new building will be supplied from the existing campus hydrant system. Additional fire water demands are not anticipated for the new development.

Sanitary Drainage

The site features two connection points to Sydney Water's sewer system; on Stanley Street and Chepstow Street. The new building will connect to the internal school campus sanitary drainage which discharges to the Stanley Street sewer. Sanitary drainage discharge is not expected to change with the proposed development and therefore the existing drainage connection will not be affected.

3.12.3. Electrical

Emanuel School is supplied from an Ausgrid Kiosk Substation SS-46321 located onsite near the Chepstow Street entrance. The transformer is rated at 1000kVA and also supplies other customers.

The maximum demand of the site is expected to increase by approximately 115A (80kVA) following the removal of the existing Adler Building and the construction of the replacement building. The existing kiosk

substation, consumer mains and site main switch board are adequate to supply the additional electrical loads associated with the proposed development.

The incoming supply to the existing D&T Building from the Site MSB is rated at 400A and is therefore capable of supplying a maximum demand load of 250kVA with 10% spare capacity. At this stage the existing incoming submain will have sufficient capacity to the supply electrical power to the proposed building.

Telecommunications Services

Telecommunications services will be provided throughout the new building by extending the existing school telecommunications network from the existing D&T Building. The existing service provider network connections serving the Emanuel School will be retained.

3.13. Development Plans and Supporting Documentation

This SEE has been prepared with regard to the following plans and technical reports which accompany the application:

- Architectural Plans prepared by TKD Architects;
- Landscape Plans prepared by Context Landscape Architecture;
- Accessibility Report prepared by Design Confidence;
- Arborist Report prepared by ArborSafe;
- BCA Report prepared by Design Confidence;
- Stormwater Management Report & Civil Plans prepared by M+G;
- ESD Statement prepared by Umow Lai;
- Geotechnical Report prepared by JK Geotechnics;
- Phase 1 Preliminary Site Investigation Report prepared by JK Geotechnics;
- Hazardous Materials Survey prepared by Asbestos Audit;
- Heritage Impact Statement prepared by City Plan Heritage;
- Quantity Surveyor's Cost Report prepared by MBM;
- Survey Plan prepared by Rygate Surveyors;
- Traffic and Parking Assessment prepared by Traffix;
- Construction Waste Management Plan prepared by Foresight;
- Operational Waste Management Plan prepared by Foresight;
- Acoustic Report prepared by Wilkinson Murray;
- View Analysis prepared by Virtual Ideas; and
- Sustainability Report prepared by Umow Lai.

CPSD have relied on the information in these reports, prepared by professionals in their field, for the preparation of this SEE.

3.14. Consequences of Not Carrying out the Development

Alternatives to the current proposal include to 'do nothing'. The consequences of not carrying out the project are extensive and include:

- Failure to provide suitable learning facilities for current and future students and teachers;
- Failure to accommodate the growing demand for improved learning facilities for the local Jewish community;

- Failure to better utilise the existing school site;
- Failure to reduce greenhouse gas emissions produced by the School as a result of maintaining inefficient infrastructure and assets that are not designed in accordance with the principles of ESD; and
- Increased maintenance costs of a degraded sub-standard building.

3.15. Pre-Lodgement Consultation

3.15.1. Council

Pre-lodgement advice was sought from Randwick City Council prior to lodgement of this DA. A meeting was held with Randwick City Council on 6 November 2019 between Council officers, the applicant and the consultant team to discuss the proposed development at the site. Written pre-lodgement advice was received from Council on 26 November 2019 (**Appendix 7**). **Table 3** provides a summary of Council's comments and a summary of how these items have been addressed.

Table 3: Pre-Lodgement issues raised by Council.

Item	Comment
Consistency with the concept plan approval Council considers it is more appropriate to submit a new concept plan to act as a Development Control Plan for the site as a whole rather than submit a modification to the concept plan. If a S4.55 modification application is to be prepared, Council stated that legal advice should be provided in support to demonstrate the proposal remains substantially the same development.	As detailed in Section 3.2, a new concept plan is to be submitted with a Stage 1 DA for the redevelopment of the Adler Building.
Design Excellence Council identified the DA would be referred to Council's Design Excellence Panel (DEP). Council identified the main challenges to be:	Noted.
Context and landscaping: Whether a larger building envelope than existing buildings on site and surrounding buildings will contribute to the existing and desired streetscape character of the site and surrounding area; does the proposal take into account visual catchment of the streetscape, visual setting of heritage items and the conservation area. Subject to refinement of built form and detailing in a staged DA, it is noted that the proposed part 3 part 4 storey envelope will present at least one storey higher than the built form of the school building to the east; it has a shallower setback along the Chepstow and Stanley Street boundaries than existing buildings which limits the capacity to provide for any genuine landscaping along these frontages.	Since meeting with Council at the pre-DA meeting, the architectural plans have been further reviewed and refined. Specifically, the rooftop play area has been removed from the plans to ensure the proposed building is three storeys in height and consistent with the height of the adjoining D&T Building. The proposed building provides an increased setback along Chepstow Street when compared with the existing Adler Building and the existing school buildings located along Chepstow Street. The proposed building along Stanley Street in part provides an increased setback and in part provides a reduced setback when compared to the existing Adler Building and adjacent D&T Building. Notwithstanding, the setback is sufficient to

Item	Comment
	provide adequate landscaping along the site's boundaries to the façade of the building. As detailed in the Landscape Plan, a variety of shrubs, planters and cascading groundcovers are proposed which will assist in softening the appearance of the proposed building.
Amenity: Whether there will be sufficient amenity for students and teachers on site. Whilst security is acknowledged as a significant concern of the school, teacher and student amenity would benefit from larger openings to improve light and ventilation within the classrooms;	The replacement building maximises natural ventilation and natural light to benefit the health and well-being of the students and staff. The building has a high floor to floor level and has maximised the use of windows and skylights (balancing the need for security) for natural light. The design also includes the use of roof terraces and balconies to encourage outdoor learning associated with the principal indoor spaces.
Aesthetics: larger openings present a less insular development and improve articulation along both street frontages; it's recommended multiple photomontages be provided showing the visual setting of the development from street level and the way in which the proposed built form fits into the both Stanley Street and Chepstow Street. Whilst models are required for sites over 10,000sqm, consideration will be given to not having to provide a model if it can be demonstrated that adequate material has been provided in the form of multiple photomontages.	Photomontages have been prepared by Visual Ideas and are provided at Appendix 20. The photomontages are taken from five locations within the public domain at varied distances from the site. As detailed in Section 6.2.7 the proposed Adler Building will largely maintain existing views which are currently obscured by the existing built form on the site and nearby vegetation. The proposal will not affect any significant views as its location at the corner of Stanley and Chepstow Streets is isolated and distant from key visual corridors and vistas to the historic core of the Emanuel School site.
Sustainability: It is not clear if any sustainable elements are included in any future DA. The DEP places a great emphasis on sustainable forms of development including photovoltaic cells and sustainable water supply. Any buildings elements are required to be clearly shown on plans and documented in the application;	The integration of ESD principles and environmental initiatives are a priority for the school. The following environmental initiatives are to be investigated and incorporated during design development: ▪ PV Panels to the roof for power generation. ▪ Rainwater capture and reuse for irrigation and toilet flushing. ▪ Water efficient fittings and fixtures. ▪ Energy efficient LED lighting. ▪ Smart sensors and controls. ▪ Maximise natural light and ventilation. ▪ Incorporate appropriate sun shading to minimise solar heat gain into the building including horizontal shading to the north and vertical shading to the east and west. ▪ Light coloured roof sheeting to minimise heat absorption.

Item	Comment
	- High levels of thermal insulation. - Visual display located at entry of the building as learning tool showing energy generation and consumption and water capture and use to show how the building is performing. A Sustainability Report has been prepared by Umow Lai and is provided at Appendix 21. The report outlines the key sustainability initiatives for the replacement Adler Building.
The DEP will consider amenity impacts on the neighbouring properties and surrounding area having regard to visual on the neighbouring bulk, view loss and overshadowing.	Consideration to amenity impacts is discussed in Section 6.2 .
Heritage The Emanuel School site is listed as a heritage item (Inventory No. 398: former Little Sisters of the Poor Chapel, Novitiate and 11Aston Lodge"), listed on the State Heritage Register and located within the North Randwick Heritage Conservation Area under Randwick Local Environmental Plan 2012. Council's Heritage Planner will need to be satisfied that the general height and building envelopes proposed demonstrate adequate sensitivity to the heritage items on the site (buildings and landscape items), embodies conservation principles identified in previous and amended conservation documents and relates well with the adjacent heritage conservation area.	A Heritage Impact Statement has been prepared by City Plan Heritage and is provided at Appendix 12. The Statement concludes the proposed works will result in some but an acceptable impact on the heritage significance of the subject site, the North Randwick HCA or the nearby heritage items. The proposal demonstrates compliance with the existing controls regarding heritage conservation and is therefore recommended to Council for approval.
Traffic and Parking A future concept plan or 4.55 and staged DA is required to include details of the student population across the whole of the site and the way in which the staff and student population may or may not be altered by the proposed concept plan and a staged DA. These applications shall also include the preparation and submission of a comprehensive Traffic Management Plan (TMP). In preparation of the TMP please address existing parking/traffic conditions in the area (based on existing approvals and staff and student numbers), the potential increase in demand for on-street parking, traffic associated with future applications and any modifications to the vehicular access from Chepstow Street and any pedestrian access (with the exception of an emergency fire exit).	As detailed in Section 3.2, this DA seeks to regularise the existing student enrolments at the school which currently exceed the 725-cap imposed by Condition 6 of DA/181/2009. As of 2019, excluding the ELC, 827 students are currently enrolled at the School, with an additional 10 student enrolments proposed in 2020 and an additional 23 student enrolments proposed in 2021. It is noted the School does not anticipate there will be any further increase in student enrolments at the School from 2021. In relation to staffing numbers, there are currently 138 FTE staff members employed at the school. The proposed development will not result in an increase in staff members. A Traffic Impact Assessment has been prepared by Traffix (Appendix 15) which details the traffic and parking impacts from the proposed student population and existing staff population.

