

STATEMENT OF ENVIRONMENTAL EFFECTS

TO ACCOMPANY A DEVELOPMENT APPLICATION FOR DEMOLITION OF THE EXISTING ADMINISTRATION BUILDING, REMOVAL OF ALL EXISTING TEMPORARY DEMOUNTABLE BUILDINGS & CONSTRUCTION OF TWO NEW SCHOOL BUILDINGS (ADMINISTRATION, CLASSROOMS & INDOOR HALL/ACTIVITY SPACE) AND A BASEMENT STAFF CAR PARK AT LOT 1 DP 1172313 No. 15 CANNERY ROAD, PLUMPTON



Prepared for
Western Grammar School

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ENCLOSURES

Architectural Plans, Site Analysis, Schedule of External Building Materials,
Finishes & Colours, Shadow Diagrams, Landscaping Plan, Construction
Staging Plan and Stormwater Management Plan

1. INTRODUCTION

This Statement of Environmental Effects (SEE) accompanies a Development Application (DA) for demolition of the existing single storey administration building, removal of all temporary demountable buildings and construction of two new school buildings and a basement staff car park, with access off Bottles Road. The new school buildings include a 2 storey administration and classroom building (2 classrooms at first floor level) in the southeast portion of the site and a 2 storey building with 5 classrooms on the ground floor and an indoor hall/activity space at first floor level. This new building will be located on the southern side of the existing Bottles Road car park. The proposal also includes an increase in the permitted maximum number of students from 320 to 550.

This report examines the characteristics of the subject property, the nature of the surrounding locality, the zoning of the property and details of the proposed school buildings. The report then provides an assessment of the proposal in terms of Section 4.15 of the Environmental Planning and Assessment Act 1979 (as amended). Conclusions are drawn and relevant illustrative material and supporting specialist reports are attached. A full set of plans is enclosed separately with the Development Application.

2. THE SITE AND LOCALITY

The subject land is located between Cannery Road and Bottles Road, approximately 400 metres south of Plumpton Marketplace Shopping Centre and some 2.7 kilometres northeast of Mt Druitt Town centre and railway station. The site has relatively direct access to the nearby M7 motorway, via Bottles Road and Power Street. The site comprises land known as Lot 1 DP 1172313, No. 15 Cannery Road, Plumpton (see **Figure 1 - Location** and **Figure 2 - Site**).

Figure 1 - Location

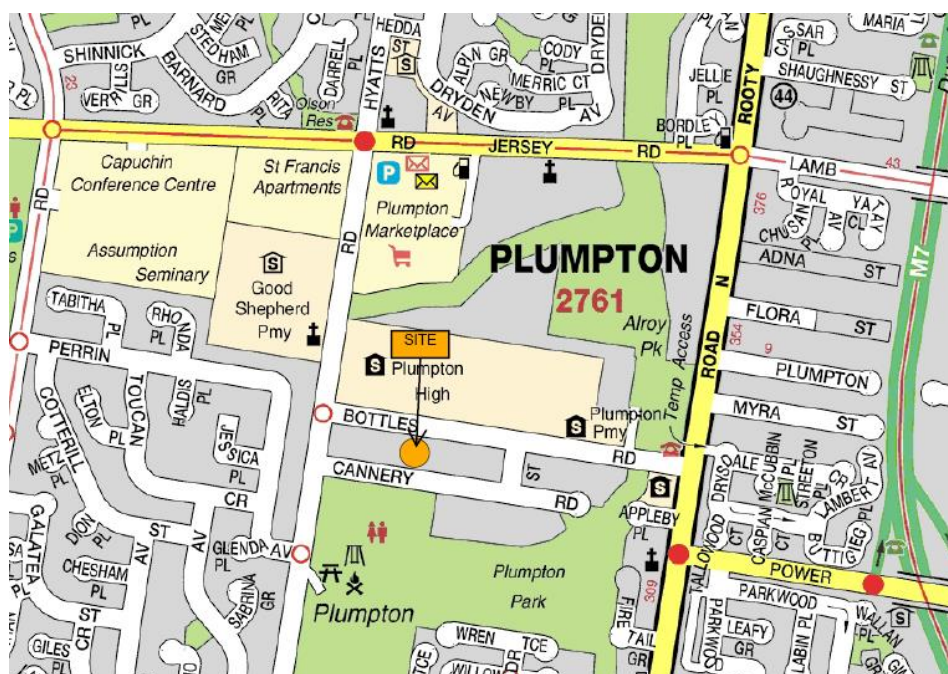
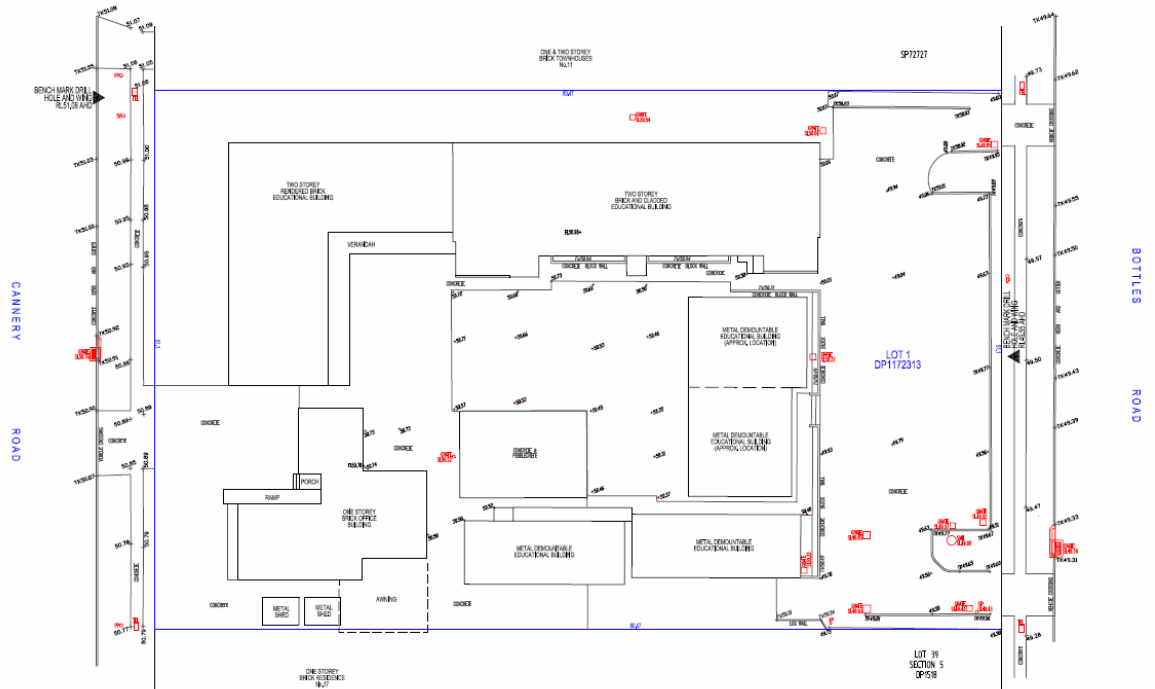


