RESPONSE TO SUBMISSIONS AND PRELIMINARY ASSESSMENT

SCEGGS DARLINGHURST CONCEPT PLAN AND WILKINSON HOUSE REDEVELOPMENT

SA7240
FINAL
PREPARED FOR SCEGGS DARLINGHURST

URBIS

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1. INTRODUCTION

1.1. OVERVIEW

This Response to Submissions (**RTS**) report has been prepared by Urbis Pty Ltd (**Urbis**) in response to the community and agency submissions received during the public exhibition of the Environmental Impact Statement (**EIS**) for the SCEGGS Darlinghurst 2040 Masterplan and redevelopment of Wilkinson House.

The EIS accompanied a Concept State Significant Development (**SSD**) Development Application (**DA**), referred to as SSD_8993 for the SCEGGS Darlinghurst 2040 Masterplan, including the Detailed SSD DA for the redevelopment of Wilkinson House.

In response to the submissions and comments received, further detailed investigations have been completed and additional information has been prepared to support the proposed development. Some design elements and details of the proposed development has also been amended in response to the feedback received, and an assessment of the revised proposed development is provided within this PPR report.

1.2. THE EXHIBITED PROPOSAL

The exhibited EIS supported the SSD DA for future development at the SCEGGS Darlinghurst campus at 215 Forbes Street, Darlinghurst NSW 2010 (**the site**).

The SSD DA sought development consent for:

- Concept approval of the 2040 Masterplan for the SCEGGS Darlinghurst campus, including:
  - Conceptual approval for the demolition of the following buildings:
    - Wilkinson House fronting Forbes Street and St Peters Street
    - Library and science building fronting Bourke Street
    - The old gym building at the northern end of Thomson Street
    - Part of the additions to the Barham Building fronting Forbes Street
  - Conservation works to the existing Barham Building within the school premises to remove non-original building fabric and use for general school purposes
  - Building envelopes and land use for the following new buildings:
    - Four-storey school building at the corner of Forbes Street and St Peters Street for general school purposes (new Wilkinson House)
    - Maximum seven storey multi-purpose building fronting Bourke Street for general school purposes and a centre based childcare facility (multi-purpose building)
    - On-site vehicular drop-off with associated car parking from Bourke Street within the multi-purpose building
    - Maximum three-storey administration building fronting Forbes Street for general school purposes (Administration building)
- Detailed consent for the demolition of Wilkinson House, basement excavation, and construction of a new four storey building (new Wilkinson House) comprising approximately 1,325sqm of GFA and a building height between 15m and 16.3m for the purposes of new learning and education spaces.

The future use of the multi-purpose building proposed above is to be confirmed as part of a subsequent detailed SSD DA for the construction, operation, and fit out of the building however could accommodate an information and research centre (contemporary library), early learning centre, classrooms and general learning areas, meeting rooms, and/or a swimming pool.

The ultimate potential functions proposed within the multi-purpose building and forming part of the SSD DA were defined as ‘educational establishment’ and ‘early education and care facility’.

1.3. SUMMARY OF CONSULTATION PROCESS

The project was the subject of public exhibition undertaken by the NSW Department of Planning, Industry, and Environment (**DPIE**) in accordance with Part 6, Division 6 of the *Environmental Planning and Assessment Regulations 2000* (**the Regulations**).

The proposal was exhibited from 7 March 2019 to 3 April 2019, during this time 118 submissions were received. 109 public submissions were received and nine government and organisation submissions.

The following agency submissions were specifically received:

- City of Sydney Council
- NSW Environment Protection Agency
- Heritage Council of NSW
- Office of Environment & Heritage
- Roads & Maritime Services
- Sydney Water
- Transport for NSW

A summary of the number and location of submitters is shown in **Table 1** below.

Table 1 – Summary of Submission Location and Source

Source of Submitter	Location of Submitter					Total Number of Submissions
	Within LGA	Outside LGA	International	Not Specified	Government/ Organisation	
Individual	94	9	2	1	-	106
Special Interest Groups	3	-	-	-	-	3
Govt Agencies	-	-	-	-	8	8
Council	-	-	-	-	1	1

The submissions were all objections or sought clarification on a number of issues. The key issues raised are addressed in **Section 3** and in detail within submissions matrix at **Appendix A** and **Appendix B**. The key issues raised were:

- Proposed built form of the multi-purpose building, including;
  - Building height;
  - Floor space ratio;
  - Interface with Bourke Street and Thomson Street terraces;
  - Visual privacy; and
  - Overshadowing impacts.
- View impacts resulting from the Wilkinson House proposal and multi-purpose building;
- Heritage impacts;

  - Wilkinson House;
  - Barham House;
  - Old Gym Building; and
  - Archaeology.
- Impacts associated with the childcare centre;
- Existing and potential traffic and parking impacts on the surrounding locality;
- Construction impacts;
- Noise and acoustic impacts;
- Accuracy of the stated Capital Investment Value (**CIV**);
- Ongoing community use of school facilities; and
- The stated purpose of the proposal.

1.4. ACTIONS TAKEN DURING AND AFTER EIS EXHIBITION

1.4.1. Engagement

The majority of engagement activities with the local community and stakeholders was undertaken prior to lodgement of the SSD DA as outlined in the EIS and the Consultation Outcomes Report prepared by Elton Consulting that accompanied the EIS.

Two additional engagement activities were undertaken by Elton Consulting post lodgement of the SSD DA, these activities were:

- **8 March 2019**
  - Advised all community members who had provided contact details for updates details of public exhibition and how to make formal submissions.
- **1 April 2019**
  - Meeting with Thomson Street residents to run through diagrams lodged as part of the application to clarify heights to inform submissions.
  - Explanation of building height of the proposed “envelope” of the buildings using large plans with additional RLs.
  - Comments were made about construction traffic, trees and heritage. Project team members reiterated the importance of residents making submissions to the DPIE ahead of the public exhibition closing date of 3 April 2019.

1.4.2. Amendment of the Proposal

In response to the submissions and comments received, SCEGGS Darlinghurst (**the applicant**) proposes to amend the SSD_8993 as described in **Section 2**. A response to each of the key issues raised during the exhibition of the proposed development is provided at **Section 3** of this report and is supported through a submission matrix for agency and public submissions included at **Appendix A** and **Appendix B** respectively.

Additional environmental assessment of the revised proposal is undertaken in **Section 4** onwards. The specialist technical reports that accompany this report at **Appendix C** – **Appendix U** address the key issues identified in the SEARs and provide additional assessment, justification and clarification on the revised proposal in response to the submissions and comments received.

The additional technical assessment accompanying this report are listed in **Table 2**.

Table 2 – Additional Technical Assessments

Appendix	Report	Prepared by
Appendix C	Amended Architectural Plans	TKD Architects
Appendix D	Architectural Design Report	TKD Architects
Appendix E	Supplementary Statement of Heritage Impact	TKD Architects
Appendix F	Revised Visual Impact Study	Virtual Ideas
Appendix G	Clause 4.6 Variation Request	Urbis
Appendix H	Revised Traffic Impact Assessment	Traffix
Appendix I	Traffic and Pedestrian Management Plan	Traffix
Appendix J	Revised Construction and Operational Noise Report	Wilkinson Murray
Appendix K	Revised Landscape Plans	Context
Appendix L	Detailed Site (Contamination) Investigation	Douglas Partners
Appendix M	Wilkinson House Structural Options	Taylor Thomson Whitting (TTW)
Appendix N	Supplementary Energy Efficiency Information	Erbas
Appendix O	Supplementary Green Star Information	Erbas
Appendix P	Supplementary Rainwater Information	Erbas
Appendix Q	Supplementary Water and Sewer Demand Information	Erbas
Appendix R	Additional Flood Statement	TTW
Appendix S	Review of Estimated CIV	mbm
Appendix T	CIV Response	Altus Group
Appendix U	Community Consultation Response	Elton Consulting
Appendix V	Construction Impacts – Response to Submissions	TTW
Appendix W	Sydney Water Response	Rose Atkins Rimmer (Infrastructure)
Appendix X	Arboricultural Impact Assessment	Bluegum Arborist
Appendix Y	Additional Bourke Street View	Virtual Ideas

2. DESCRIPTION OF REVISED PROPOSAL

In response to the issues and objections raised during the exhibition period a number of changes to the design are proposed. The revised proposal comprises a reduced built form, and a reduction of the associated impacts from the multi-purpose building and the administration building. Changes to building materials to the new Wilkinson House building also included within the revised proposal. Amended Architectural Plans are prepared by TKD Architects are provided at **Appendix C**.

A summary of the proposed modifications to the SSD DA submitted works are outlined below:

- Wilkinson House:
  - Amendments to external façade design to improve integration within heritage streetscape and with neighbouring developments;
  - Additional justification of proposed design; and
  - Use of natural materials that reflect positive qualities of the local heritage conservation area.
- Multi-purpose building:
  - Modified envelope of built form to fit generally within the envelope of the existing buildings and to make sure there are no additional view impacts and shadow impacts are minimal;
  - Relocation of indicative driveway entrance to allow retention of street tree;
  - Increased setback from Bourke Street at the upper levels; and
  - Blade wall against Bourke Street terraces removed to reduce bulk and scale.
- Administration Building and Barham House:
  - Reduced height of parapet to match adjacent Chapel Building gutter level; and
  - Roof plant set back 6.7m from eastern façade to reduce the visual impact from Forbes Street.

Furthermore, clarification is provided that the maximum capacity of a future childcare centre capable of operating within the multi-purpose building has been reduced from 90 children to 45 children.

A comparison of the modified design with the submitted proposal is provided in **Table 3** below.

Table 3 – Numeric Changes to Proposed Development

Component	Submitted Design	Amended Design
Wilkinson House		
GFA	1,325sqm	1,325sqm
Height	16.420m	16.420m
Administration Building		
GFA	821sqm	821sqm
Parapet height	12.70m	11.70m
Total height	12.70m	13.40m
Multi-purpose building		
GFA	5,669.4sqm	5,692sqm

Component	Submitted Design	Amended Design
Height	25.190m	18.490m
Setbacks from Bourke Street (cumulative)	3rd Floor Setback (street frontage) - 4m 4th Floor Setback (podium) - 9.145m 7th Floor Setback (secondary podium) - 13.495m	3rd Floor Setback (street frontage) - 4m 4th Floor Setback (podium) - 8m 6th Floor Setback (secondary podium) - 28m
Setbacks from Forbes Street	21.7m	21.7m
Setbacks from the southern boundary (Thomson Street and Thomson Lane)	2.52m	1m generally 0m for section abutting 2 Thomson Street
Childcare centre places	Capacity 90 children	Capacity 45 children
Parking	22 Spaces	22 Spaces

The Environmental Impact Assessment of the proposed design changes is provided in **Section 4**.

2.1. WILKINSON HOUSE

The proposed design amendments to the submitted new Wilkinson House create a more refined, highly detailed building, improving the pedestrian experience (see **Figure 1**). Improvements are also being made to the materials at the top of the building and to the glazing to the stair.

At the ground level, the brickwork and window reveals have been refined and improved. Stainless steel vertical blades have been introduced to mirror the treatment on the Joan Freeman Science and Technology Centre. They are designed to tie in with the revised brickwork treatment while reflecting the vertical elements on the upper levels.

The cladding at the top of the building has been changed to Zinc, providing a higher quality material, that will gain a natural patina over time.

The glazing of the stair has been revised to be a projecting, frameless glazed bay and increasing the height of the element to create a more prominent, refined streetscape element on the Forbes Street elevation.

Figure 1 – Proposed Amendments to Wilkinson house

Perspective Image - Refined, Highly Detailed Street Level Frontage

Perspective Image - Projecting Glazed Bay to Main Circulation Stair

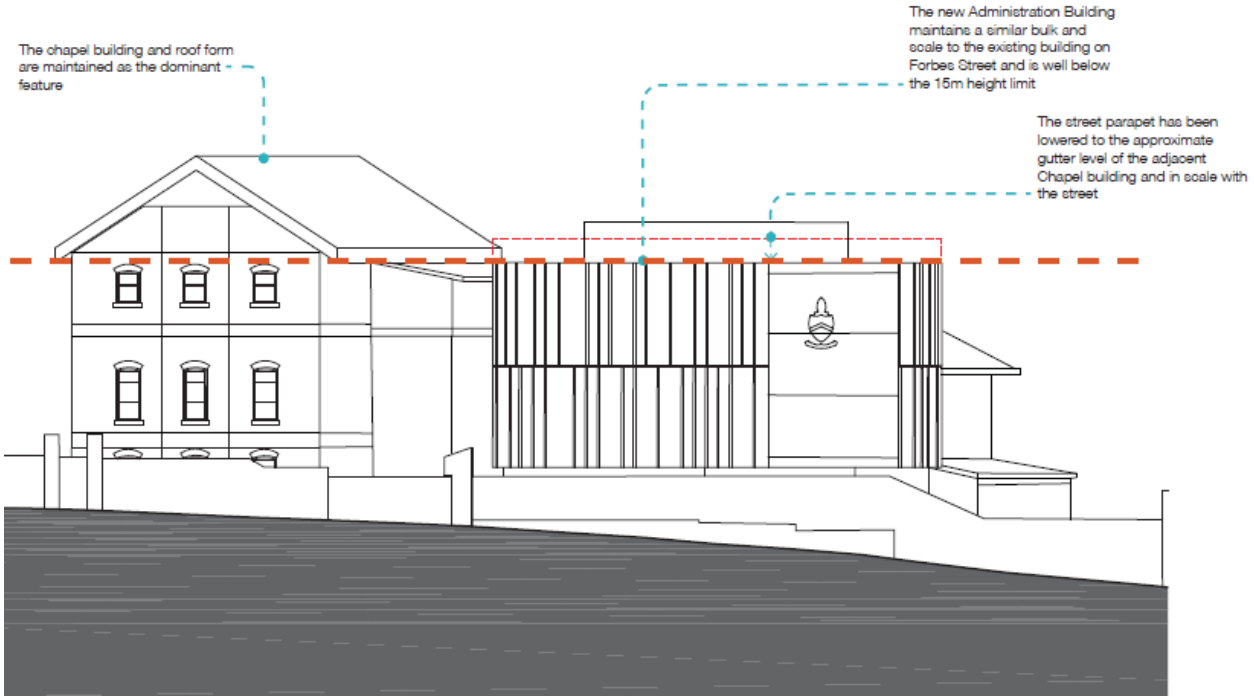
Source: TKD Architects – Architectural Design Report

2.2. ADMINISTRATION BUILDING

The building envelope of the new Administration Building has been revised to reduce the height of the street parapet (**Figure 2**). The street parapet has been lowered to the approximate gutter level of the adjacent Chapel Building. This creates an improved relationship between the two buildings without the loss of functional floorspace.

The reduced height establishes the Chapel Building as being more dominant and improves the appearance of the overall streetscape.

Figure 2 – Proposed Amendments to Administration Building



Source: TKD Architects – Architectural Design Report

2.3. BARHAM HOUSE

No changes are proposed to the proposed restoration of Barham House.

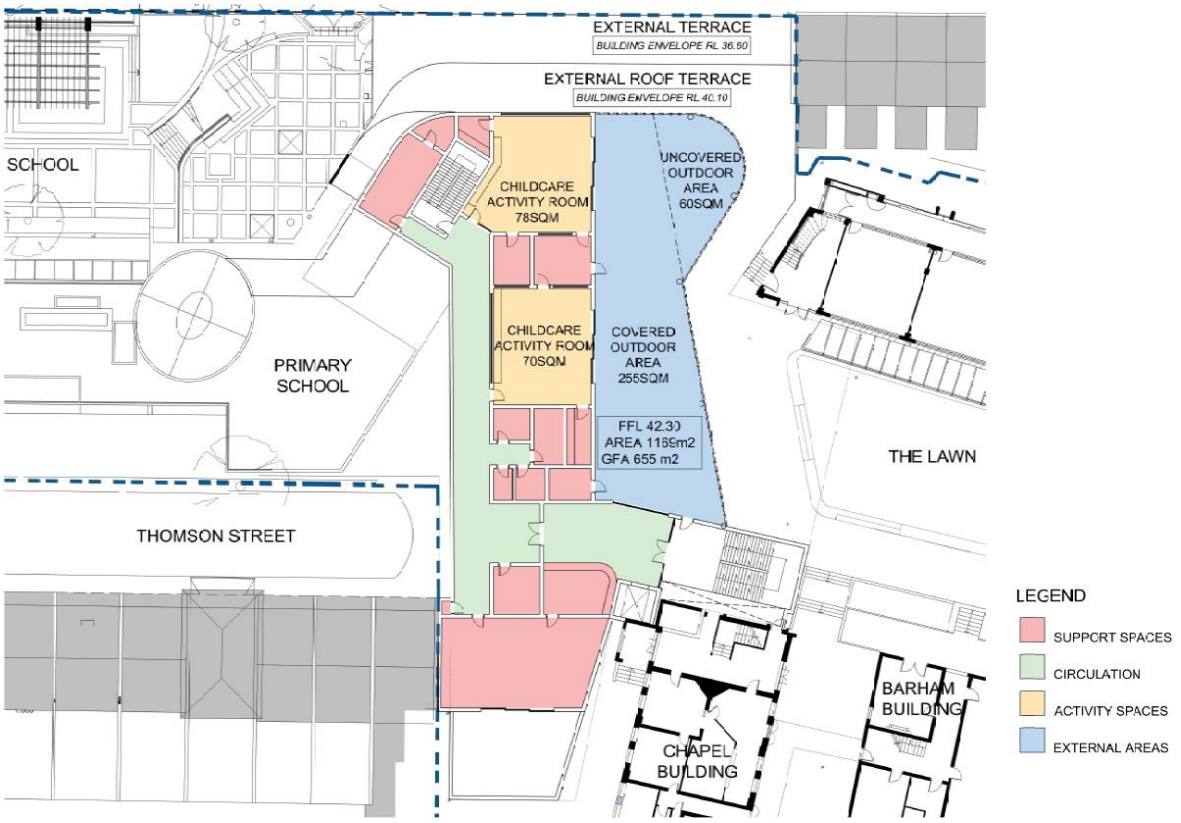
2.4. MULTI-PURPOSE BUILDING

In response to the submissions received, significant design changes are proposed for the multi-purpose building envelope. Generally, the built form issues raised in the public submissions related to where the proposed building envelope exceeded the existing built form on the site.

The proposed building envelope has been reduced to be generally within the envelope of the existing buildings so that there are minimal, if any, additional impacts to neighbouring properties. The overall height has been reduced from 25.2m to 18.5m.

The proposed childcare centre use can be accommodated within approximately 655sqm GFA of the multi-purpose building. **Figure 3** illustrates an indicative layout of the childcare centre, final design and layout is subject to detailed design within a subsequent SSD DA. The maximum number of childcare places to be accommodated within the building envelope has been reduced from 90 children to 45 children.

Figure 3 – Indicative Layout of Proposed Childcare Centre Use



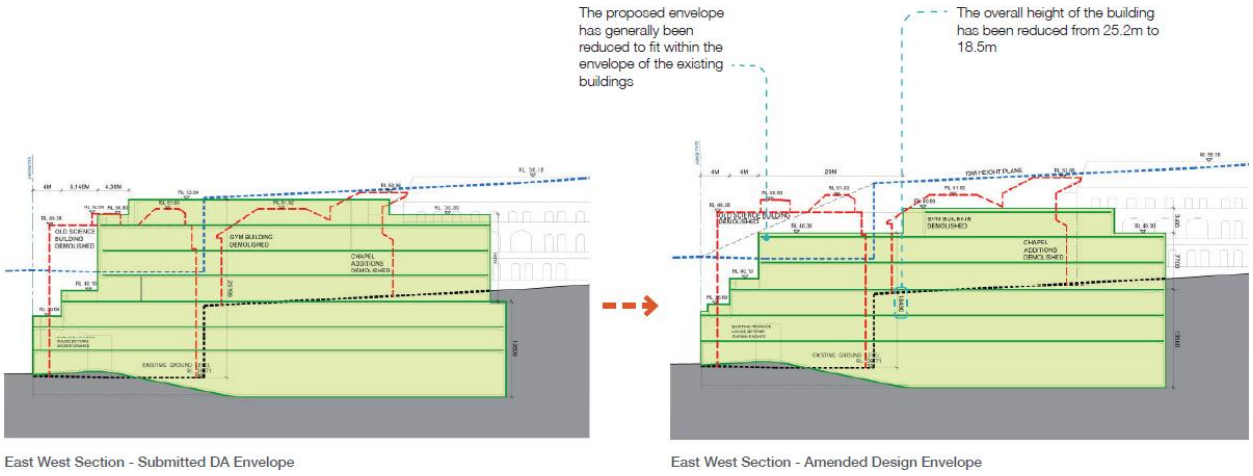
Source: TKD Architects – Architectural Design Report

Proposed design changes include (**Figure 4**):

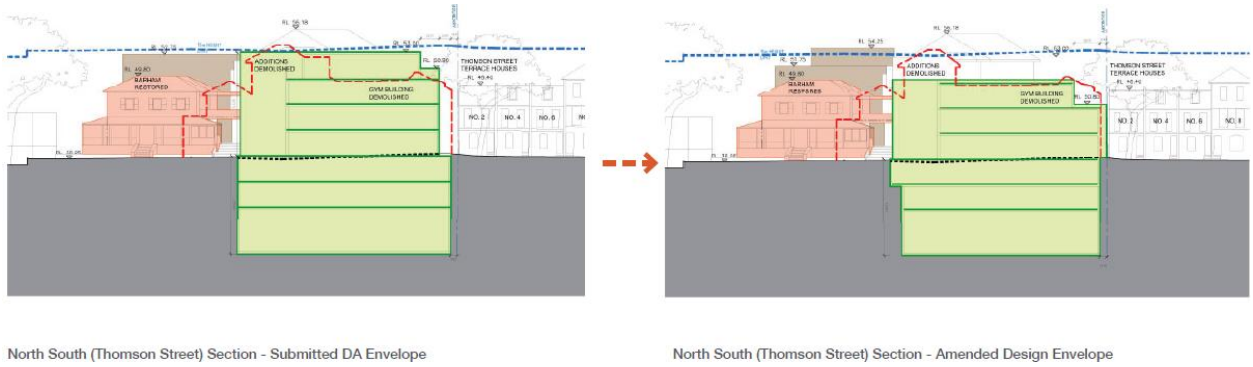
- Thomson Street:
  - Removal of the top storey so that the envelope sits below the level of the existing Gym Building ridge level;
  - Provision of a two-storey scale building adjacent to Thomson Street in keeping with the scale of the existing neighbouring buildings; and
  - Adjustments to the envelope to ensure that the proposed envelope generally fits within the envelope of the existing buildings (to be demolished) so that there is no loss of existing views or additional bulk or scale to the existing situation.
- Bourke Street:
  - The existing Library and Science buildings present a sheer six-storey height to Bourke Street, which is angled against the existing urban grain and only set back 2.4m. The proposed envelope looks to utilise the envelope of the existing Library and Science buildings but improves its relationship to the street and urban context through the following:
    - Provision of a two-storey scale building adjacent to Thomson Street and Bourke Street in keeping with the scale of the existing neighbouring buildings.
    - Above the two-storey height on Bourke Street the buildings set back 4m at Level 3 (at the podium level of the school) and 8m above this at Levels 4 and 5.
    - The envelope sets back 4m from the adjacent terrace house on Bourke Street at Levels 4 and 5 (The existing Science building currently has 0m setback).
    - The envelope has been aligned parallel to the street in keeping with the existing alignment of existing neighbouring buildings.
    - Deletion of the blade wall adjacent to the Bourke Street Terraces in order to improve the streetscape and the relationship with existing adjoining buildings.

- Basement parking (remains 22 overall spaces) redistributed as:
  - Seven (7) school staff space, relocated from the Forbes Street car park as per original proposal;
  - Three (3) school service vehicle spaces;
  - Six (6) childcare centre pick-up and drop-off spaces;
  - Five (5) childcare centre staff spaces; and
  - One (1) childcare long-term visitor space.

Figure 4 – Proposed Building Envelope Amendments to the Multi-purpose building



Picture 1 – East West Section Comparison



Picture 2 – North South Section Comparison
Source: TKD Architects – Architectural Design Report

The amendments to the submitted design will minimise the impact of the building's bulk on the existing Bourke Street and Thomson Street terraces. The amendments will result in a building envelope which falls within the scale of the existing buildings but also improves the relationship of the new building form with the street and urban context compared with the existing buildings and the originally submitted design.

The amended building envelope comprises of two storeys along Bourke Street to relate to the adjacent two-storey terraces and the historic street alignment. Above this level, the proposed envelope steps back to minimise the impact of the building's bulk to the streetscape and adjacent buildings. Taking the issues raised by the City of Sydney into consideration, the blade wall originally proposed adjacent to the existing neighbouring Bourke Street terraces has been removed.

The amended design will reduce overshadowing impacts to the Thomson Street terraces from the current situation. As a result, there will be no additional shadow impacts from what is existing, improving solar access to 2-6 Thomson Street when compared to the original submitted design.

The revised proposal as viewed from Bourke Street and Thomson Street, compared to originally proposed is illustrated in **Figure 5** below.

Figure 5 – Photomontage of Lodged Proposal and Revised Proposal

Picture 3 – Lodged proposal from Bourke Street

Picture 4 – Revised proposal from Bourke Street

Picture 5 – Lodged proposal from Thomson Street

Picture 6 – Revised proposal from Thomson Street

Source: TKD Architects

3. RESPONSE TO KEY ISSUES RAISED

3.1. PROPOSED BUILT FORM OF THE MULTI-PURPOSE BUILDING

The submitted proposal for the multi-purpose building received numerous submissions from agencies and the public. The submissions generally revolved around the built form or the building's interface with neighbouring residential dwellings. Particularly surrounding:

- Building height;
- Floor space ratio;
- Interface with Bourke Street and Thomson Street;
- Overshadowing; and
- View impacts.

Generally, the built form issues raised related to where the proposed building envelope exceeded the existing built forms. The submissions sought clarification on certain elements and an overall reduction in the building envelope of the development.

The following sections address the key issues raised surrounding the multi-purpose building and the design amendments made in response. More minor issues regarding the multi-purpose building are addressed in **Appendix A** and **Appendix B**.

3.1.1. Building Height

A number of submissions from agencies and the public raised objections about the height of the multi-purpose building, particularly towards the Bourke Street frontage and the rapid rise from street level. Public submissions were concerned about the proposed building height exceeding the existing buildings height and the impact on their views, privacy and solar access, alongside being inconsistent with the heritage character of the area.

In response to submissions the maximum building height has been reduced in the amended design from 25.2m to 18.5m. The Bourke Street frontage will also be reduced from 7-storeys to 5-storeys with a stepped form. The two-storey podium form will be maintained in line with the adjacent terraces before stepping back twice to the upper levels.

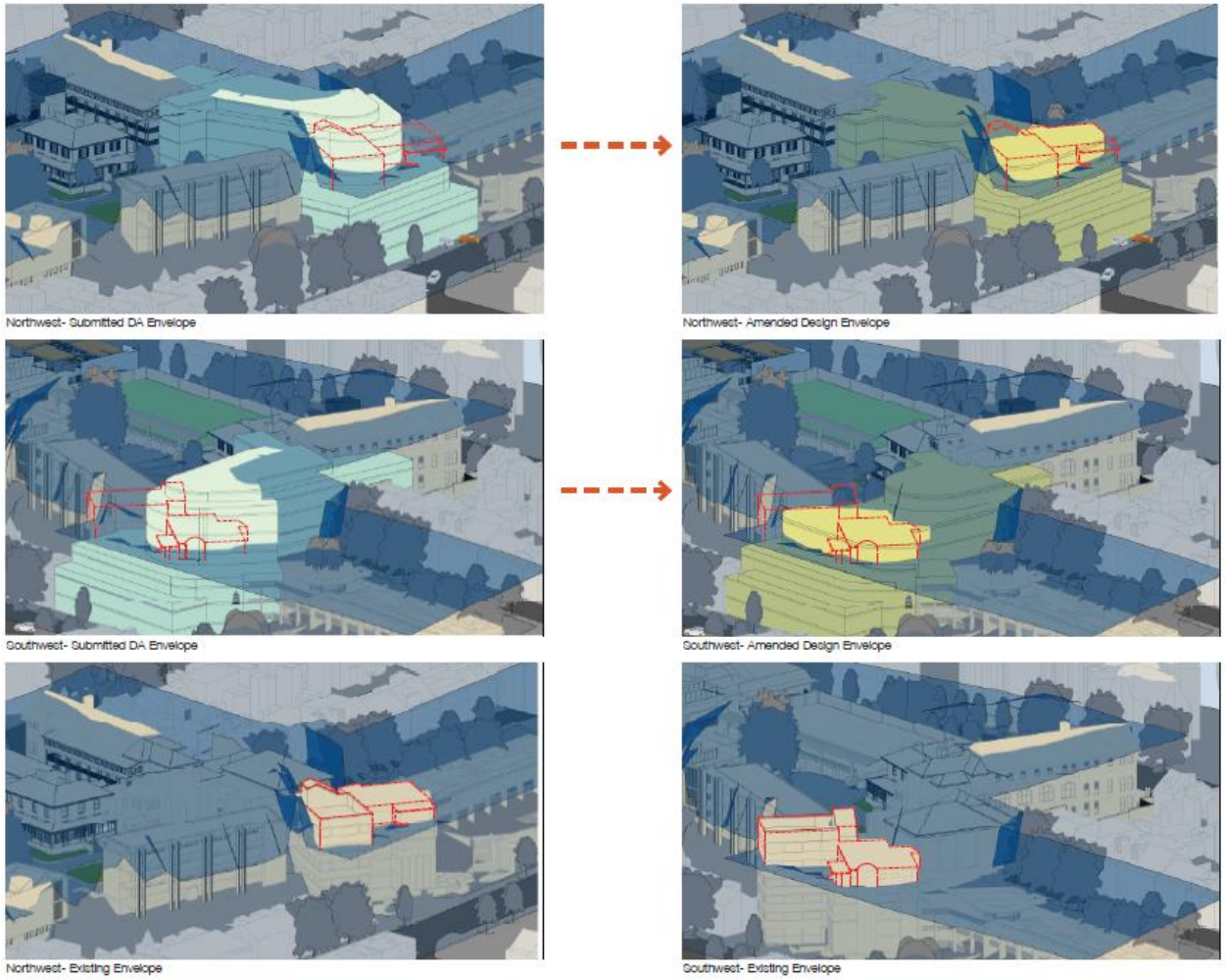
In response to a request made by the DPIE, a 3D height plan diagram including an outline of the existing buildings over the proposed building height is provided below (**Figure 6**) and within the architectural package at **Appendix C**. As shown within **Figure 5**, the scale of the development fronting Bourke Street has been significantly reduced and is generally contained within the existing building envelopes. The proposed orientation of the revised building however directly addresses the alignment and frontage to Bourke Street compared to the existing buildings, resulting in a more appropriate and contextual streetscape presentation.

Notwithstanding the proposed reduction in height, due to the significant slope in the land, the proposed multi-purpose building remains above the *Sydney Local Environmental Plan 2012* (**SLEP 2012**) maximum building height standard of 15m, as are the existing buildings on the site. The DPIE has requested that a clause 4.6 variation request be submitted to enable the variation in the maximum building height development standard contained within the SLEP 2012.

Clause 42 of *State Environmental Planning Policy (Educational Establishments and Childcare Facilities) 2017* (**Education SEPP**) states that development consent may be granted for a school that is categorised SSD even though the development would contravene a development standard imposed by the Education SEPP or any other environmental planning instrument under which the consent is granted.

As such, while we are of the view that a clause 4.6 variation request is not required to be submitted pursuant to clause 42 of the Education SEPP, a request to vary the height control contained within the SLEP is provided at **Appendix E**.

Figure 6 - Amended 3D Height Plan



Source: TKD Architects – Architectural Design Report

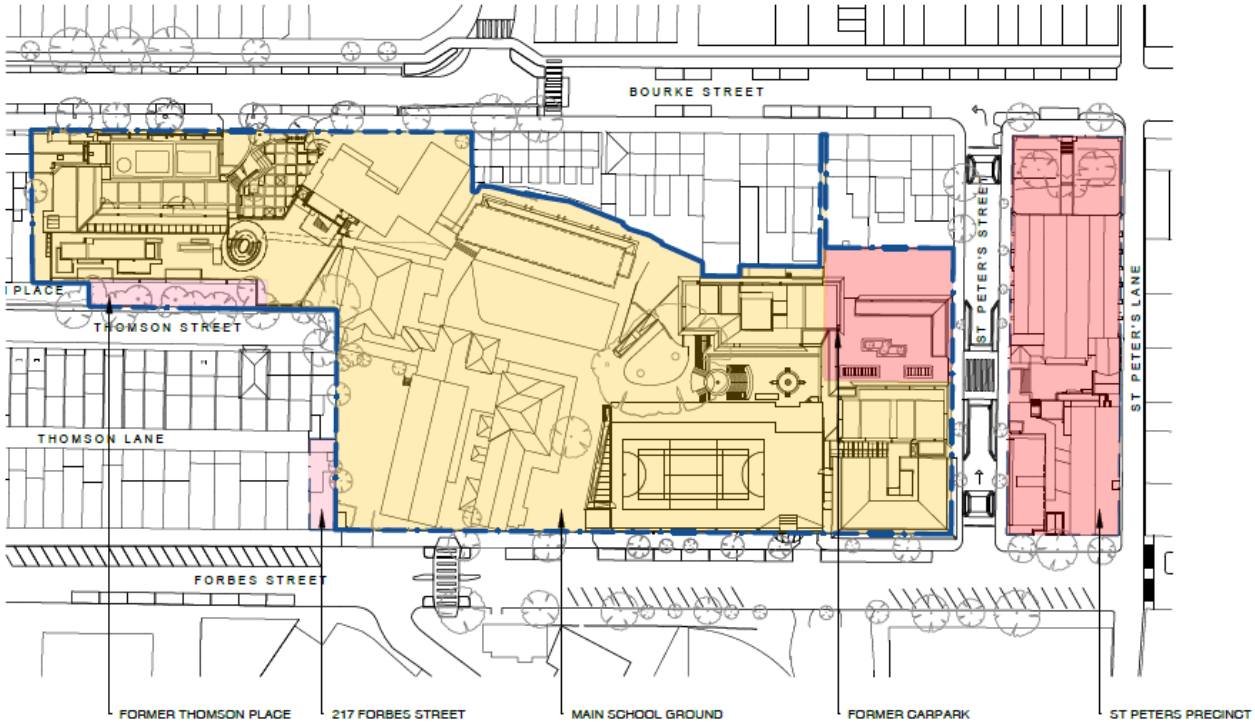
3.1.2. Floor Space Ratio

Confirmation of the proposed Floor Space Ratio (**FSR**) and allowable FSR control across the site are provided within the Amended Architectural Plans at **Appendix C,** however for clarity are simplified in **Table 4**. The School is covered by a number of FSR standards across the site. The arrangement of FSR controls are shown in **Figure 7**. No work is proposed on the St Peters Precinct, nor 217 Forbes Street, and as such these sites are not included within the FSR and site area calculations in accordance with the relevant definitions prescribed within the SLEP 2012.

Table 4 – Detail of FSR Controls

Site	Site area	Max. FSR (GFA)	Existing FSR/GFA	Additional FSR/GFA	Total FSR/GFA
Main school grounds	10,503.2 sqm	1.5:1 (15,755 sqm)	1.25:1 (13,110sqm)	0.32:1 (3,319 sqm)	1.56:1 (16,429 sqm)
Former car park site (within the same allotment)	787.3 sqm	2:1 (1,575 sqm)	1.07:1 (838.6 sqm)	NIL	1.07:1 (838.6 sqm)
Thomson Place	228.5 sqm	1.75:1 (400 sqm)	NIL	NIL	NIL
Total	**11,519 sqm**	**1.54:1 (17,730 sqm)**	**1.2:1 (13,949 sqm)**	**0.29:1 (3,319 sqm)**	**1.5:1 (17,267.6 sqm)**

Figure 7 – Maximum Floor Space Ratios



Source: TKD Architects - Amended Architectural Plans

3.1.3. Interface with Bourke Street and Thomson Street Terraces

Several existing residents of Bourke Street and Thomson Street made submissions regarding the interface of the proposed multi-purpose building with adjacent terraces, with specific concerns surrounding setbacks, scale and appropriateness of the building within the heritage character of the area.

3.1.3.1. Thomson Street Streetscape

Nineteen (19) existing residents made submissions that the scale and design of the multi-purpose building is too big and is inappropriate for the area. Nine (9) residents raised concerns that the building is not setback enough from the Thomson Street terraces.

In response to these objections the scale and size of the multi-purpose building is proposed to be reduced with specific regard to the interaction with the Thomson Street terraces. The height and scale of the amended design more closely resembles the scale of the existing school buildings.

The top storey of the proposed building has been removed so that the amended design now sits below the existing height of the Old Gym Building. The scale of the building element adjacent to Thomson Street has been reduced to two storeys to match the scale of the existing buildings adjacent. This will reduce visual bulk and scale to these terraces and reduce any opportunities for overlooking. The revised building envelope also reduces overshadowing and view impacts to the neighbouring properties compared to the submitted scheme and in some instances compared to the existing buildings (addressed in **Section 4** of this report).

The green wall at the end of Thomson Street will be retained as part of the amended design, as this treatment is designed for privacy to the neighbouring dwellings.