Item	Comment
	There are no proposed changes to the School's existing pedestrian access points or the vehicular access from Chepstow Street.
Amenity Impacts Significant to the replacement of the Adler building, the following information is recommended to be provided in any future concept plan application: - Shadow diagrams, showing existing and future shadow lines at every hour during the winter solstice between 8:00am, and 4pm. - A sustainable building report. - BCA report indicating that the building can be built to the proposed specifications; - View loss analysis for any properties that may be impacted by the proposal. A review of surrounding properties opposite Stanley Street and Chepstow Street suggests views of the state heritage item and district views may potentially be impacted by the proposal. It is recommended survey levels be provided for openings and balconies for all buildings whose views may potentially be impacted by the proposal. - Acoustic report addressing the noise from the use of the playground at the top level including reference to any required physical measures and or plans of management. It is important to note that the playground at the top level has great potential to result in adverse privacy impacts which cannot be ameliorated without physical measures. The setback shown on the additional plans is noted however it will be visible from the street and surrounding developments and is generally not supported.	- Shadow diagrams are included in the architectural package at Appendix 1; - A Sustainability Report has been prepared by Umow Lai and is provided at Appendix 21; - A BCA Report has been prepared by Design Confidence and is provided at Appendix 5; - Photomontages have been prepared by Virtual Ideas and are provided at Appendix 20 and view loss analysis is considered in Section 6.2.7 of this SEE; - An Acoustic Report has been prepared by Wilkinson Murray and is provided at Appendix 18. As discussed above, since meeting with Council the playground at the top level has been removed and is not detailed on the architectural plans.

4. STATUTORY PLANNING CONSIDERATIONS

4.1. Overview

The relevant statutory framework considered in the preparation of this report comprises:

- Environmental Planning and Assessment Act, 1979;
- Environmental Planning and Assessment Regulation 2000;
- State Environmental Planning Policy No. 55;
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017;
- State Environmental Planning Policy (Infrastructure) 2007;
- Sydney Regional Environmental Planning Policy (Sydney Harbour Catchment) 2005; and
- Randwick Local Environmental Plan 2012.

Where relevant, these controls are addressed below.

4.2. Environmental Planning and Assessment Act 1979

4.2.1. Section 4.15 of EP&A Act 1979

Section 4.15(1) of the Act as amended specifies the matters which a consent authority must consider when determining a development application. The relevant matters for consideration under Section 4.15 of the Act are addressed in the Table below.

Table 4: Section 4.15 of EP&A Act 1979.

Section	Comment
Section 4.15(1)(a)(i) Any environmental planning instrument	Consideration of relevant instruments is discussed in Section 4 .
Section 4.15(1)(a)(ii) Any draft environmental planning instrument	Not relevant to this application.
Section 4.15(1)(a)(iii) Any development control plan	Consideration of relevant the development control plan is discussed in Section 5 .
Section 4.15(1)(a)(iia) Any planning agreement	Not relevant to this application.
Section 4.15(1)(a)(iv) Matters prescribed by the regulations	Refer to Section 4.3 .
Section 4.15(1)(a)(v) Any coastal zone management plan	Not relevant to this application.
Section 4.15(1)(b) - (e)	Refer to Section 6 of this SEE for consideration of (b), (c) and (e). Matter (d) relates to submissions and is a matter for the consent authority.

4.2.2. Section 4.46 – Integrated Development

This section of the Act defines integrated development as matters which require consent from Council and one or more approvals under related legislation. In these circumstances, prior to granting consent Council must obtain from each relevant approval body their General Terms of Approval (GTA) in relation to the development.

Emanuel School is a State heritage item and therefore requires approval under Section 57(1) of the Heritage Act 1977.

4.3. Environmental Planning and Assessment Regulation 2000

4.3.1. Clause 92 – Demolition

All demolition work will be undertaken in accordance with AS 2601 - 1991: The Demolition of Structures.

4.3.2. Clause 98 – Compliance with the BCA

Pursuant to the prescribed conditions under Clause 98 of the Regulation, any building work *"must be carried out in accordance with the requirements of the Building Code of Australia"*. A BCA Report has been prepared by Design Confidence and is provided at **Appendix 5**.

4.4. Biodiversity Conservation Act 2016

The Biodiversity Conservation Act 2016 (BC Act) lists and protects threatened species, populations and ecological communities that are under threat of extinction in NSW. Impacts to threatened species and endangered ecological communities listed under the BC Act are required to be assessed in accordance with Section 7.3 of the BC Act and Applicants must also consider whether their proposal will exceed the following Biodiversity Offset Scheme Development Thresholds:

1. Exceeding the clearing threshold on an area of native vegetation;
2. Carrying out development on land included in the Biodiversity Values Land Map; or
3. Having a 'significant effect' on threatened species or ecological communities.

The site does not contain a threatened species, endangered ecological community or critically endangered ecological community or habitat of a threatened species or ecological community. The site is not a declared area of outstanding biodiversity value and the biodiversity offsets scheme does not apply. Therefore, further consideration of this Act is not required.

4.5. State Environmental Planning Policies

4.5.1. State Environmental Planning Policy No 55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Contaminated Lands (SEPP 55) establishes State-wide provisions to promote the remediation of contaminated land.

Clause 7 of the SEPP 55 requires that a consent authority must not grant consent to a development unless it has considered whether a site is contaminated, and it is satisfied that the land is suitable (or will be after undergoing remediation) for the proposed use.

A Preliminary Site Investigation (PSI) has been prepared by JK Environments and is provided at **Appendix 10**. The PSI included a review of site history, walkover site inspection and soil sampling from six boreholes with laboratory analysis of samples from four boreholes.

The review of site history indicated the following:

- Pre-1954 the site was part of a religious institute with possible school/educational activities;
- From 1954 to 1985 the site was part of a school. This included construction of the existing building on the site prior to 1982; and
- From 1985 until the present the site and surrounds have been occupied by a school. The existing shade structure was constructed between 2007 and 2014.

Fill material, pesticide use and hazardous building materials were identified as the main potential contamination sources.

Lead concentrations in the fill in borehole (BH) 5 exceeded the human health-based site assessment criterion (SAC). This fill appeared unique to this location and contained demolition material that was absent in other boreholes drilled at the site.

The carcinogenic polycyclic aromatic hydrocarbon (PAH) concentrations in the fill in BH3 and BH5 exceeded the human health-based SAC. Both exceedances were only slightly above the SAC of 3mg/kg.

This risk posed by the lead and PAHs contamination to on site receptors in the present site configuration is very low as the soils are largely beneath hard surfaces which eliminates exposure. However, potential risks could increase following disturbance/removal of the pavement and these risks will therefore need to be appropriately managed during demolition and construction.

The risk of groundwater becoming impacted by the contaminated fill is considered to be low. Groundwater was not considered to require further consideration in the context of the overall site contamination assessment.

Based on the results of the PSI, a (Stage 2) detailed site investigation (DSI) is recommended to better assess the nature and extent of the soil contamination at the site. This should include additional sampling locations within the building footprint area which was inaccessible during the PSI and, if possible, test pits in the vicinity of BH5 to assess for potential asbestos contamination associated with the demolition material in fill at this location.

While a Stage 2 DSI would ordinarily accompany a DA, due to the existing coverage of buildings on the site, a Stage 2 DSI is unable to practicably be undertaken to meet the EPA sampling requirements until the building on site has been demolished.

The consent authority could condition the Stage 2 DSI following demolition of the building on the site and require the preparation of a Remediation Action Plan, if needed.

A Hazardous Materials Assessment (HAZMAT) has been prepared by Asbestos Audit and is provided at **Appendix 11**. The HAZMAT identifies there is asbestos containing materials within the existing Adler Building including within the soffits of the building and the electrical cabinet. The Assessment requires that all materials are removed in accordance with the relevant regulations and codes.

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

State Environmental Planning Policy (SEPP) (Educational Establishments and Child Care Facilities) (Education SEPP) was gazetted in 2017 and outlines provisions for new and existing educational establishments.

Part 4 of the SEPP outlines the relevant provisions to "schools", a summary of which has been provided in the table below

Table 5: Relevant Clauses of the Education SEPP

Clause	Comment
33 Definition of “prescribed zone” prescribed zone means any of the following land use zones: (s) Zone SP2 Infrastructure,	As per the Randwick Local Environmental Plan 2012 (RLEP), the subject site is zoned SP2 Infrastructure (Educational Establishment) and is therefore identified as a prescribed zone.
34 Development for the purpose of student accommodation In this Part, development for the purpose of a school does not include development for the purpose of residential accommodation for students that is associated with a school, regardless of whether, or the extent to which, the school is involved in, or exercises control over, the activities and life of the students living in the accommodation.	Not applicable to this application.
35 Schools—development permitted with consent (1) Development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone. (2) Development for a purpose specified in clause 39 (1) or 40 (2) (e) may be carried out by any person with development consent on land within the boundaries of an existing school. (3) Development for the purpose of a school may be carried out by any person with development consent on land that is not in a prescribed zone if it is carried out on land within the boundaries of an existing school. (4) Subclause (3) does not require development consent to carry out development on land if that development could, but for this Policy, be carried out on that land without development consent. (5) A school (including any part of its site and any of its facilities) may be used, with development consent, for the physical, social, cultural or intellectual development or welfare of the community, whether or not it is a commercial use of the establishment. (6) Before determining a development application for development of a kind referred to in subclause (1), (3) or (5), the consent authority must take into consideration: (a) the design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4, and	(1) The subject land is a prescribed zone as defined under Clause 33. (2) Noted. (3) Noted - the subject land is both within a prescribed zone and within the boundaries of an existing school. (4) Not applicable to this application. (5) Noted - the proposed new building is to be used by the student and staff of the school and on occasions, by the community. (6)(a) A Design Statement has been prepared by TKD Architects and is provided at Appendix 1. (6)(b) The new learning building is intended to be predominantly used by the staff and children,

Clause	Comment
(b) whether the development enables the use of school facilities (including recreational facilities) to be shared with the community. (7) Subject to subclause (8), the requirement in subclause (6) (a) applies to the exclusion of any provision in another environmental planning instrument that requires, or that relates to a requirement for, excellence (or like standard) in design as a prerequisite to the granting of development consent for development of that kind. (8) A provision in another environmental planning instrument that requires a competitive design process to be held as a prerequisite to the granting of development consent does not apply to development to which subclause (6) (a) applies that has a capital investment value of less than \$50 million. (9) A provision of a development control plan that specifies a requirement, standard or control in relation to development of a kind referred to in subclause (1), (2), (3) or (5) is of no effect, regardless of when the development control plan was made. (10) Development for the purpose of a centre-based child care facility may be carried out by any person with development consent on land within the boundaries of an existing school. (11) Development for the purpose of residential accommodation for students that is associated with a school may be carried out by any person with development consent on land within the boundaries of an existing school.	however there will be occasions where the building is used by the community. (7) This Clause excludes Clause 6.11 of the RLEP as it refers to Design Excellence. (8) There are no requirements for a competitive design process under the applicable LEP. (9) This DA is prepared in accordance with the SEPP and therefore any DCP prepared by Council is not applicable and has no effect. Notwithstanding, an assessment of the proposal against the key controls contained in the Randwick DCP 2012 is included at Appendix 19. (10) Not applicable to this application. (11) Not applicable to this application
Schedule 4 Schools - design quality principles Development for the purpose of a new school, in accordance with Clause 35 of the SEPP, will need to consider the below design principles. Refer to SEPP for the 7 Design Principles.	TKD Architects have prepared a Design Statement at Appendix 1 which describes how the proposal has considered the Design Principles.