Figure 2 - Site



The site is rectangular in shape with 2 street frontages. The land has a total area of 4,112m², with a frontage of 51.1 metres to Cannery Road and Bottles Road and a depth of 80.47 metres. The site has a gentle fall of approximately 1.5% towards the northeast, to Bottles Road.

The school opened in 2012 as the Western Grammar School and is a private school managed by a company limited by guarantee as a “Non-Profitable Organisation/Society”. Since opening, a new 2 storey school building has been constructed adjacent to the western boundary of the site, temporary demountable school buildings established on the site. Currently, in 2019, the school has 330 students.

The existing school buildings comprise an L shaped 2 storey classroom building containing 6 classrooms (Building 2) a single storey brick veneer administration building (Building 3), and a 2 storey building (Building 1) containing 7 classrooms, a library computer room, toilets, staff room, kitchen and a lift. 4 temporary demountable buildings are located in the northeast portion of the site and are used for 6 classrooms, a computer lab and a science lab. Ancillary facilities include playgrounds (including an outdoor shelter), access driveways and pathways, landscaping, fencing and car parking facilities for 22 vehicles, including 1 disabled car space.

The locality is primarily a residential precinct, with the majority of housing comprising detached single dwellings, mostly single storey. There is some medium density development to the west of the school site. Existing schools and parks are also a feature of the locality.

To the north and northwest of the site is Plumpton High School. To the northeast is Plumpton Primary School. To the east and southeast of the site is single detached dwelling residential development. To the south of the site is Plumpton Park and to the west of the site, medium density housing comprising 4 two storey duplex buildings with a north-south driveway adjoining the common side boundary with the proposed school.

Photographs of the site are attached at **Appendix A**. An aerial photograph of the site and locality is shown below at **Figure 3**.

Figure 3 - Aerial Photo



3. PROPOSED DEVELOPMENT

The proponent seeks approval to demolish the existing single storey administration building, remove 4 temporary demountable single storey school buildings and construct 2 new 2 storey school buildings and a basement staff car park. All existing car parking in the Bottles Road carpark will be reserved for student drop-off and pick-up. The proposal also an increase in the maximum number of students from 320 to 550 and new landscaping along the eastern side boundary.

The proposed development will be constructed in stages to facilitate the ongoing safe and efficient use of the existing school facility. The first stage of construction entails demolition of the existing single storey administration building in the southeast corner of the site and construction of a new 2 storey school building (Building 3) in this location, comprising ground floor administration and 2 classrooms at first floor level.

During this construction phase administration functions will be temporarily relocated to the ground floor of existing Building 2 in the southwest corner of the site.

The second stage of constructions entails removal of 3 existing demountable buildings (D2, D3 and D4), excavation of the northeast portion of the site and construction of the basement staff car park (Building 4).

The third and final stage of construction entails construction of a 2 storey school building above the basement car park, on the southern side of the Bottles Street car park. This building (Building 5) comprises 2 components – 3 ground floor classrooms (Building 5A) and at first floor level, a hall/activity space (Building 5B). Following completion of this building, the last remaining demountable (D1) will be removed and landscaping completed.

The proposed new school buildings are described as follows:

New Building 3 - 2 Storey Administration and Classroom Building

Ground Floor

School administration facilities (total floor area 212m²), including offices, reception, foyer, meeting room, storeroom, kitchen and toilets

First Floor

2 large classrooms (total of 172.4m² excluding the verandah floor area of 39.82m²) capable of conversion into 4 small classrooms, accessed by new stairs to be installed at the northeast end of the existing Building.

New Building 4 - Basement Carpark

The 29.87m x 18.59m basement car park will provide for 22 staff car spaces in a stacked parking arrangement. A 5.3m to 6m wide driveway will extend south from the existing eastern driveway access to the site, in Bottles Road.

New Building 5 – Classrooms and Hall/Activity Space

Ground Floor (B5A)

The ground floor (Building 5A) has a width of 9.1m, a length of 26.3m and a floor area of 237.78m², providing 5 ground floor large classrooms (each with a floor area of between 43.97m² and 44.02m²). An undercover walkway is provided on the southern side of the building providing access to the classrooms. A walkway is to be provided on the western side of the building providing a pedestrian connect between the school facilities and the Bottles Street school car park and the Bottles Street footpath.