3.1.3.2. Bourke Street Streetscape

The interface between Bourke Street and the multi-purpose building was raised as an issue within the agency submissions, for instance as below:

> *"The proposed building envelopes provides a generally appropriate scale to Bourke Street at the boundary but rises very quickly (in breach of the maximum height) taking cues from the detracting building it is replacing rather than the controls or what is appropriate in the context. Section EE from the submitted drawings shows clearly the breach of height. The result is an envelope that is over-scaled, excessively bulky and too high, resulting in a poor streetscape outcome" – City of Sydney submission*

> *"The design should be modified to separate any open space atop the new form from the boundary by a setback (in the order of 2m) rather than a blade wall. Fire separation of windows should be dealt with by sprinklers rather than blade walls on the boundary." – City of Sydney submission*

The amended design proposal maintains the 2-storey street frontage and then steps back at a greater distance to the submitted proposal and is effectively reduced in height by two storeys at the Bourke Street edge. The proposal has been designed to sit predominantly within the envelope of the existing Library and Science buildings but provide an improved relationship to the street and urban context through the reduced envelope and greater setbacks of the upper storeys. The existing buildings are angled against the historic urban grain of the area and the proposed building will align with the adjacent buildings and create a consistent street frontage.

The amended design has removed the blade wall originally proposed adjacent to the adjacent terraces on Bourke Street. This element has been removed to improve the transition point between the terraces and the multi-purpose building.

3.1.4. Visual Privacy

Privacy concerns for neighbouring residential properties from the proposed outdoor terrace use on the seventh storey of the multi-purpose building was raised in seven public submissions. Concerns surrounding privacy impacts to private courtyards and homes due to the raised height and roof top uses was raised in 70 public submissions (**Appendix B**).

Due to the relatively small site area and location of existing buildings, open space on the site is limited. As such, when designing new buildings on the site finding opportunities to improve recreation and open space provision for student use is important to the School. The significant level changes across the site also result in challenging open space design. As such, the utilisation of rooftop space especially where connecting into existing open space and existing site levels is considered appropriate and suitable for the site.

Notwithstanding the above, the applicant recognises the importance of protecting privacy to adjacent neighbouring properties. While the design of the multi-purpose building will be subject to a detailed SSD DA, it is proposed to address future privacy concerns as follows.

3.1.4.1. Privacy to Bourke Street Terraces

The rear private open spaces of the Bourke Street terraces are adjacent to the proposed podium (west) terrace open space area. The design intention of the landscaped area of the proposed multi-purpose building is to maintain the privacy into these private open space areas. The landscape design, as shown in **Figure 8**, includes planted screening, providing a level of visual and acoustic screening. Additional mitigation measures that can be included at the detail design stage to mitigate privacy issues include:

- The use of planters and balustrades to create a setback to roof terrace edges to prevent overlooking;
- The use of privacy screens; and
- The location and orientation of outdoor childcare spaces away from neighbouring residential areas.

3.1.4.2. Privacy to Thomson Street Terraces

As shown in the Amended Architectural Plans (**Appendix C**) and the Revised Landscape Plans (**Appendix K**), the proposed rooftop terrace is located at the western side of the building on Level 4 fronting onto Bourke Street. The terrace will not infringe on nearby private open space or internal living areas of residential properties on Thomson Street as the top floor of the multi-purpose building will block sightlines of Bourke Street and the Old Girls School Building will block sightlines to private open space areas.

Figure 8 illustrates that the proposed rooftop terrace will be at the same level as the existing rooftop terrace associated with the primary school building, and therefore, will not provide additional height for viewing into residential private spaces. The classrooms in the upper levels of the multi-purpose building will also not overlook any of the residential private spaces, as shown in the updated design report at **Appendix D**, the windows are orientated west, away from Thomson Street.

As illustrated within the Revised Landscape Plans (**Appendix K**) there is no proposal for the rooftop at the southern boundary (Level 6) to be accessible by students in response to privacy concerns to Thomson Street residents.

Figure 8 - Character Zone – Podium + Rooftop

Source: Context – Landscape Plans

Figure 9 – Masterplan 3D Public Views 6

Source: TKD Architects - Amended Architectural Plans

3.1.5. Overshadowing Impacts

3.1.5.1. Thompson Street Terraces Overshadowing

One agency submission and seven public submissions raised concerns about the overshadowing impacts from the proposed multi-purpose building upon Thomson Street terraces to the south of the site.

The amended design of the multi-purpose building has resulted in significantly reduced overshadowing impacts to the Thomson Street terraces. The revised building envelope has also resulted in reducing the overshadowing impacts compared to the existing buildings. The overshadowing drawings are found within the Amended Architectural Plans prepared by TKD Architects at **Appendix C**.

Figure 10 shows that at 21 June, only 4 Thomson Street will have additional shadows cast into the rear private open space, at the small south east corner at 1:00pm and 1:30pm, as a result of the proposed multi-purpose building envelope. This negligible additional overshadowing to the rear corner for 30 minutes in mid-winter is unlikely to have a observable impact on the overall amenity of the dwelling. Furthermore, this additional overshadowing is resultant from Level 6 of the multipurpose building, which is proposed within the 15m maximum height plane control and therefore is considered an appropriate impact.

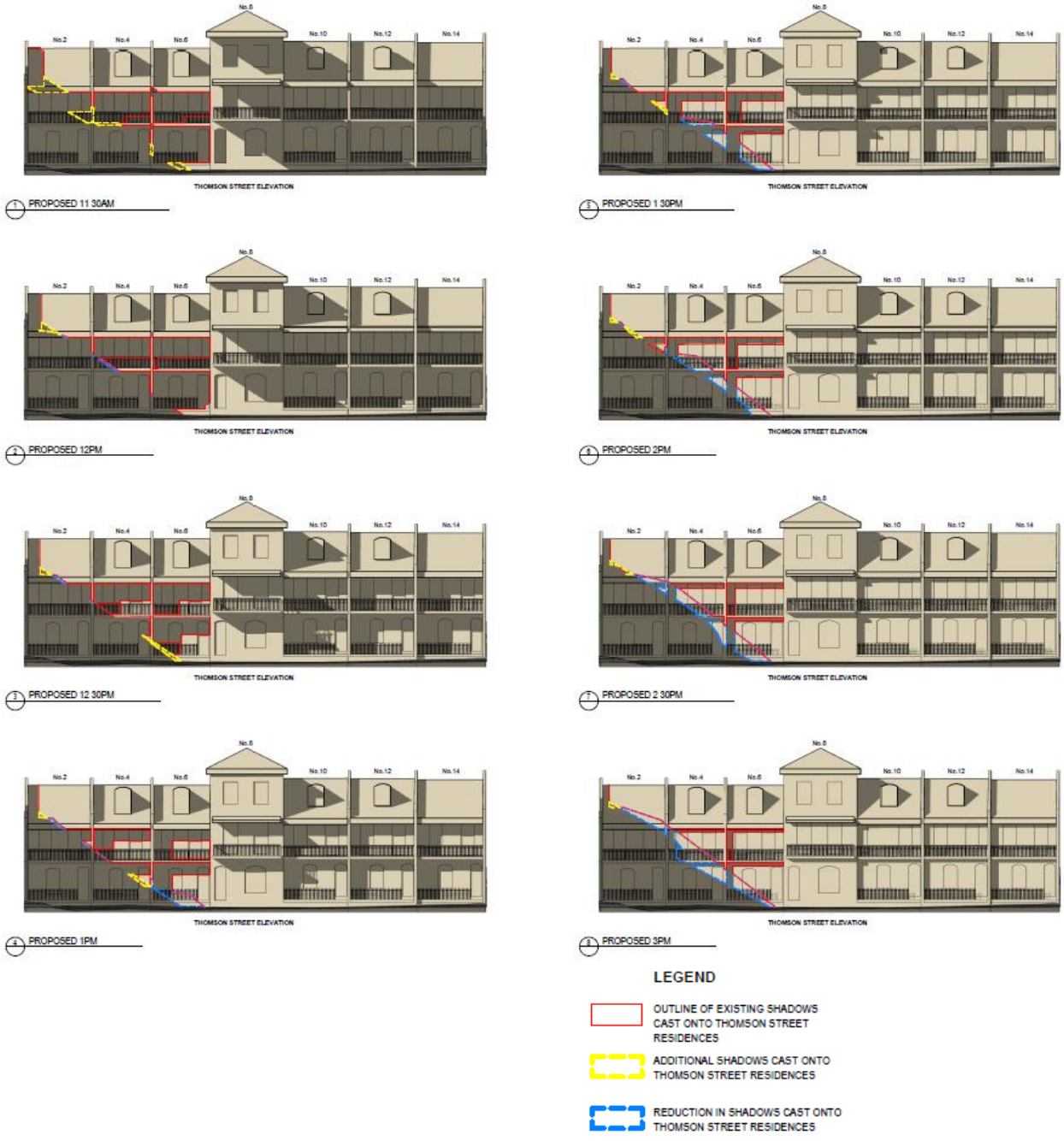
Figure 10 – Thomson Street Winter Solstice Overshadowing Impacts

Source: TKD Architects – Amended Architectural Plans

Figure 11 shows the overshadowing impacts of the revised design upon the front facades of the Thomson Street residences. The shadow study shown here is during the winter solstice on the 21 June. Thomson Street residences are in full shadow until 11.30am as the sun is behind the façade. As a result of the revised building envelope, the net extent of shadows on the front elevations of 2 – 6 Thomson Street is reduced, when compared to the existing buildings. As such there is a net improvement to the solar access of the façade to the Thomson Street terraces, most significantly to 4 and 6 Thomson Street, as a result of the proposed development.

The shadows outlined in yellow show the additional shadow cast by the proposed development. The areas outlined in blue show where the existing shadows have been reduced based upon the amended building envelope, resulting in an improved solar outcome for the 4 and 6 Thomson Street neighbours.

Figure 11 – Amended Overshadowing Impacts upon Thomson Street



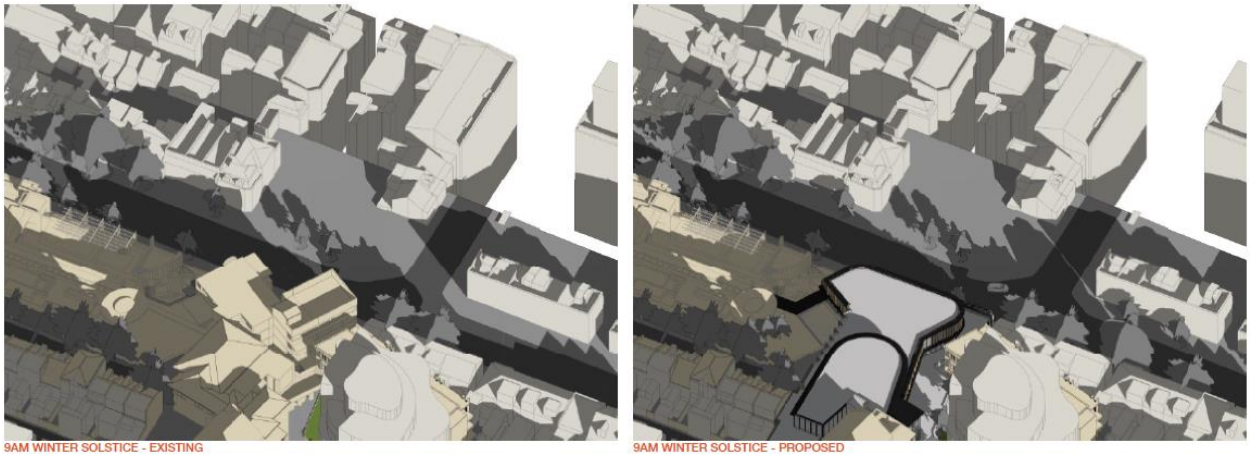
Source: TKD Architects – Amended Architectural Plans

3.1.5.2. Bourke Street Dwellings Overshadowing

One submission raised concerns over the impacts of overshadowing to the dwellings on Bourke Street to the west of the site. **Figure 12** below shows that the amended multi-purpose building design will have a decreased shadow impact to Bourke Street when compared to the existing buildings.

The shadows will not extend onto the Bourke Street façade of 7 O'Brien's Lane from 9:00am, resulting in a positive outcome for residents.

Figure 12 – Amended Design Bourke Street Overshadowing Impacts



Source: TKD Architects – Amended Architectural Plans

3.2. VIEW IMPACTS

A Revised Visual Impact Study has been prepared by Virtual Ideas at **Appendix F** and an assessment of the visual impacts can be found in **Section 5.3.2**.

The following public submissions were received raising objections around view impacts:

- New buildings will negatively impact the views towards the City and the Harbour Bridge (38 responses)
- Reduction in views specifically from Thomson Street (7 responses)
- Reduction in views specifically from Forbes Street (15 response)
- Reduction in views specifically from Liverpool Street (8 responses)
- Impacts on views have not been assessed and justified in accordance with 'view sharing' principles outlined by Land and Environment Court planning principles (8 responses)

Six of the public submissions raised that they will be losing views to the Harbour Bridge or Centre Point Tower from their properties along Forbes Street. While four public submissions from residents on Thomson Street raised that they will be losing their views of the City.

In response to the number of submissions the design of the multi-purpose building was revised to fit within the envelopes of existing buildings. The reduced building envelope results in existing views being retained or marginally improved, with minor additional views towards the City and the Harbour from some vantage points.

A number of residents in the Horizon building have also raised concern regarding view loss of Wilkinson House and the impacts the new building will have upon their views, particularly those on the lower levels of the Horizon building. They request that reflective materials not be used and potential for a green roof to be explored. There submissions have been addressed in **Appendix A** and **Appendix B**.

3.3. HERITAGE IMPACTS

Submissions received from the National Trust (NSW), City of Sydney, Office of Environment and Heritage and a number of public submissions raised concerns and/or requested further clarification regarding the potential impact of the proposal on the heritage significance of Wilkinson House, Barham House, the Old Gym Building, and/or the archaeological impacts of the proposed development and its contribution to the heritage significance of the locality.

This section provides an additional assessment of the proposal on heritage grounds and is supported by the following enclosed documents:

- Revised Architectural Plans - **Appendix C** (TKD)
- Additional Heritage Impact Statement - **Appendix E** (TKD)
- Revised Visual Impact Study - **Appendix E** (Virtual Ideas)

Impact on the heritage conservation area, streetscape, and the demolition of heritage items in terms of the amended design proposal is assessed in **Section 5.5** of this RTS Report.

3.3.1. Wilkinson House

Submissions received from the National Trust (NSW), City of Sydney, and Office of Environment and Heritage raised concern and/or requested further clarification regarding the proposed demolition of Wilkinson House and the replacement of the building with a four-storey purpose-built school building 'New Wilkinson House'. Several public submissions also objected to the proposed demolition of Wilkinson House and the replacement of the building with a new purpose-built school building.

The retention of Wilkinson House was a large focus of the public submissions, with 69 submissions objecting to the demolition of the heritage building. More justification on the rationale for the reason for the upgrade and for demolishing Wilkinson House (Option C) rather than retaining the façade (Option B) was sought by the DPIE.

Options for the retention and adaptation of Wilkinson House are explored in detail within the 'Wilkinson House Options Analysis' dated November 2018 and further explored in the Architectural Design Report at **Appendix D**, the Supplementary Statement of Heritage Impact at **Appendix E** and the Wilkinson House Structural Options report at **Appendix M**. The options considered for the site have been fully explored, and it is concluded that the retention of the building or the building façade is not structurally viable and will not meet the School's requirements for the provision of contemporary learning spaces and is not appropriate for the site. This is outlined in detail within the following sections.

3.3.1.1. Justification for Upgrade of Wilkinson House

As outlined in the EIS, SCEGGS is in need of classrooms and teaching facilities that are in line with current building standards and education needs. The School has identified that the campus generally suffers from a lack of adequately sized, large flexible General Learning Spaces.

As outlined within the SCEGGS Darlinghurst 2040 Masterplan, the school is broadly structured with the junior school to the south, administration and shared facilities within the centre of the school, and the secondary school to the north of the site. Wilkinson House is within the secondary school portion of the site, where the demand for General Learning Space is dominant.

Of the School's 30 learning spaces provided for secondary students, only 12 learning spaces are over 60sqm and able to adequately accommodate a full classroom size. The NSW Department of Education has a standard for school of an equivalent size (4 stream) to provide a minimum of 20 General Learning Spaces of 60sqm. Presently, Wilkinson House accommodates five learning spaces varying in size from 41sqm to 57sqm.

Wilkinson House was purchased by the School in 1960. The building has formed part of the SCEGGS Darlinghurst campus for 59 years. The School converted the former residential flat building into boarding facilities in 1962 with the garages being converted into workshops for the art department in the late 1960s. Upon the closure of on-site boarding facilities in 2001 Wilkinson House was adaptively reused for staff facilities and classroom use. The School has therefore adaptively reused the original residential flat building for over 50 years, with all efforts made to adaptively reuse the space for learning and teaching facilities for specifically 18 years. The ongoing use of these spaces for learning and teaching facilities has however

reached the end of its practical lifespan, with spaces within Wilkinson House being the least desirable in the School for learning, and not meeting the School's ongoing requirements.

Not adapting the existing facilities, or a do-nothing scenario, is therefore not seen as an option for the School. In response to this need the decision to upgrade Wilkinson House was made. The three options (**Figure 13**) that were considered were:

- Option A – Refurbishment of the building;
- Option B – Redeveloping the building with the principle facades retained; and
- Option C – Replacing Wilkinson House with a new purpose-built facility.

Each option was developed with input from a specialist consultant team to a level of detail that allows the impact and implications of each option to be appropriately analysed and understood.

Figure 13 – Options Considered – Built Form to be Retained in Red

Source: TKD Architects – Architectural Design Report

3.3.1.2. Justification for Option C

The proposed development has evolved from 'Option C' as explored in the Options Analysis dated November 2018, and is supported through the additional information provided in the Wilkinson House Structural Options report at **Appendix M** concludes that the replacement of Wilkinson House with a new building provides the optimum solution for redeveloping the site to meet the School's educational requirements and continued use of the site.

The DPIE submission and the public submissions requested additional justification for selecting Option C rather than Option B. The following sections describe the options for the adaptation and development of Wilkinson House against the following considerations:

- BCA and Access;
- Floor to ceiling heights;
- Thermal performance;
- Building amenity, including daylight, views, privacy, ventilation and acoustics;
- Functionality and educational outcomes; and
- Buildability and loss of area.

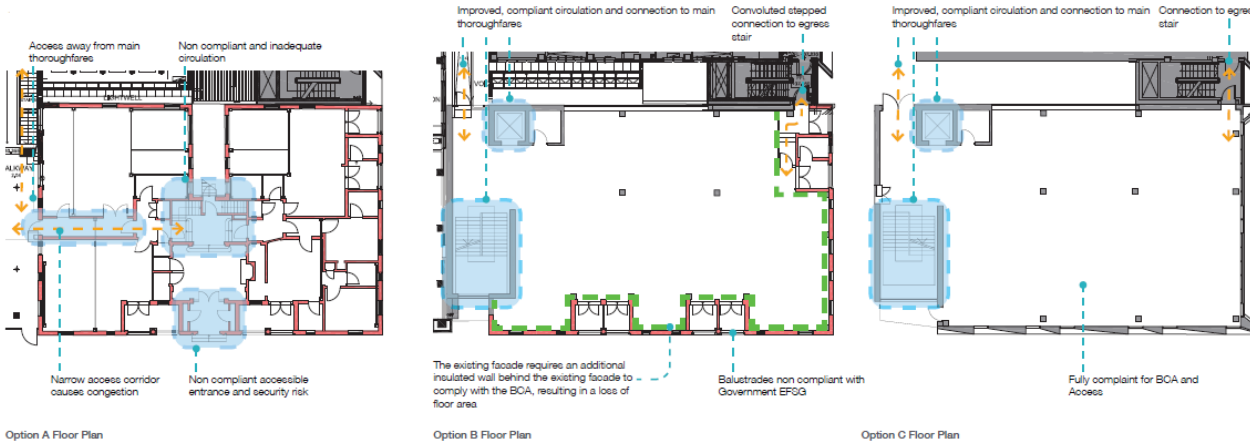
BCA and Access

BCA, compliance, general pedestrian safety and ease of accessibility are important to facilitate circulation of students between classes.

The existing building is not BCA compliant in a number of instances as listed in the Architectural Design Report at **Appendix D**. Option B would also not be fully compliant with key non-compliances in windows, sill heights, ventilation and glazing safety glass. While accessibility will be improved through provision of a lift and a compliant stairwell in Option B (unlike Option A), the convoluted series of connecting ramps to the adjacent Joan Freeman Building would still be retained.

Option C allows for the delivery of a building designed to meet current BCA and Australian Standards requirements, being fully accessible, with natural light, ventilation and thermal performance. Option C also allows for a clear alignment of levels between the Joan Freeman Building and the new Wilkinson House to improve accessibility. **Figure 14** below, highlights the spatial benefits and accessibility benefits of Option C compared to Options A and B.

Figure 14 – BCA and Access Options Analysis



Source: Architectural Design Report

Floor to Ceiling Heights

Due to the location of existing windows and the concrete structure of the building, future floor to floor heights will be permanently restricted to similar levels as existing within Option B. When considering the requirement for larger column free spaces within the building, this results in future ceiling height standards that is lower than the minimum National Construction Code required 2400mm, and well below the minimise NSW Department of Education required 2700mm ceiling height. This issue is resolved within Option C.

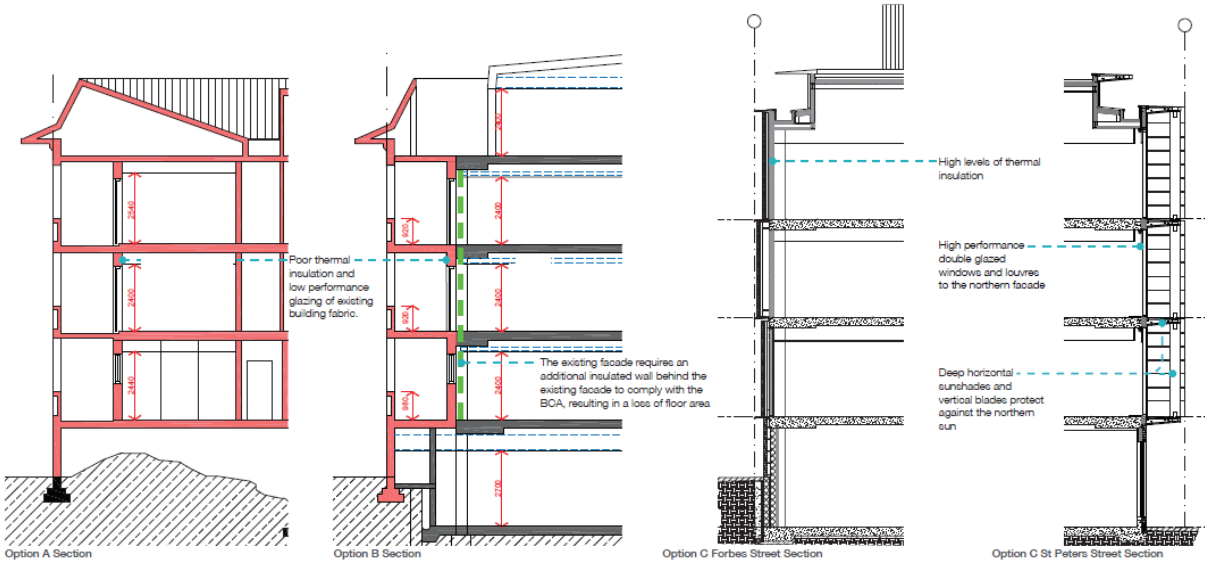
Thermal Performance

The façade, windows, doors and the roof of the existing building are poorly insulated with poor thermal performance resulting in higher levels of heat gain and heat loss. The lack of shading on windows results in blinds being drawn for the majority of the day. The inefficient nature of the façade and roof results in high energy usage and inclusion of insulation will reduce the size of available learning spaces.

Option B will not resolve a majority of these issues and incorporation of additional insulation will reduce available floor area of the spaces as illustrated in **Figure 14** above and **Figure 15**. It is also not possible to include external shading to the windows within Option B, and therefore solar heat gain and glare cannot be mitigated.

Option C offers a fully compliant solution with good thermal performance which is proposed to exceed requirements set out within the BCA and has been designed to Green Star Level 4.

Figure 15 – Thermal Performance Options Analysis



Source: Architectural Design Report

Building Amenity

In addition to implications for thermal performance, we note that the existing façade contains small 'domestic' windows designed for a series of smaller residential spaces which provide low levels of natural light and inadequate natural ventilation. The lack of shading results in the blinds on windows being closed as a result of solar heat gain and solar glare. Retention of the windows with Option B will not solve the ventilation or solar access issues with only 26% of nominated learning areas receiving daylight.

Option C provides high levels of daylight to 46% of the nominated area, an increase of 77% from option B and C. External sunshades and louvre blades are incorporated into the design to mitigate solar heat gain and solar glare.

The purpose-built new Wilkinson House building also allows for improvements in privacy and outlook for occupants of the building, with the eastern façade comprising a number of solid panels with façade openings orientated to the north to benefit from daylight, views, and to avoid residential overlooking.

Functionality and Educational Outcomes

Wilkinson House has been adaptively reused for over 18 years since boarding ceased on the site, and the School's experience from using Wilkinson House since 2001 is that the learning spaces do not work well, provide inadequate sightlines, are difficult to access, and are not conducive to high-quality learning.

While internal alterations have sought to improve the useability of this building, these spaces are the least desirable spaces in the School for learning. These spaces do not meet the school's requirements to provide high quality, contemporary flexible learning spaces. Option B, while allowing for some improvement in open plan learning and teaching spaces, maintains some functional challenges where existing balconies create unusable and/or compromised areas. In addition to resulting in significantly improving building compliance and building amenity as described above, Option C also results in superior spaces for education.

Buildability and Loss of Area

Notwithstanding the compromised functionality and amenity resulting from Option B as described above, from further review on a construction perspective Option B is also not feasible. To enable the retention of the north and eastern building facades multiple engineering firms have been engaged to develop a construction methodology for Option B as described at **Appendix M**. Taylor Thomson Whitting conclude within their report at **Appendix M** that the façade of Wilkinson House should not be retained as proposed in Option B due to:

- An inability to safely construct the temporary façade retention system in a logical and viable manner;
- High risk of structural collapse due to the removal of existing floor structure which currently provides the lateral support to the entire building façade, and the extreme difficulty in temporarily and adequately supporting the existing façade from within a relatively small and congested site;

- Safety concerns to the public and workers during underpinning activity and construction where the façade stability may be unknown in numerous locations and/or left unstable, particularly during vibration work; and
- The inability to certify this façade before or during construction due to inadequate existing information being available.

Significant demolition of the load bearing structure is required at ground floor and basement levels to enable the construction of foundations needed to support temporary façade retention steelwork. This significant demolition however is not possible without the temporary support steelwork being in place – risking the lateral stability of the building, resulting in a high possibility of collapse.

Furthermore, pursuing Option B will also result in significant disruption to the School and local community during construction. Notably, though not exhaustively, St Peters Street will need to be re-levelled to facilitate truck access, the existing street islands must be removed, and street closures for Forbes Street and St Peters Street will be required either for the duration of the project or significant periods of the construction.

As described at **Appendix M**, even with the most rigorous construction methodology available to support the retention of the existing façade – the practical requirement of needing to demolish portions of the façade to enable construction machinery to access the site will still result in significant demolition to the original heritage fabric of the façade. This demolition further undermines the ability of the heritage fabric of the building to be interpreted and to maintain significance as a former residential flat building.

3.3.1.3. Legal Precedence for Demolition of a Heritage Item

The SCEGGS Darlinghurst main campus is identified as a local heritage item under the SLEP 2012. While the heritage listing does identify Wilkinson House as one notable element, the site will remain a heritage item notwithstanding the demolition of the building. Further, it is proposed elsewhere within the 2040 Masterplan to enhance the heritage values of the site, including notably the restoration of Barham House.

The decision to propose the demolition of Wilkinson House, which has been identified as having moderate heritage significance, has not been undertaken lightly. The building has already been adaptively reused for a significant period (since 1962), for as long as feasible. The 2040 Masterplan has considered alternative options for the demolition of the building, however, to meet the educational requirements of the School and the objectives outlined within the TKD options study, Option C is now pursued as the most reasonable and appropriate option for the site. As stated above, the ability for the building to be further converted or facades retained is not feasible from a buildability, construction, safety, functionality and amenity perspective.

We note for DPIE reference that there is legal precedence for the demolition of a heritage item, and also the demolition of a contributory item within a conservation area.

Within the findings of Bunnings Properties Pty Ltd v Ku-ring-gai Council (No.2) [2018] NSWLEC 19, the feasibility of upgrading the relevant building and finding an appropriate tenant and use was determined a relevant financial burden on the landowner and deemed a relevant matter for consideration in the demolition of a heritage item. The practicality of the ongoing use of the building has been demonstrated within this report and the EIS, and the inability to adaptively reuse the structure of the building has been demonstrated in detail.

Within the findings of Helou v Strathfield Municipal Council [2006] NSWLEC 66, the question of whether the building is structurally safe is a relevant matter for consideration in determining whether the demolition of a contributory item should be permitted. Further, even if the building can be rendered structurally safe and adaptively reused, the question of whether the costs are so high that they impose an unacceptable burden of the owner of the building was deemed a relevant matter for consideration. In response to each of these questions, Option B is not feasible, and Option C should be supported. The Helou v Strathfield case also questions whether the replacement proposal will fit into the conservation area. This is addressed in the following section.

3.3.1.4. Proposed Design

Notwithstanding it is predicated on the demolition on the existing Wilkinson House, the proposed new Wilkinson House building has been designed to make a positive contribution to the heritage conservation area in which the site is located.

The proposed new Wilkinson House building has been designed to provide contemporary and flexible learning spaces, whilst also outwardly expressing the purpose of the building. The new Wilkinson House building is not designed to reflect a residential apartment building, given the new purpose-built use, but the

proportion and scale of the new building directly responds to the scale of the existing Wilkinson House building and the local building height standard.

The materials and finishes proposed for the new building are not only durable but have been selected to complement the character of the existing school campus and surrounding locality. Specifically, face brickwork is proposed to the lower levels of the building addressing the street. The building above these levels feature large areas of glazed windows where facing existing school buildings, and sandstone cladding to provide fenestration and privacy on the eastern façade.

The proposed design of the new Wilkinson House has addressed the design quality principles of the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (**Education SEPP**) as outlined in **Section 4.2.3**, notably by:

- using natural materials that reflect positive qualities of the local heritage conservation areas;
- designing the building to respond to its orientation and context, specifically with greater glazing along the northern frontage with greater solid façade elements on the western frontage, in addition to physically connecting to existing school buildings on the site;
- providing a building with high internal amenity and whole of life flexibility and adaptability; and
- providing a building that has good proportions that align closely with the adjacent building and the former Wilkinson House building.

3.3.2. Barham House

Agency submissions from OEH and the National Trust and nineteen (19) public submissions raised concerns surrounding the impact the proposed Administration Building will have upon Barham House and the Chapel Building, as well as concerns about restriction of views towards the heritage building, such as:

> *"The bulk of the proposed building envelope located between Forbes Street and the existing Barham building is significantly larger than the existing structure. The proposed envelope has the potential to obscure Barham building from Forbes Street.*
>
> *The new building envelope is to the street alignment and has the potential to dominate the Chapel building.*
>
> *The proposed envelope cannot be supported in its current form and needs further refinement to be sympathetic, particularly to the most important building on the site – the Barham building."*

In response to concerns regarding the impact of the proposed Administration Building upon the streetscape, the amended design includes a reduction in the building envelope height of the street parapet to be in-line with the eaves of the adjacent Chapel Building. This reduction allows the Chapel Building to maintain its visual prominence within the streetscape and respect its heritage significance.

The proposed Administration Building has been designed to improve the functionality of the school and replace the ad hoc utilitarian eastern extensions to Barham House. The reduction in the height of the Administration Building parapet will have a positive heritage impact as it will assist in the retention of the significant north-west presentation of Barham House and better relate the new building to the scale of the existing building.

The conservation and reconstruction of Barham House will enhance its presentation within the school and reinstate lost historic views to the building while also providing the school with an improved entrance address to Forbes Street.

Additionally, the proposed Administration Building envelope will not block views towards Barham House from Forbes Street as there are no existing views to the historic dwelling. The extensions to be removed have no historic merit or architectural distinction. Aesthetically, the additions detract from the understanding of Barham House as a detached mid-nineteenth century villa, and they do not provide an appropriate address to Forbes Street. The removal of a century of accretions constructed by the School is a positive heritage outcome for Barham House, allowing for the reconstruction of the building to its original 1833 form.

The original Barham House was not designed to address Forbes Street and it is orientated towards the north west and historically, views towards Sydney Harbour. The heritage significance of Barham House is in its presentation of the north-west, the restoration and retention of the façade reinstates is prominence and significance within the locality. The administration building has been sympathetically designed so as to not

detract from the heritage significance of Barham House and improve the overall presentation to Forbes Street.

3.3.3. Old Gym Building

The National Trust is opposed to the demolition of the Old Gym building in the view that it will erode the heritage significance of the whole school site. The proposed multi-purpose building necessitates the demolition of the Old Gym and the rear (western) annexe to the Chapel Building. The Old Gym is assessed as having moderate heritage significance within the Heritage Impact Statement provided with the EIS; however, it is not explicitly identified within the local heritage listing of the site. The exterior of the building has been substantially modified with intrusive additions and alterations with a low level of physical integrity.

Accepting the low integrity of the building and its assessed level of significance, removal of the building will permit the provision of new facilities and spaces which better serve the current and future needs of the School.

3.4. CHILDCARE CENTRE

Over thirty (30) public submissions raised concerns and objections surrounding the proposed childcare use within the multi-purpose building. More details were requested surrounding traffic, acoustic and student number impacts. The following information has been prepared in response to the submission received:

- Details of the operation of the childcare and indicative floor plans;
- Acoustic and traffic impact for the childcare;
- Compliance against Education SEPP; and
- Clarification that the childcare will not affect the 'cap' imposed on student capacity.

3.4.1. Concept Childcare Centre Proposal

The proposed childcare centre use will be located within the proposed multi-purpose building envelope. Indicative plans for the childcare centre are provided within the Architectural Design Report at **Appendix D**, which demonstrates the following capacity and operation of a future childcare centre on the site:

- Approximately 655sqm GFA for childcare purposes;
- Approximately 315sqm of outdoor area for childcare purposes;
- Location currently proposed within Level 5 within the multi-purpose buildings;
- Capacity of a maximum 45 students (reduced from original proposal);
- Vehicular access from Bourke Street, including car parking spaces and student 'drop-off' spaces within the lower ground floor of the multi-purpose building; and
- Separate pedestrian access from Bourke Street, including dedicated lift access.

Further details of the proposed childcare centre (concept only – subject to a future detailed SSD DA) is described within a description of the revised proposal at **Chapter 2**, and additional environmental assessment provided at **Chapter 4** and **Chapter 5**.

3.4.2. Traffic and Acoustic Impacts

A Revised Traffic Impact Assessment (**Appendix H**) and Revised Construction and Operational Noise Report (**Appendix J**) has been undertaken to support conceptually the proposed use of a childcare centre on the site. As described in **Section 5.6**, these studies determine that the potential impact of a childcare centre on site can be appropriately mitigated within a future detailed DA for the site.

3.4.3. Student Number Implications

A component of the Concept SSD DA is to include centre-based childcare facility as an approved land use on the site, subject to the detailed design and operation being approved within a Detailed SSD DA. Such a future Detailed DA would also be subject to public exhibition, allowing community members and government agencies the opportunity to comment on the detailed design and operation of such a facility prior to its construction.

While the delivery of a centre-based childcare facility on the site would result in potential additional impacts as assessed within **Section 4** and **Section 5** of this report, it is important to note that the childcare centre is a separate land use to the school and therefore will not change the existing approved maximum student capacity for the site. Under the *Standard Instrument—Principal Local Environmental Plan* and the *Sydney Local Environmental Plan 2012* **childcare centre** and **school** are defied as separate uses:

> ***centre-based childcare facility*** *means:*
>
> > *(a) a building or place used for the education and care of children that provides any one or more of the following:*
> >
> > > *(i) long day care,*
> > >
> > > *(ii) occasional childcare,*
> > >
> > > *(iii) out-of-school-hours care (including vacation care),*
> > >
> > > *(iv) preschool care, or*
> >
> > *(b) an approved family day care venue (within the meaning of the Children (Education and Care Services) National Law (NSW)),*
>
> ***Note.*** *An approved family day care venue is a place, other than a residence, where an approved family day care service (within the meaning of the Children (Education and Care Services) National Law (NSW)) is provided.*
>
> *but does not include:*
>
> > *(c) a building or place used for home-based childcare or school-based childcare, or*
> >
> > *(d) an office of a family day care service (within the meanings of the Children (Education and Care Services) National Law (NSW)), or*
> >
> > *(e) a babysitting, playgroup or child-minding service that is organised informally by the parents of the children concerned, or*
> >
> > *(f) a child-minding service that is provided in connection with a recreational or commercial facility (such as a gymnasium) to care for children while the children's parents are using the facility, or*
> >
> > *(g) a service that is concerned primarily with providing lessons or coaching in, or providing for participation in, a cultural, recreational, religious or sporting activity, or providing private tutoring, or*
> >
> > *(h) a child-minding service that is provided by or in a health services facility, but only if the service is established, registered or licensed as part of the institution operating in the facility.*
>
> ***school*** *means a government school or non-government school within the meaning of the Education Act 1990.*
>
> ***Note.***
>
> *Schools are a type of educational establishment—see the definition of that term in this Dictionary.*
>
> ***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.*

As stated in the EIS there is no intention to increase the capacity of school students on the site and **this SSD DA application does not seek development consent to increase site student capacity on the site**.

We note that while this application does not seek consent to increase student numbers of SCEGGs Darlinghurst compared to existing levels, a DA can legally be submitted to increase student numbers on the site pursuant to *Planning Circular PS 1-004 – Regulating expansion of schools* issued by the Department of Planning and Environment in 2017. The School has been very clear that seeking an increase in site student

numbers is not currently desired by the School and they understand it is not desired by the community and as such has made clear in the SSD DA that approval for an increase site student capacity is not being sought within this SSD DA.