4.5.3. Planning Circular PS 17-004 - Regulating expansion of schools

PS 17-004 provides guidance to consent authorities and applicants on the application of certain conditions of consent that regulate the expansion of schools. The Circular notes that many existing schools, such as Emanuel School, have conditions on development consents that currently limit the intensification of the school development through caps on both student and staff numbers. The Circular identifies that these cap conditions are an important tool to manage parking and traffic impacts but can be a major constraint on the growth of the school and the provision of essential school infrastructure.

The School proposes a maximum student enrolment of 920 students which has been carefully considered having regard to population and enrolment forecasts. The School does not anticipate there will be an increase in current staff numbers at the school to support the student enrolment increase.

This SEE demonstrates that the proposed expansion and increase in student enrolments can be accommodated for the following reasons:

Traffic and Parking

This application is supported by a comprehensive Traffic and Parking Assessment (**Appendix 15**) which identifies there are appropriate and adequate arrangements to address the traffic and parking needs generated by the development. This is discussed in greater detail at **Section 6.4** but in summary includes:

- Supervised and managed student drop off/pick up zones and procedures;
- Efforts undertaken by the School to reduce private vehicle trips including carpooling and the provision of a dedicated school bus service;
- The availability of public transport; and
- Initiatives to encourage walking and cycling.

Amenity

The proposed building has been appropriately sited and design to ensure visual and amenity impacts (including noise) on surrounding areas are minimised. An Acoustic Report is provided at **Appendix 18** and confirms the noise emissions from the proposed new building and mechanical services will be able to meet acceptable noise level requirements. For further details regarding the physical impacts of the development, refer to **Section 6**.

Environmental Considerations

Appropriate stormwater management and other environmental measures such as contamination, geotechnical procedures and services and utilities have been addressed and are supported by reports prepared by appropriately qualified professionals.

The increase in student enrolments at the school is considered to be justified in this SEE and in the supporting documentation.

It is noted that if Council wishes to impose a condition on student enrolment numbers at the school, consideration should be had to this Circular which includes a set of best practice principles provided by the Department of Planning, Industry and Environment when considering whether to place numeric caps for staff or students on school consents. As explained in the Circular, the consent authority should recognise the need for flexibility when limiting staff and student numbers. Non-government schools, such as Emanuel School, can experience fluctuations in enrolments due to changes in population and parental preference. Staff numbers may also fluctuate at schools depending on student number and specialist learning needs of the school. If Council determines a cap is necessary, then it should also consider how the cap may be reasonably implemented with sufficient flexibility to allow the school to meet increased student enrolment demands.

4.6. Randwick Local Environmental Plan 2012

4.6.1. Zoning and Permissibility

Under the RLEP the subject site is zoned SP2 Infrastructure (Educational Establishment) as shown in Figure 15.

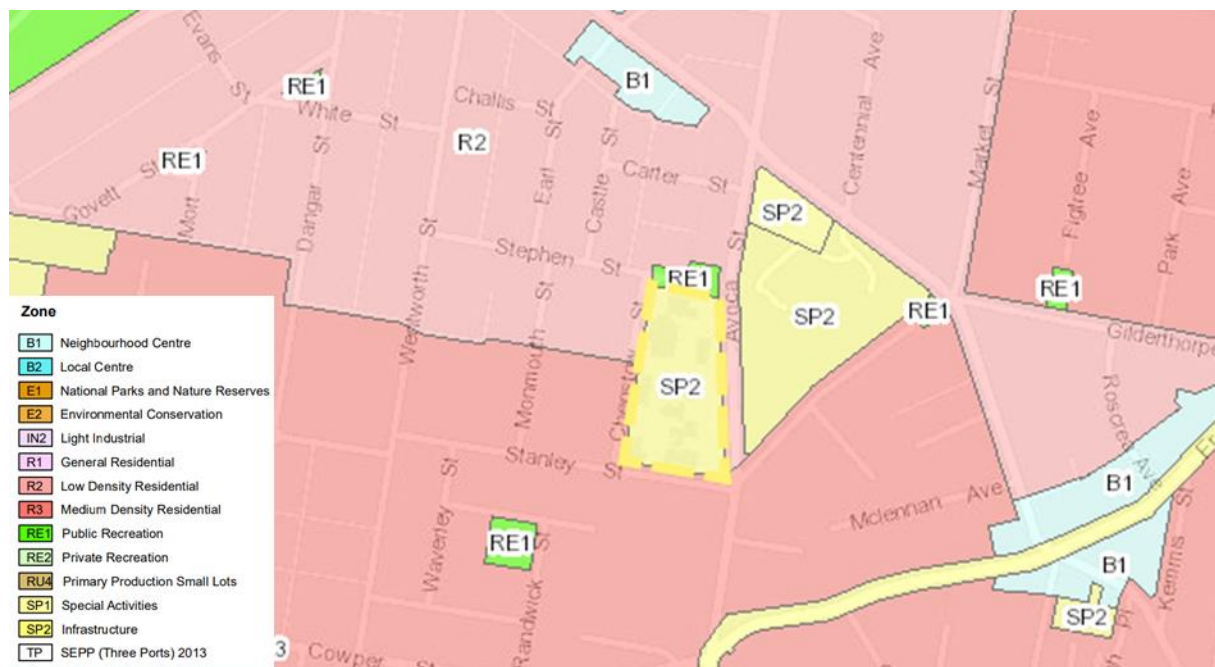


Figure 15: Extract of Land Zoning Map (Source: NSW Planning Portal)

The proposed development is identified as an "Educational establishment" and is permissible with consent in the SP2 zone. Notwithstanding, the proposal is permissible under the Education SEPP as discussed previously.

4.6.2. Demolition

Approval is sought for the proposed demolition works as part of this application, in accordance with Clause 2.7 of the RLEP.

4.6.3. Remaining RLEP Provisions

Clause	Comment	Comply
Part 4: Principal development standards		
4.3 - Height of buildings	The site is not subject to a height of buildings control	N/A
4.4 - Floor space ratio	The site is not subject to a floor space ratio control.	N/A
Part 5: Miscellaneous provisions		

Clause	Comment	Comply
5.10 - Heritage conservation	The subject site is listed on the State Heritage Register (SHR) under the Heritage Act 1977 (SHR no. 00386). It is also as a heritage item under Part 1 of Schedule 5 of the Randwick Local Environment Plan (LEP) 2012 as (item no. 1449). The subject site is listed as in the North Randwick Heritage Conservation Area (C1) (HCA), within Part 2 of Schedule 5 of the Randwick LEP LEP 2012. A Heritage Impact Statement has been prepared by City Plan Heritage and is provided at Appendix 12. The Statement concludes the proposal demonstrates compliance with the existing controls regarding heritage conservation and is therefore recommended to Council for approval.  Figure 16: Extract of Heritage Map (Source: NSW Planning Portal)	Yes
Part 6: Additional local provisions		
6.2 - Earthworks	Localised excavations to a maximum depth of 0.6 metres are envisaged to achieve design surface levels. In addition, an absorption system is proposed adjacent to the western side of the new building and excavations to a maximum depth of 1.5 metres will be required. Demolition and excavation will be carefully completed in order to maintain the stability of the adjacent sections of paved surfaces buildings and walls within the school grounds, including the boundary walls to the west and south. The Geotechnical Report at Appendix 9 includes recommendations to mitigate potential risks and design parameters for the proposed building's structural, pavement and excavation design.	Yes
6.10 - Essential services	Clause 6.9 of the LEP states that consent must not be granted to development unless the consent authority is satisfied that the services are available or that adequate arrangements have been made to make them available when required. Further consideration of essential services is provided at Section 3.12 of this SEE.	Yes

Clause	Comment	Comply
6.11 - Design Excellence	This Clause is not applicable pursuant to Clause 35(7) of the Education SEPP.	N/A
6.12 - Development requiring the preparation of a development control plan	This Clause requires that development on land with a site area of at least 10,000m² occurs in accordance with a site-specific development control plan. The School has a site area of approximately 15,000m² and therefore a site-specific development control plan is required. However, Section 4.23(2) of the EP&A Act states <i>"if an environmental planning instrument requires the preparation of a development control plan before any particular or kind of development is carried out on any land, that obligation may be satisfied by the making and approval of a concept development application in respect of that land"</i>. To this effect, a concept development application is to be prepared for the site. As required by Section 4.23(3) of the EP&A Act, consideration has been given to the information required to be included in the development control plan as set out in Clause 6.12 of the RLEP. This is provided in Table 6 below:	

Table 6: Consideration to Clause 6.12(4) of the RLEP

Development Control Requirement	Response
(a) design principles drawn from an analysis of the site and its context,	The design principles to be implemented across Emanuel School is drawn from the site analysis of the site prepared by TKD Architects (refer Appendix 1).
(b) phasing of development and how it will provide for the social and recreational needs of a new community,	No staging is proposed. The development involves the redevelopment of the Adler Building only. The new learning building is intended to be predominantly used by the staff and children of the School, however there will be occasions where the building is used by the community.
(c) distribution of land uses, including open space (its function and landscaping) and environment protection areas,	The development is for the construction of a new learning building which will be used in connection with the existing education establishment on the site. The development will be supported by a distinctive and high-quality landscape design which is integrated with the existing campus. The proposed landscaping reinforces the pedestrian environment, assists in the comprehension and legibility of the site by building on the existing landscape patterns and integrating those patterns into the overall framework of the proposal. Provision of new seating steps and planting within the existing outdoor precinct will greatly improve the barren concrete external play zone.
(d) subdivision pattern and provision of services,	The development will not change the existing subdivision pattern across the Emanuel School site. The site currently contains and is connected to all necessary services including electricity, gas, water, communications, drainage and sewage. There is