First Floor (B5B)

The first-floor level (Building 5B) provides a 605m² hall/activity space, with access from the existing stairs located at the northeast corner of the existing main classroom building (Building 1) and from new stairs off the verandah on the left hand side of the covered walkway. . The proposed first floor also includes a stage, preparation room and amenities. A verandah extends along the southern side of the building and along the southern half of the eastern and western elevations.

A schedule of external building materials, colours and finishes is included with the development application plans. The proposed buildings will have concrete walls, rendered and painted to match the school's existing colour scheme. Buildings will have metal roofs, behind parapet walls. A large glass awning is provided over above the main reception area, off Cannery Road.

The existing car park off Bottles Road, containing 13 car spaces and a student drop-off/pick-up aisle on the southern side, will be retained and wholly devoted to parent/carer parking and student drop-off and pick-up.

After completion of building works and removal of all existing temporary demountable buildings, landscaping will be provided in the side setback along the eastern side boundary and in the Cannery Road front setback of the proposed administration/classroom building, west of the existing car spaces.

Stormwater drainage will be connected to the new buildings in accordance with the Stormwater Management Plan enclosed with the Development Application plans. Stormwater will be discharged to Council's existing drainage system in Bottles Road.

The proposal includes an increase in maximum student numbers from 320 students to 550 students. Upon completion of the new buildings, there will be sufficient classroom space to accommodate at least 550 students. Removal of demountable buildings will allow for an increase in outdoor playground area. Some 900m² of outdoor play space (excluding landscaped areas and passive areas for seating) will be available centrally within the site, plus 605m² in activities hall during lunch and recess. Both lunch & recess will be split into 2 separate times to reduce student numbers outdoors at any one time.

Some 35% of students travel to the site by public transport, or by walking or cycling. From the start of Term 1 in 2020 the school is commencing its own transport using 2 to 4 x 12/14 seat mini-buses, for transport students to and from the school, at a subsidised cost. Accordingly, any increase in car traffic associated with an additional 222 students will be modest. The amount of on-site car parking will be doubled, resulting in an increase in the ratio of on-site car parking to student numbers. Traffic generation, car parking and car parking/driveway design are addressed in detail in the Traffic and Parking Report enclosed separately with the development application plans.

School hours will remain as existing. Two separate lunch periods and recess periods will be introduced. Use of the proposed hall/activity space will for the most part be limited to weekdays between 8am and 6pm. There is no weekend use of the school, or any night-time use, apart from occasional parent/teacher interviews, teacher/professional development sessions, orientations, excursions, briefing sessions and board meetings.

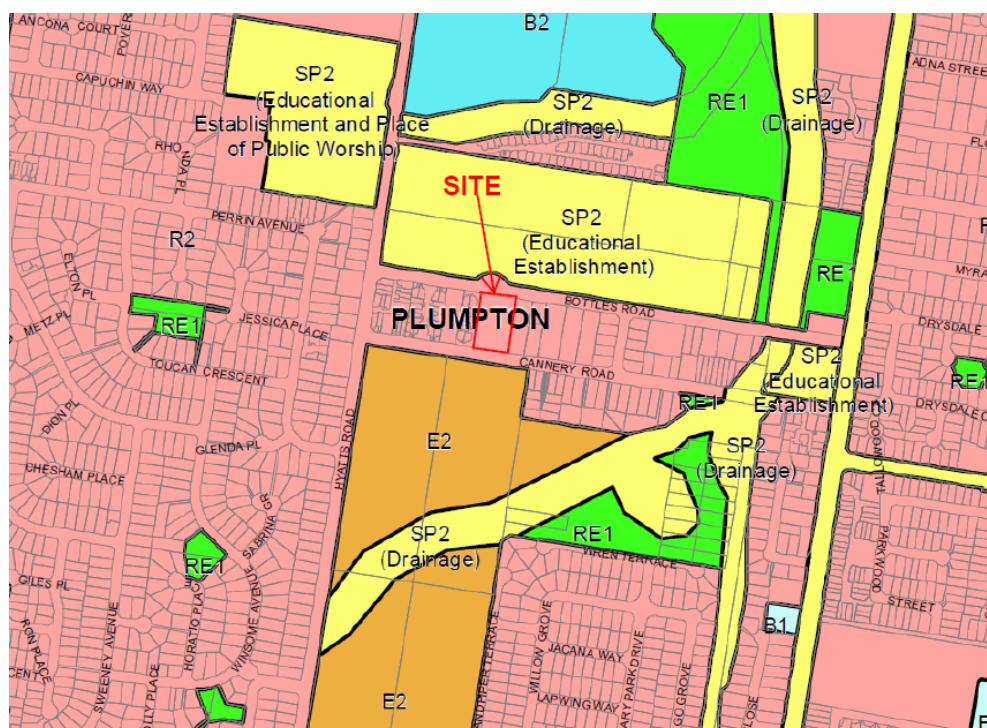
4. MATTERS FOR CONSIDERATION UNDER SECTION 4.15 OF THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT, 1979.

4.1(i) The provisions of any environmental planning instrument

Blacktown Local Environmental Plan 2015

The relevant environmental planning instrument is the Blacktown Local Environmental Plan 2015 (BLEP 2015). The subject land is zoned R2 Low Density Residential, pursuant to BLEP 2015, as shown below in **Figure 4**, which is an extract from the BLEP 2015 Zoning Map.