3.5. TRAFFIC AND PARKING

A Revised Traffic Impact Assessment has been prepared in response to the public submissions and request from the DPIE and is included at **Appendix H**. This revised traffic and parking assessment provides the following:

- Assessment of the impacts associated with introducing a childcare centre on the site;
- Traffic impact of the car parking proposed on site (in masterplan);
- Cumulative impacts associated with other construction activities in the area (if any) for the detailed SSD DA;
- Green Travel Plan and Construction Traffic Management Plan;
- An assessment of any school facilities used by the community outside of school hours;
- Detailed justification with respect of the car parking numbers proposed on site; and
- Clarification of the number of short-term pick-up and drop off spaces proposed.

A copy of the Traffic and Pedestrian Management Plan is included at **Appendix I**.

Agency submissions raised objections surrounding the provision of 22 spaces within the proposed basement car park and requested additional information on the Green Travel Plan (**GTP**) and Construction Traffic Management Plan (**CTMP**).

The proposed parking provision does not increase the total number of spaces associated with the School use. The seven spaces to be removed from the Forbes Street car park will be incorporated into the proposed basement. The additional five parking spaces and seven pick-up and drop-off spaces are associated with the childcare centre use in accordance with the Sydney DCP.

A draft GTP and draft CTMP has been included within the Revised Traffic Impact Assessment (**Appendix H**). A final GTP will be prepared prior to the occupation of the Stage 1 works. A final CTMP will be prepared prior to issue of the Construction Certificate of the Stage 1 works.

More than 30 public submissions raised concerns surrounding the traffic impacts associated development, with the majority requesting additional information about increases in traffic from additional students, staff and construction vehicles. It is noted that there will be no increase in traffic associated with the school use as there will be no increase in the number of students or staff, traffic impacts associated with the school are outlined in **Section 5.6.1**. Additional information about truck movements and construction traffic impacts are outlined in **Section 5.6.4**.

The Revised Traffic Impact Assessment has found that the additional children and staff associated with the childcare centre will have a negligible impact upon current traffic flows, intersection performance and congestion levels. The pick-up and drop-off area for the centre will be located within the basement car park and will not affect queuing and existing school pick-up and drop-off locations.

Other transport related submissions are addressed in detail at **Appendix A** and **Appendix B**. Further assessment of the revised scheme including proposed mitigation measures to address traffic and parking matters are addressed in **Section 5.6.**

3.6. CONSTRUCTION IMPACT

The submission from the City of Sydney raised the potential for damage to the structural integrity of the Chapel Building. As outlined in the Heritage Impact Assessment by TKD Architects, the structure and original fabric is generally intact and it in good condition. The following steps will be taken to ensure the protection of the heritage significance of the Chapel Building and its structural integrity:

- Undertake a photographic archival record of the whole building, including all areas proposed for demolition.

- Avoid removal, damage or alteration to significant original elements and details, including windows, doors, chimneys and the original stair well.
- Retain historic school bell in its current location on north verandah.

The structural integrity of the Chapel Building will be ensured through traditional construction methods and a more detail assessment of the building will be undertaken, refer to **Appendix A** for details.

The City of Sydney and public submissions want more information about whether the impacts to the nearby residential heritage items from the proposed multi-purpose building is acceptable. It is noted that the building envelope sought within the SSD DA is a maximum envelope, and if during detailed design it is determined that should additional structure or supports be needed within this envelope to ensure the protection of adjacent properties, this will be documented within a subsequent Detailed SSD DA.

Furthermore, as a standard condition of consent, dilapidation reports will be undertaken before, and after construction works to mitigate and repair any potential damages to heritage properties.

Reuse or recycling will be employed for all materials demolished and excavated where appropriate during the proposed construction and demolition works as outlined in the Preliminary Construction Management Plan prepared by TBH. Sydney sandstone will be extracted as per the City of Sydney regulations if sandstone is of a quality for this to be possible.

3.7. NOISE AND ACOUSTIC IMPACTS

A number of public submissions raised objections to the noise, dust and vibration impacts to their homes and disruption that this will cause. In response additional mitigation measures were included in the Revised Construction and Operational Noise Report.

Noise, vibration and dust mitigation measures will be put in place as outlined in **Section 5.7** to manage negative construction impacts to neighbours. Mitigation measures will be put in place to minimise impacts to neighbouring dwellings and for students during the construction period.

A Revised Construction and Operational Noise Report has been prepared by Wilkinson Murray in response to the public submissions received on the proposal, which is provided at **Appendix J** and provides the following:

- Assessment of any school facilities used by the community outside of school hours.
- Assessment of the impacts associated with introducing a childcare centre on the site.
- A Draft Construction Noise and Vibration Management Plan which details specific measures to mitigate construction noise.

The City of Sydney also requested an updated acoustic report with site-specific noise and vibration mitigation measures for the Stage 1 Wilkinson House redevelopment. A draft Construction Noise and Vibration Management Plan has been prepared and is included in Appendix C of **Appendix J**.

Other acoustic related submissions are addressed in detail at **Appendix A** and **Appendix B**. Further assessment of the revised scheme including proposed mitigation measures to address acoustic considerations are addressed in **Section 5.7**.

3.8. CAPITAL INVESTMENT VALUE

The DPIE, the City of Sydney and 21 public submissions raised concerns about the calculation of the capital investment value (**CIV**) of the proposal. The DPIE commissioned an independent CIV report and additional information to be peer reviewed and considered with regard to other recent comparable school developments.

The DPIE commissioned review of the Estimated CIV (**Appendix S**) concluded that the cost of works was originally understated and an estimated CIV of $62,110,065 excluding GST for the project would be appropriate. This review is $12,735,865 higher than the originally submitted estimate of $49,374,200. As outlined within the CIV response prepared by Altus Group at **Appendix T**, the key variance between the cost estimates is explained by the rate per sqm used, being based on either typical construction for a ‘horizontal’ (less than 3 storeys) or ‘vertical’ (more than 3 storey) school building. Furthermore, the cost variances could

be explained in the amount of fit-out and detailed design specifics assumed by each report given many of the discrepancies are within the 'concept envelope' buildings.

The purported CIV variance would not affect the classification of the project as State Significant Development, the trigger of which is a CIV of more than $20 million for the purpose of alterations or additions to an existing school. Other than the calculation of development application fees, the other impact of the CIV variance raised within the submissions is the potential trigger for a competitive design process in accordance with clause 6.21 of the SLEP 2012, discussed below.

3.8.1. Design Competition

The main concern regarding the calculation of CIV raised in the submissions was the project exemption from a competitive design process. This mechanism to exempt development with a CIV less than $50 million from requiring a competitive design process is provided in clause 35(8) of the Education SEPP.

Despite the reviewed CIV estimate being more than $50 million, the detailed design of the proposed development remains exempt from a competitive design process under the SLEP 2012 as outlined below.

Clause 6.21(5) of SLEP 2012 typically requires applicants to undertake a competitive design process for certain kinds of development:

> *(5) Development consent must not be granted to the following development to which this clause applies unless a competitive design process has been held in relation to the proposed development—*
>
> > *(a) development in respect of a building that has, or will have, a height above ground level (existing) greater than—*
> >
> > > *(i) 55 metres on land in Central Sydney, or*
> >
> > > *(ii) 25 metres on any other land,*
> >
> > *(b) development having a capital investment value of more than $100,000,000,*
> >
> > *(c) development in respect of which a development control plan is required to be prepared under clause 7.20,*
> >
> > *(d) development for which the applicant has chosen such a process.*
>
> *(6) A competitive design process is not required under subclause (5) if the consent authority is satisfied that such a process would be unreasonable or unnecessary in the circumstances or that the development—*
>
> > *(a) involves only alterations or additions to an existing building, and*
> >
> > *(b) does not significantly increase the height or gross floor area of the building, and*
> >
> > *(c) does not have significant adverse impacts on adjoining buildings and the public domain, and*
> >
> > *(d) does not significantly alter any aspect of the building when viewed from public places.*

The revised development does not exceed a maximum height of 25m, nor does it exceed the $100 million CIV threshold. As for clause 6.21(5)(c) the development is exempt from this provision through clause 8(2)(i) of the Education SEPP, which states:

> *(1) Subject to subclause (2), if there is an inconsistency between this Policy and another environmental planning instrument, whether made before or after the commencement of this Policy, this Policy prevails to the extent of the inconsistency.*
>
> *(2) In particular, without limiting subclause (1) and despite any other provision of this Policy, the following provisions do not apply to development carried out under this Policy on land to which those provisions apply:*
>
> > *(…)*
> >
> > *(i) clause 7.20 of Sydney Local Environmental Plan 2012,*

Further, the applicant has not chosen to undertake a competitive design process. Therefore, the competitive design process provisions of SLEP 2012 do not apply to this SSD DA as none of the triggers of clause 6.21(5) apply to the development.

Notwithstanding, the proposal does include a design excellence strategy to guide the detailed design of the administration building and the multi-purpose building. As described within the Design Report at **Appendix D**, design principles have been nominated for each building to guide the detailed design of the buildings in accordance with the matters identified in clause 6.21(4) of the SLEP 2012.

3.9. SECTION 7.11 CONTRIBUTIONS

The site is covered by the City of Sydney's Development Contributions Plan, which authorises the Council to collect contributions of money, land or both from developers to provide for local infrastructure needed by the relevant development. The plan was prepared in reference to Section 7.11 of the EP&A Act.

Pursuant to the plan, the following development requires a contribution:

- Development that results in a net population increase; and
- Development that is not excluded in accordance with the Clause 1.3 of the Development Contributions Plan.

The City of Sydney in their submission state that the proposed works should not be exempt from the payment of contributions, as notwithstanding the proposal does not increase student population on the site, the proposal results in an increase in GFA. Under the City of Sydney Development Contributions Plan, the Council attribute an increase in GFA to an increase in student population. The applicant maintains that the redevelopment of Wilkinson House does not increase student population on the site, notwithstanding a minor increase in GFA associated with these 'Stage 1' works.

Contributions for the multi-purpose building and new administration building should be determined as part of the Detailed SSD DA.

3.10. COMMUNITY USE OF SCHOOL FACILITIES

Two public submissions requested additional information about what community uses will be sought under the proposal and three public submissions requested additional information about how the school is used outside of school hours.

In response to the submissions received, a detailed schedule of existing community use of school facilities is provided at **Table 5** below.

Table 5 – Schedule of Community Use of School Facilities

Community Use	Hours / Frequency	Estimated Number of People	Building/ Location
Meeting spaces for strata and resident committee meetings	1 evening per month	10-50 people	Within existing buildings not affected by this application.
External sporting competitions	On demand		Sports Building not affected by this application.
Holiday kids club programs including Code Camp	School holidays		Within existing buildings not affected by this application.
Pero Gymnastic	2 weeknights per week and Saturdays	40-50 people	Sports Building not affected by this application.
Intrinsic sports	3 weeknights per week	100 people	Sports Building not affected by this application.

Community Use	Hours / Frequency	Estimated Number of People	Building/ Location
Book launches/ charities	Sporadically	80-300 people	Within existing buildings not affected by this application.
Local/ State/ National elections	As necessary		Within existing buildings not affected by this application.
Weddings, funerals, Sydney symphony, operas and community charity events	Sporadically		Great Hall not affected by this application.

As stated within the EIS submitted with the SSD DA, the School offers the use of facilities to the local community where such a use is non-disruptive and does not conflict with the day to day operation of the school. No change is proposed to this arrangement within this SSD DA, other than the potential community use of a potential pool within the building footprint, or a childcare centre on the site – described in detail at **Section 2** and **Section 5**.

Notwithstanding, clause 38(1)(i) of the Education SEPP states that existing school buildings may be used for the physical, social, cultural or intellectual development or welfare of the community whether or not it is a commercial use of the establishment as exempt development. As such, the continued use of existing school buildings by use of the community does not comprise part of this SSD DA as development consent is not required.

Any future shared use of a pool within the multi-purpose building would be the subject of a detailed SSD DA, and does not form part of this Concept SSD DA, where the shared community use would be permitted on the site as per clause 35(5) of the Education SEPP, and development consent specifically sought.

Use of the multi-purpose building rooftop after school hours is not specifically proposed within this SSD DA, however the Noise Impact Assessment at **Appendix J** has considered mitigation measures that would be required within a future detailed DA for this building should this ever be considered by the School.

3.11. PURPOSE OF PROPOSAL

Ten public submissions identified a lack of rational for the overall development and questioned whether the outcomes would offset the potential negative impacts. Seven public submissions sought more justification specifically regarding the purpose and future use of the multi-purpose building.

3.11.1. Purpose of the Proposal

Since 1901 SCEGGS Darlinghurst has evolved on the site through the construction of new buildings and acquisition of adjacent land, in line with the growth in student numbers and changing educational needs. By the end of the 20th century, most of the School's development had been in reactionary, without a holistic approach to campus planning. The campus layout had developed within the context of a relatively constrained site with difficult and complex topography, and in a suburb that had evolved into a close grained and congested urban area. The resulting campus buildings were, in many cases, not aligned to each other, were on different levels and were repurposed buildings or ad-hoc additions to earlier buildings.

The School's 2020 Masterplan developed in 1999 and endorsed by City of Sydney Council, was the first major step in the School's history which considered long term planning of the site. The 2020 Masterplan envisaged the renewal of six early school buildings and the reordering of the urban context of the campus including the establishment of the main 'school street' circulation spine. The final component of the 2020 Masterplan was the Joan Freeman Science and Technology building which was completed in 2016.

This proposed 2040 Masterplan (now submitted as a concept development application) follows from the legacy of the 2020 Masterplan and addresses the three remaining 'outmoded' buildings on the campus such that the completion of the 2040 Masterplan will realise the total renewal of the campus to contemporary standards for the next generation of SCEGGS students. The nominated staging and timing of the 2040 Masterplan responds to the remaining usable life span of each existing building, with each stage of the development prioritised accordingly in response to the School's needs.

The 2040 Masterplan recognises that the school's aspirations for providing a high-quality education must be supported by spaces that align with the curriculum and modern learning facilities. The relatively small site area and the physical constraints of the site make it critical for the School to utilise every available space to its maximum efficiency and effectiveness. Not utilising this space effectively can result in not providing adequate learning spaces that meet contemporary learning requirements and impact the School's ability to deliver a high-level education.

3.11.2. Purpose of the Multi-purpose Building

As outlined in the EIS, the multi-purpose building forms part of the 2040 Masterplan. The concept approval being sought for the multi-purpose building is in response to the ageing classroom facilities that need to be updated to match contemporary education trends and industry standards. The primary objective is not to increase the capacity or population of the school for more students or teachers, but rather to provide up-to-date, high quality, flexible learning spaces.

The multi-purpose building is part of Stage 3 of the 2040 Masterplan and likely will not be delivered until between 2030-2040. The specific building design and internal layout will be subject to a detailed SSD DA to be submitted in accordance with the conditions of this concept SSD DA, closer to the time of the actual proposed construction. School drivers for the detailed design and function of the multi-purpose building are however known, and for transparency and coordinated campus planning are included within the concept SSD DA:

- The building envelope must be able to accommodate flexible floor plates to enable multiple functional spaces including general learning areas, classrooms, meeting rooms, and shared facilities such as a library.
- The building envelope must be able to accommodate the equivalent student numbers currently available within the science building, library building, and gym building, within more contemporary learning spaces.
- The building envelope must be able to accommodate the spatial dimensions of a pool suitable for recreational activities (such as water polo and/or lap swimming). Given then limited recreation space available on the site, an indoor pool would be a welcome addition to the school facilities. Understandably however funding for such a facility is not yet guaranteed, and as such at this stage the building envelope must only be able to accommodate this concept proposal and not preclude the inclusion of such a facility in the future (subject to a further DA).
- The constrained site limits the amount of green and open space to be enjoyed by the students, as such the building envelope must also allow SCEGGS to maximise the site and create additional outdoor spaces for the students to utilise.
- The building envelope must be able to accommodate the spatial (internal and external) requirements of a centre-based childcare facility. Given the school cohort is aged from kindergarten (approximately 4-5 years of age), interest from families for on-site childcare for younger children is frequent and is anticipated within the Education SEPP at clause 35(10). However, funding for such a facility is not yet known, and as such the building envelope and approved land uses must be able to accommodate this concept proposal and not preclude the inclusion of such a facility in the future (subject to a further DA).
- The scale of the building envelope should complement the local context, including the two-storey scale of adjacent development on Bourke Street, and the two-three storey scale of Thomson Street, without undermining the achievement of other functional outcomes.

The Concept SSD DA has suggested that facilities within the multi-purpose building may also be available to the community for use upon completion. This is in line with the State Government's objective of sharing of facilities with the local community. As described above, development consent for the shared use of facilities within new buildings with the community will be outlined in the detailed DA for such buildings.

The submitted proposal has been revised in scope to include a more detailed design and reduced size in response to the submissions received. The amended design for the multi-purpose building is more responsive to the neighbouring properties and constrained site and will be further revised for the detailed development application.

3.11.3. Purpose of Wilkinson House Redevelopment/ Additional Floorspace

The purpose of the Wilkinson House redevelopment is outlined in detail at **Section 3.3.1** of this report.

4. PLANNING CONTEXT FOR REVISED PROPOSAL

The following planning context relates to the proposed development, as sought to be amended within this Response to Submissions report. This section should be read in conjunction with the proposed architectural plans at **Appendix C**.

4.1. STRATEGIC POLICIES

The proposed amendments to the development do not change the consistency of the proposed development with the relevant strategic policies as outlined in the EIS.

4.2. STATUTORY PLANNING

4.2.1. Biodiversity Conservation Act 2016

The purpose of the *Biodiversity Conservation Act 2016* is 'is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.'

The proposed design amendments will not impact the findings of the Biodiversity Assessment prepared by Ecoplanning dated August 2018 that was submitted with the EIS.

4.2.2. State Environmental Planning Policy (State & Regional Development) 2011

The proposal is classified as State Significant Development on the basis that it falls within the requirements of clause 15 of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* **(SRP SEPP)**, being 'development that has a capital investment value of more than $20 million for the purpose of alterations or additions to an existing school'. The submitted capital investment value of the project is anticipated to be approximately $49,374,000 (Excl. GST) as outlined within the Capital Investment Value Report dated November 2018.

An independent review of the cost of works by mbm (**Appendix S**) estimated the CIV to be $62,110,065. Notwithstanding the purported discrepancy between CIV values, there is no doubt that the proposed development is categorised as State Significant Development under the SRP SEPP.

Clause 11(a) of the SRD SEPP further states that development control plans do not apply to State Significant developments. As such, the Sydney Development Control Plan 2012 does not apply to this development.

4.2.3. State Environmental Planning Policy (Educational Establishments and Childcare Facilities) 2017

State Environmental Planning Policy (Educational Establishments and Childcare Facilities) 2017 (**Education SEPP**), provides the legislative planning framework for the effective delivery of educational establishments and early education and care facilities across the State.

The Education SEPP establishes consistent State-wide assessment requirements and controls, that supersede development standards contained within other environmental planning instruments. Clause 35, Part 4 of the Education SEPP identifies school specific provisions. The development as proposed to be amended has been assessed against the relevant provisions of Part 4 within the following table.

Table 6 – Education SEPP Compliance Table

Clause	Proposal	Compliance
Clause 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.	The proposed development is in Zone R1 General Residential which	✓

Clause	Proposal	Compliance
	is a prescribed zone for the purposes of the Education SEPP.	
(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.	Development consent is sought for the proposed works.	✓
(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.	The potential swimming pool considered for the new multi-purpose building is proposed to be utilised by the students and the community.	✓
(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 (b) whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.	The EIS addresses the design quality of the development. A formal response to the Schedule 4 School Design Principles is included in **Table 7** below, a Wilkinson House specific response has also been prepared in response to submissions received at **Section 3.3.1.4**. Details of how the community can use the proposed new school facilities will be included within the detailed DA for the Multi-purpose building. Community use of existing buildings will continue as per the current practice (exempt development).	✓
(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.	The *Sydney Local Environmental Plan 2012* requires a competitive design process to be completed for certain development. A competitive design process is not required for the project as outlined in **Section 3.8.1**. The design principles for achieving design excellence under the SLEP 2012 were addressed in the Design Report prepared by TKD Architects dated January 2019	✓
(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.	The reviewed CIV amount by mbm at **Appendix S** found that the CIV may exceed the $50m threshold. A competitive design process is however not required for the project as outlined in **Section 3.8.1**.	✓

Clause	Proposal	Compliance
(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.	Noted. Notwithstanding this provision, relevant sections of the Sydney Development Control Plan 2012 have been considered through the development of the concept plan and detailed DA.	Refer to **Section 4.2.8** of this RTS.
(10) Development for the purpose of a centre-based childcare facility may be carried out by any person with development consent on land within the boundaries of an existing school.	The concept plan envisages a centre-based childcare facility being a potential use of part of the multi-purpose building and as such consent is sought for this land use. The design, operation, and fit-out of a centre-based childcare facility would be the subject of a subsequent detailed DA.	✓
(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.	The proposal does not include any residential accommodation.	N/A

Schedule 4 of the Education SEPP outlines the design quality principles to which consideration must be given in the determining of applications for school developments. **Table 7** below outlines the compliance of the overall proposal.

Table 7 – Schedule 4 Schools – Design Quality Principles – Overall Proposal

Control	Response
Principle 1—context, built form and landscape	
Schools should be designed to respond to and enhance the positive qualities of their setting, landscape and heritage, including Aboriginal cultural heritage. The design and spatial organisation of buildings and the spaces between them should be informed by site conditions such as topography, orientation and climate.	**Concept Masterplan** The revised design proposal reflects the building height and heritage character of the surrounding streetscape. The new multi-purpose building will realign the streetscape along Bourke Street, aligning with the 2-storey street height and providing setbacks above. The new administration building establishes a positive site entrance that addresses the street and removes the ad-hoc extensions to Barham House. The new Administration building will solidify the heritage significance of the Chapel building and Barham House. **Wilkinson House Detailed Proposal** The façade of the new Wilkinson House responds to the heritage character of the locality, the adjacent St Peter's Street precinct and the Joan Freeman building. The new Wilkinson House building is not designed to reflect a residential apartment building, given the new purpose-built

Control	Response
	use, but the proportion and scale of the new building directly responds to the scale of the existing Wilkinson House building and the local building height standard. The design establishes its own identity to reflect the contemporary learning spaces within. It incorporates materials from the surrounding heritage streetscape. Vertical sunshades and slot windows protect against the northern sun, whilst increasing the privacy for neighbours. The building will provide contemporary and flexible learning spaces while complementing the surrounding street context and responding to environmental factors. The new building provides natural surveillance of the surrounding public domain and introduces a richness of materials and quality detailing.
Landscape should be integrated into the design of school developments to enhance on-site amenity, contribute to the streetscape and mitigate negative impacts on neighbouring sites.	**Concept Masterplan** The proposed landscaping is designed to unify the campus while remaining sympathetic to the rich heritage of the site. The proposed works will improve the amenity within the school grounds with high quality domain and outdoor spaces. **Wilkinson House Detailed Proposal** The proposed landscaping associated with the new Wilkinson House development is limited to vertical gardens within the lightwell between the proposed structure and the Joan Freeman Building, retention of the street tree and restoration of public domain works to Forbes Street and St Peters Street adjacent to the building works.
School buildings and their grounds on land that is identified in or under a local environmental plan as a scenic protection area should be designed to recognise and protect the special visual qualities and natural environment of the area, and located and designed to minimise the development's visual impact on those qualities and that natural environment.	The proposed development is not identified as being within a scenic protection area under the SLEP 2012.
Principle 2—sustainable, efficient and durable	
Good design combines positive environmental, social and economic outcomes. Schools and school buildings should be designed to minimise the consumption of energy, water and natural resources and reduce waste and encourage recycling.	The proposed Masterplan and new Wilkinson House has been developed using the principles of ESD. The new buildings will utilise current industry standard ESD Principles & Green Star credits such as: • Energy efficient HVAC and lighting systems,

Control	Response
	• High performance building fabric using passive design principles (i.e. insulation, glazing, shading), • Energy modelling techniques, • PV cells and solar hot water, • Metering and monitoring strategies, • Water efficient fixtures and fittings, • Health-conscience construction materials such as low VOC paints or low formaldehyde wood products, • High quality indoor environment such has thermal comfort and acoustic comfort, and • Furniture and fixtures with consideration of its life cycle impacts. New buildings within the 2040 Masterplan are generally designed to the 4 Star green star rating for school buildings or equivalent.
Schools should be designed to be durable, resilient and adaptable, enabling them to evolve over time to meet future requirements.	**Concept Masterplan** The proposed multi-purpose building is seeking approval for built envelope only with a range of possible internal uses to be determined at the time of the detail DA. Notwithstanding, we note that the proposed building envelope includes floor plates that maximise flexibility and adaptable learning techniques that can change over time. **Wilkinson House** The proposal to replace the existing Wilkinson House with a new purpose-built building directly responds to this principle to enable the evolution of existing school buildings and the ongoing adaptation of buildings to suit future requirements. The proposed new purpose-built building has been designed to be durable and resilient, unlike the existing degraded building which has reached the end of its adaptable life.
Principle 3—accessible and inclusive	
School buildings and their grounds should provide good wayfinding and be welcoming, accessible and inclusive to people with differing needs and capabilities.	**Concept Masterplan** The campus has an established central spine that provides pedestrian circulation through the campus and connects with all buildings. The central spine is easily navigated, and wayfinding is relatively straight forward except for access between the Old Gym and Library Building, which is a tighter space with limited visual

Control	Response
	connections. The main entry into the school and connection with the central spine is also very convoluted and not clear. The 2040 Masterplan proposes to address these issues. The multi-purpose building seeks to connect and enhance the pedestrian spine at a podium level. The new works will further improve way finding across the campus and between buildings for all users including after-hours community use. The administration building will activate the Forbes Street frontage and create an entrance that is visible, engaging and welcoming. The 2040 Masterplan will also provide access for people with a disability and provide a continuous accessible path of travel, clear way finding guidance and the equitable provision of accessible facilities. **Wilkinson House** The existing building does not comply with disability access requirements, and the new proposed building will provide a significant improvement for student accessibility not only by providing compliant disability access but also providing direct connections to adjacent school buildings.
Schools should actively seek opportunities for their facilities to be shared with the community and cater for activities outside of school hours.	SCEGGS Darlinghurst currently allows community use of existing buildings which is set to continue. Shared use of facilities within the proposed multi-purpose building will be available for community use upon completion, subject to details to be provided within the Detailed SSD DA.
Principle 4—health and safety	
Good school development optimises health, safety and security within its boundaries and the surrounding public domain, and balances this with the need to create a welcoming and accessible environment.	The proposed 2040 Masterplan and new Wilkinson House incorporates Crime Prevention Through Environmental Design (**CPTED**) principles to create a safe and secure environment that encourage activity, vitality and viability, enabling a greater level of security. The design incorporates the four main principles of natural surveillance, access control, territorial reinforcement and space management as outlined within the EIS.
Principle 5—amenity	
Schools should provide pleasant and engaging spaces that are accessible for a wide range of educational, informal and community activities, while also considering the amenity of adjacent development and the local neighbourhood.	The proposed new buildings are designed to provide improved amenity for SCEGGs students and teachers. The proposed purpose-built education buildings provide improved natural light, ventilation, and open spaces that

Control	Response
	suit learning and educational needs, compared to outdated building on the site. The proposal aims to minimise impacts to neighbours, particularly those adjacent to the development on Forbes Street, Bourke Street and Thomson Street. The impacts of the proposed works upon neighbouring dwellings is addressed in detail at **Section 5**. Critically, the proposed development as proposed to be amended has been designed to be compatible with the scale of existing buildings on the site, as follows: • The new Wilkinson House building is substantially the same scale as the existing building. The proposed new building maintains four storeys. • The new administration building replaces existing ad-hoc additions to Barham House. The parapet of the new building is no higher than the eaves of the adjacent Chapel building. By relocating administration staff and floor space into the new administration building, insensitive additions to Barham House can be removed and the significant heritage item can be restored. Further, as demonstrated at **Appendix D**, as a result of the proposed amended development views towards Barham House are marginally improved. • The maximum height of the multi-purpose building above ground is no higher than the maximum height of the existing Gym Building ridge level. The maximum height of the multi-purpose building at Bourke Street is also less than the existing Old Science Building. The multi-purpose building envelope has an improved presentation to Bourke Street compared with existing buildings as the new envelope is designed parallel to the street, and with a two-storey street presentation to respond to the prevailing character of Bourke Street. As such the proposal has been designed to minimise external environmental impacts while improving amenity for the School.
Schools located near busy roads or near rail corridors should incorporate appropriate noise mitigation measures to ensure a high level of amenity for occupants.	The School is not located near a busy road or rail corridor.
Schools should include appropriate, efficient, stage and age appropriate indoor and outdoor learning and play	The proposed works will improve the central spine of the campus with a new landscaped podium around the proposed multi-purpose building that improves the

Control	Response
spaces, access to sunlight, natural ventilation, outlook, visual and acoustic privacy, storage and service areas.	connections between the Primary School and the remainder of the campus and increases the area of useable outdoor learning areas and play space. This area will incorporate passive recreational areas and opportunities for outdoor learning.
Principle 6—whole of life, flexible and adaptive	
School design should consider future needs and take a whole-of-life-cycle approach underpinned by site wide strategic and spatial planning. Good design for schools should deliver high environmental performance, ease of adaptation and maximise multi-use facilities.	Large and flexible multi-purpose spaces are generally proposed that are suitable for a variety of uses and offers the school the maximum flexibility. These larger spaces allow the school to accommodate uses such as meetings, music and drama rehearsals, examinations, flexible learning spaces, etc. They also allow the school to adapt these spaces as learning needs change into the future. The proposed 2040 Masterplan and Stage 1 Wilkinson House redevelopment has been designed to consider a whole-of-lifecycle approach in consideration of a wider public and environmental benefit over time. Whole-of-lifecycle initiatives include: • External materials that are robust, durable and low maintenance. • Incorporation of PV panels on the roof to supplement energy consumption. • Rainwater harvesting.
Principle 7—aesthetics	
School buildings and their landscape setting should be aesthetically pleasing by achieving a built form that has good proportions and a balanced composition of elements. Schools should respond to positive elements from the site and surrounding neighbourhood and have a positive impact on the quality and character of a neighbourhood. *The built form should respond to the existing or desired future context, particularly, positive elements from the site and surrounding neighbourhood, and have a positive impact on the quality and sense of identity of the neighbourhood.*	**Concept Masterplan** The facade composition and materiality for each building is to respond to the surrounding development, urban context and unique environmental conditions as per the suggested design guidelines (**Appendix D**), to be detailed within the subsequent Detailed SSD DA. **Wilkinson House Detailed Proposal** The proposed new Wilkinson House building has been designed to provide contemporary and flexible learning spaces. The new Wilkinson House building proportion directly responds to the scale of the existing Wilkinson House building and surrounding building heights. The materials and finishes proposed for the new building are durable and have been selected to complement the character of the existing school campus and surrounding locality. Specifically, face brickwork is proposed to the lower levels of the building addressing the street. The

Control	Response
	building above these levels feature large areas of glazed windows where facing existing school buildings, and sandstone cladding to provide fenestration and privacy on the eastern façade.

4.2.3.1. Development Standards

The amended design proposal exceeds the maximum building height control under the SLEP 2012, as the proposed new Wilkinson House building and the revised multi-purpose building both comprise a building height greater than 15m when measured from existing ground level. Each of these buildings replace existing buildings that currently exceed the 15m development standard for building height (and pre-date the introduction of the standard in the SLEP 2012).

Clause 42 of the Education SEPP allows the proposal to contravene a development standard imposed by the SLEP 2012 as follows:

> ***State significant development for the purpose of schools—application of development standards in environmental planning instruments***
>
> *Development consent may be granted for development for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted.*

As stated in **Section 3.1.1**, while we are of the view that a clause 4.6 variation request is not required to be, a request to vary the height control contained within the SLEP 2012 is provided at **Appendix E**. As outlined within the clause 4.6 variation, compliance with the development standard is unreasonable in the circumstances of the site.

4.2.3.2. Childcare Centre

The amended design proposal retains the proposed childcare facility as a proposed use within the Multi-purpose building, although at a reduced scale. Under the Education SEPP, a consent authority must take into consideration the Childcare Planning Guideline (**the Guideline**) when assessing a DA for a centre-based childcare facility. As determined under the Education SEPP, the Guideline will take precedence over a development control plan where there are inconsistencies in relation to controls for childcare facilities (with the exception of building height, rear and side setbacks and car parking rates).

Part 3 of the Guideline includes matters which must be considered by the consent authority when assessing a DA for a childcare facility. We note that the proposal for a childcare facility is contained only within the Concept SSD DA. While an assessment of the proposal under *Part 3* is provided in **Table 8**, further detail and assessment will be required as part of the future Detailed SSD DA.

Part 4 of the Guideline provides the requirements for internal and external areas of childcare facilities as per the National Quality Framework (**NQF**). The National Quality Framework Assessment Checklist has been completed for the concept proposal to address the National Regulations, this is included in **Table 9**.