Development Control Requirement	Response
	capacity within the services networks to ensure adequate services are provided for the proposed development.
(e) building envelopes and built form controls,	There are no specific objectives of the SP2 - Infrastructure (Educational Establishment) zone within which the site is located nor are there any specific development standards prescribed for the site under the RLEP. Notwithstanding, the indicated built form parameters, indicated on the architectural plans prepared by TKD Architects have been drawn from the surrounding land uses built form controls and design principles stipulated in State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017. These are drawn upon to provide a reasonable height of the replacement Adler Building to ensure that the development will remain consistent with the surrounding built upon area and the future development potential of these adjoining lands.
(f) housing mixes and tenure choices, including affordable and adaptable housing,	N/A
(g) heritage conservation, including both Aboriginal and European heritage,	With regard to archaeological potential, some level of archaeological potential may exist below the area of the proposed works. In the 2002 CMP for the site, an area of the southwestern portion of the site titled 'Precinct 4' is identified as having some potential to contain archaeological significance due to the potential nearby remnants of the original carriage drive and foundations for the succession of buildings in the south-west of the site. The Adler Building is specifically noted in that in its construction the building has <i>likely covered over - or possibly removed - evidence of the previous structures there.</i> Due to the significant earthworks involved in the construction of the Adler Building, it is less likely than the unbuilt areas around the building to contain archaeological remnants. However, as stated in the 2002 CMP and as no archaeological investigation has been undertaken for the area, the presence of underground structures or artefacts cannot be completely discounted. Therefore, it is appropriate to proceed with caution should any unexpected archaeological finds are uncovered during the ground works, a STOP WORK procedure should be applied to allow for the inspection of an appropriately qualified archaeologist in order to advise on the requirements of management and consultation with the Heritage NSW of the Community Engagement, Department of Premier & Cabinet.
(h) encouraging sustainable transport, including increased use of public transport, walking and cycling, road access and the circulation network and car parking provision, including	The existing pedestrian, cycle and road access and circulation networks will remain unchanged. The existing car parking provisions will remain as unchanged.

Development Control Requirement	Response
integrated options to reduce car use,	
(i) impact on, and improvements to, the public domain,	The proposed development will replace an existing outdated building and will provide a modern, contemporary building complemented by landscaping to improve and enhance the relationship of the School to the public domain.
(j) identification and conservation of native flora and fauna habitat and habitat corridors on the site, including any threatened species, populations or ecological communities,	The proposed development does not include nor anticipate any loss of existing vegetation from the Emanuel School site.
(k) the application of the principles of ecologically sustainable development,	The integration of ESD principles and environmental initiatives are a priority for the School. The following environmental initiatives will be investigated and incorporated during design development: ▪ PV Panels to the roof for power generation. ▪ Rainwater capture and reuse for irrigation and toilet flushing. ▪ Water efficient fittings and fixtures. ▪ Energy efficient LED lighting. ▪ Smart sensors and controls. ▪ Maximise natural light and ventilation. ▪ Incorporate appropriate sun shading to minimise solar heat gain into the building: horizontal shading to the north and vertical shading to the east and west. ▪ Light coloured roof sheeting to minimise heat absorption. ▪ High levels of thermal insulation. ▪ Visual display located at entry of the building as learning tool showing energy generation and consumption and water capture and use to show how the building is performing.
(l) identification, extent and management of watercourses, wetlands and riparian lands and any buffer areas,	N/A - there are no watercourses, wetlands or riparian lands within the vicinity of the school.
(m) environmental constraints, including climate change, acid sulfate soils, flooding,	This development application is accompanied by a Phase 1 PSI (Appendix 10) and a detailed site investigation will be provided once the existing Adler Building has been demolished. If contamination is identified, the land will be remediated, validated and certified. This will ensure that if contamination is identified, proper precautions for managing the risk to human health and the

Development Control Requirement	Response
contamination and remediation,	environment from the contamination will be implemented prior to development so that the land to be developed is suitable for the proposed use.
(n) opportunities to apply integrated natural water-cycle design and integrated renewable energy design.	An underground rainwater re-use tank is proposed. At least 60% of the roof water is to be collected and piped to this tank. The harvested rainwater will be used for both irrigation and toilet flushing to reduce the potable water demand for the school. The development also incorporates high water efficiency amenity fixtures and fittings to reduce potable and non-potable water consumption and reduce energy consumption for domestic hot water consumption. Solar panels are proposed on the roof of the building for power generation.

5. OTHER PLANNING CONSIDERATIONS

The relevant planning framework considered in the preparation of this report comprises:

- A Metropolis of Three Cities - the Greater Sydney Region Plan;
- Eastern City District Plan; and
- Randwick Development Control Plan (Randwick DCP) 2012.

5.1. Eastern City District Plan

The Eastern City District Plan provides a series of priorities and actions to guide development and accommodate expected growth across the district. This District Plan has been prepared to give effect to the Greater Sydney Region Plan.

Responses are provided in Table 5 below with respect to the relevant planning priorities in the Western City District Plan.

Table 7: Consistency with the Eastern City District Plan

Planning Priority	Comment
Planning Priority E1 Planning for a city supported by infrastructure	Randwick and the surrounding Eastern Suburbs are experiencing high levels of population growth. The proposed development will facilitate the expansion of a school that is supported by existing infrastructure.
Planning Priority E4 Fostering healthy, creative, culturally rich and socially connected communities	The proposal will facilitate the expansion of the school to accommodate an additional 135 students to accommodate the growing demand for improved learning facilities within the locality.

Based on the assessment provided above, the proposed works are consistent with the strategic direction and priorities envisaged by the Western City District Plan.

5.2. Randwick Development Control Plan 2013

Under Clause 35(9) of the Education SEPP, a provision of a DCP that specifies a requirement, standard or control in relation to a development for the purposes of a school which is in a prescribed zone, is of no effect, regardless of when the development control plan was made.

The necessary assessment of this DA has been made under the relevant SEPPs and RLEP.

Notwithstanding, a high-level assessment of the proposal against the key controls contained in the Randwick DCP 2013 is included at **Appendix 19**.

6. ENVIRONMENTAL IMPACT ASSESSMENT

6.1. Overview

This section identifies and assesses the impacts of the development with specific reference to the heads of consideration under Section 4.15 of the Act.

The context and setting of the development site are described in **Section 2.3** of this Statement. It is considered that the proposal is compatible within the context and character of 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 proposal aims to mitigate any potential physical impacts it may have on surrounding properties. The proposal's physical impacts relate to overshadowing, bulk and scale, visual impact and views.

In relation to overshadowing, the proposal will not affect the amenity of neighbouring properties; all neighbouring properties will achieve at least three hours of sunlight between 9am and 3pm on 21 June.

In relation to visual impacts and bulk and scale, the design of the proposal recognises the existing character of the School site and the character of the adjoining streetscape. The proposed building purposefully holds the corner of the site and is consistent with the scale and height of the adjacent D&T building. The windows on the southern and western elevations have been carefully placed to prevent any opportunities for overlooking between the site and adjoining residential dwellings to the west and south.

In relation to views, the proposed Adler Building will largely maintain existing views which are currently obscured by the existing built form on the site and nearby vegetation. The proposal will not affect any significant views as its location at the corner of Stanley and Chepstow Streets is isolated and distant from key visual corridors and vistas to the historic core of the Emanuel School site.

Overall, the proposal does not constrain the development potential of surrounding sites and represents the orderly development of the school in accordance with the site's land use zoning. The amenity impacts are addressed in detail throughout Section 6 of this SEE and in comprehensive specialist reporting that accompanies this application.

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

The proposal's appearance is in harmony with the adjacent school buildings, specifically the existing D&T Building. The materiality, roof ridge line, building height and front and side setbacks respond to the established built form on the southern and western boundaries of the site. The design creates continuity and is generally consistent with the scale and character of other development on the School site and is in character with Stanley and Chepstow Streets.

6.2. Built Environment

6.2.1. Height, Bulk and Scale

There is no maximum height or floor space ratio control for the School site. The maximum height of the replacement Adler Building is RL91950. The building height has been determined through a careful analysis of the topography of the site, consideration of the heights of adjoining and immediately adjacent buildings and the scale and built form of the existing campus.

The proposed building is situated within the site's south-western corner and responds to its setting by purposefully holding the corner of the site. The height of the proposed building is presented as three storeys when viewed from Chepstow and Stanley Streets, which is consistent with the height of the adjacent D&T building and will provide an appropriate interface to the adjacent two storey residential flat buildings and dwelling houses.

The proposed building is both distinctive and visually compatible with the bulk and scale of existing buildings at the School. To help reduce the perceived bulk and scale of the proposed building, the massing of the proposed building has been set back from the site boundaries and an additional setback is provided for the third storey which aligns with the existing setback of the D&T Building. The rooftop elements (plant and lift overrun) have been setback from the roof boundary to reduce visibility and associated bulk and scale when viewed from the street.

Landscaping is proposed along the building's façade on the southern and western elevations and planters are proposed along the Stanley Street elevation at third floor level to help reduce the perceived scale of the building.

Extracts of the elevations and 3D images prepared by TKD Architects are provided at **Figure 17** to **Figure 20**.

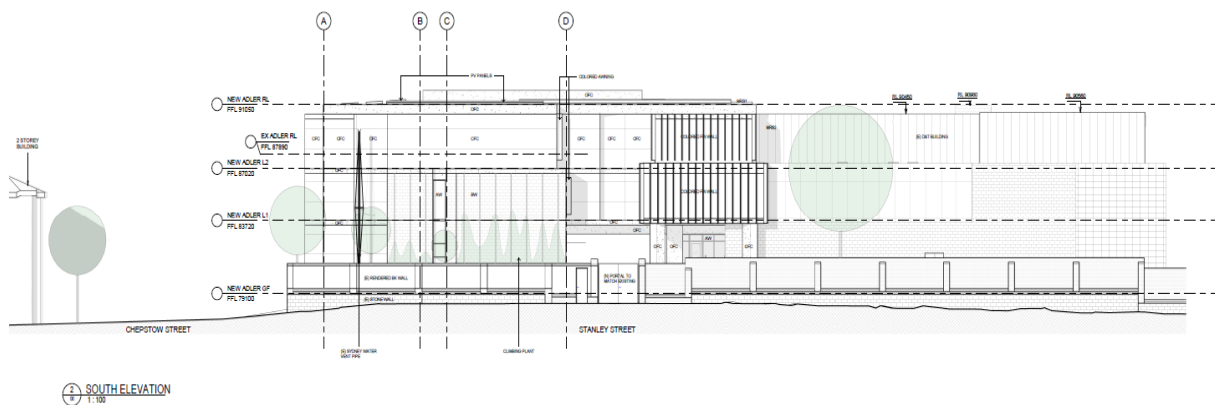


Figure 17: South Elevation along Stanley Street (Source: TKD Architects)

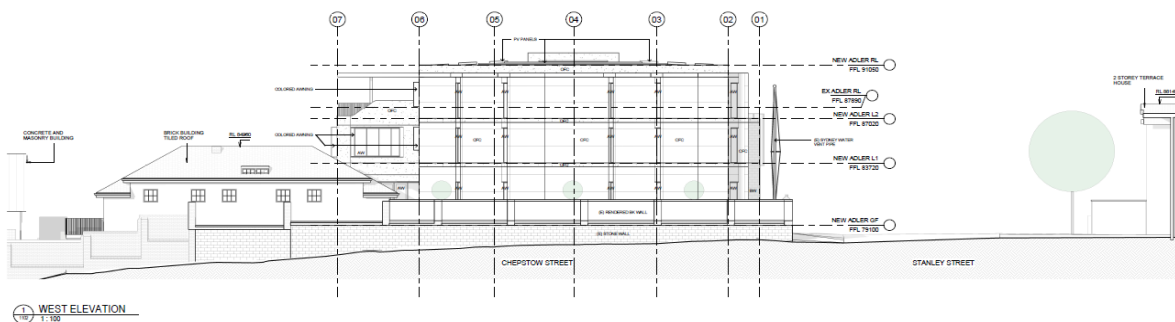


Figure 18: West Elevation along Chepstow Street (Source: TKD Architects)



Figure 19: View of proposed building looking west from the school playground (Source: TKD Architects)



Figure 20: View of proposed building looking south from the school playground (Source: TKD Architects)

As discussed in the following sections of the SEE, the proposed development does not result in any detrimental impacts on the adjoining or nearby properties in terms of overshadowing, privacy or view loss.