Figure 4 - Zoning



The existing use of the land and the proposed development of the land fall within the definition of an “educational establishment”. Educational establishments are not identified as a permissible use in the BLEP 2015 R2 Zone and on this basis the proposal is “prohibited development” in the R2 Zone. However, State Environmental Planning Policy Educational Establishments and Child Care Facilities 2017 (SEPP EECF 2017) overrides Local Environmental Plans and allows educational establishments in prescribed zones within the SEPP.

As the R2 Low Density Zone is identified as a prescribed zone in SEPP EECF 2017, the proposed development is permissible. Because much of the site is identified as bushfire prone land, the proposal is not complying development and therefore requires development consent. In addition, the proposal is integrated development and requires referral to the Rural Fire Service.

The objectives of the Residential R2 Zone are:

- (a) *To provide for the housing needs of the community within a low density residential environment.*
- (b) *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- (c) *To enable certain activities to be carried out within the zone that do not adversely affect the amenity of the neighbourhood.*

The proposed development is consistent with the applicable LEP objectives, particularly in terms of objectives relating to provision of facilities and services to the residents of Plumpton and other suburbs of the City of Blacktown.

Enhancement and expansion of educational facilities on the site will improve educational choice for residents. The site is conveniently located for school purposes, being located adjacent to a large park and other schools, as well as being readily accessible to bus routes and the Plumpton Shopping Centre. As addressed in this SEE, the proposed development will have a limited and acceptable impact on residential amenity.

Part 4 of Blacktown LEP 2015 sets out principal development standards for development. There are no floor space ratio controls applying to the subject land. The Building Height Map to clause 4.3 of BLEP 2015 prescribes a maximum building height of 9m for the subject land. The proposed 2 storey administration/classroom building has a maximum height of less than 9m.

The 2 storey classroom and hall/activity space building has a maximum building height of 12m, due to the need to provide a higher ceiling for the first floor hall/activity space. The complying development provisions of State Environmental Planning Policy Educational Establishments and Child Care Facilities 2017 (ESEPP 2017) allows a building height of up to 12m, provided the building is setback at least 5m from any boundary to a residential property. The proposed classroom and hall/activity space building provides a setback of 5m to the nearest boundary to residential property, being the eastern side boundary and as such, has a building height that is reasonable in the circumstances.

Clause 4.6 of BLEP 2017 allows for flexibility in the application of development standards to achieve “better outcomes for and from development by allowing flexibility in particular circumstances.” As noted above, the variation to the 9m maximum building height control is considered reasonable in the circumstances to facilitate a higher ceiling for the proposed hall/activity space. In this case strict compliance with the 9m height control is considered unnecessary and unreasonable. A submission under clause 4.6 of the LEP with respect to maximum building height is attached at **Appendix F**.

Apart from the building height standard in Part 4 of BLEP 2015, there are no planning or development controls in the LEP of specific applicability to educational establishments and the proposed development. Local planning and development controls applicable to educational establishments are contained in the Blacktown Development Control Plan 2015 and are addressed in Section 4.3 of this SEE.

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

In February 2017, in order to meet the challenges of growing educational demand throughout NSW and provisions of flexibility to accommodate the educational facilities required reforms to planning for the educational sector were announced with the release of Draft State Environmental Planning Policy - Educational Establishments and Child Care Facilities 2017 (ESEPP 2017). ESEPP 2017 was gazetted on 1st September 2017.

ESEPP allows for the development of a school within the boundaries of an existing school or on any land within prescribed zones identified within the ESEPP. An educational establishment and school is defined as follows under the provisions of the ESEPP:

educational establishment means a building or place used for education (including teaching), being:

- (a) a school, or
- (b) a tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act.

A **school** means a government school or non-government school within the meaning of the Education Act 1990.

Clause 35 provides the types of educational establishments permitted with development consent and states as follows:

- (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.

It is noted that under the provisions of Clause 35(3) the proposed new school buildings within the boundaries of the existing school are permitted with development consent.

It must be stated that the planning policy intent behind the Education SEPP is to assist and streamline the development of existing schools.

Clause 39 of the Education SEPP is the relevant legislation for complying development within an existing education establishment.

Clause 39 allows for complying development on existing school sites as follows:

- (1) Development carried out by or on behalf of any person on land within the boundaries of an existing school is complying development if:
 - (a) it consists of the construction of, or alterations or additions to, any of the following:
 - (i) a library, an administration building or office premises for the purposes of the school,
 - (ii) a gym, indoor sporting facility or hall,
 - (iii) a **teaching facility** (including lecture theatre), laboratory, trade facility or training facility,

- (iv) *a cafeteria that is carried out in accordance with AS 4674—2004, Design, construction and fit-out of food premises, published by Standards Australia on 11 February 2004,*
 - (v) *a kiosk or bookshop for students or staff (or both),*
 - (vi) *a hall with associated covered outdoor learning area or kiosk,*
 - (vii) *an outdoor learning or play area and associated awning or canopy,*
 - (viii) *demolition of a building or structure (unless a State heritage item or local heritage item),*
 - (ix) *minor alterations or additions (such as internal fitouts, structural upgrades, or alterations or additions to enable plant or equipment to be installed, to address work health and safety requirements or to provide access for people with a disability),*
 - (x) *restoration, replacement or repair of a damaged building or structure, and*
- (b) *it complies with this clause.*

Note.

Complying development must also comply with the general requirements in clause 19.

The provisions of the ESEPP allow for alterations and additions to existing school buildings and new school buildings on existing school sites for the purposes of administration and teaching facilities, as complying development, if the above provisions are satisfied and the design parameters listed in Schedule 2 of the SDEPP are complied with. However, under the provisions of the Rural Fires Act, a complying development certificate (CDC) cannot be issued for a special fire purposes, such as hospitals and schools, within bushfire prone land. Accordingly, the proposed development cannot be dealt with through the complying development pathway of the ESEPP and a development application is therefore, required.