Table 8 – Part 3 - Matters for Consideration

Matters for Consideration	Proposed	Complies
3.1 Site selection and location		
Objective: To ensure that appropriate zone considerations are assessed when selecting a site.	The proposed childcare centre is located within the boundaries of an existing school. There are no external noise sources, odour sources or licensed premises located nearby.	✓
Objective: To ensure that the site selected for a proposed childcare facility is suitable for the use.	A childcare centre is a compatible use with the existing school. It will be a purpose-built facility	✓

Matters for Consideration	Proposed	Complies
	within a new building. The surrounding area is residential in nature will not be adversely impacted by the proposal once noise and privacy mitigation measures are finalised during the detail design stage of the multi-purpose building.	
Objective: To ensure that sites for childcare facilities are appropriately located.	The childcare centre is co-located with an existing school and is in close proximity to multiple methods of public transport and high levels of pedestrian connectivity.	✓
Objective: To ensure that sites for childcare facilities do not incur risks from environmental, health or safety hazards.	The proposed childcare is not in proximity to risks from environmental, health or safety hazards.	✓
3.2 Local character, streetscape and the public domain interface		
Objective: To ensure that the childcare facility is compatible with the local character and surrounding streetscape.	The childcare centre will be a purpose-built facility inside a new building that has been designed to respond to the heritage character of the area. The proposed multi-purpose building has been reduced in scale compared to the submitted development to minimise external environmental impacts and complement the surrounding area. Car parking for the childcare centre will be located within the proposed basement of the multi-purpose building with proposed off-street pick-up and drop-off areas.	✓
Objective: To ensure clear delineation between the childcare facility and public spaces.	The proposed building envelope of the multi-purpose building is designed to respond to the character of the surrounding. Access to the facility however is intended to be within the envelope of the new multi-purpose building, with clear delineation between School and childcare access.	✓
Objective: To ensure that front fences and retaining walls respond to and complement the context and character of the area and do not dominate the public domain.	The interface with the community will be determined during the Detailed DA. The building envelope of the multi-purpose building is designed to respond to the area.	✓
3.3 Building orientation, envelope and design		
Objective: To respond to the streetscape and site, while optimising solar access and opportunities for shade.	The proposed childcare centre is designed to be orientated towards the north and the west of the multi-purpose building to allow for maximum solar access. The southern side of the building is predominantly used for circulation or support spaces to prevent privacy issues to adjoining residences on Thomson Street and Thomson Lane.	✓

Matters for Consideration	Proposed	Complies
	As the childcare centre is located on the upper floor of the Multi-purpose building and any required wind and climate mitigation measures required will be determined during the Detailed DA..	
Objective: To ensure that the scale of the childcare facility is compatible with adjoining development and the impact on adjoining buildings is minimised.	The childcare centre will be a purpose-built facility inside a new building that has been designed to respond to the heritage character of the area.	✓
Objective: To ensure that setbacks from the boundary of a childcare facility are consistent with the predominant development within the immediate context.	The childcare centre is included within a larger development. The multi-purpose building has been designed to integrate into the surrounding area. Setbacks to upper levels to minimise overlooking, view and privacy impacts to neighbouring dwellings.	✓
Objective: To ensure that the built form, articulation and scale of development relates to its context and buildings are well designed to contribute to an area's character.	The childcare centre will be a purpose-built facility inside a new building that has been designed to respond to the heritage character of the area. The proposed amended multi-purpose building has been reduced in scale to reduce external impacts and complement the surrounding area.	✓
Objective: To ensure that buildings are designed to create safe environments for all users.	Entry to the facility will be outlined within the Detailed DA, however we note that the access points is to be limited to one secure point which is: • Located to allow ease of access, particularly for pedestrians • Directly accessible from the street where possible • Directly visible from the street frontage • Easily monitored through natural or camera surveillance • Not accessed through an outdoor play area • Clearly defined and separate from entrances to other uses in the building	✓
Objective: To ensure that childcare facilities are designed to be accessible by all potential users.	Internal accessibility will be determined during the detail design stage. The multi-purpose building is being built in order to bring the school up to current learning and building standards. The building will comply with all relevant access and construction standards as current at the time of the Detailed DA.	✓

Matters for Consideration	Proposed	Complies
3.4 Landscaping		
Objective: To provide landscape design that contributes to the streetscape and amenity.	Principles for landscaping for the multi-purpose building are included in the Concept SSD DA. Landscaping for the childcare centre specifically will be determined during the detail design.	✓
3.5 Visual and acoustic privacy		
Objective: To protect the privacy and security of children attending the facility.	Topography of the site and neighbouring dwelling means that indoor and outdoor play areas will not be overlooked from neighbouring properties.	✓
Objective: To minimise impacts on privacy of adjoining properties.	The multi-purpose building has been designed that overlooking in minimised through orientation of windows and landscaping.	✓
Objective: To minimise the impact of childcare facilities on the acoustic privacy of neighbouring residential developments.	Any additional noise mitigation measures required to minimum noise will be included during the detail design stage. As described at **Appendix J**, child care facilities are not classified as 'acoustically significant' and as such the acoustic impacts associated with the proposed use are not considered unable to be contained within the fabric of the future building with typical mitigation measures.	✓
3.6 Noise and air pollution		
Objective: To ensure that outside noise levels on the facility are minimised to acceptable levels.	The outdoor and indoor play areas are orientated away from residential noise receivers at Thomson Street and Thomson Lane. Noise mitigation measures from the childcare centre for residences on Bourke Street will be determined during detail design if required. General mitigation measures that will be implemented if required: • The use of planters and balustrades to create a setback to roof terrace edges to prevent overlooking; and • The use of privacy screens. An Acoustic Report will be prepared to accompany with Detailed DA for the multi-purpose building.	✓
Objective: To ensure air quality is acceptable where childcare facilities are proposed close to external sources of air pollution such as major roads and industrial development.	The proposed childcare centre is not located in close proximity to external sources of air pollution such as major roads or industrial development.	✓

Matters for Consideration	Proposed	Complies
	An air quality assessment can be prepared if required at the detail design stage.	
3.7 Hours of operation		
Objective: To minimise the impact of the childcare facility on the amenity of neighbouring residential developments.	It is anticipated that the proposed childcare centre will operate between the hours of 7:00am to 7:00pm, as per the requirements of the guideline.	✓
3.8 Traffic, parking and pedestrian circulation		
Objective: To provide parking that satisfies the needs of users and demand generated by the centre.	The required parking for the childcare centre has been provided in accordance with the rates found in the SDCP 2012 and is located in the basement parking area. A Revised Traffic Impact Assessment has been prepared to accompany this RTS to support the number of parking spaces provided (**Appendix H**). A building specific traffic and parking study will be undertaken to inform the Detailed DA.	✓
Objective: To provide vehicle access from the street in a safe environment that does not disrupt traffic flows.	The childcare centre will be accessible from both the street and the proposed basement parking area. Exact pathways of travel from the parking area will be determined for the Detailed DA.	✓
Objective: To provide a safe and connected environment for pedestrians both on and around the site.	The childcare centre will be accessible from both the street and the proposed basement parking area. A safe and separated pedestrian external entranceway will be provided. Exact pathways of travel from the parking area will be determined for the Detailed DA.	✓

Table 9 – Part 4 – Applying the National Regulations to Development Proposals

Matters for Consideration	Proposed	Complies
104. Fencing or barrier that encloses outdoor spaces.		
Outdoor space that will be used by children will be enclosed by a fence or barrier that is of a height and design that children preschool age or under cannot go through, over or under it.	Any fencing will be designed to comply with the requirements for child safety. Exact specification of fencing will be determined during detail design.	✓
106. Laundry and hygiene facilities		
The proposed development includes laundry facilities or access to laundry facilities OR explain the other arrangements for dealing with soiled clothing, nappies and linen, including hygienic	Location and processes for the laundry facilities will be determined during detail design.	✓

Matters for Consideration	Proposed	Complies
facilities for storage of soiled clothing, nappies and linen prior to their disposal or laundering. Laundry/hygienic facilities are located where they do not pose a risk to children		
107. Unencumbered indoor space		
The proposed development includes at least 3.25sqm of unencumbered indoor space for each child.	Required: 146.25sqm Provided: 148sqm	✓
108. Unencumbered outdoor space		
The proposed development includes at least 7sqm of unencumbered outdoor space for each child.	Required: 315sqm Provided: 315sqm	✓
109. Toilet and hygiene facilities		
The proposed development includes adequate, developmentally and age appropriate toilet, washing and drying facilities for use by children being educated and cared for by the service. The location and design of the toilet, washing and drying facilities enable safe and convenient use by the children.	The proposed childcare centre will provide adequate bathroom facilities and change areas for use by children. Details of bathroom facilities will be determined during detail design.	✓
110. Ventilation and natural light		
The proposed development includes indoor spaces to be used by children that — • will be well ventilated; and • will have adequate natural light; and • can be maintained at a temperature that ensures the safety and well-being of children.	The indicative design for the childcare centre provided at Appendix D demonstrates that the proposed facility can be designed to be well ventilated with a narrow floor plate and north facing windows and outdoor areas.	✓
111. Administrative space		
The proposed development includes an adequate area or areas for the purposes of conducting the administrative functions of the service; and consulting with parents of children; and conducting private conversations.	The indicative floorspace allocation for the childcare centre provides approximately 700sqm of administrative, circulation and storage space for the purposes of the childcare centre. Details of exact allocation will be determined during detail design. The Amended Architectural Plans at **Appendix C** provide indicative plans for the layout of areas.	✓

Matters for Consideration	Proposed	Complies
112. Nappy change facilities		
The proposed development includes an adequate area for construction of appropriate hygienic facilities for nappy changing including at least one properly constructed nappy changing bench and hand cleansing facilities for adults in the immediate vicinity of the nappy change area. The proposed nappy change facilities can be designed and located in a way that prevents unsupervised access by children.	The proposed childcare centre will provide adequate nappy change facilities and cleaning areas. Details of nappy change facilities will be determined during detail design.	✓
113. Outdoor space—natural environment		
The proposed development includes outdoor spaces that will allow children to explore and experience the natural environment.	The indicative layout of the childcare centre provides 255sqm of covered outdoor and 60sqm of uncovered outdoor play area. Composition and activities within outdoor play areas will be determined during detail design.	✓
114. Outdoor space—shade		
The proposed development includes adequate shaded areas to protect children from overexposure to ultraviolet radiation from the sun.	The indicative layout of the childcare centre provides 255sqm of covered outdoor and 60sqm of uncovered outdoor play area.	✓
115. Premises designed to facilitate supervision		
The proposed development (including toilets and nappy change facilities) are designed in a way that facilitates supervision of children at all times, having regard to the need to maintain the rights and dignity of the children.	The proposed centre will be designed to provide maximum supervision of children to all area by staff. Details will be determined during detail design.	✓
97 and 168. Emergency evacuation procedures		
Facility design and features should provide for the safe and managed evacuation of children and staff from the facility in the event of fire or other emergency. An emergency and evaluation plan should be submitted with a DA and should consider the location of a safe congregation point and how children will be supervised during an evacuation event.	Evacuation procedures will be determined during detail design.	✓

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

State Environmental Planning Policy No.55 – Remediation of Land (SEPP 55) provides a state-wide planning approach for the remediation of land and aims to promote the remediation of contaminated land to reduce the risk of harm to human health or the environment. Clause 7(1) requires the consent authority to consider whether land is contaminated prior to the issuance of consent to a DA.

A Preliminary Site Investigation Report and a Geotechnical Report accompanied the EIS, the proposed amendments will not have any additional impacts upon the findings within those reports.

In response to submissions a Detailed Site (Contamination) Investigation report has been prepared for the detailed proposal of Wilkinson House by Douglas Partners at **Appendix L**, assessment of the findings are found in **Section 5.3.3**.

4.2.5. State Environmental Planning Policy No.64 – Advertising and Signage

The *State Environmental Planning Policy No.64 – Advertising and Signage* aims to ensure that signage is compatible with the desired amenity and visual character of an area, provides effective communication in suitable locations, and is of high-quality design and finish.

The proposed concept plan and amended design does not seek detailed planning approval for any informational directional or wayfinding signs. Any future Detailed DA for informational, directional, and wayfinding signages to be proposed will be assessed against the assessment criteria on Schedule 1 of the SEPP. There is no advertising signage proposed within the Concept SSD DA or detailed proposal for Wilkinson House.

4.2.6. Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005

SCEGGS Darlinghurst is located within the Sydney Harbour Catchment, as indicated in the map of Gazette No 38 of 7 April 1989 at page 1841. The *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005* aims to ensure that the catchment, foreshores, waterways and islands of Sydney Harbour are recognised, protected, enhanced and maintained for existing and future generations.

The proposed amendments will not have any further impacts upon the biodiversity, ecology and environment protection, and the maintenance, protection and enhancement of views compared to those considered in the EIS.

4.2.7. Sydney Local Environmental Plan 2012

Sydney Local Environmental Plan 2012 (**SLEP 2012**) is the principal environmental planning instrument governing development at the site. An assessment against the relevant controls of the SLEP 2012 has been undertaken in the subsections below.

4.2.7.1. Land Zoning and Permissibility

The site is zoned R1 General Residential within the SLEP 2012. The proposed land uses include '*educational establishment'* and '*early education and care facility*' which are permissible with development consent in the R1 General Residential zone. The proposal is consistent with the objectives of the R1 General Residential zone as it:

- Provides non-residential land uses that provide facilities or services to meet the day to day needs of residents; and
- Maintains the existing footprint and boundary of the SCEGGS Darlinghurst main school campus and does not seek to alter the predominant residential land use pattern of the locality.

4.2.7.2. Development Standards

Notwithstanding clause 42 of the Education SEPP allows the proposal to contravene a development standard imposed by the SLEP 2012 or any other environmental planning instrument, the proposed design amendments has been assessed against the relevant SLEP 2012 development standards in **Table 10**.

Table 10 – Relevant SLEP 2012 Development Standards

Consideration	Control	Proposal	Compliance
Clause 4.3 **Height of Buildings**	Maximum 15 metres. Thomson Place is subject to an 18m height control.	The amended design of the multi-purpose building projects above the 15m height control as shown in **Section 3.1.1** due to the significant fall across the site and varying ground levels. The proposed amended design is reduced in height than the submitted design and is below that of the existing building. The multi-purpose building is generally in accord with the maximum height control when measured from the average ground level for that part of the site. As such, while projections occur above the 3D height plane, it is considered that the proposed design amendments to the multi-purpose building is generally consistent with the objectives and overall height control across the site. Further, the existing and proposed new Wilkinson House building has a minor projection to the 3D height plane as the existing ground level falls to the west. A Clause 4.6 report accompanies this RTS at **Appendix E**. The maximum building height non-compliance for Wilkinson House and the multi-purpose building does not have any additional significant impacts upon neighbouring dwellings.	No – Refer to **Section 3.1.1** of this RTS and **Appendix G**.
Clause 4.4 **Floor Space Ratio (FSR)**	Maximum FSR of 1.5:1 for the majority of the site. The Joan Freeman Science Building site is subject to FSR control of 2:1. Thomson Place has an FSR control of 1.75:1.	Based on a site area of 11,519sqm and the varying FSR controls for the site, the maximum available GFA available on the site is 17,729sqm. The proposed design amendments result in a total GFA of 17,267.6 sqm across the site the subject of this SSD DA.	✓
Clause 5.10 **Heritage Conservation**	The SCEGGS Darlinghurst site is identified as a local heritage item (no. I301) within the C13: East Sydney Conservation Area. It is also located within the vicinity of a number of local and state significant heritage items.	The submitted proposal includes demolition works within the school site (heritage item), including buildings specifically identified within the heritage listing (Wilkinson House). This RTS provides additional justification for the decision for a replacement over the alternative options. The demolition and construction of a new building in the place of Wilkinson House is concluded to be the most appropriate outcome for the 2040 Masterplan. The amended building envelope for the proposed administration building achieves the objectives of this clause through the:	Partially. Refer to **Appendix E**, **Appendix D** and **Section 3.1.5.2** of this RTS.

Consideration	Control	Proposal	Compliance
		• Consolidation of a building envelope that assists in reinforcing the existing character of Barham House • Consolidation of a building envelope which reinforces and enhances the street frontage along Forbes Street. The amended building envelope for the proposed multi-purpose building achieves the objectives of this clause through: • Retention of the significant fabric of the Chapel Building, including the original entry porch. • Retention of the views to the Chapel Building and its entry porch from Forbes Street. • Retention of day light amenity to the Chapel, the key space in the Chapel Building. • Establishment of an envelope that is lower in height than the Chapel Building. • Establishment of a building envelope which retains the existing character of the Chapel Building. • Establishment of an envelope which is setback from Forbes Street. • Establishment of a building envelope that reinforces and enhances the street alignment of Bourke Street, and reduces potential impacts on nearby heritage items and the East Sydney Special Character and Conservation Area.	
Clause 6.21 **Design Excellence**	Development consent must not be granted for a development that requires a development control plan to be prepared unless a competitive design process has been held.	The proposed development present design excellence and is not required to conduct a competitive design process as it does not meet any of the required categories as explored in **Section 3.8**.	✓
Clause 7.9 **Car Parking**	The maximum number of car parking spaces for education facilities is 1 space for every 200sqm of GFA used for those purposes.	The School currently provides 112 off-street parking spaces. The amended design proposal seeks to maintain this number and relocate the car park off Forbes Street to within the multi-purpose building basement. The proposed basement car park will not increase the number of spaces associated with the School use. The seven spaces to be removed from the Forbes Street car park will be incorporated into the proposed basement. An	As per existing car parking provision (excluding new childcare spaces)

Consideration	Control	Proposal	Compliance
		additional five (5) parking spaces and seven (7) pick-up and drop-off spaces are associated with the childcare centre use in accordance with the Sydney DCP.	
Clause 7.14 **Acid Sulfate Soils**	The site is classified as having a low probability (6-7%) of Acid Sulfate Soils occurring.	The proposed design amendments do not impact the findings and impacts outlined in the EIS.	✓
Clause 7.15 **Flood Planning**	The flood planning level that applies to any flood affected lot is the level of a 1:100 ARI flood event plus 0.5m freeboard	As outlined in the Masterplan Stormwater and Flood Report that accompanied the EIS, the site is affected by a minor amount of flooding. An Additional Flood Statement has been prepared by TTW (**Appendix R**) which contains additional flood assessment and mitigation measures that have been incorporated into the design.	✓
Clause 7.20 Development requiring or authorising preparation of a DCP	A site specific DCP or Concept Plan application is required for a site exceeding 5,000sqm in area	The SSDA comprises a concept DA for the total main school campus and stratifies this requirement.	✓

4.2.8. Sydney Development Control Plan 2012

Sydney Development Control Plan 2012 (**SDCP 2012**) provides detailed controls for specific developments types and locations. Controls in the SDCP 2012 in part relate to character, streetscape and public domain works.

Clause 11 of SRD SEPP however makes explicit that development control plans **do not apply** to SSD DAs. This is further emphasised by clause 35(9) of the Education SEPP which states that a provision within a development control plan that specifies a 'standard', 'requirement' or 'control' **is of no effect** for development for the purposes of a school on land that is within the boundaries of an existing school.

Notwithstanding, the proposed design amendments have been considered against the primary guidelines of the SDCP 2012 that relate to the local context in the table below.

Table 11 – SDCP 2012 Compliance Table

Reference	Provision	Proposal	Compliance
Section 2 – Locality Statement			
2.4.9 East Sydney	Development is to respond to and complement heritage items and contributory buildings within heritage conservation areas, including streetscapes and lanes.	The proposed design amendments to the multi-purpose building and administration building have been made in response to submissions requesting a reduction in the scale and more appropriate response to the heritage character of the area. The proposed amendments reduce the impacts on the adjoining heritage items and heritage character. The multi-purpose building provides a	✓

Reference	Provision	Proposal	Compliance
		more sympathetic street frontage along Bourke Street than the existing building. The materiality of the proposed buildings reflects the materials used in neighbouring buildings in the streetscape.	
	Maintain the building heights of SCEGGS Darlinghurst to allow local views from adjacent houses along Thomson Street.	The amended design generally follows the building envelopes of existing buildings. The proposed buildings will not have any significant additional impacts upon views or overshadowing compared with existing site conditions.	✓
Section 3 – General Provisions			
3.2.1.1 Sunlight to publicly accessible spaces	Shadow diagrams are to be submitted indicate the existing condition and proposed shadows at 9am, 12 noon and 2pm on 14 April and 21 June.	Shadow Diagrams have been prepared by TKD Refer to **Appendix C**.	See **Section 5.2** of this RTS for further assessment.
3.2.1.2 Public views	Buildings are not to impede views from the public domain to highly utilised public places, parks, Sydney Harbour, Alexandra Canal, heritage buildings and monuments including public statues, sculptures and art.	The amended design does not impede views from public places. Potential view impacts on private properties are considered at **Section 5.3** of this report.	✓
3.2.2 Addressing the street and public domain	Buildings are to be designed to maximise the number of entries and visible internal uses at ground level.	The proposed design amendments do not include a change to building entrances as proposed in the submitted EIS. No building entrances are proposed to the street in the new Wilkinson House building for safety and perimeter considerations.	No – refer to the EIS.
3.2.7 Reflectivity	Light reflectivity from building materials used on facades must not exceed 20%.	The proposed façade of the new Wilkinson House building has been designed to include materials and finishes which cause minimal reflectivity. Future building design of the remaining buildings in the concept plan will be low reflective materials.	✓
3.3.1 Competitive Design Process	Development in which a DCP is required to be prepared under Clause 7.20 of the SLEP must be subject to a competitive design process.	Pursuant to clause 35(8) of the Education SEPP, the prerequisite does not apply.	N/A

Reference	Provision	Proposal	Compliance
3.5.2 Urban Vegetation	Development applications are to include a Landscape Plan, except where they are for single dwellings, terraces and dual occupancies. Locally indigenous species are to be used where possible and in accordance with the City's Landscape Code.	A Revised Landscape Plan is attached at **Appendix K**. The plan proposes to plant various native Australian plants, trees and vegetation species throughout the site in accordance with the City of Sydney's Landscape Code.	✓
3.6 ESD	Development is to be designed and constructed to reduce the need for active heating and cooling. Apply principles and processes that contribute to ESD. Generally, water used for irrigation of public and private open space is to be drawn from reclaimed water or harvested rainwater sources.	The proposed design amendments will make no changes to the overall ESD compliance. The ESD Report prepared by Erbas dated October 2018 confirms that the proposal has been generally designed to the City of Sydney and NSW Government's requirements for sustainability including an equivalent 4 Star Green Star Rating. Additional information about ESD compliance as requested in submissions can be found in **Appendix A** and **Appendix B**.	✓
3.7 Water and Flood Management	Apply sustainable water use practises. Assist in the management of stormwater to minimise flooding and reduce the effects of stormwater pollution on receiving waterways. Ensure that development manages and mitigates flood risk	The proposal has been suitably designed to manage stormwater discharge and prevent adverse flood impacts. The Additional Flood Statement provides additional flood mitigation measures. Refer **Section 5.8** of this report.	✓
3.9.1 Heritage Impact Assessment	Where the development application proposes the full or substantial demolition of a heritage item, the Heritage Impact Statement is to: • demonstrate why the building is not capable of retention or re-use • include a statement from a quantity surveyor comparing the cost of demolition to the cost of retention if the demolition is recommended primarily on economic grounds	A Heritage Impact Statement by TKD Architects dated January 2019 contained an options analysis with specific consideration of the heritage impacts for the proposed demolition of Wilkinson House. Additional information regarding the demolition of Wilkinson House can be found in **Section 3.3.1**. The assessment concludes that the replacement of Wilkinson House is the best option for the 2040 Masterplan.	✓

Reference	Provision	Proposal	Compliance
3.11.1 Managing Transport Demand	A Transport Impact Study is required to address the potential impact of the development on surrounding movement systems	A Traffic Impact Assessment accompanied the EIS. A Revised Traffic Impact Assessment (**Appendix H**) and Traffic and Pedestrian management Plan (**Appendix I**) accompany this report. Refer **Section 0** of this report for discussion.	✓
3.11.3 Bike Parking and Associated Facilities	Provide 1 space per 10 staff and 1 space per 10 students on-site.	As the proposal does not involve an increase in students or staff numbers, additional bicycle facilities are not required. Existing facilities will be utilised. Additionally, the proposed multi-purpose building basement parking area will have capacity to accommodate and additional 50 bicycle spaces in the form of 25 bicycle rails. For the childcare centre three (3) spaces are required and four (4) have been provided within the indicative basement car park design.	✓
3.12 Accessible Design	All development must comply with: All Australian Standards relevant to accessibility, the Building Code of Australia access requirements, and Disability Discrimination Act 1992.	The proposed design amendments are inclusively designed in accordance with the relevant Standards. Refer to the Accessibility Assessment dated November 2018 and BCA Assessment Report dated November 2018 that accompanied the EIS.	✓
3.13.1 CPTED	The proposed development must be designed in accordance with the NSW Department of Planning and Environment's CPTED principles.	The proposal has been appropriately designed in accordance with the principles. The proposed design amendments will not impact upon the findings and recommendations made in the EIS.	✓
3.14 Waste Management	A Waste and Recycling Management Plan is to be submitted with the Development Application and will be used to assess and monitor the management of waste and recycling during construction and operational phases of the proposed development.	An Operational Waste Management Plan accompanied the EIS. The proposed design amendments will not change the findings in the plan.	✓

5. ASSESSMENT OF KEY ENVIRONMENTAL ISSUES

5.1. INTRODUCTION

This section of the Response to Submissions report provides a comprehensive environmental assessment of the proposed amended development against the SEARs dated 12 January 2018 and identified key issues by the DPIE.

In addition to addressing the submissions received as described in **Section 3** and **Appendix A** and **Appendix B**, the specialist technical reports provided at **Appendix D** – **Appendix W** provide an addendum assessment based on the revised development, and address the key issues identified in the SEARs and DPIE requests for additional information or assessment.

5.2. BUILT FORM AND URBAN DESIGN

The amended design proposal has been reduced in scale to respond to the submissions and better reflect the site topography and heritage character while adhering to the key urban design principles and functional requirements as outlined in the original EIS.

Further detailed aspects of the built form of the amended building envelopes of the multi-purpose building and administration building and materiality changes to new Wilkinson House are outlined in the following sections.

5.2.1. Streetscape Presentation and Character

The proposed design amendments seek to improve the presentation of the proposed works to the streetscape and integration with the heritage character of the locality. The proposed amendments have been made in order to improve the streetscape presentation and integration into the heritage character of the surrounding locality.

Potential Impacts

New Wilkinson House

The new Wilkinson House building has been designed to reflect the purpose of the building. It maintains the scale and proportions of the existing Wilkinson House building and surrounding building heights. The façade composition is in line with surrounding development, local urban context and unique environmental conditions.

The materials and finishes proposed for the new building are durable and have been selected to complement the character of the existing school campus and surrounding locality. The following design changes have been made:

- Revised materiality - Zinc cladding in the upper storey recess provides a higher quality material that will be enriched by the natural patina
- The glazing to the main circulation stair has been revised to provide a stronger glazed element. Through amending the recessed glazing to a projecting, frameless glazed bay and increasing its height the element becomes a more prominent, refined element to the Forbes St elevation.
- The brickwork and window reveals to the lower level of the building has been revisited to provide a more refined, higher level of detail. Vertical stainless-steel blades have been introduced to window reveals and brickwork panels, which mirror the treatment on the Joan Freeman Science and Technology Centre. The treatment provides a robust and durable finish at street level and has been stretcher bonded in accordance with the local context.
- Standardised aluminium louvres have been revised to provide a more robust and enhanced feature to the building. Randomised vertical stainless-steel blades tie in with the revised brickwork treatment, while reflecting the elevation treatment at upper levels. The vertical slot windows and louvres on the eastern facade to increase privacy of neighbours while maintaining natural light to the learning spaces.

The proposed materials and façade design have been refined and is in keeping with the local context and character of the St Peter's Street precinct and surrounding heritage character.

Administration Building

The street parapet has been lowered to the approximate gutter level of the adjacent Chapel Building. This creates an improved relationship between the two buildings without the loss of functional floorspace.

The reduced height establishes the Chapel Building as being more dominant within the streetscape. Maintaining the Chapel building as the prominent element of the streetscape assists with conserving the heritage character of the streetscape.

The proposed administration building will improve the presentation of the main SCEGGS entrance to Forbes Street without being an imposing element within the streetscape.

Multi-Purpose Building

The proposed design revisions to the built envelope of the multi-purpose building will improve the integration of the building with the Bourke Street streetscape and heritage character of the area. The overall scale of the building has been reduced to improve the interface with adjoining dwellings.

The new envelope will generally fit within the envelope of the existing Science and Library buildings in order to offset the loss of floorspace from the reduced design. The existing Science and Library buildings present a sheet 6-storey height to Bourke Street that is angled against the urban grain with a minimal setback. The proposed Bourke Street frontage has been modified to more closely align with the street and extend the form of the terrace houses to the north.

The 2-storey podium creates a consistent element joining the terraces to the Primary School and is in keeping with the scale of nearby buildings. The upper levels have a clear setback to improve the human scale at street level.

The reduced scale of the Bourke Street frontage improves the presentation to the streetscape and integration into the character of the area than the existing buildings.

The amendments to the envelope of the multi-purpose building involve minor amendments to the setbacks of the southern wall adjacent to Thomson Street and Thomson Lane. The setback has been reduced generally to 1m and 0m for the section abutting 2 Thomson Street. The modified setback generally aligns with the proposed southern basement boundary. The scale of the proposed multipurpose building at this setback is consistent with the existing Old Gym Building, currently within 1m from the site boundary.

5.2.2. Proposed Building Heights

The site is subject to a 15m maximum height of buildings control under the SLEP 2012. However, clause 42 of the Education SEPP allows for a school classified as SSD development to be granted consent even through the proposal would contravene a development standard imposed by an environmental planning instrument. Despite this, the proposed building form and massing has been prepared with consideration of the SLEP 2012.

Potential Impacts

New Wilkinson House

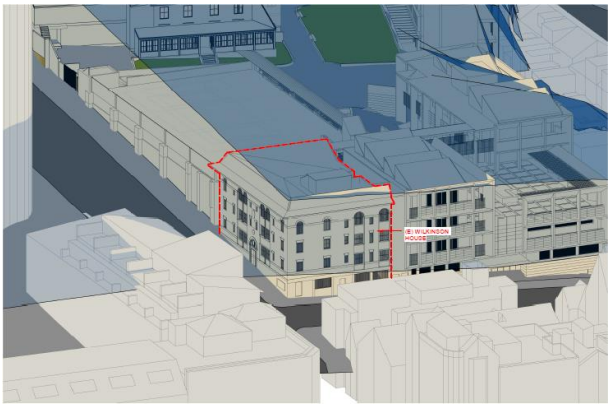
The design amendments to the proposed new Wilkinson House does not modify the building height as described in the EIS. The existing Wilkinson House building marginally exceeds the 15m height of building standard at the western corner of the St Peters Lane frontage due to the natural fall in the land.

The proposed Wilkinson House building will also exceed the 15m height of building standard at this location as shown in **Figure 16** The maximum height exceedance proposed for the proposed Wilkinson House building is 1.42m.

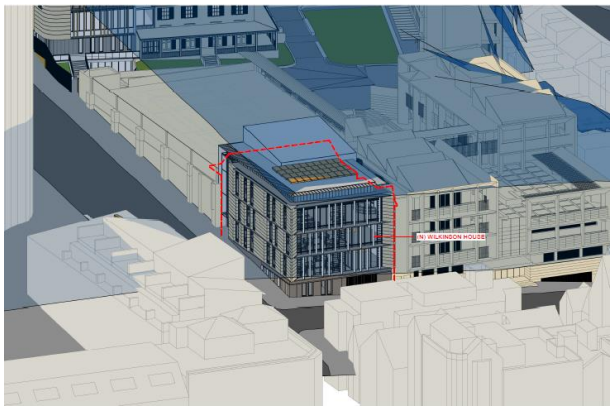
The slope of the land means that the plant room at the southern extent of the building does not exceed the height limit, despite appearances in **Picture 8**.

A Clause 4.6 variation request has been prepared to accompany this application at **Appendix G**.

Figure 16 – Proposed Variation to the Height of Building Standard – Wilkinson House



Picture 7 – Existing Northern Elevation



Picture 8 – Proposed Northern Elevation

Source: TKD Architects – Revised Architectural Plans

Administration Building

The proposed Administration building does not exceed the 15m maximum height limit. The amended design includes an increase in the overall height of the building from 12.7m to 13.4m to accommodate the plant room. Although, this increase in height will not be apparent from the street.

The height of the parapet at Forbes Street has been reduced from 12.7m to 11.7m to align with the eaves of the Chapel building.

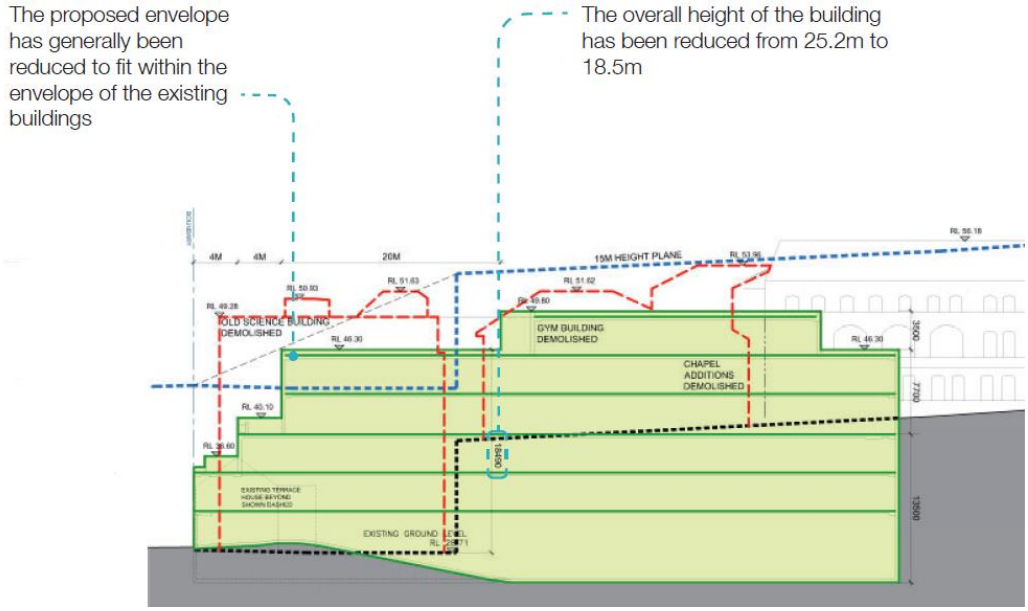
Multi-purpose Building

The existing Library and Science buildings fronting Bourke Street currently exceed the 15m height of building standard largely due to the fall in the land as a result of the historic cliff face present on the site.

The amended multi-purpose building will exceed the maximum height of building standard by 2.49m at the Bourke Street frontage. As illustrated at **Figure 17**, this height exceedance is less than the existing buildings fronting Bourke Street. As the site rises to the east, the building is significantly below the height limit and is lower than the height of the existing buildings.

The form above the maximum building height limit does not negatively affect views, privacy or overshadowing compared with the existing buildings as explored in **Section 5.3**. A clause 4.6 variation request has been prepared to accompany this application at **Appendix G.**

Figure 17 – Proposed East West Section – Proposed Multi-Purpose Building



Source: TKD Architects – Revised Architectural Design Report

5.3. ENVIRONMENTAL AMENITY

5.3.1. Solar Access and Overshadowing

Analysis on the potential overshadowing associated with the proposed amended built form of the multi-purpose building has been prepared by TKD Architects as part of the Revised Architectural Plans at **Appendix C**.

Methodology

Shadow diagrams have been provided for 9:00am, 12:00pm and 3:00pm on the spring, summer, autumn and winter solstices for the entire campus. Detail shadow diagrams have been prepared for every hour between 9:00am and 3:00pm on the winter solstice for Thomson Street and Thomson Lane.

Façade shadow diagrams of the Thomson Street terraces have been prepared for every half hour between 11:30am and 3:00pm. Diagrams begin at 11:30am as the Thomson Street dwellings are in full shadow up to 11:20am as the sun is behind the façade.

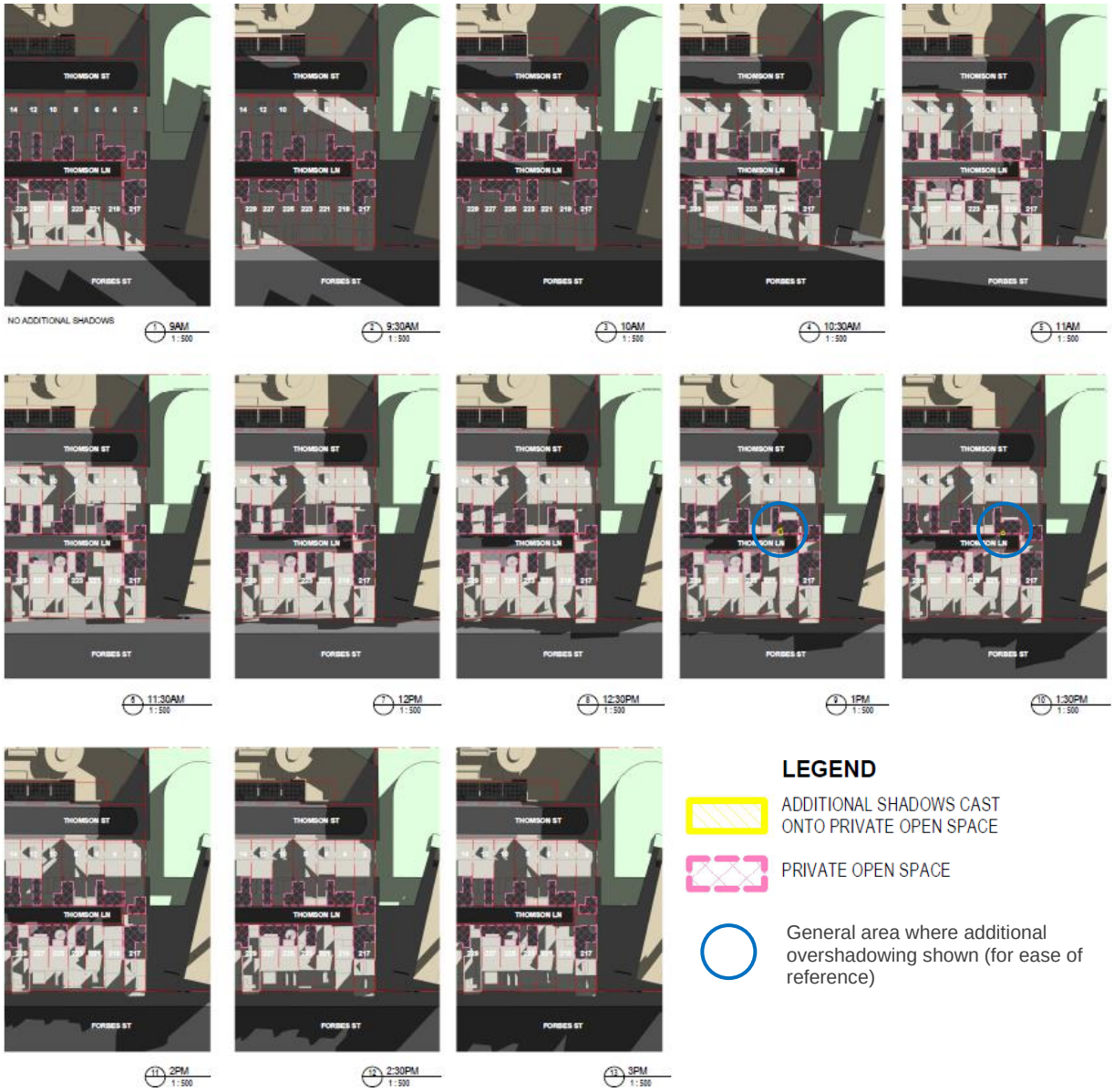
Potential Impacts

The prosed concept masterplan is anticipated to result in the following additional shadow impacts in winter:

- The new Wilkinson House building will cast marginal additional overshadowing to the basketball court and onto Forbes Street across the day, overshadowing will not impact adjacent properties.
- The proposed administration building will cast marginal additional overshadowing to the Chapel building and onto Forbes Street across the day, overshadowing will not impact adjacent properties.
- The proposed multi-purpose building casts additional shadows over the primary school buildings and minor overshadowing onto Thomson Street and Forbes Street.
- The proposed amended multi-purpose building is anticipated to result in the following additional shadow impacts to adjacent residential properties in mid-winter:
  - The amended design casts additional shadows into the rear private open space of 4 Thomson Street only at 1:00pm and 1:30pm. The additional overshadowing is of minimal impact to a small corner of the rear yard, and results in a minimal loss of solar access compared to existing (**Figure 18**).
  - The amended design does not cause any other additional overshadowing impacts to the private open spaces of Thomson Street and Thomson Lane terraces compared to the existing buildings (**Figure 18**).
  - The amended design casts minor amounts of additional shadows on the western façade of Thomson Street terraces from 11:30am to 3:00pm as shown at **Figure 19**. Compared with the existing shadow impacts, the amended design reduces the amount of shadows cast from 12:00pm to 3:00pm.
  - There is a large reduction in overshadowing to 4 and 6 Thomson Street after 1:00pm and a large reduction in overshadowing to 2 Thomson Street after 2:30pm. The balcony and window openings of 2 Thomson Street are currently significantly overshadowed, and the amended proposal reduces the overshadowing impacts in the afternoon on the upper portion of the roof (**Figure 19**).
  - The amended design casts a minimal amount of additional shadows to the façades of the Thomson Street terraces, but also reduces the amount of shadows to the same properties, resulting in net positive benefit to the properties (**Figure 19**).