6.2.2. Setbacks

There are no setback controls prescribed for the site under the RLEP or RDCP. As identified in **Figure 21** and **Figure 22** below, the proposed setbacks are generally consistent with the existing Adler Building and in a number of locations, provide an enhanced setback.

The proposed building setbacks create a sensitive built form response and adequate separation is provided to residential interfaces to assist in minimising bulk, overshadowing and privacy impacts. Proposed building setbacks include:

- Southern setback:
 - 2.05 metres at ground and first floor levels
 - 2.87 metres to the blade wall and 4.25 metres to the prevailing building line at second floor level
- Western setback:
 - 1.3 metres from the blade wall and 2.7 metres from the prevailing building line at ground, first and second floor levels

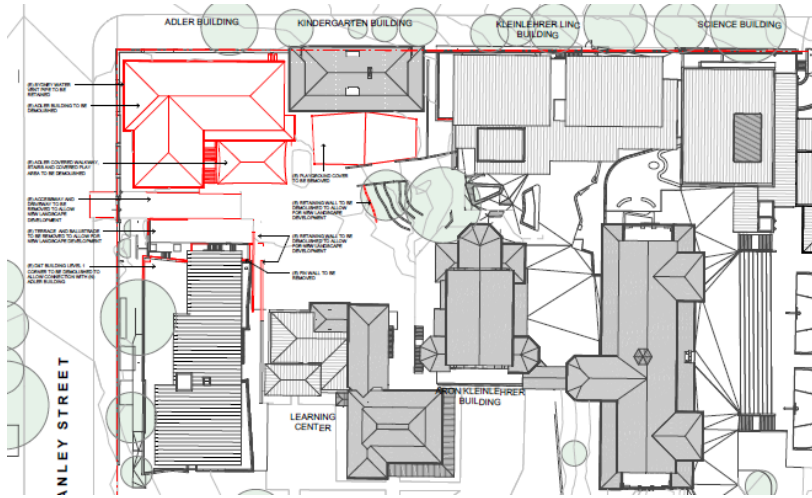


Figure 21: Existing Adler Building outlined red (Source: TKD Architects)

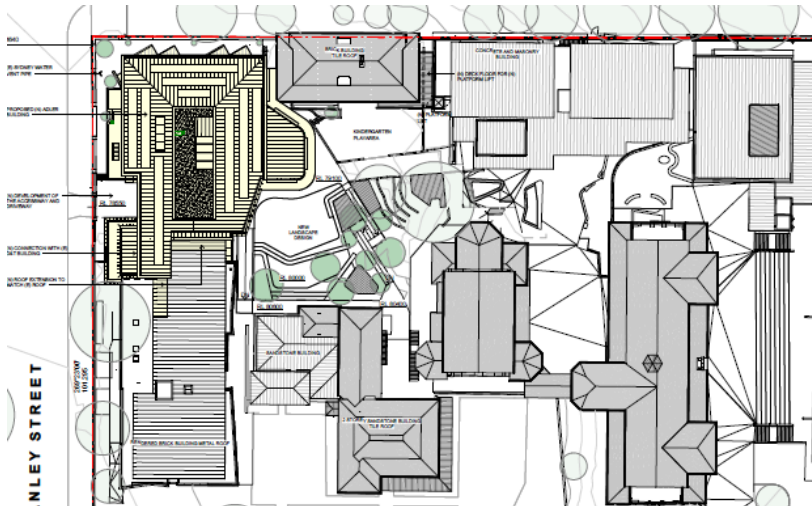


Figure 22: Proposed building shaded yellow (Source: TKD Architects)

6.2.3. Design and Aesthetics

The security constraints have driven the façade design on the southern and western facades to provide a blast hardened façade to protect students in the event of an attack. The southern and western street facades feature a series of angled blade walls to shield windows and create window boxes with access to daylight in learning spaces.

The articulation of the proposed facade has been purposely considered so as to reduce the expanse of walls and perceived height by articulating the facade horizontally through use of expressed floor edges and parapets.

The articulation of the facade includes the use of different high-quality materials, window fenestration and vertical blades. The main extent of facade is a light, neutral colour and will use off form concrete and

integrally coloured fibre cement panels. The rooftop elements will use a darker more recessive colour that contrasts with the main building elements below.

In terms of materials and finishes, the new building has been designed with low maintenance and durable external materials that will complement the character of the existing campus. Existing heritage buildings on the campus feature a dominance of golden coloured sandstone and painted render and both will be referenced in the new building. External materials consist of off form and painted concrete to the lower levels of the building providing a robust and grounding material.

An extract of the external materials and finishes schedule is provided at **Figure 23**.

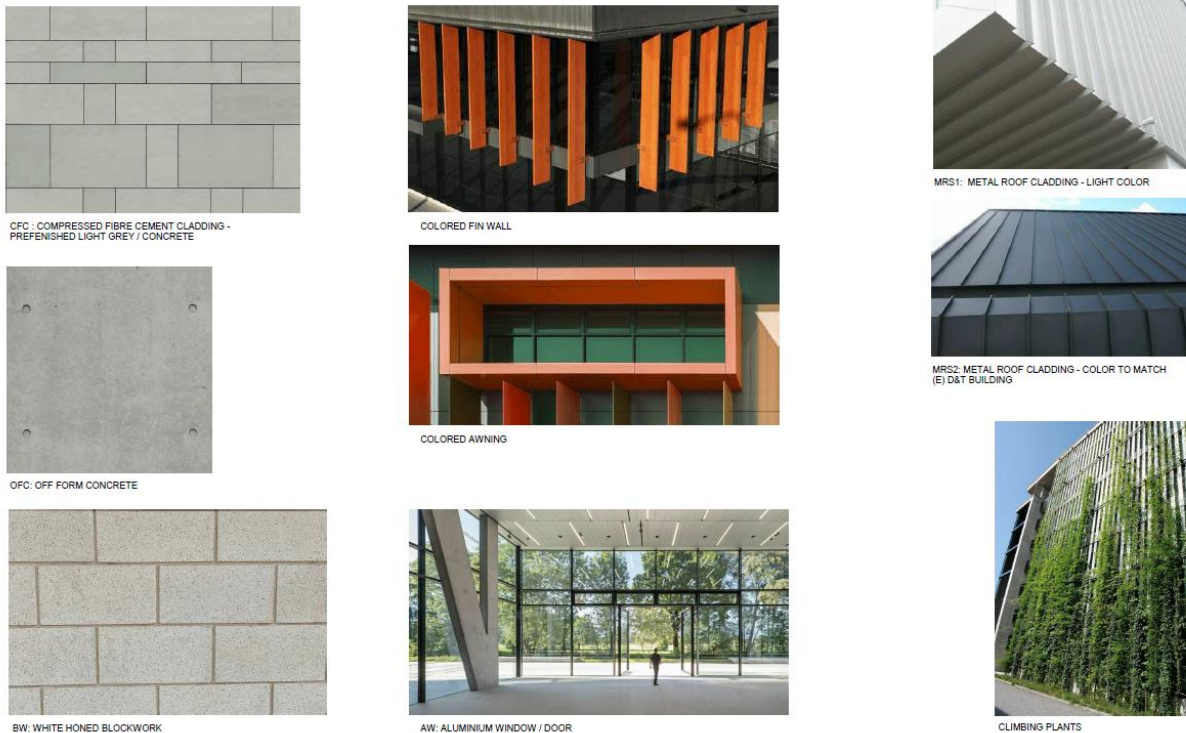


Figure 23: External Materials and Finishes (Source: TKD Architects)

6.2.4. Solar Access

Shadow diagrams have been prepared by TKD Architects and are included in the architectural plans at **Appendix 1**. The diagrams provide an overview of the overshadowing caused as a result of the proposed development between 8am and 5pm on 21 June.

Overall, the proposed development ensures at least three hours of direct sunlight is provided to the north-facing living area windows of the neighbouring dwellings between 8am and 4pm on 21 June.

An overview of the impacts on 21 June is provided below:

- At 8am the proposed development results in additional overshadowing to the north facing windows and roofs of Nos. 11, 11A, 15, 17, 19 and 21 Stanley Street;
- At 9am the proposed development results in additional overshadowing to the north facing windows of Nos 15, 17 and 19 Stanley Street;

- At 10am the proposed development does not result in any overshadowing to the adjacent residential dwellings and only results in additional overshadowing to the road reserve on Stanley and Chepstow Streets;
- At 11am until 3pm the proposed development does not result in any overshadowing to the adjacent residential dwellings and only results in additional overshadowing to the road reserve on Stanley Street;
- At 4pm the proposed development results in additional overshadowing to the north facing windows of No. 34 Stanley Street; and
- At 5pm the proposed development does not result in any further overshadowing to the adjacent residential dwellings other than what is currently cast by existing buildings.

6.2.5. Amenity

The new building provides a range of age and stage-based learning spaces including defined home bases and classroom zones together with breakout and collaboration zones. The building has been arranged to enable the youngest children in kindergarten to use the lower levels and the older children use the upper levels.