The proposed development is assessed against the Education SEPP Schedule 2 design parameters in the following evaluation.

Building Height

The proposal complies with the requirement that a building not exceed 4 storeys and not extend to a height of more than 22m from ground level. The administration/classroom building is 2 storeys and extends to a height of less than 9m. The hall/classroom building is 2 storeys and extends to a maximum height of 12m

Side and rear setback.

The proposal complies with side and rear setback requirements. All proposed buildings do not extend to a height of more than 12m and are setback at least 5m from side boundaries to land within a residential zone. The site does not have a rear boundary to a residential zone.

Front setback

The proposal complies with the requirement that the front setback must not be less than the average distance of front setbacks to existing development located within 70m of the development (if no development, 5m applies)

The administration/classroom building is setback 7m from Cannery Road and aligns with the existing school building to the west and generally aligns with the front setback of existing dwellings along the northern side of Cannery Road.

The hall/classroom building is setback between 6.9m and 7.0m from Bottles Road, which is similar to, or marginally greater than the front setbacks of existing dwellings on the southern side of Bottles Road.

Design and materials

The external walls and roofs of the proposed buildings are constructed of non-reflective material. The administration/classroom building has windows facing towards Cannery Road and includes a glass awning to the main reception entrance off Cannery Road. The hall/classroom building has windows facing towards Bottles Road. A contemporary design is proposed, consistent with the modern 2 storey classroom buildings that have been constructed on the site.

Noise

The proposed buildings have been designed so that noise emissions will be limited to not more than 5 dB(A) above background noise when measured at the boundaries of neighbouring properties. The DA is accompanied by an Acoustic Impact Assessment that confirms acoustic impacts will be satisfactory.

Overshadowing

Adjoining residential properties will continue to receive 3 hours solar access in mid-winter between 9am and 3pm. There is no increase in shadows to residential properties adjoining the site to the west and there is minimal increase in shadows to the residential property to the east, after allowing for shadows cast by existing boundary fencing. The DA is accompanied by shadow diagrams illustrating existing and proposed shadows. Shadows cast over the residential property to the east are minor and generally less than a typical 2 storey residential building with a complying side setback.

Privacy

There is no potential for overlooking of residential properties to the west. The proposed administration/classroom building is setback 5m from the common side boundary of the residential property to the east and the building has no windows at first floor level facing east. The existing solid boundary fence prevents any overlooking from the proposed ground floor east facing windows.

The proposed hall/classroom building is set back 5m from the eastern side boundary and has no east facing windows at ground floor level. The hall above has 5 east facing windows, however, these windows all have high sills, preventing overlooking of the residential property to the east.

Landscaping

Landscaping to a width of 3m is required along boundaries to residentially zoned land, with such landscaped areas capable of accommodating plants with a mature height of 3m or more. A complying 3m wide corridor of landscaping is provided along the western side boundary and includes landscaping capable of achieving a mature height of at least 5m.

The landscaping plan provides for a corridor of landscaping at least 3m wide along the eastern boundary, adjacent to the proposed administration/classroom building. This area provides ample space adjoining the new building for growing tall shrubs with a mature height of at least 5m, as detailed in the landscaping plan included with the architectural plans.

Due to the need to provide a driveway access into the basement car park, it is not possible to provide a 3m wide corridor of landscaping along the eastern side boundary, adjacent to the proposed hall/classroom building. A 500mm wide landscaping strip is proposed in this location with shrub species selection suitable for narrow plant areas and capable of growing to a height of at least 3m.

Waste

A suitably designed screened garbage and waste storage area for recyclable and non-recyclable waste materials is required behind the front building line.

The existing waste storage area behind the demountable near the Bottles Road carpark entry is to be relocated to the southern side of the western end of the Bottles Road carpark, sited behind the building line and located at least 6m from the nearest residence on neighbouring land. 1500 litre waste bins for recyclable and non-recyclable waste are provided, with regular collection by the School's waste collection contractor (Bingo waste management).

Earthworks

No earthworks are proposed within 40m of a natural waterbody or adjacent to a rail corridor or within Class 3 or 4 Acid Sulfate Soils. Proposed excavation for the basement car park is proposed to a depth of 3m and is setback at least 500mm from the closest boundary. Appropriate drainage and structural support will be provided and designed by a professional engineer, when construction certificate (CC) plans are prepared.

Drainage

Stormwater drainage is to be provided to the proposed buildings and connected to the existing stormwater drainage system on the site. The stormwater system includes stormwater detention tanks under the driveway near Bottles Road and rainwater tanks adjoining the western side boundary, for stormwater re-use. Stormwater discharges into Council's drainage system in Bottles Road.

Western Grammar School has an existing Voluntary Planning Agreement (VPA) with Blacktown Council. A suction pump-out system will be utilised for drainage of any basement water and the design includes a pump out well of approximately 4m³ volume, with twin suction pumps. A stormwater management plan is included with the architectural plans.

Flood control lots

The subject land is not flood prone. Accordingly, flood control/management requirements do not apply to the proposed development.

The proposal generally complies with the complying development provisions of the Education SEPP.

4.1(ii) Any draft environmental planning instrument that is or has been placed on public exhibition and details of which have been notified to the consent authority.

There are no exhibited draft environmental planning instruments that are relevant to the proposed development.

4.2 Any development control plan.

Blacktown Development Control Plan 2006 (BDCP 2015) is the local planning instrument which provides details of the various standards, policies and guidelines adopted by Council for development in its Local Government Area.