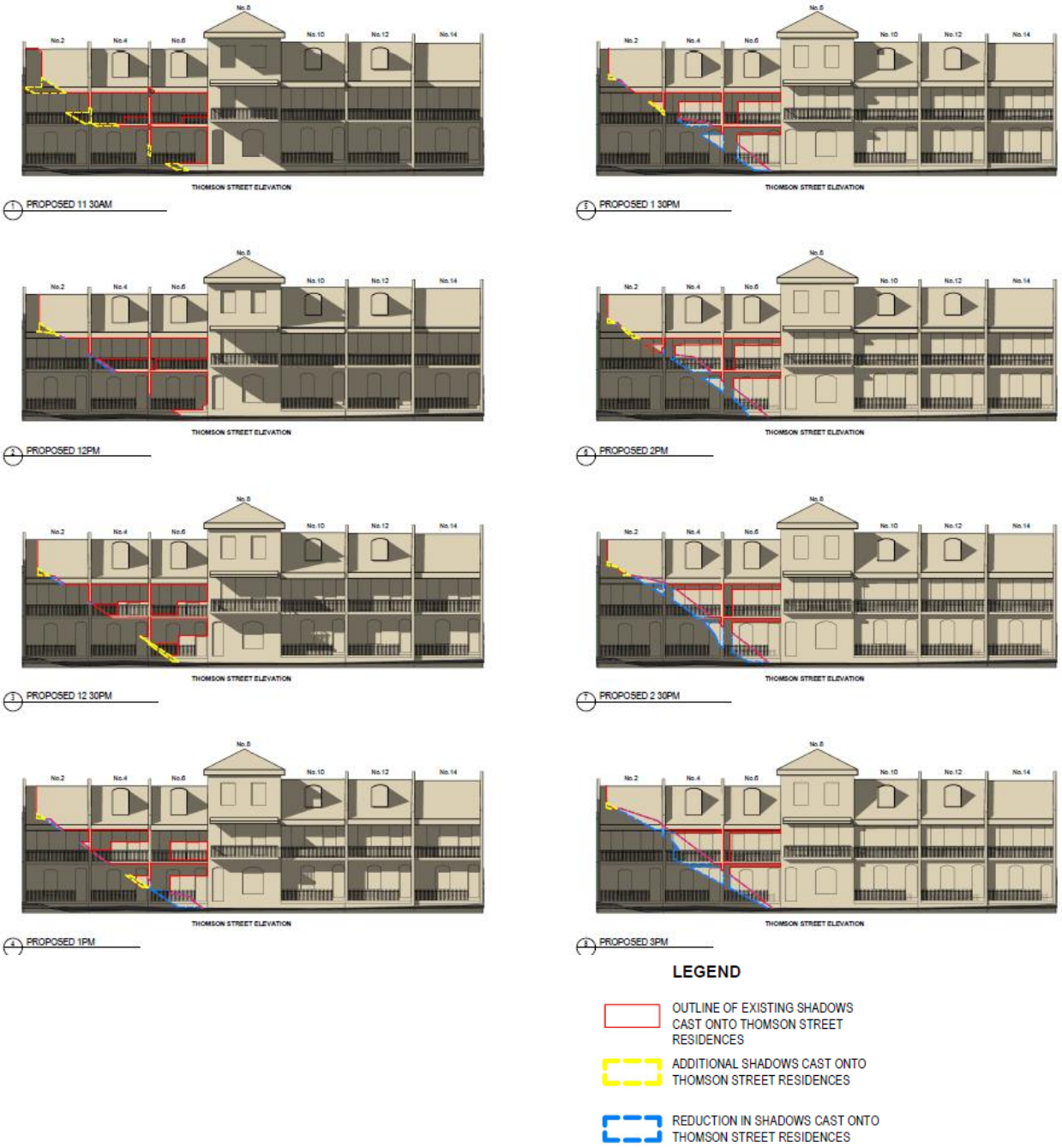
The proposed 2040 Masterplan results in minimal overshadowing impacts to adjacent development. The amended multi-purpose building has a net reduction in overshadowing impacts to the residents of Thompson Street and Thompson Lane compared with the existing.

Figure 18 – Shadow Diagram – Thomson Street and Thomson Lane Detail



Source: TKD Architects – Amended Architectural Plans

Figure 19 – Shadow Diagrams – Thomson Street Façade Detail



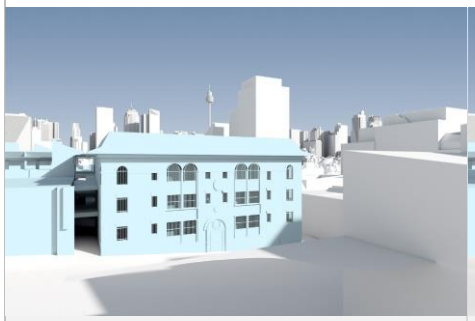
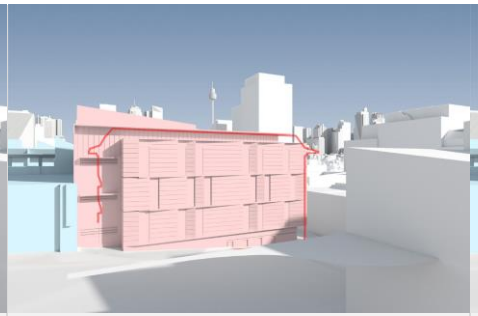
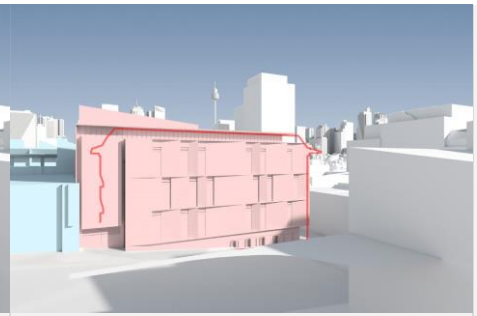
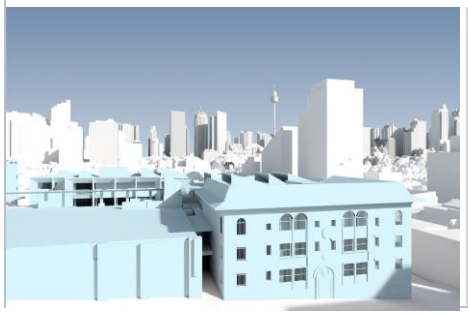
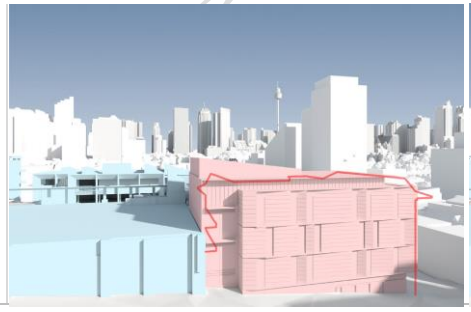
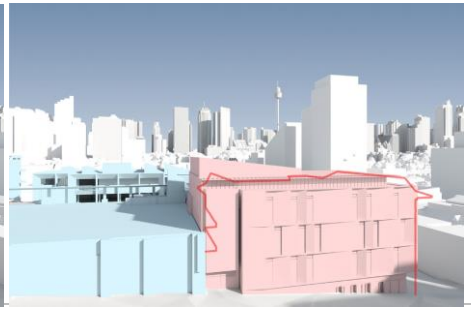
Source: TKD Architects – Amended Architectural Plans

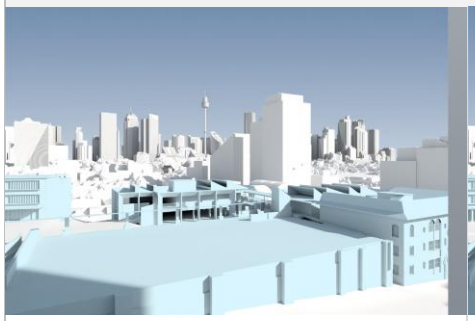
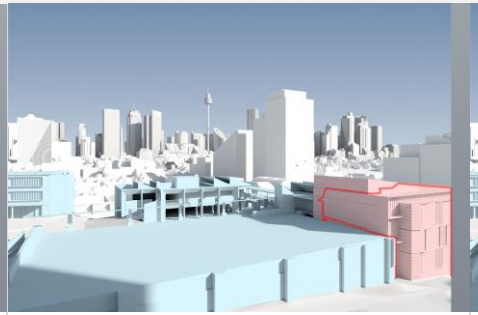
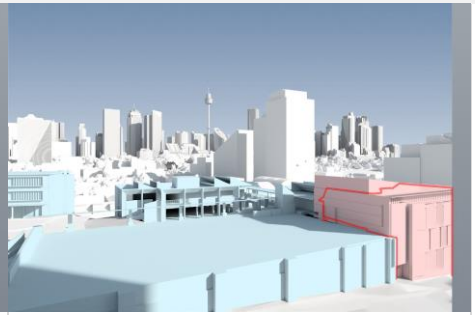
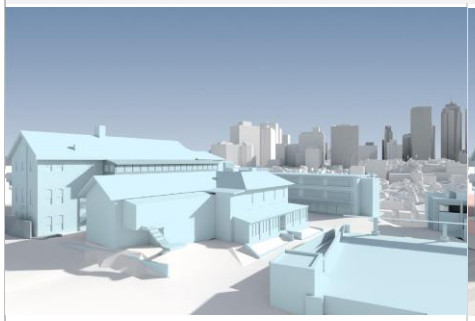
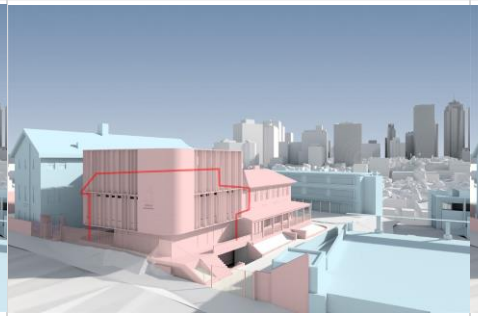
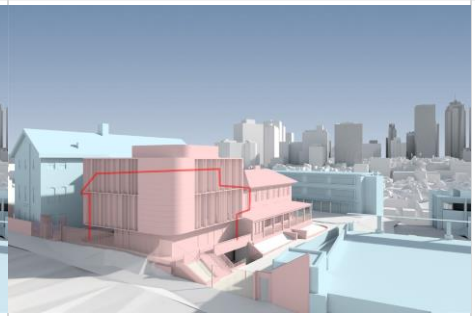
5.3.2. View and Visual Impacts

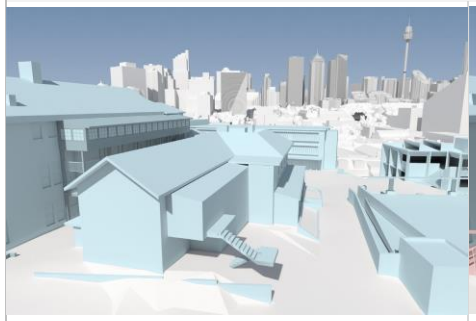
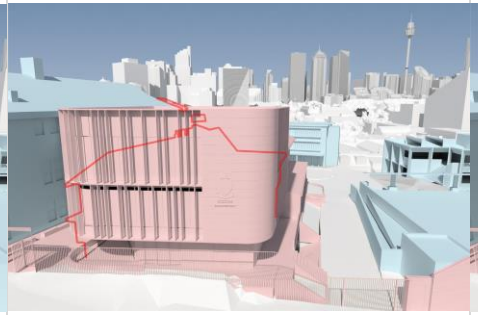
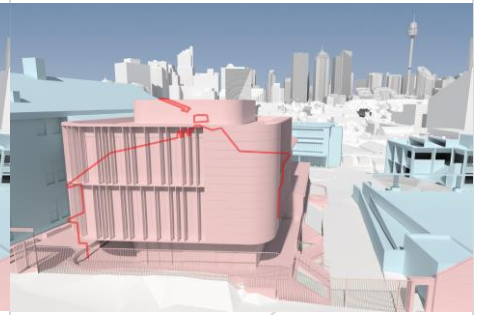
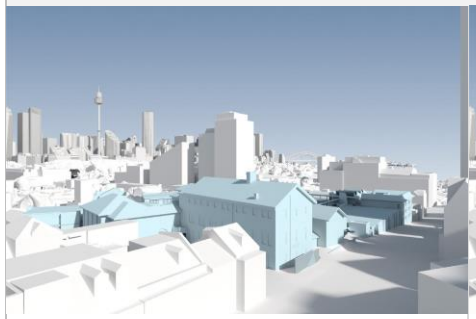
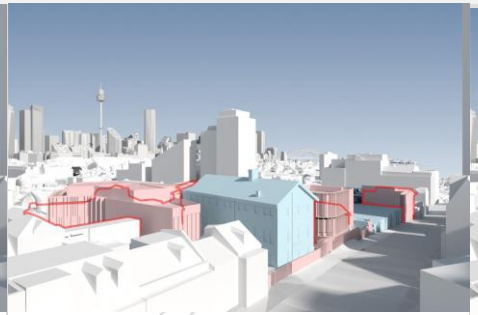
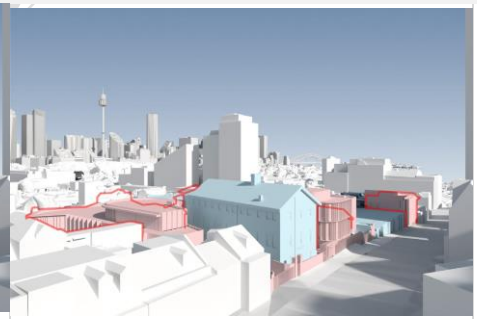
A Revised Visual Impact Study has been prepared by Virtual Ideas at **Appendix F** to assess the visual and view impact of the amended multi-purpose building design. The study involved the preparation of a 3D massing model of the existing, original proposal and amended proposal to show the potential view impacts to the Sydney skyline, Sydney Harbour glimpses, and local character views from the public domain and private residential dwellings.

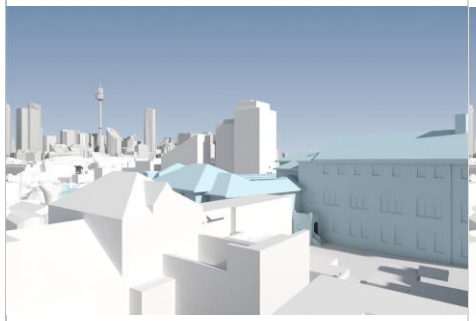
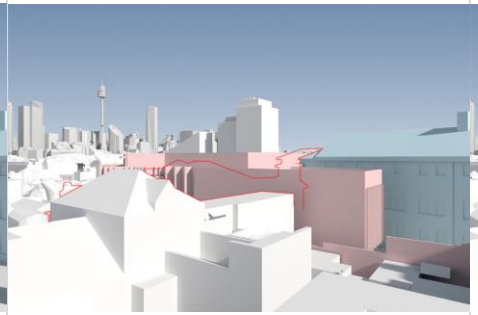
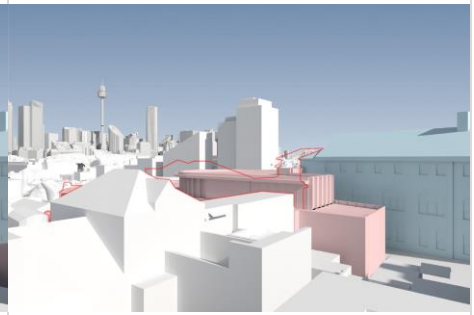
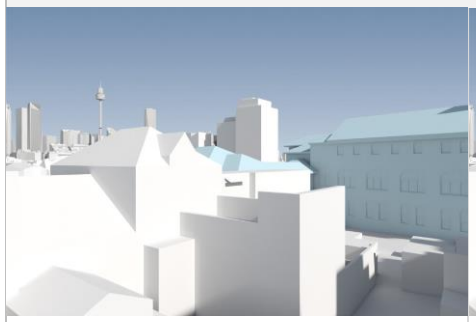
Table 12 provides an assessment of the potential view impacts identified to surrounding properties. The chosen views were determined on a selection of the most likely impacted dwellings and properties raised as having potential impacts during the response to submissions.

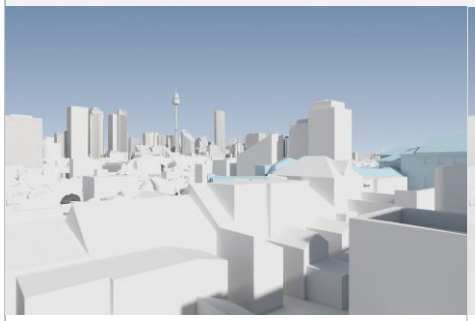
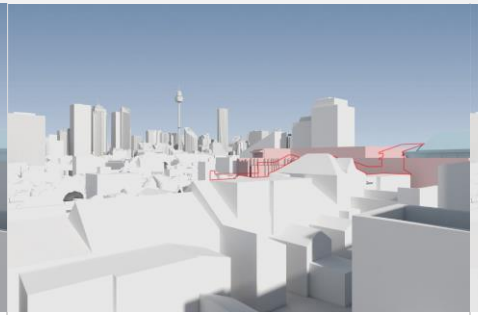
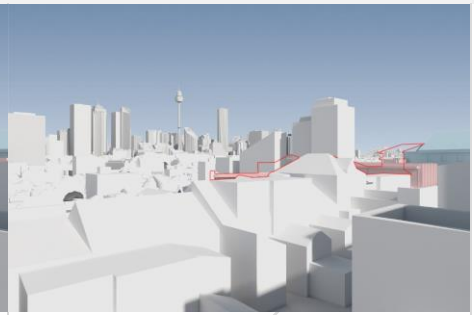
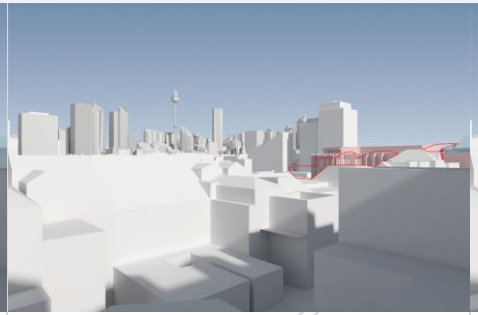
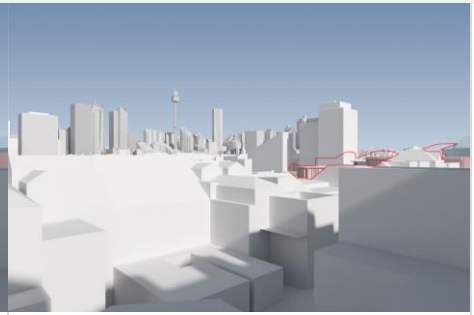
Table 12 – View Impact Assessment

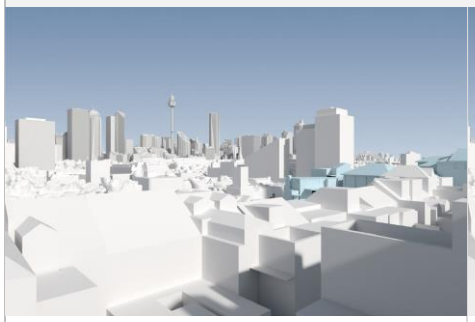
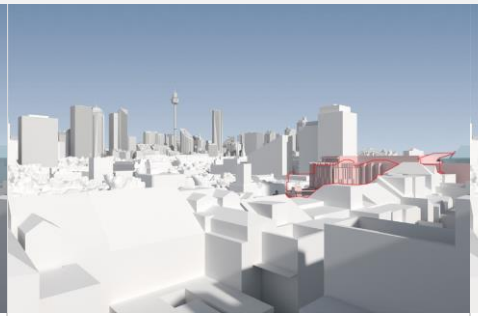
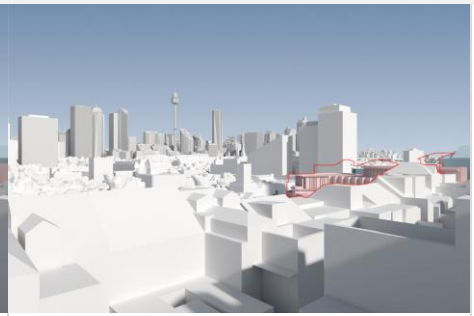
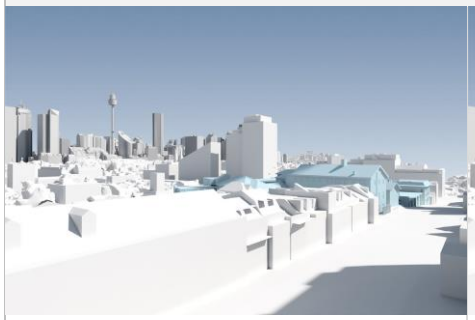
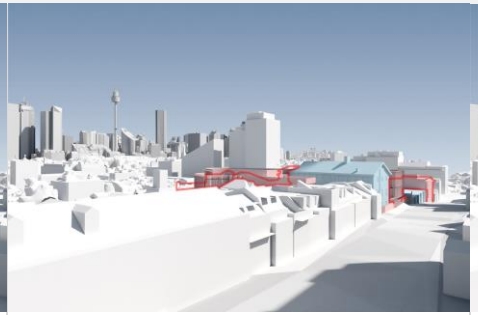
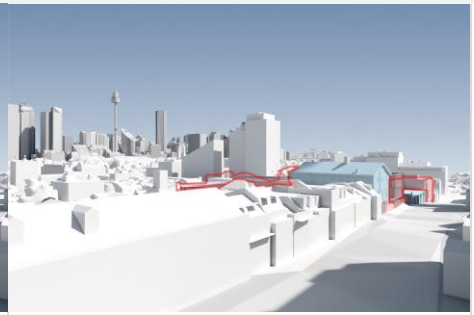
Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
The Horizon Apartments			
Level 2 Apartment 1 – RL 42.5			
			Potential for increased view impacts at Level 2 vantage point due to additional plant room associated with new building. Iconic views towards Centre Point Tower are not impacted, whereas minor impact associated with views towards distance city scale towers. Visual impact can be summarised as low-moderate. Given the low-moderate impact is a result of a building element that is compliant with the building height control, this impact is considered reasonable.
Level 4 – RL 48.5			
			The proposed development is a prominent feature of the streetscape, however, does not obstruct the important views of the Sydney skyline or any iconic buildings. View impact is summarised as low.

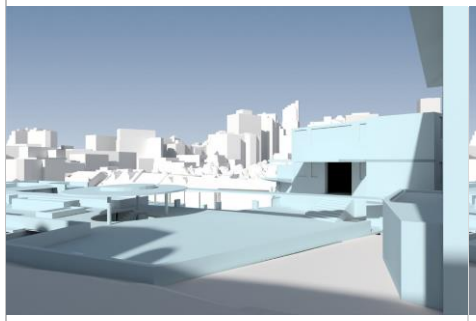
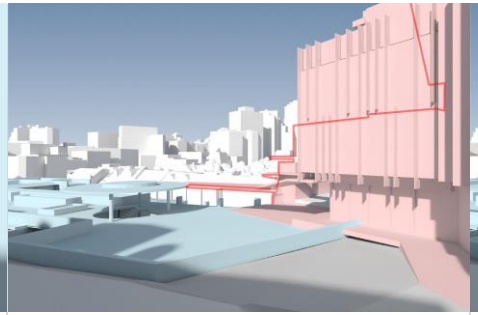
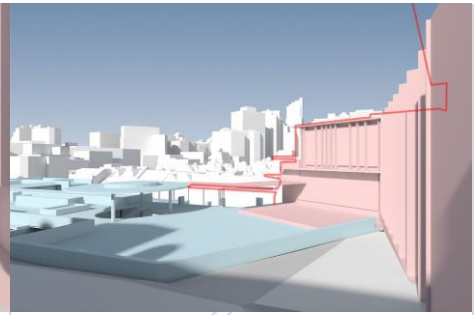
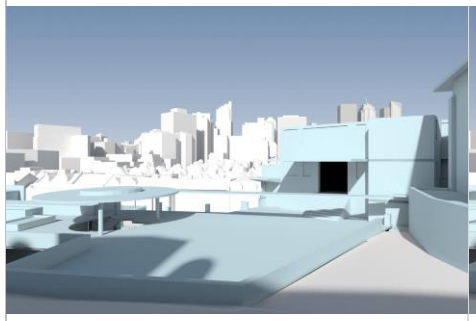
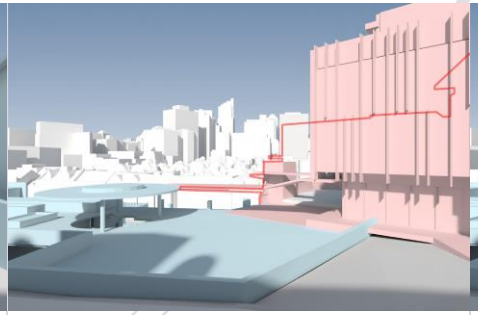
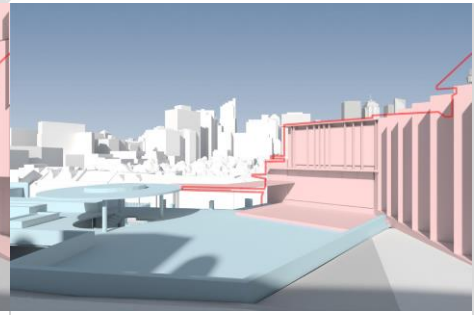
Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
Forbes Street			
186 Forbes Street – North – RL 51.6			
			Additional height of the proposed plant room slightly impacts non-iconic, regional views of the eastern CBD. View impact can be summarised as low. Given the low impact is a result of a building element that is compliant with the building height control, this impact is considered reasonable.
186 Forbes Street – South – RL 51.6			
			Impacts to views towards southern CBD are very limited, and there is no impact to any iconic views. While the new administration building results in additional building scale at Forbes Street, this building height is compliant with the relevant height control and has been revised to result in lower parapet height to align with the eaves of the Chapel building. As such the visual impact associated with the administration building is considered reasonable.

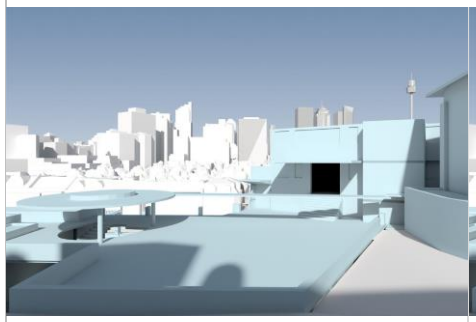
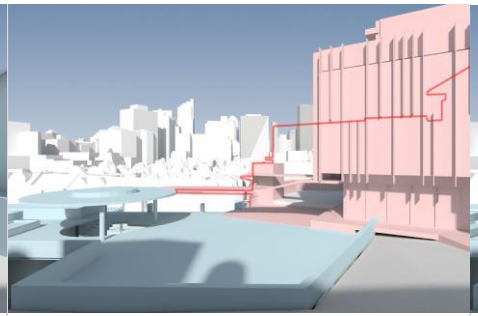
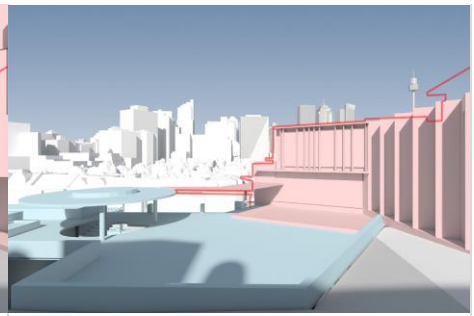
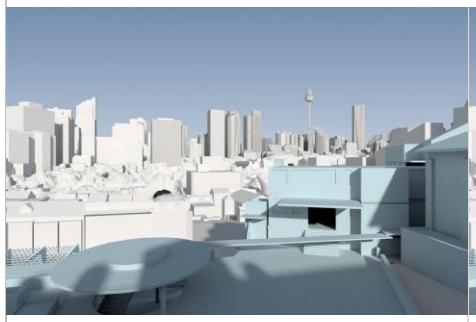
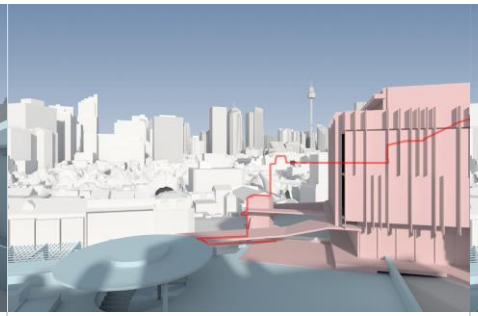
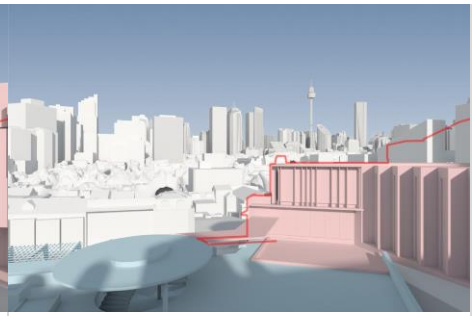
Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
188 Forbes Street – Northeast – RL 53.2			
			Administration building has potential for marginal view impacts towards the south-eastern CBD. The proposed building will not impact on views towards the Sydney skyline. Given the view impacts are not to any iconic building elements or iconic features (such as to open space or water views), the view impacts associated with the new administration building are considered low. Given the low impact is a result of a building element that is compliant with the building height control, this impact is considered reasonable.
200 Forbes Street – RL 65.0			
			Proposed multi-purpose building and new Wilkinson House have minimal view impacts from what is existing, regional views are not likely to be affected, with a small impact on views towards other SCEGGS buildings. Proposed administration building does not impede any existing view corridors. Proposed works are not likely to impact iconic or significant views towards Sydney Harbour, CBD or skyline. View impact summarised as low.

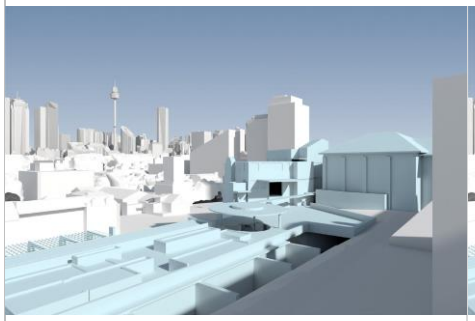
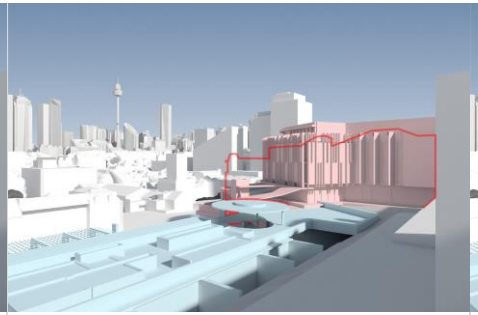
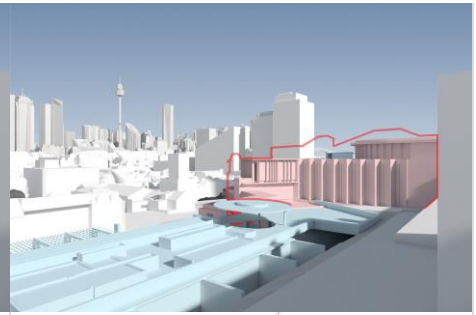
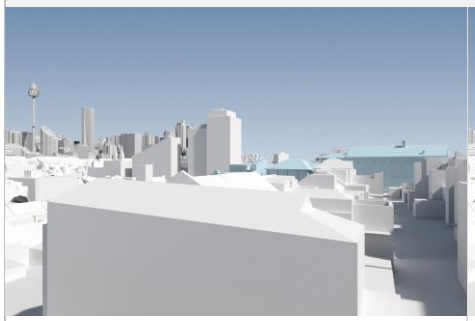
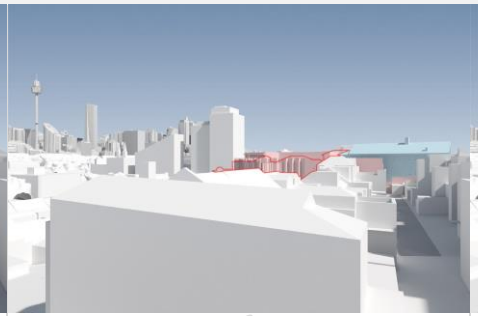
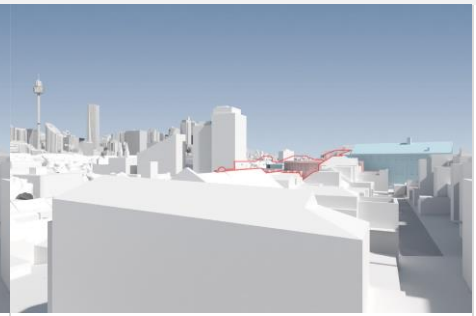
Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
227 Forbes Street – Roof Top – RL 52.2			
			Amended design of proposed multi-purpose building significantly reduces view impacts from original proposal. Amended design likely increases view lines towards Sydney Harbour Bridge from some properties on Forbes Street as shown in the model compared to existing building form. Amended design marginally obstructs visibility of nearby buildings. View impact can be summarised as low.
227 Forbes Street – Level 1 Balcony – RL 49.1			
			Amended design is similar in built form to the existing buildings and reduced from original proposal. Amended design marginally obstructs visibility of nearby buildings. View impact can be summarised as low.

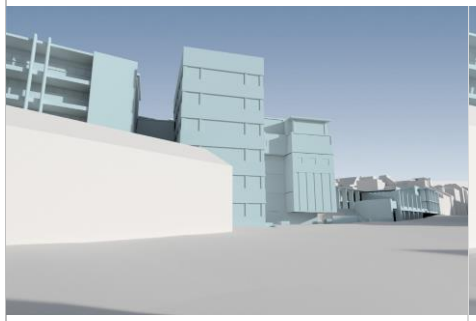
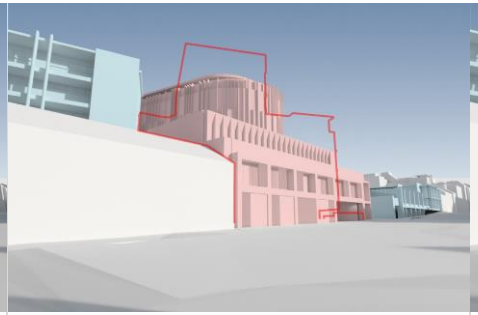
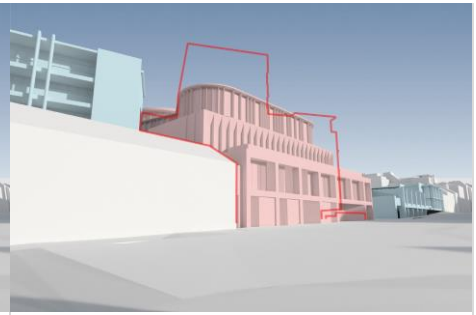
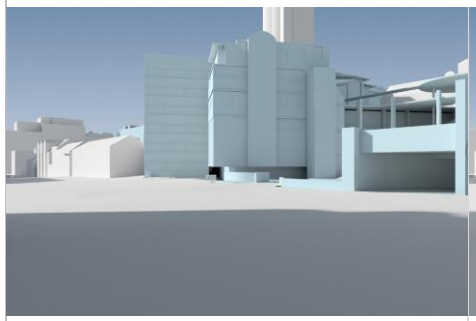
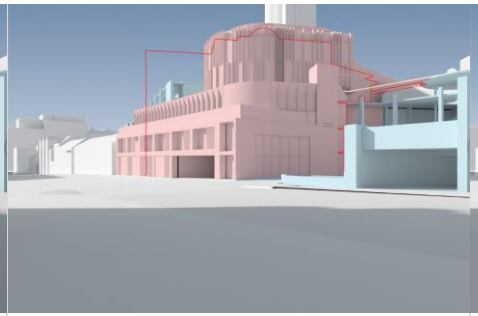
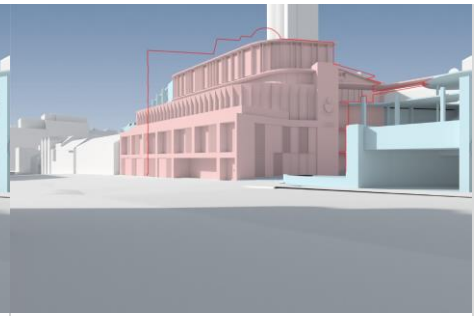
Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
237 Forbes Street – Top Level, Rear Elevation – RL 50.8			
			Amended design decreases view impact from original proposal. Amended design has potential to improve iconic views towards the Sydney Harbour Bridge. View impacts can be summarised as low to beneficial.
253 Forbes Street – Level 1, Rear Elevation – RL 49.5			
			Amended design decreases view impact from original proposal. Amended design has potential to improve iconic views towards the Sydney Harbour Bridge compared to existing view corridors. Amended proposal does not further impact upon views than the existing building from this vantage point. View impacts can be summarised as beneficial.

Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
253 Forbes Street – Attic Dormer Window, Rear Elevation – RL 52.1			
			Amended design significantly decreases view impact from original proposal. Amended design has potential to improve iconic views towards the Sydney Harbour Bridge. Amended proposal does not further impact upon views other than the existing building from this vantage point. View impacts can be summarised as beneficial.
262 Forbes Street – Mezzanine – RL 57.6			
			Proposed new buildings result in minimal view impacts from what is existing, and regional views are not adversely affected. Proposed works do not impact iconic or important views towards Sydney Harbour, CBD or skyline. View impact can be summarised as nil.

Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
Thomson Street			
2 Thomson Street – RL 43.0			
			The amended design significantly decreases the visual impact of the development from the original proposal. The amended design closely matches the built form of the existing building with potential for a small view impact towards the top of one building. Views impacted are minor and are not iconic views. While the proposed building is the dominate feature of this aspect, it does not extend significantly beyond the existing. View impact can be summarised as negligible.
4 Thomson Street – RL 43.0			
			The amended design significantly decreases the visual impact of the development from the original proposal. The amended design closely matches the built form of the existing building with a minor reduction in visibility of the sky. While the proposed building is the dominate feature of this aspect, it does not extend significantly beyond the existing. View impact can be summarised as negligible.

Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
6 Thomson Street – RL 43.0			
			The amended design decreases the view impacts from the original proposal and restores iconic views towards Centre Point Tower, currently available. The amended design closely matches the built form of the existing building with potential for small view impacts towards the Sydney skyline. While the proposed building is the dominate feature of this aspect, it does not extend significantly beyond the existing. View impact can be summarised as low.
8 Thomson Street – RL 47.0			
			Proposed multi-purpose building closely matches existing building form and does not have further view impacts. The amended design significantly decreases view impacts from the original proposal. The proposed built form will marginally increase visibility of nearby buildings to the north. View impact can be summarised as nil.

Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
22 Thomson Street – Attic – RL 46.5			
			The amended design is a significant decrease in view impacts from the original proposal. The amended design has the potential to open up minor views towards the Sydney Harbour Bridge. The proposed built form does not have further view impacts compared to what is existing. View impacts can be summarised as beneficial.
Liverpool Street			
254 Liverpool Street – RL 50.6			
			The amended design is a significant decrease in view impacts from the original proposal. The proposed built form does not have further view impacts from what is existing. Visual impacts can be summarised as beneficial.

Existing Buildings	Original Proposal	Amended Proposal	Visual Impact
Bourke Street			
225 Bourke Street – RL 28.8			
			The proposed amended design results in a less imposing building presentation to Bourke Street compared to the existing Old Science and Library buildings. The visual impact of the building is reduced and a lower scale podium that aligns with the existing terraces and junior school is proposed. Visual impact is considered beneficial.
247 Bourke Street – RL 30.9			
			The proposed building is a significant feature of the streetscape, however results in a reduced building scale at Bourke Street. The only building projection proposed from this aspect is the proposal for a two and three storey podium on Bourke Street which aligns with the existing terraces adjacent to the site. Visual impact can be summarised as beneficial.

The potential view and visual impacts of the proposed amended Concept Plan and Stage 1 works have varying degrees of impact from slightly beneficial to low moderate. In summary, the proposed design has been amended in response to the submission received to minimise and protect the significant views to the Sydney skyline and iconic elements. Any adverse impacts are balanced with potential for new view lines towards iconic elements and the reasonableness of the proposed building envelopes compared to the existing buildings on the site and compliance with the height of building control across the site.

5.3.3. Visual Privacy

The proposed buildings and landscaped areas have been designed to maintain privacy for adjoining residential dwellings on Forbes Street, Thomson Street and Thomson Lane. Noting that the proposed multi-purpose building is concept only and privacy impacts and specific mitigation measures cannot be determined until detail design, visual privacy and overlooking impacts to adjoining residential developments will be managed and mitigated.

The amended design report suggests additional privacy measures to prevent overlooking from the proposed terrace areas and from classrooms. In addition to the privacy measures outlined in the EIS, preliminary privacy and overlooking measures include:

- Raised planters to provide a pedestrian buffer between the terrace and residential properties.
  - Raised buffer planting is proposed along the northern edges of the proposed Level 3 and 4 terraces to provide a pedestrian setback from the private open space areas of the Bourke Street terraces. The buffer landscaping will provide further screening for the Bourke Street terraces.
- Sun and privacy screening devices where needed for additional privacy.
  - Shading and privacy devices can be included on the northern and Bourke Street elevations to mitigate any potential privacy issues.
- Design and orientation of windows and solid sections of the southern façade to provide privacy screening to Thomson Street terraces.
  - The south facing windows of level 4 and level 5 of the multi-purpose building are orientated south-west, away from the Thomson Street dwellings, with no windows directly orientated towards internal residential areas or private open space areas.
- The outdoor open space for the proposed childcare centre is on the northern side of the building, with minimal habitable rooms along the southern elevation.

Further privacy or overlooking issues may arise during the detail design stage, these will be mitigated at this stage. Accordingly, the proposal is appropriate in terms of visual privacy and no additional mitigation measures are required.

5.4. CONTAMINATION

A Preliminary Site Investigation (**PSI**) prepared by Douglas Partners was submitted with the EIS in response to SEARs. The PSI concluded that the site has a generally low risk of widespread gross contamination of the site and further that the site can be made suitable for the proposed development following additional testing completed after the demolition of existing buildings.

A Detailed Site (Contamination) Investigation (**DSI**) (**Appendix L**) has been prepared by Douglas Partners for Stage 1 redevelopment of Wilkinson House in response to the submission from the City of Sydney.

Methodology

The preparation of the DSI involved a review of historical data, aerial photography and previous site investigations, conducting a site walkover and, undertaking investigations on soils and bedrock.

Groundwater analysis was not conducted due to evidence that the permanent water table within the intact bedrock is expected to be many tens of metres below the current site level.

The DSI report only addresses the Wilkinson House redevelopment area.

Existing environment

The site has undergone significant change as it transitioned from mixed-use residential housing and commercia/ industrial uses to the school during the 1900s. Since the establishment of the School in 1901 the School has expanded by purchasing surrounding properties. Over time these buildings have been demolished and replaced as needed and, in the process, removed filling from the footprints of these new buildings and excavated into the natural bedrock. Wilkinson House specifically has remained relatively unchanged since 1943 and possibly since circa 1920s.

Potential contamination sources and contaminants of concern have been identified and are outlined in **Table 13**.

Table 13 – Potential Contamination Sources and Contaminants of Concern

Potential Source	Description of Potential Contaminating Activity	Contaminants of Concern
Fill of unknown origin	Filling of site from unknown sources.	Metals, TRH, BTEX, PAH, OCP, OPP, PCB, phenols and asbestos.
Former sections of Wilkinson House on site	Demolition/refurbishment of former sections of the Wilkinson House impacting the fill and surficial soils.	Asbestos, lead based paints, PCB capacitors and synthetic mineral fibres (SMF).
Existing buildings on site	Potential presence of hazardous building materials in the existing Wilkinson House foundations and frame.	Asbestos, lead based paints, PCB capacitors and synthetic mineral fibres (SMF).
Historic and current site uses	Inappropriate disposal of wastes. Application of pesticides for building management.	Metals, TRH, BTEX, PAH, OCP, OPP, PCB and phenols.

Assessment

The assessment involved a review of available background information, field investigation of soil samples and geotechnical boreholes. With laboratory testing and data analysis and reporting. Five (5) site sampling locations were used in the assessment.

The majority of the potential contaminants of concern identified in **Table 13** were found to be below the Site Assessment Criteria (**SAC)** and laboratory reporting limit (**LRL**). No asbestos-containing materials, coal tar, clinical or related waste, or waste tyres were observed in the bores. Asbestos was not detected by the analytical laboratory.

Two samples contained concentrations of lead that exceeded the SAC, which also exceeded the Health Investigation Levels (**HIL**) of 600 mg/kg. Three samples reported concentrations of PAH which exceeded the SAC and the HIL of 3mg/kg. The found SAC exceedances of metals and PAH occurred in the fill samples and not within the bedrock.

Toxicity characteristic leaching procedure (**TCLP**) testing was also conducted and found that the risk to the groundwater is considered to be low from the reported contaminants. The contaminants are non-volatile and vapour intrusion into buildings is not of concern. Therefore, the primary risk is associated with direct contact (inhalation and dermal contact) of site users with the fill.

Analysis of the preliminary waste classification found that the fill material across the site is General Solid Waste (non-putrescible), with the exception of the fill in vicinity of the SS1 sampling location which was preliminarily classified as restricted solid waste due to the lead TCLP result.

The report concluded that subject to the adoption of recommendations, the site could be made suitable for the proposed Stage 1 works.

Mitigation Measures

Douglas Partners has made recommendations to manage the human and environmental risks to manage the proposed works. The results of the DSI shows that the contamination appears to be limited to lead and B(a)P present on the site.

As the final construction approach is yet to be determined, the exceedances in the fill can be mitigated through either:

- Remove of all fill from the development footprint; or

- Implementation of a long-term environmental management plan, post construction of the concrete slabs for the new development as these will act as suitable capping measures and hence remove the potential complete source – pathway – receptor linkages.

Additional measures are also recommended prior to or following demolition of Wilkinson House (as appropriate) including:

- **Hazardous Building Materials Survey:** Given the age and potential renovations which may have taken place in Wilkinson House, it is considered likely to contain hazardous building materials. A hazardous material building survey and subsequent appropriate removal of any identified hazardous materials in accordance with relevant legislation and guidelines is to be undertaken prior to demolition.
- **Waste classification:** Confirmation of the waste classification of the soils requiring offsite disposal should be undertaken to inform the lawful disposal of excess spoil. The waste classification must be undertaken in accordance with the *Protection of the Environment Operations Act 1997* and EPA (2014); and
- **Unexpected finds protocol:** An unexpected finds protocol is prepared and implemented during site works to address any potentially impacted fill (e.g. asbestos contamination) encountered during the works.

Based on the findings of the DSI by Douglas Partners, it is considered that the site is suitable for the proposed works, from a contamination perspective, subject to implementation of the above recommendations.

5.5. HERITAGE

SCEGGS Darlinghurst is identified as a local heritage item and is located within a heritage conservation area. The EIS outlined the heritage impacts of the proposed design upon the heritage conservation and heritage significance of the site.

The proposed amendments do not change the mitigation measures as proposed in the EIS. As outlined within the additional heritage information provided in **Section 3.3** and assessment in the Supplementary Statement of Heritage Impact prepared by TKD Architects at **Appendix E**, the proposed design amendments provide the following changes to the heritage impact of the proposal:

- Reduction in height of the parapet of the administration building to match the eaves of the Chapel to reduce the potential visual impacts on Forbes Street, Barham House and the Chapel.
- The reduction in height of the administration building will enhance and reinforce the historic form of Barham House and relates purposefully in scale to Barham House and the neighbouring buildings on Forbes Street. The reduction in its height reduces visual impacts on the Conservation Area, Forbes Street and Barham House.
- The reduced multi-purpose building envelope results in a better heritage impact outcome, including:
  - Reduction and mitigation of impacts on adjacent heritage items in Bourke Street;
  - Reduction and mitigation of impacts on Thomson Street and Thomson Lane. The building bulk defined by the modified envelope is equivalent to that of the existing buildings;
  - Reduction of impacts on significant buildings within the campus, including views to the Chapel building from Forbes Street;
  - The amended building envelope that reinforces and enhances the street alignment of Bourke Street, and reduces potential impacts on nearby heritage items and heritage conservation area;
  - The reduction in height establishes an envelope that is lower than the Chapel building, reinforcing and retains the heritage significance and character of the building and Forbes Street; and
  - The modifications to its envelope assist in minimising impacts on significant buildings within the school and heritage items in the vicinity of the subject site.

Based on the assessment in the Supplementary Statement of Heritage Impact, the proposed amended 2040 Masterplan will result in a better outcome for the locality and will assist with reinforcing the heritage significance of the site.

5.6. TRAFFIC AND PARKING

A Revised Traffic Impact Assessment (**RTIA**) prepared by Traffix and accompanies this report at **Appendix H**. Section 7 of the RTIA contains the Green Travel Plan and Section 9 contains the Construction Traffic Management Plan.

The RTIA provides a revised assessment of the impacts of the proposed school uses and the proposed childcare centre separately, noting that the childcare centre is only concept.

As a result of the proposed development and design amendments, the following changes to the existing car parking configuration is proposed:

- Retention of 105 off-street parking spaces, comprising:
  - 22 parking spaces, with access via Bourke Street; and
  - 83 parking spaces, with access via St Peters Street.
- Retention of 18 leased on-street parking spaces from the neighbouring private car park, located at 184 Forbes Street, Darlinghurst.
- Retention of 18 on-street pick-up and drop-off spaces, comprising;
  - Nine spaces on Bourke Street; and
  - Nine spaces on Forbes Street.
- Removal of seven off-street parking spaces from the car park off Forbes Street.
- Construction of a basement car park with access from Bourke Street, comprising;
  - Seven (7) school staff spaces, relocated from the Forbes Street car park;
  - Three (3) school service vehicle spaces;
  - Six (6) childcare staff spaces; and
  - One (1) childcare long-term visitor space.

Key traffic and parking impacts and mitigation measures are presented below.

5.6.1. School Traffic Impacts

Traffic Generation

The Concept Masterplan and Stage 1 DA do not propose any increases in students or staff numbers for the school. Therefore, it is anticipated that there will be negligible change in traffic generation or traffic impacts on the external road network as a result of the proposed development.

The following traffic management measures are already undertaken by the School:

- During morning drop-off periods on Bourke Street, the School employs a dedicated crossing supervisor, a traffic warden to monitor pick-up and drop-off zones and a member of primary school staff to help with efficient on-site vehicular movement;
- During afternoon pick-up periods on Bourke Street, the school employs a dedicated crossing supervisor, a traffic controller to monitor and ensure smooth flow of traffic and two primary school staff to assist with student lining up and entering cars;
- Student tags are displayed in vehicles for students in Kindergarten to Year 5. Where student is not ready to be pick up, cars will be directed to re-join the queue;
- SCEGGS Darlinghurst operate staggered pick up times:
  - Kindergarten to Year 2 students are picked up between 2:55pm to 3:10pm and Year 3-12 students are picked up from 3:10pm; and
  - Year 6 students are picked up from Forbes Street to alleviate traffic congestion on Bourke Street.

- SCEGGS Darlinghurst also schedules extracurricular activities across all weekdays to dilute drop-off and pick-up impacts.

The following additional methods are also recommended to assist with ensuring traffic flow is efficient and streamlined:

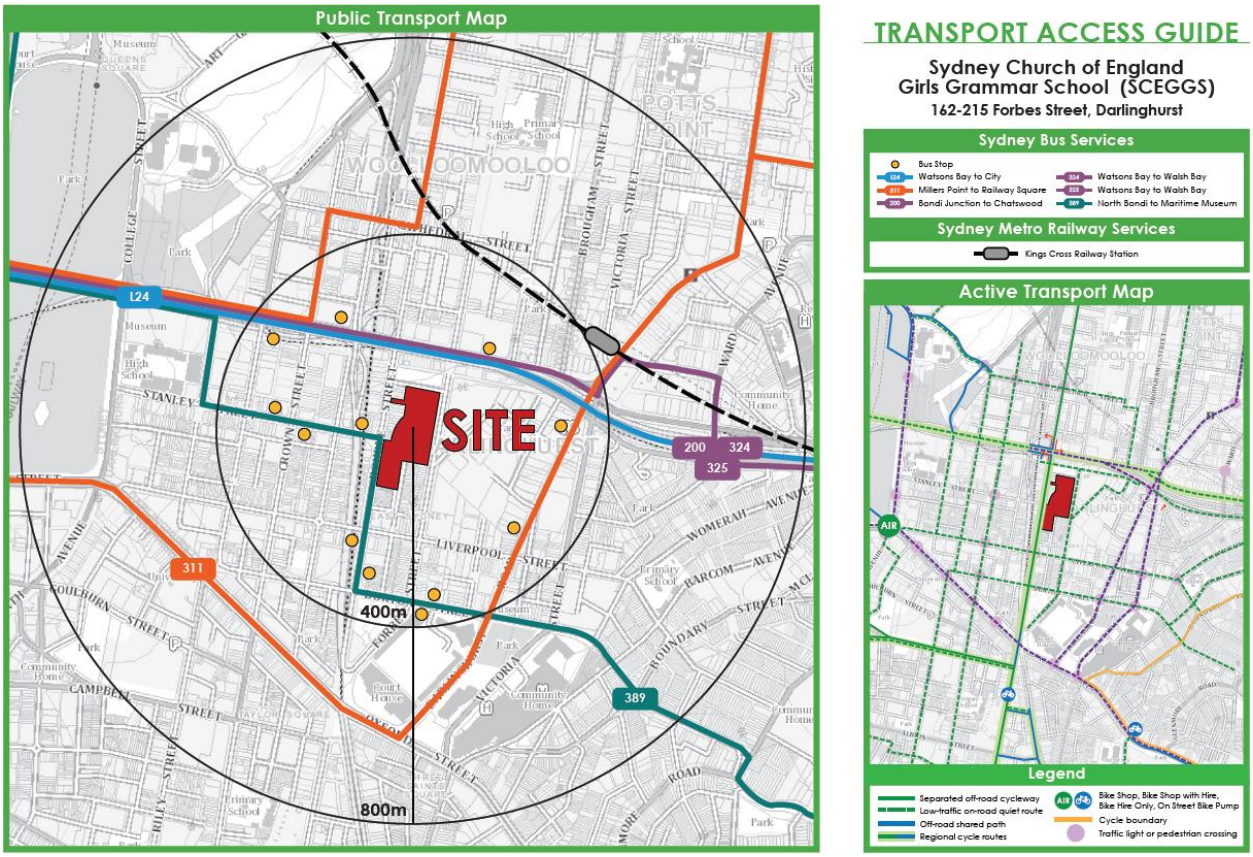
- Parent re-education through audits of school operations for pick-up and drop-off facilities. This would involve the school to communicate any concerns following monitoring of the facilities during peak periods and would supplement any enforcement undertaken by Council's rangers or the NSW Police; and
- Provision of informative documentation (posters) along the school boundary informing parents of the road rules for No Parking restrictions.

The 2040 Masterplan does present an opportunity to change travel behaviour through implementation of a **GTP** included within **Appendix H**. The GTP encourages students, staff, parents and visitors to use the available public transport and active forms of transport available surrounding the site.

Measures included in the preliminary GTP outlined in the RTIA include:

- Setting mode share targets for staff and for different student year groups;
- Travel demand management measures:
  - A Transport Access Guide (**Figure 20**) that illustrates the public transport routes operating in the locality that can be distributed to parents, staff and students;
  - Car sharing schemes can be encouraged for both students and staff; and
  - Implementation of a 'walking bus' concept, which can alleviate safety concerns of parents and develop an active mind set for students.

Figure 20 – Transport Access Guide



Source: Appendix D of the Revised Transport Impact Assessment - Traffix

Car Parking and Pick-up and Drop-off Management

The concept masterplan includes the relocation of seven staff parking spaces from the Forbes Street car park to the proposed basement car park. This will result in no net increase to the School's existing parking provision of 112 off-street parking spaces.

As the proposed works do not result in an increase in staff and student numbers there will be no changes current travel arrangements for students and teachers. No additional accessible parking or motorcycle parking spaces are proposed as there are no changes to the school's existing net parking spaces.

The proposed design amendments do not change pick-up and drop-off management methods as outlined in the EIS.

Bicycle Parking

As there is no increase in students and staff no additional bicycle parking is required. As such, existing bicycle facilities will remain as follows:

- Dedicated lockable bike storage areas:
  - One car bay dedicated for bike storage for staff; and
  - One lockable bike cupboard on top of the gym that can accommodate 12 student bicycles.
- Shower locations:
  - Four in the gym for staff and student use;
  - One in the Joan Freeman building for accessible use;
  - One in the Joan Freeman building for male/female use;
  - One in the Primary School basement for accessible use; and
  - One in the Diana Bowman building.

While additional bicycle spaces are not required, the basement car park presents an opportunity to accommodate additional bicycle spaces. An additional 50 bicycle spaces for school use can be located in the basement car park in the form of 25 bicycle rails.

The additional bicycle parking is a major benefit to staff and students and will assist in reducing private car dependency.

Servicing Arrangements

Service vehicle parking for the school will be accommodated in the proposed basement car park. Three spaces are dedicated for service vehicle parking, noting that the School owns two maintenance vehicles leaving one space for couriers and trade persons.

The RTIA therefore concludes that the proposed Concept Plan and Stage 1 detailed design are supportable on transport planning grounds.

5.6.2. Childcare Centre Impacts

Traffic Generation

The RTIA undertaken has considered the increase of 45 children and 8 staff for the proposed childcare centre.

The RMS Guide to Traffic Generating Development 2002 (**RMS Guide**) recommends a trip generation rate for long-day childcare centres of 0.8 vehicle trips during the AM peak and 0.7 trips during the PM peak period (typically between 4:00pm to 6:00pm). Application of these rates to the proposed childcare centre of 45 children results in the following anticipated traffic generation:

- 36 vehicle trips per hour during the AM peak period (18 in, 18 out); and
- 32 vehicle trips per hour during the PM peak period (16 in 16 out).

The key intersections identified in the RTIA Bourke Street/ Liverpool Street and Forbes Street/ Liverpool street. The above traffic generation will be added to the existing 'base case scenario' to analyse the potential increased impacts of the childcare centre on the existing traffic levels in the surrounding intersection.

The analysis in the RTIA (**Figure 21**) found that there are minor increases in degree of saturation and intersection delays to the key intersections, resulting in no change to the level of service. With Bourke Street/ Liverpool Street and Forbes Street/ Liverpool Street intersections maintaining Level of Service B and Level of Service A, respectively during both the AM and PM peak periods.

Figure 21 – Existing vs Future Intersection Performance

Intersection	Period	Scenario	Degree of Saturation (DoS)	Intersection Delay	Level of Service
Bourke Street and Liverpool Street	AM	Existing	0.590	11.8	B
		Existing + Child Care Centre	0.610	12.0	B
	PM	Existing	0.434	10.9	B
		Existing + Child Care Centre	0.464	11.1	B
Forbes Street and Liverpool Street	AM	Existing	0.154	8.0	A
		Existing + Child Care Centre	0.159	8.0	A
	PM	Existing	0.274	9.0	A
		Existing + Child Care Centre	0.281	9.0	A

Source: Extract from Revised Transport Impact Assessment - Traffix

As such, the proposed childcare centre will have minimal impacts on the surrounding key intersection, which will continue to operate with similar delays and queues.

Car Parking and Pick-up and Drop-off Management

The childcare centre parking will be accommodated within the basement car park accessible via Bourke Street. The entrance of the basement car park has been relocated to ensure that an existing street tree can be retained.

The SLEP 2012 specifies a maximum of eight spaces for childcare development and the SDCP 2012 specifies a maximum of seven pick-up and drop-off spaces including one long-term visitor space. The proposed development includes five spaces for the use of the childcare centre and seven pick-up and drop-off spaces within the basement car park in compliance with the SLEP 2012 and SDCP 2012.

One accessible space can be accommodated in the basement car park in accordance with the SDCP 2012 requirements. A service vehicle space is not provided, and it is anticipated that any additional demands will be accommodated using the existing and proposed service vehicle parking arrangements across the site.

One motorcycle parking space is required as per the SDCP 2012 guidelines, and while this has not been included in the indicative plans it can be included as part of the detailed design.

Bicycle Parking

The SDCP 2012 recommends a bicycle parking rate of one space per 20 staff and two spaces per centre, therefore three spaces are required for the childcare centre. Four bicycle spaces are provided in the basement car park, thereby complying with the SDCP 2012 provisions.

5.6.3. Proposed New Driveway on Bourke Street

The proposed basement car park driveway entrance location on Bourke Street has been relocated to allow for the retention of a mature street tree. The proposed future design of the driveway and building entrance will respond to the principles as outlined in the EIS, as follows:

- Minimise the width of the driveway to a maximum two vehicular lane widths only;
- Locate the proposed driveway to minimise impact to street landscaping including mature street trees;
- Wrap the Bourke Street façade building materials into the building entrance; and
- Ensure fine grain building articulation is presented to Bourke Street that relates to the prevailing streetscape character.

5.6.4. Construction Vehicle Impacts

A preliminary Construction Traffic Management Plan is included in Section 9 of the RTIA (**Appendix H**) for the indicative construction methodology for the Wilkinson House redevelopment. A final CTMP will be prepared and submitted to the relevant authority in response to any conditions of consent. New CTMPs will be prepared for Stage 2 and Stage 3 works to accompany the applicable Detailed SSD DA.

Working Hours

The construction program will be based on a 5.5 day working week. With construction hours in accordance with the City of Sydney regulations, which state:

> *All potentially noisy work in the city centre must be carried out between 7:00am and 7:00pm on weekdays, and 7:00am and 5:00pm on Saturdays.*
>
> *Construction in all other parts of the local area must take place between 7:30am and 5:30pm Monday to Friday, and 7:30am to 3:30pm on Saturday."*

Any other works that may be required to be undertaken outside these normal hours will require the relevant permissions by the contractor.

Temporary Learning Areas

The construction program will allow for the delivery and installation of ten temporary demountable functional learning areas to be installed in the Centenary Sports Hall for use during the Stage 1 (Wilkinson House) works.

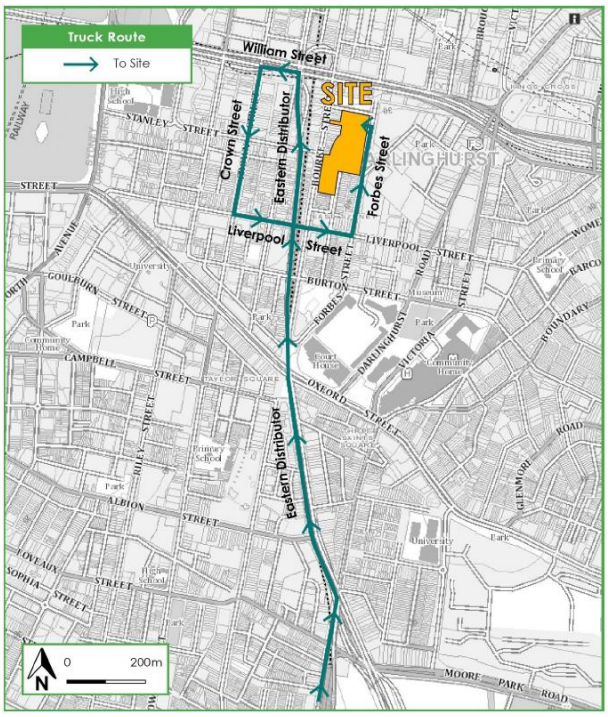
Traffic Control Plans

Traffic Control Plans will be designed in accordance with the RMS Traffic Control at Worksites Manual and AS 1742.3. The Traffic Control Plans would primarily relate to pedestrian controls in order to ensure appropriate safety measures are implemented.

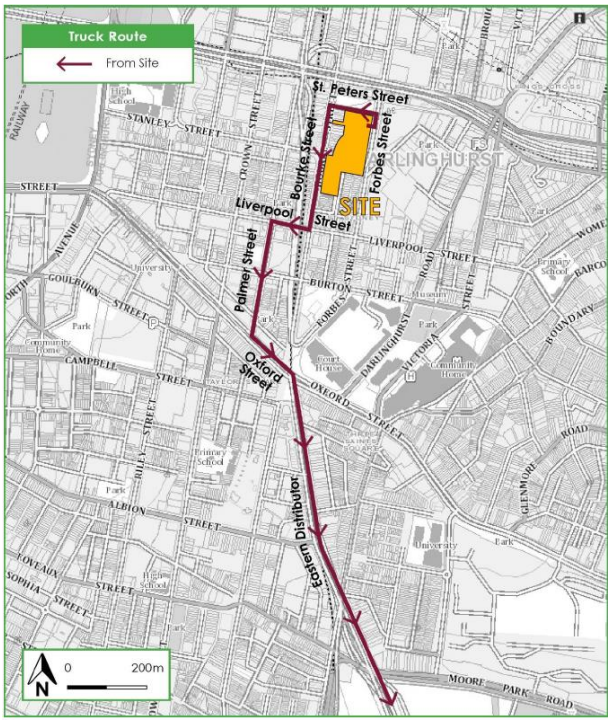
Construction Vehicles

The anticipated truck frequencies range between two (2) trucks per day (2 in, 2 out) to a maximum of 16 trucks per day (16 in, 16 out). The maximum sized vehicle is expected to be an 8.8 metre Medium Rigid Vehicle, with a payload of 12 tonnes. **Figure 22** below illustrates the truck routes to be utilised to and from the site for all trucks to access and egress the site in a forward direction.

Figure 22 – Truck Routes



Picture 9 – Truck Routes to Site



Picture 10 – Truck Routes from Site

Source: Revised Traffic Impact Assessment - Traffix

A tower crane is anticipated to be erected within the floor area and dismantled after the installation of the roof structure works and loading of bulk materials to the floors, expected to be for a period of eight (8) weeks.

5.7. NOISE AND VIBRATION

A Revised Construction and Operation Noise Report has been prepared by Wilkinson Murray at **Appendix J** to assess the noise and vibration generated during the construction of new Wilkinson House and operation of all stages of the Masterplan. Appendix C of the report includes a draft Construction Noise and Vibration Management Plan (**CNVMP**) for the Stage 1 works.

The following sections provides additional assessment and mitigation measures for the detailed Stage 1 works. The assessment and mitigation measures outlined in the EIS have not changed as a result of the proposed amendments to the 2040 Masterplan.

5.7.1. Construction Impacts

Careful management will be required to minimise acoustic and vibration impacts during construction. Preliminary minimisation and mitigation measures have been investigated, with a final CNVMP to be prepared once a contractor has been engaged.

Noise modelling has been conducted for each of the following construction scenarios:

- Demolition
- Building construction
- Façade/ fitout

The modelling assumes a “typical worst-case” scenario whereby all plant, is running continuously. As such, the modelling represents likely noise levels that would occur during intensive periods of construction. Therefore, the presented noise levels can be considered in the upper range of noise levels that can be expected at surrounding receivers when the various construction scenarios occur.

Overall, noise levels from demolition and construction stages exceeds the noise management level by up to 12dBA, particularly for Forbes Street residents and for St Peters Street (**Figure 23**).

Figure 23 – Predicted Construction Noise Levels at Residence

Residential Receiver	Predicted Noise Level	NML	Exceedance
Scenario A – Demolition			
A – Thomson Street & Lane Residences	42	57	0
B – Bourke Street	51	57	0
C – Forbes Street	72	60	12
D – St Peters Street	71	60	11
Scenario B – Building Construction			
A – Thomson Street & Lane Residences	33	57	0
B – Bourke Street	51	57	0
C – Forbes Street	65	60	5
D – St Peters Street	68	60	8
Scenario C – Façade / Fitout			
A – Thomson Street & Lane Residences	27	57	0
B – Bourke Street	34	57	0
C – Forbes Street	60	60	0
D – St Peters Street	60	60	0

Source: Wilkinson Murray – Revised Construction and Operational Noise Report

Demolition and construction activities requiring the operation of rock breakers and the like will generate vibration that has the potential to transmit to nearby buildings. The highest vibration levels will occur when construction equipment is located on the eastern side of the site near residences on the eastern boundary.

Mitigation Measures

Careful management will be required to minimise acoustic and vibration impact during demolition and construction. These measures will be accurately determined when a contractor has been engaged. The following site-specific mitigation measures are recommended during construction:

- Installation of a 2.4 metre plywood hoarding around the construction site;
- Selection of the quietest feasible construction equipment;
- Use of jaw crushers in preference to rock breakers where feasible;
- Localised treatment such as barriers, shrouds, and the like around fixed plant such as pumps, generators, and concrete pumps; and
- Provision of respite periods.

In addition, the following measures should be included in a Noise and Vibration Management Plan.

- Plant Noise Audit – Noise emission levels of all critical items of mobile plant and equipment should be checked for compliance with noise limits appropriate to those items prior to the equipment going into regular service. To this end, testing should be established with the contractor.
- Operator Instruction – Operators should be trained in order to raise their awareness of potential noise problems and to increase their use of techniques to minimise noise emission.
- Equipment Selection – All fixed plant at the work sites should be appropriately selected, and where necessary, fitted with silencers, acoustical enclosures, and other noise attenuation measures in order to ensure that the total noise emission from each work site complies with EPA guidelines.
- Site Noise Planning – Where practical, the layout and positioning of noise-producing plant and activities on each work site should be optimised to minimise noise emission levels.

Noise and vibration levels from construction are likely to be at similar predicted levels for school student and staff within the site. Accordingly, measures that will be adopted to manage the acoustic impact within the school should be detailed in a Construction Management Plan. Measures that can be adopted to manage noise and vibration impacts at the school could include:

- Closing of classroom windows;
- Relocating classes during busy construction periods; and
- Scheduling works during school holidays.

5.7.2. Operational Impacts

Operational noise from the proposed concept masterplan will be from activities associated with the new building, as well as mechanical plants located predominantly on the roofs of the buildings.

The project noise trigger levels represent the level that, if exceeded, may indicate a potential noise impact upon a community. The amenity and intrusiveness noise levels to nearby sensible receivers and resulting project trigger levels (shown in bold) applicable to sources of continuous operational noise associated with the development (i.e. mechanical plant and equipment) is shown in **Figure 24**. The Sleep Disturbance Trigger Levels are also shown in **Figure 25**.

Figure 24 – Project Noise Trigger Levels

Receiver	Period	Intrusiveness Noise Level[1] $L_{Aeq,15min}$ (dBA)	Project Amenity Noise Level[2] $L_{Aeq,15min}$ (dBA)
A – Thomson Street & Lane Residences	Day	**52**	58
	Evening	50	**48**
	Night	49	**43**
B – Bourke Street	Day	**52**	58
	Evening	50	**48**
	Night	49	**43**
C – Forbes Street	Day	**55**	58
	Evening	54	**48**
	Night	52	**43**
D – St Peters Street	Day	**55**	58
	Evening	54	**48**
	Night	52	**43**

Note 1: Intrusiveness noise level is $L_{Aeq,15min} \leq$ RBL +5. Minumum background is 35dBA in the day period whilst the minimum background in the evening and night is 30dBA.

Note 2: Project amenity noise level (ANL) is suburban ANL minus 5dBA plus 3dBA to convert from a period level to a 15-minute level.

Source: Wilkinson Murray – Revised Construction and Operational Noise Report

Figure 25 – Sleep Disturbance Trigger Levels

Receiver	$L_{Aeq,15min}$	L_{AFmax}
A – Thomson Street & Lane Residences	49	59
B – Bourke Street	49	59
C – Forbes Street	52	52
D – St Peters Street	52	52

Source: Wilkinson Murray – Revised Construction and Operational Noise Report

Mechanical Services Noise Emissions

The major mechanical noise sources associated with the development will be exhaust fans and plant that will be located on the roof of the new buildings. These will consist of roof mounted condensers or plant that have yet to be determined.

In line with the approvals for other developments, detailed assessment of operational noise emission should form a conditional requirement of the development, to be satisfied to the PCA, prior to the issue of the construction certificate.

To mitigate noise from mechanical plant, it is likely the some or all of the following noise control measures may need to be adopted at the design stage to meet noise objectives:

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

Wilkinson House Noise Emissions

The proposed use of the Wilkinson Building is for classes and, as such, noise generated within this area is expected to be general classroom noise which will be adequately contained by the facade of the building.

No special measures are required to protect the acoustic amenity of nearby residents.

New Administration Building and Restoration of Barham

Noise generated by activities in these areas will be acoustically insignificant. Any noise will be contained within the facade of the buildings.

New Multi-purpose Building Noise Emissions

The new multi-purpose building will generate significant internal noise levels due to sports and musical events. Therefore, adequate control of noise breakout will be required. The proposed activities are not considered to be 'acoustically significant' activities. The childcare centre has located the outdoor play area on the northern side of the building purpose building and any noise will be contained by the surrounding school buildings.

Measures that will be adopted to ensure that compliance with established noise criteria include:

- Ceiling and wall treatments to improve the sound isolation of these elements;
- Laminated or double glazing of doors and windows;
- Acoustic treatment of mechanical services; and
- Sound system design and installation of sound limiters where deemed necessary.

Specific noise mitigation measures cannot be developed in detail at this stage and will be adequately addressed during the detail design stage. A project specific assessment of operational noise will be submitted when the DA for this stage is submitted.

School Announcements and Bells

Noise generated from school bells and announcements can vary significantly depending on the system chosen. The following measures should be adopted once a PA system has been determined to ensure that their impact at 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.

The system bell should be set so that it only occurs on school days.

5.8. DRAINAGE AND FLOODING

An Additional Flood Statement has been prepared by TTW for the 2040 Masterplan and Stage 1 building works and is attached at **Appendix R**. The report provides additional flood assessment and mitigation measures in addition to the measures outlined in the Stormwater Management and Civil Design Report prepared by TTW that accompanied the EIS.

Methodology

The additional assessment has been prepared in response to a submission from the City of Sydney regarding the flood planning levels required for the subject development to ensure compliance with the City's Interim Floodplain Management Policy.

As the site is too large for a single Flood Planning Level to be relevant for all building, the Flood Planning Levels of the components of the proposed development have been assessed separately.

The assessment is based on flood modelling from the Council's approved flood model and the City of Sydney Interim Floodplain Management Policy. TTW have used Councils TUFLOW model for the Woolloomooloo catchment for greater accuracy.

Proposed Impacts

New Wilkinson House

The 1% AEP Flood Level at the Wilkinson House is 33.50m (all levels to AHD) at its highest point. Summing the required 0.5m freeboard to the 1% Flood Level gives a Flood Planning Level of RL 34.00m. The ground floor level of the existing Wilkinson Building is RL 33.36m and the new Wilkinson building is proposed to have a ground floor level of RL 33.50m. Entrances and openings to the Wilkinson Building will be above the Flood Planning Level of RL 34.00m. All materials below the 1% Flood Level will be flood compatible and the structures will be designed to withstand the forces of floodwater.

Administration Building

The Administration building is adjacent to Forbes Street and the 1% AEP flood level is RL 40.80m. The Flood Planning Level for the administration building is RL 41.30m. This is above the current existing ground floor level of RL40.55m. Entrances to the Administration building will therefore need to be addressed in the detailed design to be outlined within the Detailed SSD DA.

Multi-Purpose Building

The multi-purpose building includes an underground car park on Bourke Street and the Flood Planning Level is governed by the greater of the 1% Flood Level plus 0.5m or the PMF. Council's Flood Model shows the PMF level adjacent to the proposed carpark entry to be RL 28.50m. The 1% Flood Level at the proposed carpark entry is 28.45m on the southern side and 28.20m on the northern side, the FPL is 28.95m and 28.70m respectively. A driveway crest will be provided at RL 28.96m to protect the underground car park from flood impacts.

The eastern end of the multi-purpose building backs onto Forbes Street. The 1% AEP flood level here is RL41.20m and the Flood Planning Level is RL41.70m. The floor level of the multi-purpose building adjacent to Forbes Street is RL42.3m and as such the building complies with the Floor Planning Level.