The new building maximises natural ventilation and natural light (predominantly from the northern elevation) to benefit the health and wellbeing of students and staff. The building has a high floor to floor level and where possible, maximises the use of windows and skylights for natural light (while balancing the need for security). The design includes the use of balconies to encourage outdoor learning associated with the principal outdoor spaces.

A critical aspect of the design is the provision of a secure environment that encourages activity, vitality and viability, enabling a greater level of security. Central to this is the need to provide a perimeter wall that is blast resistant and does not have openings that allow entry of material from outside the school. While this potentially conflicts with the need for natural light and outlook, the design has used angled blade walls and oblique, narrow windows to address this issue.

6.2.6. Privacy

The southern and western elevations of the building (adjacent to residential properties) include windows shielded by angled blade walls. The proposal does not result in any overlooking or privacy impacts to the adjacent residential properties. Landscaping is proposed along the building's southern and western facades to assist in providing a visual buffer between the residential properties.

6.2.7. Views

The following section provides an assessment of the potential view impacts identified from the surrounding public domain. A view analysis has been prepared by Virtual Ideas and is provided at **Appendix 20**.

▪ View from outside 27 Stanley Street

A view towards the central historical part of the School site is possible when looking in between the existing Adler and D&T Buildings from the opposite side of Stanley Street. Only the upper part of the former Chapel is visible, above the existing boundary wall and vegetation on the site.

The proposed development will include the construction of a link between floors one and two of the new Adler and D&T Building and will impact on this view. While the ability to see the historic core of the site is only glimpsing, the proposed development will remove this view entirely. It is considered that while the view itself holds some significance, the accessibility of the view compounded by factors currently obscuring the view including the external gate and boundary wall, restrict the significance of this view.



Figure 24: Existing view from outside 27 Stanley Street (Source: Virtual Ideas)



Figure 25: Proposed view from outside 27 Stanley Street (Source: Virtual Ideas)

▪ **View towards the corner of Stanley and Chepstow Streets**

The existing Adler Building is prominently visible from within the surrounding streetscape due to its location on the corner of Chepstow and Stanley Street and the elevated topography of this part of the site. Due to the location of the Adler Building at the corner of the site, views towards the centre of the School site are obscured. Views looking east across the School site are further obscured as a result of the three storey D&T Building.

The proposed building will maintain the existing views across the site and views towards the centre of the site and across to the west will remain obscured.



Figure 26: Existing view looking towards corner of Stanley and Chepstow Streets (Source: Virtual Ideas)



Figure 27: Proposed view looking towards corner of Stanley and Chepstow Streets (Source: Virtual Ideas)

▪ View from Chepstow Street

The topography of Chepstow Street increases towards the southern end, where the existing Adler Building is located. However, the building is only visible from halfway down the street. Towards the northern end of the street, views to the Adler Building are reduced due to the topography, but also due to the presence of larger buildings within the site. Further, due to the Adler Building's location in the southwestern corner of the site, it is located behind existing structures and is out of focus to any significant views to the site from Chepstow Street and subsequently its contribution to their significance limited.

The works to replace the Adler building on the site will retain the currently available views to the site from Chepstow Street.



Figure 28: Existing view from Chepstow Street (Source: Virtual Ideas)



Figure 29: Proposed view from Chepstow Street (Source: Virtual Ideas)

▪ **View from outside 34 Stanley Street**

The view of the existing Adler Building is largely obscured when viewed from 34 Stanley Street and the nearby intersection with Avoca Street. The presence of the existing three storey D&T Building, as well as existing vegetation limits existing views to the south-western corner of the site. The works to replace the Adler Building on the site will largely retain the currently available views to the site and the additional height will be consistent with the height of the D&T Building.



Figure 30: Existing view from 34 Stanley Street (Source: Virtual Ideas)



Figure 31: Proposed view from 34 Stanley Street (Source: Virtual Ideas)

In summary, existing views across the site are largely obscured by the existing Adler Building and nearby vegetation and the proposed replacement Adler Building will largely maintain these views.

The proposal will not affect any significant views as its location at the corner of Stanley and Chepstow Streets is isolated and distant from key visual corridors and vistas to the historic core of the Emanuel School site.

The proposal is acceptable in relation to view impact.

6.2.8. Heritage

A Heritage Impact Statement has been prepared by City Plan Heritage and is provided at **Appendix 12**.

The statement assesses the potential impact the proposed works may have on the known heritage values of the subject site, which is a State and locally listed heritage item, the North Randwick Heritage Conservation Area and the heritage items in proximity.

The statement acknowledges that's the proposed works will result in some but an acceptable impact on the heritage significance of the subject site, the North Randwick Heritage Conservation Area and the heritage items in proximity. The proposed change to the site aims to upgrade the school and available facilities to accommodate a projected increase in student capacity, meet the current educational standards and specific issues of security facing the Emanuel School establishment. The design and the location of these changes has been selected with consideration of the fundamental need to retain the site's significant heritage elements and their appreciation.

The existing Adler Building has been assessed in the previous 1999 CMP as a non-contributory building. The assessed significance of the building and its distance from the significant historic aspects of the site have removed the potential to physically impact upon the structures critical to the site's significance. With this knowledge, impacts assessed in the Statement have related largely to the potential change in the ability to view or interpret the site. The Statement has found that while marginal change to the current scale of the structure on the site and partial obscuration of views from Stanley Street to the heritage core will have some heritage impacts, the mitigating factors introduced in the design of the proposed new Adler Building will adequately see the proposal being an overall acceptable change to the site. The mitigating design factors including selection of materials and detailing that reference architectural language of the neighbouring D & T Building, help to soften the introduction of what is a much-needed addition to the site.

The impact on the streetscape to some extent could not be avoided but have been mitigated through design and use of a consistent architectural language with the existing D & T Building. The buildings on the opposite side of Chepstow Street are two to three-storey apartment buildings and the new building in relation to those buildings will marginally higher than the existing building it is replacing. It is considered that while the new building will make changes to the site's conditions at this part it will not adversely affect the residential character of the surrounding neighbourhood. The new building appropriately responds to its educational facility requirements and architectural character in this regard.

The proposal demonstrates compliance with the existing controls regarding heritage conservation and is therefore recommended to Council for approval.

6.2.9. Building and Construction

The proposed development has been designed in accordance with all the relevant controls of the BCA. A BCA Design Assessment Report has been prepared by Design Confidence and is provided at **Appendix 5**. Compliance with the BCA will be demonstrated with the Construction Certificate documentation.

A final Construction Management Plan will be prepared by the appointed contractor, once the terms of any approval granted by Council are known. Accordingly it is anticipated that Council will include appropriate conditions within any consent notice requiring the preparation and approval of a CMP prior to works commencing.

6.3. Natural Environment

6.3.1. Tree Removal

As discussed at **Section 3.8**, an Arboricultural Impact Assessment has been prepared by ArborSafe and is provided at **Appendix 4**. Four (4) trees were inspected which are located within the grounds of Emanuel School and on the neighbouring Chepstow Street Council roadside verge. The assessment concludes that the proposed development will impact none of the trees. Three of the trees will be retained with generic protection measures during the development, one tree will be retained with specific protection measures during the development and one tree will require minor reduction pruning within the eastern aspect of its crown to facilitate the development works.

6.3.2. Landscape

An extract of the Landscape Plan and the proposed scope of landscaping works is detailed at **Section 3.10**.

The following design principles have been incorporated into the landscape design to create an adaptive outdoor space that provides opportunities for learning within a landscape of distinct character.

Connectivity

- Link the new building to the adjacent kindergarten, D&T and Saunders Building
- Integrate the existing site levels with the new landscape
- Ensure a DDA compliant path of travel across the site

Flexible

- Provide areas for outdoor learning which incorporate intimate and open space
- Ensure multifunctional play areas cater for active and passive recreation
- Provide breakout space for the replacement Adler Building which can accommodate exhibitions, gatherings or outdoor learning

Amenity

- Provide an address for the replacement Adler Building
- Create a distinct landscape character which is sympathetic to Emanuel School
- Provide play spaces for years 5 and 6
- Introduce tree and understorey planting to improve amenity and enhance natural environmental qualities

The landscape design is integrated with the existing campus and reinforces the pedestrian environment, assists in the comprehension and legibility of the site by building on the existing landscape patterns and integrating those patterns into the overall framework of the proposal. Provision of new sitting steps and planting within the existing outdoor precinct will greatly improve the barren concrete external play zone.

6.3.3. Water Management

An overview of the proposed stormwater management is provided at **Section 3.12.1**. The stormwater drainage for the proposed development has been designed to comply with the following Randwick City Council's Control Plan and Stormwater Code, Australian Standards and Guidelines:

- Randwick City Council Comprehensive Development Control Plan 2013 – Section B8, Water Management.
- Randwick City Council Private Stormwater Code, 7th March 2013.

- Australian Rainfall and Runoff.
- Australian Standard AS3500.3 – 2018 Stormwater Drainage.

6.3.4. Soil Management

Refer to **Section 4.5.1** for the SEPP 55 assessment with regard to potential soil contamination.

Also refer to the Erosion and Sedimentation Control Plan provided at **Appendix 6** which provides measures to ensure the development provides appropriate soil management and sedimentation control.

6.3.5. Air and Microclimate

Some dust is anticipated during the construction period, particularly given demolition and excavation is involved. This impact 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.

A final CMP will be provided by the builder, once appointed, prior to the issue of the Construction Certificate.

The proposal is otherwise not expected to give rise to any long term or adverse impacts on local or regional air quality.

6.3.6. Noise and Vibration

Construction noise and vibration

Noise impacts associated with the construction phase of the development will be assessed in accordance with the NSW Environment Protection Authority NSW Noise Policy for Industry, with particular consideration to the nearest proposed residential receivers. Noise control measures will be implemented during demolition and construction to minimise the impact of the development on residential dwellings in its vicinity.

An Acoustic Report has been prepared by Wilkinson Murray and is provided at **Appendix 18**.

The nearest residential receivers surrounding the site are located to the south of Stanley Street and west of Chepstow Street. In order to quantify the existing noise environment, long-term ambient noise levels were monitored at 27 Stanley Street. **Figure 32** provides an aerial of the noise monitoring location.