The guiding principles found in Part A of BDCP 2006 and the Part C Section 10 provisions relating to non-residential development in residential zones, particularly Section 10.2 – Places of Worship and Educational establishments are relevant to the assessment of the proposed development.

Part A of Blacktown DCP 2006 (BDCP 2006) sets out guiding principles for development. The DCP guiding principles of Part A relevant to the proposed school development are considered in the following discussion:

Environmental Protection

- ❖ No filling of land is required as a result of this development.
 - ❖ Appropriate soil conservation measures will be put into place to minimise soil erosion and siltation during car park construction and building alterations.
 - ❖ With regard to tree preservation, no trees are proposed to be removed.
 - ❖ The site has no heritage or archaeological significance.
 - ❖ The proposal will not give rise to any form of pollution.
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- ❖ The proposal will not be affected by traffic noise, nor will the development result in any unreasonable noise generation, subject to compliance with the recommendations of the Acoustic Impact Assessment.
- ❖ The site has a previous long history of residential use and has been used as a school since 2012. It is therefore unlikely to contain any land contamination.
- ❖ Should any contaminated material be encountered whilst site works are underway, such material will be dealt with in accordance with statutory requirements and guidelines for managing contaminated material. Any potential land contamination issues can be suitably addressed by consent conditions.

Car Parking and Traffic

- ❖ A Traffic and Parking Report is included with the Development Application and is attached as **Appendix B**.
- ❖ The Traffic and Parking Report indicates that an additional 220 students, with 20 additional staff, requires the provision of 22 additional car spaces. The report notes that the proposed basement will provide 22 staff car spaces and thereby satisfies Council's parking code requirements.
- ❖ The traffic and parking report that with the provision of an additional 5 car spaces, adequate parking is provided and there will be no adverse impact from traffic and parking, upon the surrounding area as a result of this proposal.
- ❖ The Traffic and Parking Report assesses traffic generation and advises that the projected increase in traffic generation potential of the site as a consequence of the development proposal will not have any unacceptable traffic implications in terms of road network capacity.
- ❖ The Traffic and Parking Report notes that servicing and delivery arrangements will remain as per existing, and the existing pick-up/drop-off area will continue to satisfy school operational needs.
- ❖ The Traffic and Parking Report confirms that the geometric design layout of the basement car parking facilities has been designed to comply with the relevant requirements specified in the Standards Australia publication *Parking Facilities Part 1 – Off-Street Parking AS2890.1* in respect of parking dimensions and driveway/aisle widths.
- ❖ The Traffic and Parking Report concludes that with respect to parking, the proposed parking facilities satisfy the relevant requirements specified in Council's DCP as well as the Australian Standards and it is therefore concluded that the proposed development will not have any unacceptable parking implications.

Services

- ❖ The site is already serviced by reticulated water, electricity, telephone, gas and sewerage infrastructure. The site has frontage to two sealed existing public roads.

- ❖ Existing school bus services are also available in Bottles Road, near the school. No new driveway accesses are required to public roads. Existing services and access are adequate for the proposed additional school buildings.

Special Considerations

- ❖ The proposed development has no material impact on solar access to neighbouring residential properties, as demonstrated in the shadow diagrams submitted with the DA. There will be no increase shadowing of any residential living space or adjoining private open space in mid-winter between the hours 9am and 3pm.
- ❖ The locality comprises 1 and 2 storey residential development. Some buildings in the High School on the northern side of Bottles Road are higher than the typical 2 storey residential building. The proposed hall/classroom building is of similar height to the taller buildings within the High school to the north. The proposed hall/classroom building is well separated from the nearest dwellings.
- ❖ The proposed school expansion additional building is not a major traffic generating development.
- ❖ The proposal is accompanied by a drainage plan which demonstrates how the proposed buildings can be suitably connected to the existing stormwater system.
- ❖ The subject land is identified as being bushfire prone land. The DA is accompanied by a bushfire hazard assessment report. Adequate asset protection zones are provided, and buildings will be designed in accordance with the relevant standards relating to construction of buildings on bushfire prone land.
- ❖ Surveillance of the school grounds is available from existing school buildings and from the proposed buildings. Outdoor activity will be supervised by staff and teachers.
- ❖ Preparation of the landscaping plan has had regard to Council's recommended plant species.

Developer Contributions

- ❖ Developer contributions are payable as assessed by the Council for roads, bridge and drainage infrastructure previously provided in the locality by the Council. Contributions were levied for the previous DA approving the school and it is our understanding that further contributions would not be payable for the additional school buildings.

Part C Section 8 of Blacktown DCP 2006 (BDGP 2015) sets out guidelines for non-residential development in the residential zones with respect to the following matters:

- (a) *Height and scale of any proposed buildings and whether the development will be out of character with surrounding residential development.*

The proposed new administration/classroom building is 2 storeys and of similar height to a 2 storey dwelling and of a scale similar to a large duplex dwelling. The proposed hall/classroom building is much larger and extends to a height of 12m in order to accommodate school indoor activities for which it is designed.

The proposed hall/classroom building provides a 5m setback to the nearest residential boundary and a significant separation distance to the nearest dwellings. Views of the building from adjoining residential properties to the west are for the most effectively screened by the existing school building that extends along the western boundary of the site. There is no dwelling located on the adjacent residential land to the east. The dwelling on the neighbouring land to the east is located in the southern portion of the site, adjacent to Cannery Road. Views of the proposed school hall building are mitigated by separation distance, the existing boundary fence and proposed landscaping.

Schools are a typical feature of residential areas. In addition to the Western Grammar School, there are 2 other schools in the immediately locality.