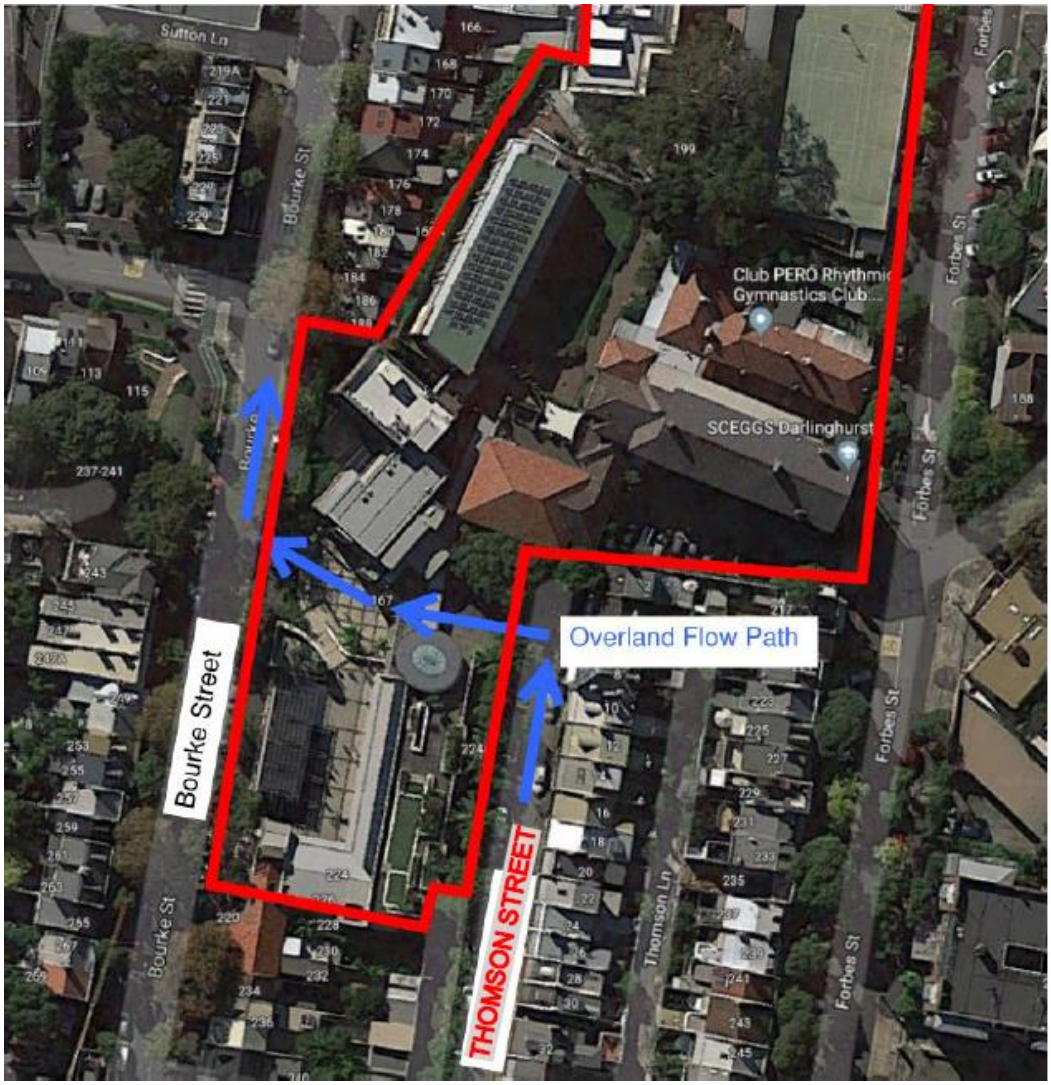
Overland Flow Path

Council's Interim Floodplain Management Policy states that the filling of flood prone land requires a flood assessment to show that the change in levels will not increase the flood affection elsewhere. The proposed multi-purpose building will block the overland flow that is expected to come from Forbes Street towards Thomson Street. The proposed development will block this flow and affect the flood conditions for both Forbes Street and Thomson Street.

Modelling of the blocked flow path shows that worsening flood conditions only occur adjacent to the SCEGGS Darlinghurst property and does not negatively impact other private properties. The block also decreases the flood level of Thomson Street because flood waters from Forbes Street do not contribute to the ponding.

Thomson Street is a low point and floodwaters will pond here and may spill over the retaining wall and into the SCEGGS Darlinghurst property. If the floodwaters spill over the retaining wall, an overland flow path exists through the SCEGGS Darlinghurst property towards Bourke Street as shown in **Figure 26**.

Figure 26 – Overland Flow Path from Thomson Street to Bourke Street



Source: TTW – Additional Flood Statement

5.9. WASTE

The proposed design amendments make no changes to the Operational Waste Management Plan prepared by Foresight Environmental that accompanied the EIS.

5.10. CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN

The proposed Masterplan and Stage 1 Wilkinson House Redevelopment incorporates CPTED principles to create a safe and secure environment that encourage activity, vitality and viability, enabling a greater level of security. The design incorporates the four main principles of natural surveillance, access control, territorial reinforcement and space management:

- The buildings are located within secure private grounds and protected by the majority of buildings located to the perimeter with security fencing elsewhere and access control to entry gates.
- Natural surveillance of the buildings occurs from within the school Campus by students and staff who will be using the facilities at all times when the campus is open.
- External lighting will be provided to illuminate external spaces and avoid dark shadows.
- Clear sightlines of the building have been maximised and landscaping designed so as to not obstruct surveillance.
- Ongoing maintenance strategies will ensure the shaping of trees for clear stems under canopies, the trimming of shrubs and integration with lighting design so to minimise dark areas and shadows in low light conditions.
- The building will be well maintained and will be highly used.

6. SITE SUITABILITY

As outlined in the EIS, the site is suitable for the proposed development as it continues the historic use of the site for education purposes. The proposed amendments to the 2040 Masterplan will improve the integration of the works into the streetscape and will not negatively impact traffic and congestion levels as a result.

SCEGGS Darlinghurst has a historical association with the site having been located on the site since 1901. The proposed design changes improve the built form and mitigates adverse view impacts of the previous proposed design. The proposed changes are more suitable to maintaining the positive relationships with the surrounding neighbours while accommodating the ongoing needs to the School on the site.

The impacts to the local heritage listing of the site have been justified and explained within this report. The minor design amendments made to the new Wilkinson House design create better streetscape integration and are sympathetic to nearby heritage items and residential properties.

7. PUBLIC INTEREST

The following assessment has been structured in accordance with section 4.15C(1)(e) of the EP&A Act. The proposed 2040 Masterplan, as amended, is in the public interest for the following reasons:

- The proposal has been prepared having regard to Council's planning policies and generally complies with the aims and objectives of the controls for the site;
- Subject to the various mitigation measures recommended by the specialist consultants as summarised in **Section 9** of this Report, the proposal does not have any unreasonable environmental or social impacts on adjoining properties or the public domain;
- The site is well serviced by public transport and various walking and cycling routes and encourages more efficient management of vehicles around the site through a consolidated drop-off/pick-up zone at Bourke Street;
- The proposal will result in the development of a high-quality educational environment for staff and students that:
  - Provides flexible working environments that can accommodate full classroom sizes;
  - Supports a fulfilling and diverse extra-curricular experience;
  - Provides an inclusive, supportive and secure pastoral environment for both primary and secondary school students; and
  - Provides efficient and environmentally sustainable facilities.
- The proposal has been designed to make a positive contribution to the overall built form of the site, having regard to topography and the heritage significance. The proposed built forms are sympathetic to the character of the surrounding neighbourhood and respect visual privacy of and significant views from neighbouring residential dwellings;
- The proposal will contribute positively to energy efficiency and environmental sustainability. The design has incorporated many ESD features to reduce energy consumption during the life of the proposed development; and
- The proposal has been revised and reduced in response to the submissions received during the exhibition period to reduce potential negative impacts on views and privacy.

8. AMENDED RISK ASSESSMENT

8.1. RISK ASSESSMENT

The SEARs require an environmental risk analysis to identify potential environmental impacts associated with the proposal.

This analysis comprises a qualitative assessment consistent with AS/NZS ISO 31000:2009 *Risk management–Principles and guidelines* (Standards Australia 2009). The level of risk was assessed by considering the potential impacts of the proposed development prior to application of any mitigation or management measures. Comment on residual risk (the remaining level of risk following implementation of mitigation and management measures) is also provided within this section.

Risk comprises the likelihood of an event occurring and the consequences of that event. For the proposal, the following descriptors were adopted for 'likelihood' and 'consequence'.

Table 14 – Risk Descriptors

Likelihood	**Consequence**
A Almost certain	1 Widespread, significant impact
B Likely	2 Extensive but reversible (within 2 years) impact or irreversible local impact
C Possible	3 Local, reversible (within 2 years) impact
D Unlikely	4 Local, reversible, short term (<3 months) impact
E Rare	5 Local, reversible, short term (<1 month) impact

The risk levels for likely and potential impacts were derived using the following risk matrix.

Table 15 – Risk Matrix

		LIKELIHOOD				
		A	B	C	D	E
CONSEQUENCE	1	High	High	Medium	Low	Very Low
	2	High	High	Medium	Low	Very Low
	3	Medium	Medium	Medium	Low	Very Low
	4	Low	Low	Low	Low	Very Low
	5	Very Low	Very Low	Very Low	Very Low	Very Low

The results of the environmental risk assessment for the Stage 1 building envelopes and uses are presented in **Table 16** below.

We note that while this analysis has been undertaken in accordance with the SEARs, this methodology was designed principally in relation to processes impacting on natural ecological systems and is highly dependent upon 'reversibility'. In an urban context where buildings are designed to be relatively permanent, rankings are skewed upwards, and of questionable real meaning.

Changes to the risk assessment in response to the proposed design changes are marked in **bold text** highlighting the changes and ~~strikethrough~~ for deletions.

Table 16 – Risk Assessment

Aspect	Potential Impact	Likelihood	Consequence	Risk Level
Design Excellence, Built Form and Urban Design	Inadequate building setbacks resulting in loss of pedestrian access / amenity.	D	1	Low
	The development does not achieve design excellence.	D	2	Low
	Imposition on the **Bourke Street** streetscape.	D	2	Low
	Imposition on the Forbes Street streetscape.	**D**	**2**	**Low**
Visual and View Impacts	Adverse impact on public view corridors	D	1	Low
	Adverse impact to views from Horizon Apartments	D	2	Low
	Adverse impact to views from 186-188 Forbes Street, Darlinghurst	D	2	Low
	Adverse impact to views from 200 and 262 Forbes Street, Darlinghurst	~~C~~ **D**	2	~~**Medium**~~ **Low**
	Adverse impact to views from 237-253 Forbes Street, Darlinghurst	~~B~~ **D**	2	~~**High**~~ **Low**
	Adverse impact to views from Thomson Street residences	~~C~~ **D**	2	~~**Medium**~~ **Low**
Amenity	Adverse solar overshadowing on surrounding residential properties	B	~~2~~ **4**	~~**High**~~ **Low**
	Adverse impact on visual and acoustic privacy of surrounding residential properties	C	3	**Medium**
	Overshadowing of surrounding public spaces.	E	1	Very Low
	Adverse impact on reflectivity of the proposed buildings on public domain.	D	1	Low
	Adverse impact on the pedestrian wind environment of surrounding streets.	D	2	Low
	Adverse impact on the safety and security of local community and school community	D	3	Low
Ecologically Sustainable Development	Irreversible increase in energy usage.	D	3	Low

Public Domain and Public Access	Reduced access to public domain spaces, streets and lanes.	E	1	Very Low
	Inactive frontages of the public domain.	D	3	Low
	Unsafe and inaccessible public domain.	E	2	Very Low
Transport and Accessibility Impacts	Additional demand for on street car parking spaces.	D	3	Low
	Reduced access via public transport services.	D	2	Low
	Adverse impact on pedestrian access across the site.	D	3	Low
Heritage	Adverse impact on the heritage significance of the site	C	2	Medium
	Adverse impact on the heritage significance of the locality	C	2	Medium
	Damage to archaeological relics	C	2	Medium
Infrastructure Provision	Adverse impact on surrounding infrastructure during the construction stage of the development.	D	3	Low
Water, Drainage, Stormwater and Groundwater	Adverse impact on the quality of stormwater runoff	D	3	Low
	Adverse impact on ground water quality	D	3	Low

8.2. POTENTIAL CUMULATIVE IMPACTS

The proposed SSD DA includes works proposed as part of a Concept Plan, or Concept DA which allows for the consideration of potential cumulative impacts associated with the redevelopment of the site. This EIS has outlined the potential cumulative impacts resulting from the SCEGGS Darlinghurst 2040 Masterplan and therefore provides a suitable assessment in accordance with the requirements of the SEARs.

9. AMENDED MITIGATION MEASURES

A range of mitigation measures are proposed to reduce any potential environmental and social impact of the proposal. The following table below provides a summary of environmental management measures proposed to mitigate the medium risks identified in **Table 16** above.

Changes to the mitigation measures in response to the proposed design changes are marked in **bold text** highlighting the changes and ~~strikethrough~~ for deletions.

Table 17 – Mitigation Measures

Item	Potential Impact	Mitigation Measure
Concept Plan		
~~View Impacts~~	~~View impacts to residents at 200 and 262 Forbes Street, 237-253 Forbes Street and Thomson Street residents~~	• ~~As outlined within Section 8.1.2 the proposed building massing has sought to minimise any adverse view impacts to private properties.~~ • ~~Potentially impacted properties retain retains views towards the Sydney skyline including other iconic elements including the Sydney centre-point tower.~~ • ~~The potential view impact is resultant from maximum building envelopes. As part of the subsequent DA for the detailed design of the multi-purpose building, any opportunities to minimise view impacts though detailed design are to be considered.~~

~~Overshadowing~~	~~Additional overshadowing to 4 Thomson Street~~	• ~~Maintaining the maximum height of the multi-purpose building less than the maximum height of the Chapel Building;~~
		• ~~Inclusion of design guidelines and development parameters to guide the future design of the multi-purpose building that include:~~
		  ○ ~~Relate to the 2-storey terrace house scale and alignment on Bourke Street and then setback above this level to minimise views over neighbours and overshadowing.~~
		  ○ ~~Setback the building to neighbours on Thomson Street to minimise overshadowing and create a landscape buffer.~~

Heritage	Adverse impact on the heritage significance of the site Adverse impact on the heritage significance of the locality	**Wilkinson House** • Zero street setbacks, consistent with the original Wilkinson House form, and the historic street alignment on the site and within the conservation area. • Comparable building scale to the original Wilkinson House and surrounding contemporary buildings on the site including the Joan Freeman Building. • The maximum proposed building height of the new Wilkinson House ensure that the prevalence of the State Heritage listed St Peter's Church s retained within the conversation area and the broader school site. • Materials and finishes selected for the new Wilkinson House are complementary of traditional building materials in the conversation area, including masonry elements such as brick and sandstone. **Administration Building**

Item	Potential Impact	Mitigation Measure
		• The building has been designed to address Forbes Street, reflecting the existing lot configuration and building orientation within the street and Conservation Area. • The building mass does not extend beyond the width of Barham House, maintaining and enhancing visual connections to the building from Forbes Street. • The proposed new building mass is setback from the original built form of Barham House, connected only by a link which has a maximum height no greater than the eave line of Barham. • **The height of the parapet is reduced to align with the adjacent eaves of the Chapel Building to ensure it remains the dominant feature in the streetscape.** **Multi-purpose building** • The proposed new building mass is no higher than the eave line of the adjacent Chapel Building. • The future detailed design of the building is to respond to the design guidelines and development parameters included within the design report at **Appendix ~~C~~D**. • Proposing a maximum street frontage height of two storeys at Bourke Street to align with the existing street frontage character of Bourke Street and the broader heritage conservation area. • At Forbes Street and the south-eastern corner of the site, the proposed building envelope is setback and reduced in height to allow the 1901 Chapel Building to maintain prevalence within the Forbes Street streetscape and broader heritage conservation area. • The proposal does not impact the significant stair and significant heritage fabric of the Chapel Building. • The proposed maximum building height does not exceed the maximum eave line of the Chapel building ~~and is proposed as a similar mass and scale to~~ **or** the existing Old Gym building on the site. • The proposed building massing retains and enhances views to the original Barham House from the west. • The future detailed design of the building is to respond to the design guidelines and development parameters included within the design report at **Appendix ~~C~~D,** including guidelines for the future architectural treatment of the building to Thomson Street.
	Damage to archaeological relics	• No physical works should be undertaken on this affected portion of the site until detailed development consent is granted on this portion of the site. • A qualified archaeologist should be appointed to manage the site's archaeology during excavation works at the affected portion of the site. • Additional archaeological testing and recording may be required on the site of the new administration as part of the detailed DA for this stage of the Concept Plan. In accordance with standard conditions of consent, any artefacts recovered during excavation will need to be catalogued and recorded.

Item	Potential Impact	Mitigation Measure
Stage 1 Works – Wilkinson House		
Construction Vehicles	Adverse construction vehicle impacts on surrounding residents.	• Implementation of measures outlined within the Traffic Control Plan. • All construction vehicles will travel to and from the site via specific dedicated routes that have been specifically designed to avoid the use of local roads. • Most construction workers will travel to and from the site outside of peak periods to minimise traffic impacts.
Crime and Safety	Crime risk to safety of students, staff and visitors.	• The proposal incorporates a range of CPTED principles to deter crime. Incorporated principles include: – Providing adequate lighting throughout the site. This includes at footpaths, entrances and walkways. – Designing spaces to ensure that a strong teacher presence will be felt throughout the School; – Incorporating study and well-designed outdoor lighting fixtures, equipment and furniture; and – Ensuring the School site continues to be surrounded by adequate fencing.
Noise	Noise level during operation on surrounding residents.	• Acceptable noise levels due to plant operation are likely to be achieved with consideration given to low-noise plant selection, sensible plant location and implementation of engineering noise control measures where required. • Further assessment will be required when detailed mechanical services design becomes available.

Contamination	Site contamination.	• Waste classification
		• Unexpected finds protocol.
		• Hazardous building materials survey.
		• **As the final construction approach is yet to be determined, the exceedances in the fill can be mitigated through either:**
		  • **Remove of all fill from the development footprint; or**
		  • **Implementation of a long-term environmental management plan, post construction of the concrete slabs for the new development as these will act as suitable capping measures and hence remove the potential complete source – pathway – receptor linkages.**

Following the delivery of appropriate mitigation measures identified above and contained within this EIS, it is determined that the Concept Plan and Stage 1 detailed works will not result in any adverse or on the surrounding environment with the exception of the loss of the existing Wilkinson House building (1926). This impact has been addressed at **Section 8.1** of this EIS and in detail at **Section 3.3.1** of this report and it is determined that the extent of impact is acceptable.

10. CONCLUSION

This response has considered the submissions received from DPE, Council, TfNSW, RMS, OEH, NSW Environmental Protection Agency, Heritage Council, Sydney Water, Residents Adjacent to Thomson Lane group and the community during the exhibition of the EIS for SCEGGS Darlinghurst 2040 Masterplan and detailed redevelopment of Wilkinson House.

Following consideration of the authority and public submissions, the applicant has:

- Provided updated information where requested;
- Revised the proposal in the following ways:
  - Wilkinson House:
    - Minor amendments to external façade design to improve integration within heritage streetscape and with neighbouring developments; and
    - Additional justification of proposed design.
  - Multi-purpose building:
    - Modified envelope of built form to fit generally within the envelope of the existing buildings and to make sure there are no additional view impacts and shadow impacts are minimal;
    - Relocation of indicative driveway entrance to allow retention of street tree;
    - Increased setback from Bourke Street at the upper levels; and
    - Blade wall against Bourke Street terraces removed to reduce bulk and scale.
  - Administration Building and Barham House:
    - Reduced height of parapet to match adjacent Chapel Building gutter level; and
    - Roof plant set back 6.7m from eastern façade to reduce the visual impact from Forbes Street.
- Demonstrated that, subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unreasonable impacts on adjoining properties or the public domain in terms of traffic, social and environmental impacts.

The Proposal in its current form is considered appropriate for the location and should be supported by the Minister and the Independent Planning Commission for the following reasons.

The Proposal:

- Is defined as an ‘educational establishment’ and ‘centre-based childcare facility’ and is therefore permissible with consent under the *Sydney Local Environmental Plan 2012*.
- Has been prepared having regard to Council’s planning policies and generally complies with the aims and objectives of the planning controls for the site.
- Will not increase the number of students at the school and as such does not constitute an intensification of the use of the site.
- Is well serviced by public transport and various walking and cycling routes. Further, the proposal greatly encourages the use of non-private vehicle options to access the site.
- Is of a high quality in terms of built form, bulk and architectural treatment and responds positively to adjoining development.
- Will result in an improved educational environment for the school through:
  - Providing additional open space for students;
  - Enabling an excellent academic programme with purpose-built learning facilities that meet contemporary education standards;

- Supporting a fulfilling and diverse extra-curricular experience;
- Developing efficient, effective, expressive and environmentally sustainable facilities.

Given that the site is suitable for the development and the proposal is in the public interest, this application, as amended should be approved.

DISCLAIMER

This report is dated 4 November 2019 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of SCEGGS Darlinghurst (**Instructing Party**) for the purpose of Response to Submissions (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A DETAILED RESPONSE TO AGENCY SUBMISSIONS

Table 18 – Type table caption here.

Topic/ Issue	Response	Refer to
City of Sydney		
"The CIV Report prepared by Altus Group does not provide detailed calculations of the CIV or details of all the assumptions and components from which the CIV is derived. Rather it provides a summary of headline cost items." *"For these reasons the estimated CIV of $49,374,200 is questionable in light of the costs of other recent school developments in the City's LGA."* *"upon receipt of the requested information, that the Department arrange for the CIV Report and additional information to be peer reviewed and considered with regard to other recent comparable school developments, with the details of the peer review provided to the City;"* *"should the peer review find that the development is estimated to have a CIV of more than $50m, then it is recommended that the proposal be amended to include a design excellence strategy to establish a suitable framework for a competitive design process;"*	The DPIE commissioned review of the Estimated CIV concluded that the cost of works was originally understated and an estimated CIV of $62,110,065 excluding GST for the project would be appropriate. This review is $12,735,865 higher than the originally submitted estimate of $49,374,200. Despite the purported CIV variance a design excellence strategy has already been prepared and was included in Section 16 of the Architectural Design Report that accompanied the EIS. Design excellence has been established through the detailed analysis of the site and the application of the Design Guidelines and Development Parameters.	Section 3.8
"The following developments require a contribution under the City of Sydney Development Contributions Plan 2015: • *development that results in a net population increase; and* • *development that is not excluded in accordance with clause 1.3 of the Plan."* *"The proposed exemption request is not consistent with the Contributions Plan and is not supported."*	Under the City of Sydney Development Contributions Plan, the Council attribute an increase in GFA to an increase in student population. The applicant maintains that the redevelopment of Wilkinson House does not increase student population on the site, notwithstanding a minor increase in GFA associated with these 'Stage 1' works. Contributions for the multi-purpose building and new administration building should be determined as part of the Detailed SSD DA.	Section 3.9
"Prior consultation with the City has consistently advised that demolition of the heritage item and contributory item is not supported. The loss of Wilkinson House would be significant and unacceptable."	The Options Analysis that accompanied the SSDA and further justification provided in the Architecture Design Report at **Appendix C** adequately justify the need for the replacement of Wilkinson House. The options considered for the site's redevelopment range from refurbishment of the existing building to its replacement with a new purpose-designed facility. The alternatives to the replacement of the building, which have been explored,	Section 3.3.1

Topic/ Issue	Response	Refer to
	will not fully meet the School's requirements for the provision of larger flexible, contemporary learning spaces. Further, the partial retention of the existing structure cannot be adequately protected during construction of a further adapted building without unacceptable risks. Accepting the limitations of the structure, the constrained nature of the inner-city site and the School's primary objective to provide educational facilities which meet contemporary standards, the analysis concluded that the replacement of Wilkinson House provides the optimum solution to meet the School's educational requirements and continued use of the site.	
"It is considered that cumulatively the demolition of Wilkinson House and the old Gym Building will erode the heritage significance of the heritage listed site. Should the DPE be of the mind to support the proposal as a minimum Wilkinson House should be retained and adaptively reused."	The Old Gym was constructed in 1925 as the School's first gymnasium building. Externally the building has been substantially modified by the construction of the concrete walkway and stairwell to the north of the building and the storeroom extension to the south of the building, which are of little heritage significance and/or intrusive to the building. The walkway and stairwell in particular have significantly diminished the appreciation of the building from the north. The building has also been modified internally. Owing to its low level of physical integrity, the building has been assessed as of moderate significance. The 2040 Masterplan proposes the demolition of the Old Gym building in order to accommodate a new multi-purpose building. Accepting the low integrity of the building and its assessed level of significance, removal of the building will permit the provision of new facilities and spaces which better serve the current and future needs of the School.	Section 3.3 and Appendix E
"The bulk of the proposed building envelope located between Forbes Street and the existing Barham building is significantly larger than the existing structure. The proposed envelope has the potential to obscure Barham building from Forbes Street. *The new building envelope is to the street alignment and has the potential to dominate the Chapel building.*	The proposed envelope for the new administration building has been designed to maintain the significance of the School and respect its surrounding heritage context, whilst improving the amenity and presentation of the School to the streetscape. The potential impacts of the proposed administration building on the site, Barham House and the Heritage Conservation Area are minimised through the following design considerations:	Section 3.3 and Appendix E

Topic/ Issue	Response	Refer to
The proposed envelope cannot be supported in its current form and needs further refinement to be sympathetic, particularly to the most important building on the site – the Barham building."	• The building is designed to align to the Forbes Street site boundary, reflecting the existing urban grain within the street and Conservation Area. • The building has a similar footprint to the proposed demolished extensions. • The building maintains and marginally improves the present visibility of Barham House from Forbes Street. • The main building mass is setback from Barham House by a link – which has a maximum height no greater than the eaves line of Barham House. The link is also setback from the northern and southern facades, to visually and physically separate Barham House. • The proposed building height has been reduced so it is no greater than the eaves line of the Chapel Building. • The building's architectural character and materiality reflects its heritage context, but ensures that Barham House historic fabric, character and form are readily understood. A view analysis undertaken as part of the Heritage Impact Statement (January 2019) that accompanied the EIS, which assessed the potential impacts of the proposed developments on the sight lines to the Barham House and the Chapel Building. It has been assessed that there will be no additional impacts to the views and vistas of the buildings.	
"The proposed excavation is significant in scale and located in close proximity to the Chapel with the potential to affect the structural integrity of the Chapel. The southern facade of the multipurpose building is also located in very close proximity to the heritage listed terraces on Thomson Street. There is insufficient information to determine whether the likely impacts are acceptable or not."	The proposed excavation of the multi-purpose building is expected to be within high to medium strength sandstone. Due to the proximity of the adjacent buildings, a rock saw and small rock breakers are expected to be used around the perimeter of the basement to limit the vibrations on the adjacent structures. Excavation trials will be carried out and will follow the acceptable vibration criteria as outlined in the Revised Construction and Operational Noise Report (**Appendix J**). A monitoring plan will be submitted by the contractor that will	Appendix V and Appendix J

Topic/ Issue	Response	Refer to
	involve reporting all movements to the client and structural engineer during excavation and apparatuses installed on existing adjacent structures facing the excavation. Mitigation measures for risks from construction to the Chapel building and other nearby heritage structures include: • Using construction equipment and drilling equipment that are low vibration impacts through the ground profile. This will reduce any significant ground movement and protect the adjacent structures. A vibration and/or acoustic consultant is to provide advice on the allowable vibration limits at certain distances from the adjacent structures. • The contractor is to choose construction and drilling equipment that are within these limits set, and to perform excavation tests to ensure the ground movement is minimised. • The adjacent heritage structures are to be protected throughout the construction period with hoarding rated to the Australian Standards. No dangerous construction activity is to occur within proximity of the existing buildings. • The retention system designed to hold back the excavation will be designed by a qualified structural engineer, and for minimal lateral movements in the temporary and permanent case. Less than 10mm of deflection will be experienced at the top of the retention system design. Movements of this magnitude will not be detrimental to the adjacent buildings. Localised cracking that may occur can be remediated easily with crack filler. • The retention systems movement will be monitored using the approach outlined above. • The proposed excavation will not undermine the adjacent buildings. The ground profile will remain intact and in place during construction.	

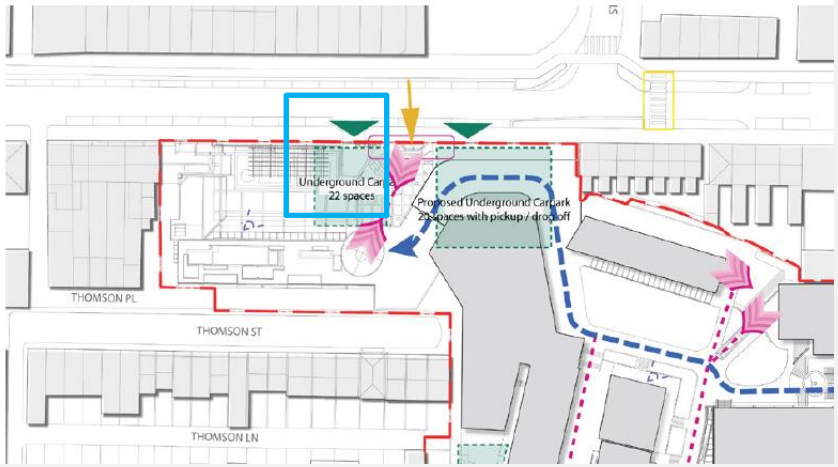
Topic/ Issue	Response	Refer to
	The foundations of the existing buildings will not be disturbed in any way	
"The significant amount of excavation, particularly at Stage 3, provides the opportunity to reuse any good quality sandstone on the site, whether on buildings (both existing and proposed) and/or in the landscape design. This should be fully explored."	In line with Council policies all sandstone to be excavated will be reused or retained, where possible. Construction and excavation of any good quality sandstone found will be undertaken in a manner that allows it to be reused on-site or elsewhere as required.	
"An updated acoustic report should be provided that includes site-specific noise mitigation measures. If major exceedances are still predicted, alternative demolition methodologies need to be considered to ensure that all reasonable and feasible measures to reduce the noise level are fully explored." *"Generic recommendations are inadequate. In addition, adequate respite periods must be nominated."* *"The Department should also ensure that a Construction Noise and Vibration Management Plan is submitted for approval prior to any construction certificate or demolition works commencing at Wilkinson House."*	Consistent with the EPA's Interim Construction Noise Guideline, noise mitigation measures have been recommended to be adopted where "reasonable and feasible". These have been included in the draft Construction Noise and Vibration Management Plan in Appendix C of the Revised Construction and Operational Noise Report at **Appendix J**. A finalised Construction Noise and Vibration Management Plan will be prepared prior to issue of the Construction Certificate once the construction methodology is known, in line with normal practice.	Section 5.7 and Appendix J
"The City recommends any construction works are to comply with the City's standard hours for construction outside of the CBD.:	Given that the assessment has been based on the EPA policy it is recommended that the hours are consistent with EPA guidelines being: • Monday to Friday 7.00am to 6.00pm • Saturday 8.00am to 1.00pm • Sunday and Public Holidays No work This compares with council's recommended hours of 7.30am and 5.30pm Monday to Friday and 7.30am to 3.30pm on Saturday.	Appendix J
"A Detailed Environmental Site Investigation (DESI) has not been submitted as per the recommendations of the Preliminary Environmental Site Investigation (PESI).	The Preliminary Site Investigation dated October 2018 concluded that the site has a generally low risk of widespread gross contamination of the site and further that the site can be made suitable for the proposed development following additional testing completed after the demolition of existing buildings.	Appendix L and Section 5.4

Topic/ Issue	Response	Refer to
Where the DESI states that the site requires remediation, a Remediation Action Plan (RAP) is to be prepared by a suitably qualified and competent environmental consultant. *In the absence of a DESI, it is submitted that the Department cannot be satisfied that the site is suitable for the proposal under SEPP 55 (Remediation of Land)."*	A Development Site (Contamination) Investigation (DSI) has been undertaken for the Stage 1 works for Wilkinson House by Douglas Partners at **Appendix L**. Additional DSI will be undertaken for each stage of the development as design plans become available.	
"The proposed building envelopes provides a generally appropriate scale to Bourke Street at the boundary, but rises very quickly (in breach of the maximum height) taking cues from the detracting building it is replacing rather than the controls or what is appropriate in the context. Section EE from the submitted drawings shows clearly the breach of height. The result is an envelope that is over-scaled, excessively bulky and too high, resulting in a poor streetscape outcome."	The design of the multi-purpose building has been revised and is reduced in scale to match the bulk, scale and height of the existing buildings. The setback of the upper levels to Bourke Street has been increased in order to interact and respond better to the heritage character of the streetscape. The proposed building will improve the appearance and consistency of the streetscape compared with what is existing.	Section 3.1
"The proposed envelope for the new multi-purpose building would provide a better fit with the context of Bourke Street and the conservation area if it complied with the maximum height control in the LEP."	The envelope of the multi-purpose building has been amended to mitigate issues relating to bulk and scale. The amended design lowers the building to two stories adjacent to the Thomson Street and Bourke Street neighbours, and has been designed to generally match the scale, height and mass of the existing buildings. These amendments have been designed to minimise any additional impacts of the proposed new building to the built environment and the School's neighbours. The amended design of the multi-purpose building still exceeds the maximum height limit but no longer creates additional privacy, overshadowing and view impacts. The proposed street frontage will improve the consistency and heritage character of Bourke Street compared with what is existing.	Section 3.1 and Appendix E
"The proposed envelope of the multi-purpose building is excessively large and does not address the context adequately."	The proposed built envelope of the multi-purpose building has been reduced in response to submissions received.	Section 3.1
"Should the Department be of the mind to support the application, the City's suite of standard public domain conditions addressing alignment levels, dilapidation reports of the public domain, stormwater and drainage, public domain lighting, submission	Noted.	

Topic/ Issue	Response	Refer to
of public domain plans, protection of stone kerbs and survey infrastructure, provision of security, defects liability periods and the like, should be imposed."		
"A poor and unsympathetic transition is proposed from the existing heritage listed two storey bald face terraces (176-188 Bourke Street – heritage item I219) to the new development in the form of a 3 storey blade wall on the boundary." *"The building within the envelope to Bourke Street should be required to have a 2 storey street edge interface to reflect the characteristic of the conservation area and the predominant streetscape scale of 2 storeys. The vertical and horizontal lines do not relate well to the heritage listed terraces."*	The envelope of the multi-purpose building has been amended in response to issues raised regarding the proposed envelope's interface with the Bourke Street terraces. As part of the amendments, the blade wall adjacent to the Bourke Street terraces has been deleted, whilst the envelope has been aligned parallel to the street, maintaining the street alignment with the existing neighbouring terraces. The building envelope is also setback at upper levels (to a total of 8m) from the adjacent terraces, minimising the bulk and scale to the Bourke Street streetscape.	Section 3.1.3.2 and Appendix E
"The design should be modified to separate any open space atop the new form from the boundary by a setback (in the order of 2m) rather than a blade wall. Fire separation of windows should be dealt with by sprinklers rather than blade walls on the boundary."	The submission for the multi-purpose building is for building envelope approval only. Any requirements for fire separation will be determined and described in the Detailed DA Submission. All fire separation will be provided in accordance with the BCA.	Appendix C
"The impact on 4 Thomson Street does not comply with the DCP requirement. The dwelling does not meet the minimum requirements, yet is being made worse by the development… These impacts are not acceptable."	The amended design reduces the scale and built envelope of the Multi-purpose building and the overshadowing impacts upon the Thomson St and Thomson Ln properties is that the properties will receive additional solar access, **Figure 11** in **Section 3.1.5** shows the overshadowing impacts to Thomson Street from the amended design.	Section 3.1.5 and Appendix C
"Drawing AR.MP.7006 Rev B provides a view of the proposal from 10 and 20 Thompson Street, but not from the closest and most impacted properties adjacent to the proposed multi-purpose building. To enable Council and the community to better understand the impacts of the proposal, a view from 2 Thomson Street should be provided that demonstrates if the proposed envelope has an overbearing impact on the adjoining residential terrace."	The Visual Impact Study and the Architectural Design Report provide a series of views from surrounding properties. The drawings show the reduced impact the amended design and is overlaid with the existing building extent to show the changes to views. The amended Multi-purpose building design generally improves view lines from that is existing, with only some very minor additional impacts. Views are shown from 2-9 Thomson Street.	Appendix C, Appendix F, Section 3.1.5.2 and Section 5.2

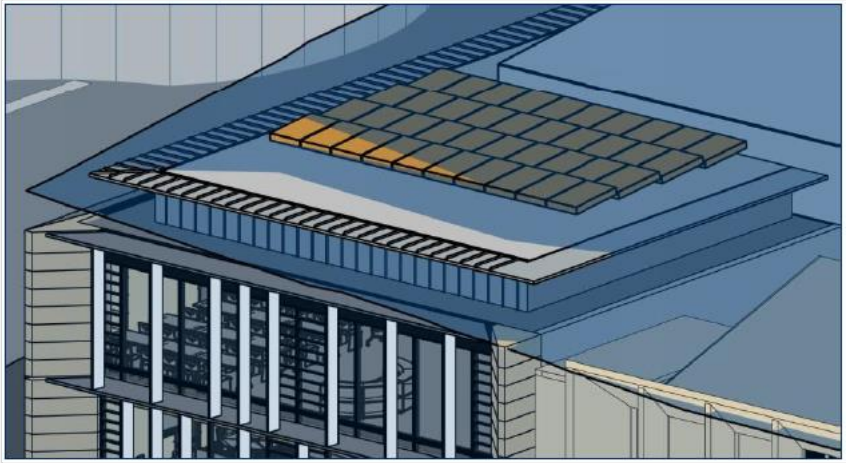
Topic/ Issue	Response	Refer to
"It is recommended that in the event of a favourable determination of this SSD, the Department make it clear that no approval is granted for all of these elements, particularly noting the following: • *All these works are associated with the future Stage 2 and 3 of the masterplan (proposed to commence the earliest in 2025 and 2030 respectively). These future Stages will be the subject of separate detailed DAs. It is premature to grant consent to these elements as part of a concept proposal.* • *Most of the identified works are on public land outside of the development site. Separate consent is required from the City (including the Local Pedestrian, Cycling and Traffic Calming Committee) for these elements."*	The School acknowledges that Stage 2 and Stage 3 works are only concept approvals and detailed development applications will be prepared in accordance with the timeline established in the SCEGGS 2040 Masterplan. Appropriate consent will be sought from the City of Sydney for any works on public land as required by the Conditions of Consent.	
"The section below through the central lawn (p14 – Appendix E – Landscape Plan) highlights the lack of shade, planting and landscape relief being proposed for the staff and students."	Upon review, the section through the central lawn provided in landscape report (rev. A) does not accurately portray the extent of existing tree canopy and shade provision to this area of the school. The intent for this central area is to maintain existing character and solar access while improving student access and usability. The cross-section has been updated to show existing tree canopy and vegetation in the background of the image along with proposed tree planting.	Appendix K
"While accepting that the proposal is concept in nature, there is nevertheless an insufficient level of detail to determine if there will be adequate soil depth and volume for the trees and planting located on slab. There is no indicative plant schedule to support the scheme, only landscape character images."	The podium area has been now been significantly reduced as a direct result of changes in the building envelope and footprint in the revised building design. As a result, tree planting to the podium areas has been reduced. A detail illustrating how soil volumes will be achieved on slab has been included in the landscape report.	Appendix K
"It is not clear how the landscape design improves the school and is not at the expense of overdevelopment of the site."	The following design principles outline how the proposed landscape design improves the School: *Provide a consistency through use of materials:* • Unification of character across the campus through consistent suite of materials and finishes.	Appendix K

Topic/ Issue	Response	Refer to
	• Build on SCEGGS commitment to high quality public domain and outdoor spaces as demonstrated in St Peters Street • Palate of materials and finishes to reflect and unify the range of architectural styles across the campus. *Improve street address and sense of arrival:* • Formalise main/admin entry from Forbes St • Enhance arrival experience for students entering the school from Forbes St, Bourke St and St Peters St • Enhance arrival experience for primary school students entering the school from Bourke St. *Enhance heritage character:* • Enhance the heritage character of the school, including existing buildings, spaces and existing mature trees • Materiality is to reflect the juxtaposed architectural character (existing and proposed) *Maximise usable outdoor space:* • Maximise usable outdoor space across the school site, with particular consideration given to how the central lawn and podium areas will function as the main passive outdoor spaces for the school • Provide a number of passive spaces throughout the campus for students to utilise in different ways for outdoor learning *Maintain and enhance existing mature tree canopy:* • Existing trees reinforce a distinctive character and identity. • Reinforce the park/campus theme to the school.	