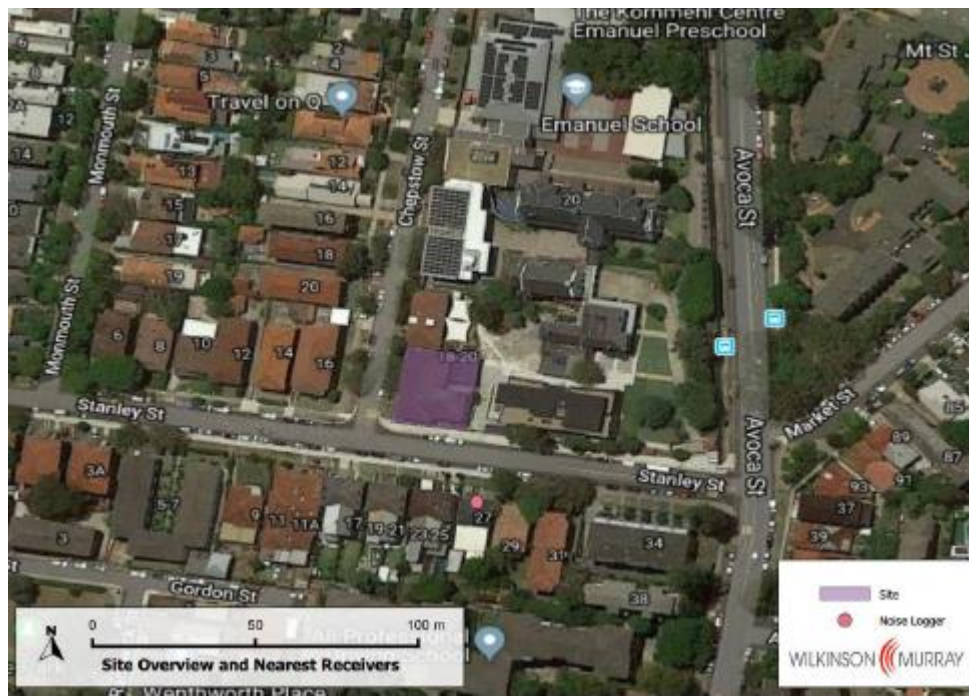


Figure 32: Aerial showing Noise Monitoring Location (Source: Wilkinson Murray)

The Acoustic Report identifies that the main sources of noise from the school include noise emission from the operation of the proposed building and noise emission from the mechanical services.

Noise emissions from the operation of the proposed building are expected to be adequately contained by the façade of the building. No special measures are required to protect the acoustic amenity of nearby residents.

The terraces will be indicatively used for small group learning activities (approximately 5 persons x 6 groups) during school hours under supervised conditions. This will occasionally occur on the level 2 terrace which faces residences on Chepstow Street. Noise levels at Chepstow Street have been predicted based on a typical “worst case” of half of the children speaking in a normal voice (each speaking at 61 dBA at 1 m) where a resultant noise levels of 42 dBA is predicted. This compares with a daytime criterion of 46 dBA and therefore no adverse impact associated with the terrace area is predicted.

In relation to announcements and school bells, while no design of the PA has been determined, the following measures are to be adopted to ensure that their impact to all surrounding residences is minimised:

- Speakers should be located and orientated to provide good coverage of the school areas whilst being directed away from residences. The coverage of the system should be subject of the detail design of the system.
- The volume of the system should be adjusted on site so that announcements and bells are clearly audible on the school site without being excessive. The system should initially be set so that noise at surrounding residences does not exceed the ambient noise levels by more than 5dBA.
- Once the appropriate level has been determined on site, the system should be limited to the acceptable level so that staff cannot increase noise levels.

In relation to mechanical services, the plant will be located on the roof of the new building and will consist of roof mounted condensers. The exact details of the condensers have yet to be determined. Preliminary

selections have been made for the roof units which indicates that compliance can be achieved for day and evening periods at all surrounding properties. Given the plant will not operate in the night period, it is likely that the mechanical plant will not require acoustic treatment. A detailed assessment of operational noise emission will be conducted during the detailed design stage to confirm the initial findings.

If further mitigation is required measures that can be adopted are:

- Acoustic louvres,
- Noise barriers, and;
- Variable speed controls on condenser fans.

Provided these recommendations can be met, the report concludes that the noise emissions from the proposed new building and mechanical services will be able to meet acceptable noise level requirements.

6.3.7. Energy

As discussed at **Section 3.12.3**, the existing incoming submain will have sufficient capacity to the supply electrical power to the expanded D&T Building.

6.4. Movement and Access

6.4.1. Transport

An extract of the existing public transport network operating in the locality is provided at **Figure 33**. The School benefits from excellent public transport, with 12 bus stops located within 400 metres of the site. These services provide connections to Sydney CBD and the Eastern Suburbs.

In addition to these services, Bondi Junction Railway Station is located approximately 1.9 kilometres north of the site. This station provides services on the T4 - Eastern Suburbs and Illawarra Line, providing connections to the Sydney CBD.

In addition to the numerous public bus services, the site is serviced by the 683E school bus which runs between Emanuel School and Watsons Bay.

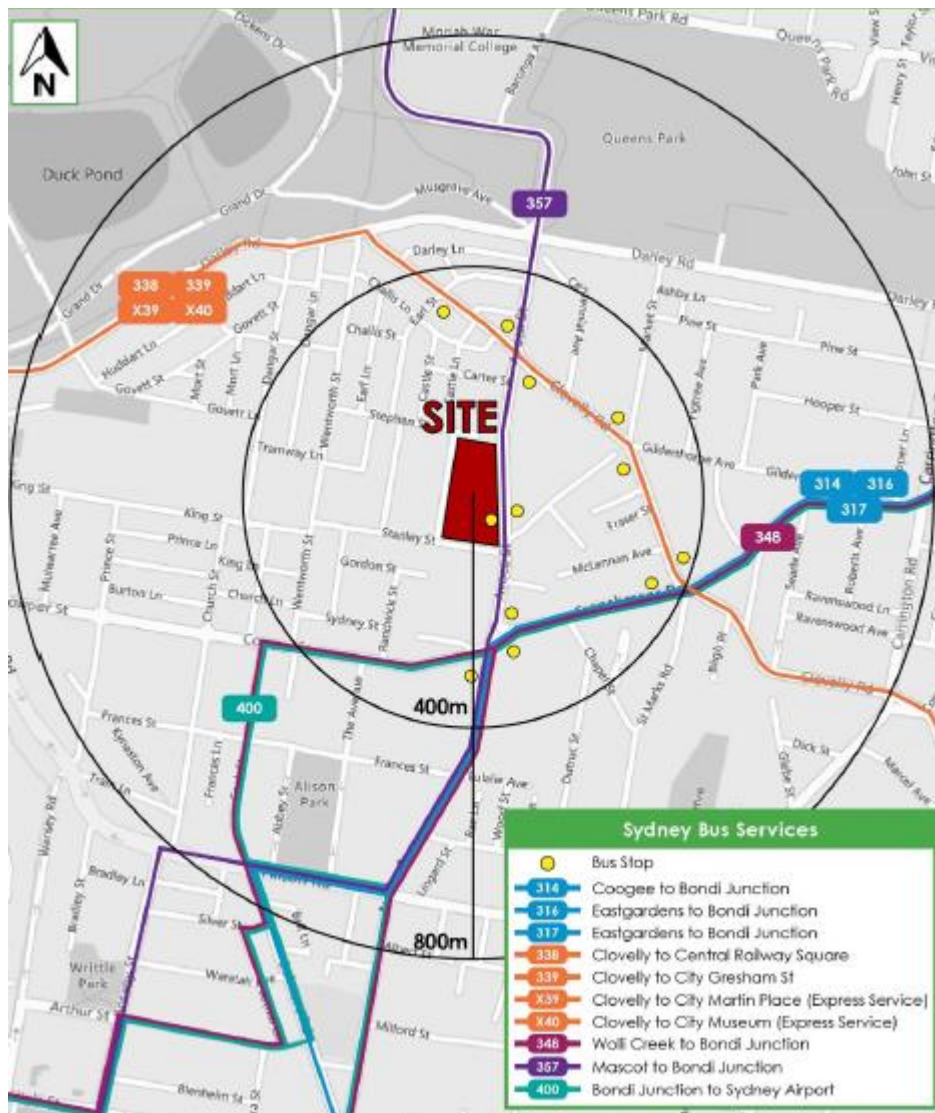


Figure 33: Public Transport Routes (Source: Traffix)

6.4.2. Parking

As identified in the Traffic Impact Assessment prepared by Traffix (**Appendix 15**), the school currently provides 19 off-street parking spaces including 11 spaces under the science block and eight (8) spaces adjacent to the Kormehl Centre (pre-school).

Local roads surrounding the school provide a number of on-street parking options for staff, parents and students. Kerbside parking restrictions include all-day parking, timed no parking, timed bus zones and no stopping.

The School is seeking approval to increase the student population to 920 students (2021 forecast), representing an increase of 33 students above current operating levels. The School currently operates with 138 FTE staff members and the proposed development will not require any additional staff. No on-site parking is proposed as part of this proposal.

With regard to parking, Clause 35(9) of the Education SEPP states that any provision of a development control plan that specifies a requirement, standard or control in relation to development for the purpose of a school is of no effect, regardless of when the development control plan was made.

The existing demand for street car parking is considered acceptable given the proposal does not propose to increase staff numbers above what is currently operating and thus the on-street parking demands would be unchanged from the existing parking situation. Secondly, as confirmed in the travel surveys undertaken by all staff, the majority of staff (77%) leave the school between the hours of 3pm and 5pm, which is outside of the critical evening parking demand period. This suggests that the availability of on-street car parking will steadily increase over that period, freeing up parking for residents returning home from work.

Lastly, a comprehensive Green Travel Plan and Workplace Travel Plan will be developed for Emanuel School staff and students/parents to improve awareness and access to alternative modes of transport for staff and students to reduce any potential future traffic and parking impacts.

In relation to parent/student parking, the Randwick DCP does not provide a car parking rate for students. Parents/guardians dropping off and picking up students will continue to utilise the existing "go with the flow" scheme which operates satisfactorily along Avoca Street. Short term parking demands associated with parents/guardians parking near the school to walk their child/children into the grounds will remain unchanged in relation to existing conditions and should continue to operate satisfactorily.

6.4.3. Traffic

The Traffic and Parking Assessment identifies that the additional student enrolments will result in an increase of 18 vehicles per hour during the morning peak period and eight (8) vehicles per hour during the afternoon peak period. This is considered to be minor and will have minimal impacts to the surrounding road network or adjacent intersections, with an additional vehicle every three (3) minutes during the morning peak and an additional vehicle every seven (7) minutes during the afternoon peak. In addition, it is noted that the school finish times generally fall outside of the network peak period and thus afternoon traffic impacts will be negligible.

Traffic surveys were undertaken of the intersections considered to be most critical in relation to the site. The analysis identified all intersections to be operating with level of service A or B under the existing 2019 scenario. These intersections clearly operate satisfactorily with the current student population of 887 and have spare capacity for additional future population expansions. As such, no external road upgrades are required to support the existing student population or forecasted student population.