Some school facilities require larger buildings to accommodate school activities such as assemblies, sports and cultural activities and the like and could not be adjudged as being in character with surrounding residential development.

The proposed school buildings are in character with the use of the site as a school and with the school buildings that have been erected since the school opened. The existing development on the site and school development opposite the site on the northern side of Bottles Road represents a different character to the existing residential development to the east and west of the site.

As noted above the larger building comprising the hall/classroom building has been sited to optimise separation distance from the nearest dwelling and minimise visual impact to those dwellings. As detailed elsewhere in this SEE, the proposal has no material impact on residential amenity. Neighbour privacy and solar access are maintained, and the proposed buildings are designed to minimise noise transmission.

Having regard to the nature of development on the site and opposite the site to the north, the proposed school buildings are considered to have an acceptable impact on the character of the locality. There will be a relatively minor and acceptable change to the character of the locality. Existing schools are a significant feature of the existing character of the area.

(b) Impacts on the amenity of the locality (noise, privacy, views etc.)

The proposed increase in student numbers can potentially increase noise emissions, predominantly arising from outdoor activities, primarily during the lunch and recess periods. In order to minimise noise emissions, 2 separate lunch periods and 2 separate recess periods will be provided, so that the number of students outdoors at these times will actually reduce, compared to the current 300 plus that are outdoors during lunch and recess. The proposed hall (Building 5B) will also be available for student activities during recess and lunch periods, further reducing the number of students in outdoor play areas during these periods.

The number of students in outdoor areas of the site outside lunch and recess periods is relatively modest and with the split lunch and recess periods and proposed hall area available, the number of students in outdoor areas at any one time during lunch and recess periods will not materially increase above existing number of students using outdoor areas during lunch and recess. Outdoor activities do not occur during the sleep sensitive times between 9pm and 7am.

The proposed buildings have been designed to minimise noise emissions and the hall/classroom building is well separated from the nearest dwellings. This building will be used predominantly during usual school hours (including recess and lunch times), with only occasional use outside usual school hours.

The DA is accompanied by an acoustic impact report (copy attached at **Appendix D**) which confirms that subject to compliance with the recommendations in the report, which primarily relate to acoustic fencing. The acoustic consultant recommends that the existing 2.4m high fence between the school and 17 Cannery Road remain in place and a 2.1m high fence constructed along the western side boundary from the car park to a point 2m past the admin/classroom building.

There is not potential for overlooking of residential properties to the west. The proposed administration/classroom building is setback 5m from the common side boundary of the residential property to the east the building has no windows at first floor level facing east. The existing solid boundary fence prevents any overlooking from the proposed ground floor east facing windows. The proposed hall/classroom building is set back 5m from the eastern side boundary and has no east facing windows at ground floor level. The hall above has 5 east facing windows, however, these windows all have high sills, preventing overlooking of the residential property to the east.

Adjoining residential properties will continue to receive 3 hours solar access in mid-winter between 9am and 3pm. There is no increase in shadows to residential properties adjoining the site to the west and there is minimal increase in shadows to the residential property to the east, after allowing for shadows cast by existing boundary fencing. The DA is accompanied by shadow diagrams illustrating existing and proposed shadows.

The proposal will have no material impact on neighbour views or outlook. Proposed buildings are substantially screened from view from residential properties to the west by existing buildings, fencing and landscaping.

There is no dwelling located on the adjacent residential land to the east. The dwelling on the neighbouring land to the east is located in the southern portion of the site, adjacent to Cannery Road. Views of the proposed building are mitigated by separation distance, the existing boundary fence and proposed landscaping.

There are no residential properties to the north or south of the site, hence no impact on residential views or outlook from the north or south.

The proposed development will have no material adverse impact on the residential amenity of the locality.

(c) Whether the use will draw patronage from areas outside the neighbourhood

The great majority of additional students will be drawn from areas within the Blacktown Local Government Area (LGA), with around 50% of students expected to be drawn from the Plumpton area and neighbouring suburbs. Given that the zone objectives do not limit the catchment area to the “neighbourhood” but rather specifically refer to the City of Blacktown as a whole, it is considered that the LEP zone objective should prevail over the DCP requirement that limits the catchment area to the neighbourhood. Most schools, particularly private schools, draw from an area that extends beyond their immediate neighbourhood.

(d) Adequacy of car parking and loading facilities

The proposal includes parking and delivery facilities in accordance with Council’s requirements, as detailed in the Traffic and Parking Report attached at **Appendix B**.

(e) Adequacy of disabled access

The site comprises level land which facilitates disabled access around the site. Provision is made for disabled access and disabled toilets within the proposed building and there is a lift access to the first-floor level of the school. The school currently provides a disabled car parking space.

An Accessibility Report is attached at **Appendix C** and confirms that the proposal complies with disabled access requirements.

Section 8.2 of DCP 2006 sets out guidelines specifically relevant to educational establishments including locational preferences, pedestrian safety measures, landscaping and off-street parking.

Clause 8.2.2 advises that the location of schools proposed in residential areas will be considered on their merit. Approval has been issued for the existing school on the subject land.

Clause 8.2.3 requires that appropriate pedestrian safety measures are installed, including where necessary pedestrian refuges, bus bays and 40 kph speed zones. Bottles Road is an existing 40 kph speed zone during morning and afternoon student arrival and departure times and is provided with pedestrian wombat crossings. A 40 kph speed zone is also provided in Cannery Road. Traffic control measures, including signage and pedestrian refuges/crossing points are also provided in Cannery Road, in accordance with the requirements of the development consent issued by the Council for the school.

Space is available in the existing car park off Bottles Road for safe student drop off and pick up both by parents/carers and by minibuses. Existing school bus parking facilities are available nearby in Bottles Road.

The Development Application is accompanied by A Traffic and Parking Report, a copy of which is attached at **Appendix B**.

Clause 8.2.4 requires that school sites include adequate noise abatement including landscaping and lapped and capped timber fencing. Active play areas are sited away from existing dwellings and existing boundary fencing assists in reducing noise impact. Additional landscaping is proposed in accordance with the landscaping plan submitted with the DA. Additional acoustic fencing is also proposed along the eastern side boundary.

Clause 18.5 sets out off-street parking requirements, in effect re-stating the parking requirements for schools, as specified in Part A of the DCP. An additional 22 car spaces for staff parking are proposed. Car parking complies with Council's requirements, as detailed in the traffic and parking report.

4.3 Any matter prescribed by the regulations that apply to the land to which the development relates.

The subject land is identified on Council's Bush Fire Prone Land Map as falling within the 100m bushfire vegetation buffer. The bushfire risk is very minor. A bushfire hazard assessment report is included at Appendix E. An adequate APZ is provided to the proposed school buildings and construction standards will comply with requirements for buildings on bush fire prone land.

4.4 The likely impacts of that development.

The likely impacts of the development have been assessed in Section 4.1(i), 4.2 and 4.3 of this SEE. There will be not material adverse impacts on the natural, social or economic environment. The overall impacts of the development are considered to be positive and include improved social and economic outcomes.

4.5 The suitability of the site for the development;

The site has been approved for development as a school and is suitable for construction of school buildings. All necessary urban services are available to the site. There are no site development hazards such as flooding, land slip or contamination that would prevent its use as a school. The site has a long previous history of residential use, with no activities likely to cause land contamination. The site is not subject to significant noise from activities such as industry, highway traffic, railways and the like.

As noted in Section 4.3, there is a minor potential bushfire hazard from nearby Plumpton Park. A bushfire hazard assessment report is included at Appendix E. An adequate APZ is provided to the proposed school buildings and construction standards will comply with requirements for buildings on bush fire prone land.

4.6 Any submissions made in accordance with the Act or the regulations;

Any submissions made in respect to this application will be addressed by Council as part of the assessment process of this development. The proposal has been designed to minimise amenity impacts on adjoining and nearby residential development.

4.7 The public interest;

There are no matters of the public interest that would warrant refusal of the proposal. The provision of additional classrooms and school facilities to cater for more students will broaden educational choice for the Blacktown community, an outcome that is considered in the public interest. The creation of additional local teaching and related jobs is also considered to be in the public interest.

Western Grammar School has developed a reputation for providing a high-quality educational experience and is unable to meet the high demand for enrolments from families in the Blacktown LGA. The proposed new school facilities will not only improve the educational experience of students, but also go some way towards addressing the high demand for places at the School. The public interest is supported by approval of the proposed school additions.

5. CONCLUSION

Having inspected the subject site and the surrounding locality and reviewed the plans and supporting documentation, we are of the opinion that the provision of additional classrooms and a hall on the subject land represents an appropriate expansion of the existing school, designed to cater for increased demand for school places.

The site has been approved for development as a school and has been used successfully as such, since 2012. Due to demand for more student places additional classrooms and student places are required.

The proposal will result in additional employment opportunities for teachers and business opportunities for service providers in the local area. The proposed additional school facilities will enhance the educational experience of students and by providing for increased enrolments, provide improved choice of school education for the Blacktown community, with no material impact on the amenity of adjoining properties and the existing character of the area.

The proposed school buildings are consistent with the contemporary design, bulk and scale of the existing 2 storey classroom buildings on the site. The new buildings are compatible with the existing mixed character and streetscape of the school site and with the existing high school on the northern side of Bottles Road. Having regard to the mixed school/open space/residential character of the locality, the proposed development achieves acceptable compatibility with that character.

A generous side setback of 5m is proposed, well in excess of the minimum site setback typically required for residential buildings. Side setback and building height accord with the requirements of the Education SEPP for complying development. The variation to the BLEP 9m maximum building height for the hall component is acceptable in the circumstances and worthy of support. Additional ceiling height clearance is necessary for school halls to enable their effective use for indoor cultural, educational and sporting activities, typically associated with schools. The hall will provide currently lacking indoor activity space and will also be available for use during recess and lunch periods.

Adequate landscaping and off-street carparking are proposed. Additional acoustic fencing will be provided along the eastern side boundary of the site. Sufficient playground space, in the order of 900m², is provided for outdoor active play for the proposed increase in student numbers from 320 to 550. This space is augmented by the proposed 605m² hall, which will provide indoor activity space, including during the recess and lunch periods.

22 additional car spaces are included to accommodate the increased number of staff. Proposed parking complies with the requirements of Council's DCP 2015 for the additional students. The modest increase in traffic is readily accommodated within the existing road network, as evidenced by the traffic impact assessment undertaken for the proposal.

We fully support the proposed development and respectfully seek Council's favourable consideration of the application.

Appendix A

**Site Photographs
Prepared by Western Grammar School**

Appendix B

Traffic and Parking Report
Prepared by Varga Traffic Planning Pty Ltd

Appendix C

**Accessibility Report
Prepared by Cheung Access Pty Ltd**

Appendix D

**Acoustic Impact Assessment
Prepared by Wilkinson Murray Pty Ltd**

Appendix E

**Bushfire Hazard Assessment
Prepared by Ecological Australia**

Appendix F

**BLEP 2015 Clause 4.6 Submission
with respect to Maximum Building Height
Prepared by Ingham Planning Pty Ltd**