6.4.4. Servicing / Waste

Demolition and Construction Waste

A Demolition and Construction Waste Management Plan (WMP) has been prepared by Foresight and is provided at **Appendix 16**.

It is estimated that the following volumes of waste will be generated by the proposal during the demolition and construction stage:

- Demolition related waste: 251m³
- Construction related waste: 42m³

Waste generated on the site during demolition and construction will be managed and minimised by waste planning initiatives, including:

- The reuse and recycling of demolition and construction waste where possible.
- Provide onsite separation of various waste streams to lower recycling costs and avoid additional fees for sorting at appropriate facilities.

- Provide a designated waste storage area for the collection of all waste and recyclables.
- Minimise stockpile size or bin numbers by regular removal of waste from site and construction staging plans to allow for the waste storage area to move within the site as the development progresses if necessary.
- Cover bins where possible to prevent transmission of dust and fine particles, odour, wind impacts, vermin and vandalism or theft.
- Dispose of hazardous materials in accordance with EPA guidelines in order to protect the environment and personnel.
- Ensure each subcontractor working on the site, including the head contractor and site manager, adheres to the WMP.
- Require all site employees and subcontractor attends a site specific induction that will outline the components of the WMP and explain the site specific practicalities of the waste reduction and recycling strategies outlined in the WMP.

Operational Waste

An Operational WMP has been prepared by Foresight and is provided at **Appendix 17**. The primary waste streams expected to be generated in the ongoing operation of the development are:

- Cardboard/paper recycling
- Co-mingled recycling
- General waste.

Additional smaller waste streams may include toner cartridge recycling, fluoro tube/globe recycling and battery recycling.

Based on industry averages and historical audit data, it is estimated that the proposed development will generate a total of 486 kilograms and 4,296 litres of waste and recyclables per week.

Waste and recycling from the proposed building is to be stored within the school's existing garbage and recycling area located off Stanley Street, which adequately services the school's current waste and recycling generation.

Current waste collection practices will continue as they are currently being conducted by the waste contractor. Specifically, bins are collected immediately adjacent to the waste room on Stanley Street and then returned to the waste room once emptied by the waste contractor.

For further information regarding waste management systems and collection practices, refer to the Operational WMP.

6.4.5. Accessibility

An Access Report has been prepared by Design Confidence and is provided at **Appendix 3**. The report concludes (p.16), *"Based upon our assessment to date we are of the opinion that the subject development is capable of achieving compliance with the relevant accessibility provisions of the National Construction Code – Building Code of Australia Volume 1, Edition 2019, subject to the comments provided in Section 3.0 and the design detail contained in Appendix 2.*

Compliance can be achieved either by meeting the deemed-to-satisfy requirements of the BCA, as are principally contained within Parts D3, E3.6, F2.4 and F2.9, or via a performance based approach".

6.5. Site Suitability

6.5.1. Geotechnical

The proposal involves minor excavation, up to a depth of approximately 0.6 metres below natural ground levels to achieve design surface levels. Steel screw pipes are being considered as a footing option. An absorption system is proposed adjacent to the western side of the Adler Building, although further details have not been provided, the Geotechnical Report assumes excavations to a maximum depth of about 1.5 metres will be required.

The Geotechnical Report prepared by JK Geotechnics (**Appendix 9**) demonstrates that the conditions of the site are appropriate for the excavation and construction works proposed. The report provides recommendation for demolition, excavation, retention, site stability, suitable footing systems, floor slabs, external paved areas, drainage, soil aggression and the geotechnical aspects of the proposed absorption system.

6.5.2. Contamination

Refer to **Section 4.5.1** for the SEPP 55 assessment.

6.5.3. Services and Utilities

Electrical

The existing Kiosk Substation, Consumer Mains and Site MSB are adequate to supply the additional electrical loads associated with the proposed development.

Telecommunications

Telecommunications services will be provided throughout the proposed development by extending the existing School Telecommunications Network from the existing D&T Building. The existing Service Provider Network Connections serving the Emanuel School will be retained.

Water

Potable water demand is not expected to change with the proposed development. The existing potable water supply will not be affected.

Sewer

The replacement building will connect to internal school campus sanitary drainage which discharges to the Stanley Street sewer. Sanitary drainage discharge is not expected to change with the proposed development. The existing drainage connection will not be affected.

6.6. Social and Economic Effects

6.6.1. 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 been designed to overlook the adjoining public domain along Stanley Street and Chepstow Street as well as the internal areas within the school. Specifically, the layout of the development provides lines of sight from all elevations of the new building to the playground, other buildings within the school and the surrounding streets.

Sight lines are also provided to the entrances of the proposed building, either from within the school site or from the street. The entrances are well defined and will be well lit. The proposed entrances to the building comprise transparent doors and glazing at ground floor to increase the opportunity for surveillance into the building and vice versa.

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.

The existing security measures for Emanuel School will continue to be implemented for the proposed development. Access to the site via Stanley Street is to be maintained which is consistent with the existing access arrangement for this part of the school.

Territorial Reinforcement: This principle provides that well-used places reduce opportunities for crime and increase risk to criminals.

There is a clear distinction between the public street and the school by maintaining the existing high-quality fencing along the site boundary. The proposed Stanley Street pedestrian entrance will be clearly defined to assist with wayfinding.

Space Management: This principle provides that space which is appropriately utilised and well cared for reduces the risk of crime and antisocial behaviour.

The presentation the development will be managed by the school's maintenance department who will be responsible for maintaining its high quality standard, and includes such things as site cleanliness, removal of any graffiti, and maintenance of the landscaped areas.

The proposed works will assist in improving the presentation of the site, which will improve the amenity, casual surveillance, and activity in the immediate area.

The maintenance department will ensure:

- Any burnt out lighting is replaced quickly;
- Regular cleaning of spaces and the collection of rubbish;
- Maintain the landscaping and footpath quality along each frontage; and
- Graffiti is removed as soon as possible.
- Clean stairwells regularly of rubbish and graffiti.

6.6.2. Social, Economic and Employment

The proposal will generate numerous social and economic impacts including:

- The proposal will provide extensive upgrades to the existing school to help meet the growing education needs for the increasing population of Randwick and the wider Eastern Suburbs. Specifically, the school will be able to accommodate an additional 33 student enrolments from the school's current student population of 887 students.
- The proposal will help ease student enrolment pressures and take enrolment pressure off other schools within the surrounding area.
- The proposal will result in improved social infrastructure consistent with State government policy. The proposed Adler Building redevelopment will accommodate modern, state-of-the-art facilities and spaces to deliver the curriculum for future teaching pedagogies.

- The proposal will result in improved areas for outdoor recreation to improve the health, physical education, and wellbeing of future students and staff.
- The design will create a series of high-quality and modern teaching spaces which are flexible and will promote increase social interaction among students and teachers.
- The proposal will create temporary job opportunities during the demolition and construction phase of the development.

6.6.3. Public interest

In *Ex Gratia P/L v Dungog Council* (NSWLEC 148), it was stated that the question that needs to be answered is “whether the public advantages of the proposed development outweigh the public disadvantages of the proposed development”.

There are no unreasonable impacts that will result from the proposed development, therefore, the benefits of upgrading and expanding the capacity of an existing school to meet growing population needs outweigh any disadvantage and as such the approval of the proposed development will be in the public interest.

7. CONCLUSION

This Concept and Staged 1 DA seeks approval for staged development under Section 4.22 of the Environmental Planning and Assessment Act 1979 (EP&A Act). Specifically, concept approval is sought for a new masterplan. The masterplan provides for the replacement of the existing two storey Adler Building in the south-western corner of the site with a new three storey learning building, and an increase in the maximum student numbers to 920.

Stage 1 approval is sought for:

- Demolition of the existing two-storey Adler Building;
- Construction of a new three-storey replacement building comprising thirteen (13) classrooms, three (3) breakout areas, two (2) external terraces, four (4) smaller meeting rooms and nine (9) W/C; and
- Landscaping works.

The growth in student numbers at the Emanuel School has tended to mirror the population growth of Randwick. The population of the Randwick LGA has grown from 139,836 in 2011 when the previous masterplan was developed, to 154,265 in 2018. The population is forecast to grow to 164,003 in 2026 – which is an increase of 17.1%.

The proposed redevelopment of the Adler Building and landscaping works will provide contemporary, high quality and flexible indoor and outdoor learning spaces improving the overall quality of the learning facilities provided at the school, without greatly increasing the student capacity.

This SEE has undertaken an environmental assessment of the proposal and has concluded that the proposal provides a built form which is consistent and compatible with the desired future character of the site and the surrounding locality.

This SEE has undertaken an environmental assessment of the proposal and has concluded the development is worthy of approval for the following reasons:

- The proposal satisfies the applicable local and state development controls. The proposal has been designed in accordance with the relevant objectives and development controls listed in State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017, the Randwick Local Environmental Plan 2012 and the Randwick Development Control Plan 2013.
- The site is zoned SP2 Infrastructure (Educational Establishment) and the proposal will continue the educational establishment use of the site. The proposal is permissible with consent and is consistent with the zone objectives. There are no significant environmental constraints that would prevent the proposal from being delivered at the site.
- The proposal is supported by a suite of specialist consultant reports which confirm the proposal will not have any unacceptable impacts on adjoining or surrounding properties in terms of physical, environmental or social impacts, subject to mitigation measures being implemented.
- The design of the building will make a positive contribution to the wider School site and the adjacent street character. The proposed building is situated within the School site's south-western corner and responds to its setting by purposefully holding the corner of the site. The height of the proposed building is presented as three storeys when viewed from Chepstow and Stanley Streets, which is consistent with the height of the adjacent Design & Technology (D&T) building. The proposed development will provide an appropriate interface to the adjacent two storey residential flat buildings and dwelling houses.
- The School currently suffers from a lack of adequate facilities to meet their curriculum requirements. The site has a limited capacity for any new additions hence the replacement of the existing Adler Building with marginally increased bulk and scale is considered necessary.
- The proposal will provide a means to facilitate the upgrade of the site while meeting the current short fall of learning spaces the School requires. The proposal will provide a modern, contemporary

learning facility which will incorporate high quality and flexible learning spaces to deliver the curriculum for contemporary teaching methods and practices.

- The proposal is not expected to have any discernible effect on the current parking and traffic characteristics of the locality.
- The proposal is in the public interest in that it will assist in meeting current and future demands for school places.

The benefits provided by the proposed development outweigh any potential impacts and is it is therefore considered to be in the public interest. The proposal will deliver a suitable and appropriate development and is worthy of approval.