Topic/ Issue	Response	Refer to
	• Develop strong landscape links through enhancing the character of additional tree planting.	
"The removal of well-established street trees with high retention values to allow for the installation of a new driveway crossover is not supported."	The proposed Architectural plans have been revised to ensure that no trees are proposed to be removed on Council's land as part of the Detailed SSDA.	
The four (4) trees marked in blue below have not been included in the AIA. The Landscape Masterplan shows the site boundary extending beneath the canopy of the trees, and the Landscape Analysis and architectural drawings appear to show a basement car park built against the boundary in close proximity to the trees. As such, it is requested that the AIA be amended to include the four (4) trees to form part of the assessment. Figure 27 - Extract from City of Sydney Submission – pg. 15 	The four trees as marked in **Figure 27** below were not included in the AIA as those trees will not be affected by any proposed works and is not in close proximity to proposed excavation areas. The basement car park (**Figure 28** outlined in blue) that is nearby the trees is existing and therefore is not part of the SSD application. The four trees have been included in the updated Aboricultural Impact Assessment prepared by Bluegum Arborist at **Appendix X**. Figure 28 - Access and Circulation Diagram – Extract from Landscape Plan  *Source: Context – Landscape Plans*	Appendix X
"It is requested that AIA and Landscape drawings be amended to:	Landscape drawings have been updated to correctly reference the AIA with any inconsistencies between the two sets amended.	Appendix K

Topic/ Issue	Response	Refer to
• *Show all existing trees identified in the AIA (whether they are proposed for retention or removal), show Tree Protection Zone radii as identified in the AIA, and* • *Show all proposed new trees,* • *Tree 1 is listed for removal in the AIA, and is shown as requiring removal for the new driveway crossover on the Landscape Analysis, but is shown for retention on the Landscape Masterplan.* • *Trees numbered as Trees 2 & 3 in the AIA are listed for retention in the AIA and the Landscape Masterplan, when the Landscape Analysis is showing an underground car park for this area."*		
"The removal of the Forbes St carpark is supported. The provision of the new Bourke St carpark with 22 spaces is not supported particularly noting the following: • *the EIS clearly indicates that there is no increase in either staff or student numbers as part of this application;* • *the Bourke St carpark is part of the future Stage 3 proposed to commence the earliest in 2030;* • *Stage 3 is only conceptual in nature and it is not good planning to agree to provision of a non-compliant car park with a precise number of spaces as part of a 'masterplan' application;* • *the Bourke St carpark relies upon removal of a street tree, construction of a new driveway and relocation of existing kerbside parking, all of which requires separate approval from the City and the Local Pedestrian, Cycling and Traffic Calming Committee.* *It is recommended that the Bourke Street carpark be deleted from any approval of the Concept application."*	The proposed parking provision does not increase the number of spaces associated with the School use. The seven (7) spaces to be removed from the Forbes Street car park will be incorporated into the proposed basement. The additional five (5) parking spaces and seven (7) pick-up and drop-off spaces are associated with the childcare centre use in accordance with the Sydney DCP. Further design refinement will occur during the detail development application of Stage 3, the proposed basement parking number is only seeking concept approval and will be subject to change following detail design. The location of the driveway entrance has been modified to avoid removal of the street tree.	Appendix H
"The submitted Green Travel Plan (GTP) and Transport Access Guide (TAG) are acceptable in principle. A condition should be included in any determination by the Department to maintain, update and implement the GTP and TAG."	Noted. A draft GTP has been included in the Revised Traffic Impact Assessment and will be implemented and updated as required. A condition of	Appendix H

Topic/ Issue	Response	Refer to
"As part of the ongoing operation of the school, a detailed Green Travel Plan (GTP), which includes target mode shares for both staff and students with the objective to reduce the reliance on private vehicles, shall be prepared. The GTP must be implemented accordingly and updated annually."	consent may be imposed to prepare a final GTP prior to occupation of the School under Stage 1 works.	
"…the School should provide good quality end of trip facilities to encourage people riding to achieve modal shift toward to more sustainable options." *"Based on 185 staff and 942 students some 19 spaces for staff and 50 spaces for students (all Class 2 /AS 2890.3:2015 Class B bicycle parking spaces) are recommended. This should be complemented by a minimum 25 lockers and 2 shower/change areas for staff use as end of trip facilities."*	No additional bicycle parking or end-of-trip facilities are proposed for the School as there will be no increase in students or staff numbers. The School will continue to use existing bicycle facilities and changing rooms provided at various locations across the campus. The proposed childcare centre will be provided with four (4) bicycle spaces in the basement car park in line with the DCP. The basement car park will also include 50 bicycle spaces in the form of 25 rails.	Appendix H
"A revised flood assessment report prepared by a suitably qualified floodplain management professional should be prepared and submitted outlining the flood planning levels required for the subject development to ensure compliance with the City's Interim Floodplain Management Policy."	An Additional Flood Statement has been prepared and outlines the flood planning levels across the site and the mitigation measures that have been incorporated in response to any inconsistencies with Council's policy. Future design of the multipurpose building and administration building are to address the nominated flood planning levels.	Section 5.8 and Appendix R
"It is unclear from the plans and ESD Report as to whether any renewable energy elements are proposed as part of the School's masterplan." *"It is requested that the applicant provide clarification as to whether any renewable energy elements (specifically photovoltaic or solar/heat pump hot water systems) are proposed for the masterplan and Stage 1 works."*	On review of the proposed drawings of the new development, see **Figure 29** below, the Wilkinson House roof generally faces north, east and west with minimum shading from adjacent buildings. Photovoltaic and solar hot water system can be placed on the roof. As there are limited amenities in the building, photovoltaic cells are recommended over solar hot water systems. Due to the limited roof space, the quantity of photovoltaic panels installed would not be extensive and is likely to offset only a proportion of the building's energy consumption. The peak load and demand will be investigated further during the design stage to determine the type and optimal number of panels to complement energy use. The placement of panels will be titled at an angle to maximise energy efficiency (within the height of building standard) and be considerate of reflectivity/glare to neighbouring buildings.	Appendix N

Topic/ Issue	Response	Refer to
	Figure 29 – Rooftop of Wilkinson House  *Source: Erbas Sustain*	
"The applicant is encouraged to avoid a cosmetic water re-use solution designed to achieve GreenStar compliance only. The applicant should provide detailed information about rainwater tank storage size and smart end-uses – preferably beyond only irrigation."	Given that the footprint of Wilkinson House is relatively small (approximately 455sqm), there is no proposal to incorporate rainwater storage tanks within this stage. The new multi-purpose building has a much larger footprint and the School will investigate the ability to incorporate a rainwater capture and reuse system within the future detailed design of this building. There are also areas of grass/planter near to the building which could use the rainwater reuse for irrigation and more fixtures which would likely be connected to rainwater reuse which will reduce the burden on the potable water supply. Both the Administration and Multi-purpose buildings are likely to incorporate rainwater capture via tanks. The size of the rainwater tanks and the locations will be determined during detailed design. For Greenstar purposes the tanks could be used to gain points. This may not be required as the buildings are likely to have enough points from other	Appendix P

Topic/ Issue	Response	Refer to
	sources to meet the requirements. If other points are not met, then rainwater capture can be used for this purpose.	
"The school must have a dedicated and enclosed waste and recycling storage area which has adequate storage area to meet their generation rates."	As the number of students will not be increasing as part of this proposal current waste levels will remain the same. No additional waste and recycling facilities are required. Construction waste and recycling is outlined in the Waste Management Plan by Foresight Environmental dated November 2018. Any waste and recycling associated with the proposed Multi-purpose building will be accommodated at the detail SSDA stage. Wilkinson House will have bins for the handling of waste and recycling but there is no proposal for a dedicated waste room. Wilkinson is not expected to generate large volumes of waste and waste handling would be similar to current arrangements. Waste will be removed from the building daily and stored in the School's current waste area adjacent to the main entry.	
The National Trust of Australia (New South Wales)		
"The National Trust of Australia (NSW) lodges a strong objection to the proposed demolition of the Emil Sodersten designed Gwydir Flats (Wilkinson House) at 165 Forbes Street, Darlinghurst… In the light of the above Statement of Significance, the Trust is currently considering the listing of Wilkinson House (Gwydir Flats) on the National Trust Register."	It is acknowledged that the National Trust is considering the listing of Wilkinson House on the National Trust Register. As the Register is not a statutory listing, the listing of Wilkinson House on the Register will not alter the significance of the building.	
"The Trust is also concerned that the broader development proposal will impact on the sight lines to the 1833 John Verge designed "Barham" which was listed on the National Trust Register in October, 1974, is listed as a Heritage Item on the Sydney Local Environmental Plan 2012, and, in the National Trust's view should be listed on the State Heritage Register."	The new Administration Building is proposed to be located in the area currently occupied by the kitchen and laundry extensions to Barham House to the east, which vary in origin from 1901-1930s. These extensions are utilitarian in nature and are heavily modified and are not part of the original 1833 John Verge designed Barham House. Furthermore, Barham House was not designed to address or be seen from Forbes Street. A view analysis undertaken as part of the Heritage Impact Statement (January 2019) that accompanied the EIS assessed the potential impacts of the proposed development on the sight lines to the 1833 John Verge building. It	Section 3.3.1.4, Appendix C and Appendix E

Topic/ Issue	Response	Refer to
	concludes that there will be no additional impacts to the views and vistas of the building. The proposed works to Barham House provides a potential positive heritage impact with the removal of later intrusive additions to the south-west allowing for the reconstruction of the 1833 form of the building and the reinstatement of the 1880s verandah to its original form. The proposed administration building envelope retains the significant north-west presentation of the building and is set-back from the north and south to emphasise the visual prominence of Barham House and is of a sympathetic sale and mass.	
"In the National Trust's view this Concept Design should be seriously re-thought with an emphasis on the recognition, better protection and conservation of the heritage of the site which is an important element of the broader heritage of the Darlinghurst area."	The 2040 Masterplan includes the restoration and reconstruction of the Barham House, to its original 1833 form, and retention/reconstruction of the 1880 verandah. The conservation and reconstruction of Barham will enhance its presentation within the School and reinstate lost historic views to the building while also providing the School with an improved entrance address to Forbes Street. Additionally, the Concept Masterplan aims to improve the School's contribution to the heritage streetscapes and conservation area through the removal of unsympathetic buildings and alterations. The masterplan proposes the demolition of the 1960s and 70s Science and Library Buildings on Bourke Street and their replacement with a new school building which better responds to the historic context and two-storey scale of the neighbouring residential development. The proposed 2040 Masterplan establishes building envelopes which allow for the long-term vision for staged development on the school site, balanced with heritage conservation of the significant items.	Appendix E
"The National Trust has consistently opposed the use of State Significant Development designation to over-ride existing heritage protection provisions. The Trust maintains that there should be a proper balance between development and	Wilkinson House presently accommodates five learning spaces varying in size from 41sqm to 57sqm. These are deficient when assessed against the DOE minimum classroom size of 60sqm. These learning spaces are poorly shaped for learning and inefficient due to the adaption of existing spaces. The small, irregularly shaped rooms do not allow uninterrupted sight lines and do not meet	Appendix E

Topic/ Issue	Response	Refer to
heritage conservation and that balance certainly does not exist in terms of State Significant Development proposals."	contemporary space requirements for child protection. The smallest learning rooms do not permit collaborative learning classes. Analysis of the development options has concluded that due to the constrained nature of the structure, that its replacement with a new purpose-designed educational building is the most viable option which meets the School's requirements for contemporary learning spaces. The proposed replacement building is designed to respect and complement the heritage context of the School and the Conservation Area. The potential heritage impacts of the proposed development are minimised through the following design considerations: • The building is designed with zero setbacks, aligned to the site boundary, retaining the historic uniformity in street alignment on the site and in the Conservation Area. • The building height, although marginally exceeding the 15m height limit for the area, is comparable in scale to the original Wilkinson House and surrounding contemporary buildings on the site along St Peter's Street. Retention of the present building height ensures that visual impacts on the State Heritage listed St Peter's church site and the precinct generally is minimized. • The building mass is similar to the present Wilkinson House. • Contemporary in its architectural expression, the facades are articulated and incorporate a variety of high quality, durable materials to provide visual interest.	
Office of Environment and Heritage (Heritage Division)		
"The SCEGGS Darlinghurst Campus Site includes the State Heritage Register (SHR) listed item, St. Peter's Church and Precinct (SHR No. 00148). It is noted that the proposed Concept DA site is located outside, however in the vicinity of the item's listed curtilage. The Concept DA site is also identified as a local heritage	The proposed replacement building is sympathetically designed to relate to St Peter's Church and Precinct. As with the present building, the proposed building is designed with zero setbacks, aligned to the site boundary, retaining the existing street alignment on St Peter's Street and within the Conservation	Appendix E

Topic/ Issue	Response	Refer to
item, 'Sydney Church of England Girls Grammar School Group including Barham, Church Building and Wilkinson House and their interiors and grounds' and is located within the Darlinghurst heritage conservation area and adjacent to a number of local heritage items."	area. The proposed building height is comparable in scale to the existing Wilkinson House. Retention of the existing building height ensures that visual impact on the St Peter's Church and Precinct is minimised.	
The archaeological assessment by Casey & Lowe indicates that archaeological remains associated with Barham Hall and Bourke Street terraces are considered to have a moderate degree of archaeological potential to survive… The assessment of significance indicates that remains within the study area are regarded as having a local level of historic significance."	In their Archaeological Assessment, Casey & Lowe outlined an appropriate guide to the management of the archaeological resources prior to the commencement of Stage 1 works. They are as follows: 1. No development-related or archaeological works can be undertaken in the identified parts of the site until prior development approval and the receipt of conditions relating to the site's archaeology. 2. A qualified archaeologist should be appointed as excavation director to manage the site's archaeology. 3. Depending on the impacts, an archaeological testing and recording program should be undertaken to the east of Barham Hall on the site of the proposed Administration Building, in the current open areas to the south and west of the Chapel, and in the areas to the east of the Science and Library buildings on the site of the proposed Multi-purpose building. 4. Enough flexibility in the development timetable must be allowed to enable remains to be recorded in appropriate detail. 5. To align with standard permit conditions, artefacts recovered during an excavation should be catalogued and analysed with a report written that includes responses to the identified archaeological research design. 6. The exposed sections of pre-1840s government quarry should be recorded by an appropriate consultant prior to impacts on them. In addition to the above management guidelines, the Archaeologists should follow the conditions recommended by the Heritage Council, which include:	

Topic/ Issue	Response	Refer to
	1. Archaeological testing shall be undertaken east of Barham Hall on the site of the proposed administration Building, in the current open areas to the south and west of the Chapel, and in the areas to the east of the Science and Library Buildings on the site of the proposed Multi-purpose building to inform the detailed design for this site. Avoidance of state significant archaeological deposits and substantially intact archaeological evidence should be employed by the works. 2. The testing shall be guided by an appropriate research design and excavation methodology and must be prepared in accordance with Heritage Council guidelines. Those documents should be prepared for the approval of the Director-General, Department of Planning & Infrastructure upon receipt of advice from the Heritage Division of the Office of Environment & Heritage. 3. The name of the nominated Excavation Director suitable to satisfy the Excavation Director Criteria of the Heritage Council of NSW for the proposed activity and significance level. 4. All construction contractors, subcontractors and personnel are to be inducted and informed by the nominated Excavation Director prior to commencing work on site as to their obligations and requirements in relation to historical archaeological sites and 'relics' in accordance with guidelines issued by the Heritage Council of NSW. 5. After any archaeological works have been undertaken, a copy of the final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW, the City of Sydney and Department of Planning & Infrastructure. The proponent shall also be required to nominate a repository for the relics salvaged from any historical archaeological excavations.	

Topic/ Issue	Response	Refer to
"No development-related or archaeological works can be undertaken in the identified parts of the site until prior development approval and the receipt of conditions related to the site's archaeology" *"A qualified archaeologist should be appointed as excavation director to manage the site's archaeology"* *"Depending on the impacts, an archaeological testing and recording program should be undertaken to the east of Barham Hall on the site of the proposed administration building, in the current open areas to the south and west of the Chapel, and in the areas to the east of the Science and Library buildings on the site of the proposed Multi-purpose building"* *"Enough flexibility in the development timetable must be allowed to enable remains to be recorded in appropriate detail"* *"To align with standard permit conditions, artefacts recovered during an excavation should be catalogue and analysed with a report written that includes responses to the identified archaeological research program"* *"The exposed sections of pre-1840s government quarry should be recorded by an appropriate consultant prior to impacts on them"*	Noted.	
Roads and Maritime Services (RMS)		
"The layout of the proposed car parking areas associated with the subject development… should be in accordance with AS 2890.1-2004, AS2890.6-2009 and AS 2890.2-2018 for heavy vehicle usage. Parking Restrictions may be required to maintain the required sight distances at the driveway."	The access for the basement car park is in a compliant location and has adequate geometry under the provision of AS2890.1 (2004). Detailed design of the driveway will be undertaken as part of the Detailed SSD DA.	Appendix I
"Parking for building maintenance and service deliveries is to be provided on site."	Three (3) parking spaces are proposed as part of the basement parking area which will be able to accommodate B99 vehicles.	Appendix H
"The swept path of the longest vehicle (including garbage trucks, building maintenance vehicles and removalists) entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS. In	A detailed basement plan showing compliance with Australian Standards and swept path analysis will accompany the detailed design development application for Stage 3.	

Topic/ Issue	Response	Refer to
this regard, a plan shall be submitted to Council for approval, which shows that the proposed development complies with this requirement."		
"A CPTMP should be submitted in consultation with the TfNSW Sydney Coordination Office (SCO), Roads and Maritime, and City of Sydney Council, prior to the issue of a Construction Certificate. The CPTMP needs to include, but not be limited to, the following: construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control, taking into consideration the cumulative traffic impacts of other developments in the area."	A draft Construction Traffic Management Plan has been prepared and can be found within the Revised Traffic Impact Assessment.	Appendix H
Sydney Water		
"Our available records indicate, there is a Sydney Water's 300mm stormwater pipe located through the development site at East – West direction between Thomson Street and Bourke Street near the northern end of Thomson Street. *Sydney Water's guidelines for building over or adjacent to stormwater assets outline the process and design requirements for such activities. As per the guidelines, the applicant is advised of the following:* • *No building or permanent structure is to be constructed over the stormwater channel / pipe or within 1m from the outside wall of the stormwater asset. Permanent structures include (but are not limited to) basement car park, hanging balcony, roof eves, hanging stairs, stormwater pits, stormwater pipes, elevated driveway, basement access or similar structures. This clearance requirement would apply for unlimited depth and height.* • *The applicant is required to submit the elevation drawings with the stormwater channel/ pipe, to ensure that the proposed buildings and permanent structures are 1m away from the outside face of the stormwater channel."* *"If the proposed development work is within 5m from the Sydney Water's 300mm stormwater pipe which is located within the development site, proponent is required to undertake a dilapidation survey report / CCTV report of the Sydney Water's stormwater pipe prior to commencement of any work on the site. This report should*	Sydney Water has made comment regarding the DN300 stormwater pipe traversing the site. The proposed multipurpose building sits over a DN300 SGW stormwater pipe, as per Sydney Water's advice in the Feasibility letter issued on the 3/04/19 no building or structure is permitted to be constructed over the stormwater. As such, during the Detailed SSD DA for this building, the stormwater pipe is to be deviated. Should deviation not be supportably, the detailed building will need to be revised to avoid impact to this stormwater asset.	Appendix W

Topic/ Issue	Response	Refer to
extent at least 10m upstream and downstream from the property boundary. A copy of this dilapidation report is to be provided to Sydney Water. *This dilapidation survey report/ CCTV Report is to be carried out again upon completion of the all construction work."*		
"The WSC should re-submit the application with estimated water uses for each new building and a plan showing each new building with proposed water connection point to existing Sydney Water's main."	A lot of the wording in the letter provided for case 177550 is standard. The letter appears to be submitted by the Department of Planning directly to Sydney Water. The feasibility study for our application is **case 173706** which also uses standard wording. The water and sewer rates have been used in our application. At the time of our feasibility the flow values were based on the population of the school when these projects will be completed. We suggest to the Department to use case 173706 rather than 177550 moving forward which will likely remove the need to have these values added as they are already submitted for the relevant feasibility study.	Appendix Q
"The WSC should re-submit the application with estimated sewer demand for each new building and a plan showing each new building with proposed sewer connection point to existing Sydney Water's sewer."	Sydney Water has not provided comments on the preferred connection point for the development. Based on the Sydney Water's hydra system it is noted that there is a DN225 VC sewer main within the property's boundary at the northern end with an existing connection. If an additional connection is required there is a DN225 VC sewer main in Bourke Street. It will be required to extend the sewer to within the property's boundary. This can be completed under Sydney Water's minor works process. At this stage it is not anticipated for Sydney Water to request any of the surrounding sewer mains to be amplified. Please note that this is at Sydney Water's discretion and will be assessed upon submission of the Section 73 application.	Appendix W

APPENDIX B DETAILED RESPONSE TO PUBLIC SUBMISSIONS

Table 19 – Public Submissions

Topic/ Issue	Response	Refer to
Heritage		
General objections regarding impacts on heritage items within the school, nearby and the heritage conservation area: • Significant reduction in the number of heritage buildings on the site with the demolition (8 responses) • New buildings not respectful to the heritage items within the SCEGGS site or to the nearby heritage items and heritage conservation area (30 responses) • Replacement of heritage buildings with inappropriately designed modern buildings (10 responses) • Reduction in heritage characteristics of the local area (13 responses) • Justification sought for demolition in terms of loss of heritage value (10 responses) • Inconsistent with the objectives of cl 5.10 of the SLEP 2012 (11 responses)	In accordance with clause 5.10(5) of the SLEP 2012, a heritage assessment was undertaken as part of the development application for the proposed masterplan. Within this heritage assessment, an assessment of the heritage significance of all the buildings within the SCEGGS Darlinghurst campus (inclusive of St Peters Church precinct) was completed to inform the masterplan design. The objectives of this assessment are to ensure the protection and conservation of buildings and areas of significance, in particular, those of high and exception significance, consistent with the objectives of clause 5.10 of the SLEP 2012. The buildings and areas which are proposed to be demolished have been assessed as of moderate or little significance, with some areas intrusive to the significance and understanding of buildings of high and exceptional significance. Best practice heritage allows for the sensitive and select demolition of items of lower significance, particularly if heavily modified, have low integrity and are impacting items of higher significance. The proposed masterplan seeks to demolish items of moderate significance which meet this threshold, are substantially modified with low integrity and are impacting the significance and understanding of Barham and the Chapel Building, the site's main heritage assets. The proposed replacement buildings and building envelopes have been designed to respect and enhance the appreciation and significance of the heritage items within the School, and to sensitively contribute to the streetscape and heritage conservation area. This has been achieved through sympathetic siting; setbacks to improve visual separation and minimise overshadowing and impacts on view lines; reduced mass and scale of the proposed buildings; designs which relate to the street alignment and existing urban scale and grain; and architectural character and materiality which has been designed to reflect the heritage and surrounding	Appendix E

Topic/ Issue	Response	Refer to
	context, but ensure that the historic fabric, character and form of the School's heritage buildings are easily understood.	
Objections specifically regarding the demolition of Wilkinson's House: • Do not want the building to be demolished (69 responses) • Why can't they build over the tennis court instead (1 response) • Replacement building at 4 storeys is overdevelopment (2 response) • Want the building to be reused and incorporated sensitively into the new development (14 responses) • Want the façade of the building to be retained (15 responses) • Protect the significant interiors of the building (1 response) • More justification as to demolition over retention and adaptive reuse needed (13 responses) • Design of replacement building is not sympathetic to the streetscape (5 responses) o *"The proposed replacement on this site is essentially an internal-facing structure that creates a boundary wall-like effect on the corner of Forbes and St Peters streets. The proposed structure replaces a human-scale façade that relates to the streetscape with a monolithic form with no entranceways or relationship to the street." (4 responses)* • Recent Land and Environment Court cases have not approved the demolition of heritage items (1 response)	Wilkinson House – which was designed in the 1920s as a residential flat building – is not suitable for use as an educational facility and is not readily able to be further adapted for educational purposes. The proposed option to retain the façade results in internal spaces which have poor thermal control and do not respond to opportunities for classroom sightlines and natural light amenity and would require the partial demolition of the façade in order to provide adequate structural support for the new internals. Further, as described in detail at Section 3.3.1 the feasibility of retaining parts of the existing structure (as described in Option B) preclude this option from being further pursued. The proposed new Wilkinson House building is comparable to the envelope of the existing building and will not have any additional impacts on the views from neighbouring properties. The design has been carefully considered to relate to the adjacent built forms and the façade will comprise high quality materials and detailing that will complement the surrounding buildings and provide a positive contribution to the streetscape and local context.	Section 3.3.1 Appendix E
Concerns specifically regarding works affecting the 'Barham' building: • Object to further obscuring of view of the building from the street (19 responses)	The proposed Administration Building has been designed to replace the utilitarian eastern extensions to the historically significant Barham building. The proposed Administration Building addition has been designed to improve the functioning of the School and enhance its address and presentation to the	Appendix E

Topic/ Issue	Response	Refer to
• Want the wall in front to also be removed for better viewing (2 response) • *"The planned partial external restoration of the 1830s Barham building seems commendable but is negated by the inappropriate modern structure between it and Forbes Street."* (1 response) • Modern building to be placed in front of the Barham building is inappropriate and too close (3 responses)	streetscape. It will have a similar mass and scale as the existing structures and will be visually separated from Barham by a glazed link. The building does not alter the existing views to Barham, and its architectural character and materiality have been designed to reflect its heritage context, but ensure that Barham historic fabric, character and form are easily understood. The wall along the street frontage will be replaced by a more transparent fence.	
Built form		

Concerns regarding the height of new buildings:
• New buildings are too high (22 responses)
  ○ Specifically, the multi-purpose building (14 responses)
  ○ Specifically, the Wilkinson's Building replacement (2 response)
• Does not comply with the height limit of the area (23 responses)
• Inconsistency between initial SEARS application and the EIS (1 response)
	In response to the submissions received, the Multi-purpose building and Administration Building have been reduced in height. The Administration Building is below the maximum building height of the area and is the same height as the eves of the adjacent Chapel Building.
	
	The Multi-purpose building has been reduced to fit generally within the envelope of the existing buildings. While the Multi-purpose building does project above the height limit at the Bourke Street side, it is below that of the existing building.
	
	The proposed Wilkinson House design matches the height of the existing building and the majority of the building is below the maximum height limit of the area. A minor projection above the height limit is found in the north-east corner and does not have any negative impacts upon the locality.
	
	A Clause 4.6 variation has been prepared for the building height variation.
	
	The SEARs application was a preliminary concept design which has been refined as the project progresses and deviation from SEARs proposal is not unexpected.
		Section 3.1.1, Section 5.2 and Appendix G

Bulk and Scale/ building design: • Scale and design of Multi-purpose building is too big and is inappropriate for the area (19 responses)	The envelope of the Multi-purpose building has been amended to mitigate issues relating to bulk and scale. The amended design lowers the building by two stories adjacent to the Thomson Street and Bourke Street neighbours, and has been designed to generally match the scale, height and mass of the existing buildings. These amendments have been designed to minimise any additional	Appendix D and Section 4.2.3

Topic/ Issue	Response	Refer to
• Building design is not responding to historic local character of the area and is inappropriate (21 responses). • No set back from the terraces for the new multi-purpose building (9 responses) • Design of building is not good and does not assist with making the new additions more acceptable to the public (3 responses) • New main building is likely to create a 'superblock'/ 'giant wall' want design to be changed to fit in with existing local character (4 response) • The built form of the building does not comply with the development controls as outlined in *Schedule 4 Schools—design quality principles* of the Education SEPP, specifically Principle 1 – context, built form and landscape, and Principle 7 – aesthetics (1 response)	impacts of the proposed new building to the built environment and the School's neighbours. The reduced size decreases the effect of a 'superblock' and breaks up the appearance of the building from adjacent properties. Compliance with Schedule 4 of the Education SEPP can be found at **Table 7** at **Section 4.2.3**.	
Concerns regarding use of the multi-purpose building: • Roof top use will impact upon neighbouring residents (3 responses) • Potential noise generation for the potential roof top use must be assessed (2 response) • Want shade/ pergola structure on rooftop removed (1 response) • No defined purpose for the multi-purpose building (7 responses) • Clarification sought as to why the building need to be so big when the Wilkinson House replacement and the new gateway building will provide additional floorspace as well (4 response)	Uses for the rooftop terrace areas may at times generate noise, however rooftop uses will be confined to during school hours and mitigation measure will be determined during detail design. A Revised Construction and Operational Noise Report has been prepared that outlines a number of potential noise mitigation levels. Treatments cannot be specified until the detail design stage and will be appropriately addressed at this time. The shade structure on the terrace of the Multi-purpose building will remain, however the reduced building envelope will reduce impacts to neighbours. Purpose of Multi-purpose building is addressed in **Section 3.10.2**. The School buildings need to be updated over time as their layout and size is no longer up to date with current education standards and trends. More flexible, high quality learning facilities are expected by students, staff and parents at SCEGGS. The redevelopment of both Wilkinson House and the Multi-purpose	Appendix D, Appendix J and Section 3.1

Topic/ Issue	Response	Refer to
• Oversized building implies that school is aiming to increase the number of students in the future once additional floorspace is achieved (16 responses) • More information about public uses of building sought – what public benefits will it provide (2 responses)	building are in response to changing education standards and the age of facilities within the School. The School will not be increasing student or staff numbers, the 2040 Masterplan is to provide updated, state-of-the-art education facilities in line with education standards and trends. The school will continue to operate with the existing arrangements for shared use of facilities with the community. Any future proposed shared uses within the multi-purpose building will be determined as part of the Detailed SSD DA.	
View impacts and overshadowing		

Concerns regarding view impacts:
• New buildings will negatively impact the views towards the city and the Harbour Bridge (38 responses)
  ○ Reduction in views specifically from Thomson Street (7 responses)
  ○ Reduction in views specifically from Forbes Street (15 response)
  ○ Reduction in views specifically from Liverpool Street (8 responses)
• Impacts on views have not been assessed and justified in accordance with 'view sharing' principles outlined by Land and Environment Court planning principles (8 responses)
• Want more drawings and diagrams of how the new building design will impact views and overshadowing (1 response)
• Potentially change shape of building to allow for more sunlight and view access to be maintained (1 response)
	A Revised View Impact Study was prepared to accompany this RTS and an assessment of the view impacts from 20 different vantage points at neighbouring properties can be found in **Section 5.3.2**.
	
	An assessment against the view sharing principles is contained in **Section 5.3.2**.
	
	The Revised View Impact Study, Amended Architectural Plans and Architectural Design Report all have a number of renders and models showing the view impacts of the proposed works.
	
	The revised building envelope of the Multi-purpose building has reduced view impacts from what is existing and opens up some additional views to the Old Girls School Building, the City and the Harbour.
		Section 5.3.2, Appendix C, Appendix D and Appendix F

Topic/ Issue	Response	Refer to
Concerns regarding overshadowing impacts: • New buildings will block sunlight access to neighbouring dwellings (22 responses) • Less sunlight access will increase damp to affected houses (1 response) • Overshadowing to the homes below Bourke Street (1 response) • 7-storey structure planned for the southern perimeter of the SCEGGS site will result in Terrace houses on the northern end of Thomas Street being completely overshadowed (1 response) • Incorrect statement in Section 8.1.2 of the EIS regarding overshadowing impacts to neighbouring properties and compliance with height controls (1 response)	The Amended Architectural Plans prepared by TKD Architects contain shadow diagrams showing the overshadowing impacts of the amended design upon neighbouring properties. The Thomson Street terrace facades are in full shadow up until 11:30am as the sun is behind the façade. **Figure 10** and **Figure 11** show that the overshadowing impacts of the amended Multi-purpose building design are minimal and generally increase solar access from what is existing. The proposed Multi-purpose building will not overshadow the terraces at Bourke Street after 9:00am. The incorrect statement has been amended.	Section 3.1.5, Section 5.2, Appendix C and Appendix D
Concerns regarding privacy impacts: • Increased height and roof top outdoor usage allows students and teacher to see into currently private courtyards and private homes (70 responses)	It is envisaged that the proposed multi-purpose building and roof terraces will have no increased adverse impact on privacy or overlooking to the Thomson Street, Thomson Lane or rear courtyards to No. 186-184 Bourke Street. The detailed design submission will look to incorporate measures to mitigate privacy and overlooking through planting buffers which provide a pedestrian setback, sun and privacy screening and the design and orientation of windows. Initial privacy and overlooking mitigation measures incorporated into the concept design include: • Raised planting as a buffer to address potential overlooking to the rear courtyards of the Bourke Street terraces; • Solid sections of the southern façade and orientation of windows to provide privacy screening to Thomson Street terraces; • Potential to include sun shading devices on windows to provide additional screening for privacy; and	Section 3.1.3, Section 3.1.4 and Appendix D

Topic/ Issue	Response	Refer to
	• Solid boundary facing façade s to eliminate overlooking.	
Traffic and parking		
Objections about increase in traffic in the area: • Increase in students unwanted as they will increase the number of cars and traffic levels in the already congested area (34 responses) ○ *Specifically want more information about traffic impacts of the parents of the pre-school children will significantly affect traffic patterns as their pick up and drop off patterns are different than older children (16 responses)*	There is no proposed increase in students or teachers as part of the submitted Concept Plan. The amended design has reduced the proposed number of childcare places from 90 to 45. The Revised Traffic Impact Assessment found that the addition of the 45 childcare places will have a negligible impact upon key intersection operation levels in the surrounding area.	Section 5.6, Appendix H and Appendix I
• Street is already too busy – the streets will not be able to cope with additional traffic (40 responses)	Traffic and Pedestrian Management Plan has been prepared to better manage existing traffic levels and construction traffic for Stage 1.	
• Development should be considered a traffic generating development with the proposed increase of 90 students for the childcare centre and that the additional floorspace will mean that the school will be "*able to accommodate 50 or more additional students*" pursuant to cl57(a)(i) of the Education SEPP (1 response)	The proposal does not request a consent to increase the number of school students from existing levels. The RMS have been referred the application in accordance with the requirements of clause 57 of the Education SEPP. The childcare has also been reduced from 90 down to 45 places.	

• More information sought on what impact the increased traffic levels will have on the area (29 responses)
  ○ Insufficient information about increase in students and teaching staff, more information sought regarding the increase in traffic on surrounding streets (8 responses)
  ○ Traffic Impact Assessment should take into account future traffic demand under the masterplan and how surrounding current applications will also impact upon traffic levels (2 responses)
	The Revised Traffic Impact Assessment includes an exploration of the current traffic levels associated with students and staff arrival and departure. There is no proposed increase in traffic from students or staff.
	The School already carries out a number of traffic management initiatives. In the future, the proposed childcare centre will have minor increases in the overall degree of saturation and intersection delays in the roads surrounding the School. The surrounding key intersection will continue to operate with similar delays and queues.
	Existing bus movements are assessed in the Revised Traffic Impact Assessment. Given that student and staff numbers will remain the same, no	

Topic/ Issue	Response	Refer to
○ Traffic Impact Assessment does not address the long periods that buses sit idling outside of school grounds waiting for pick up (4 responses) • Condition of consent should include a requirement for SCEGGS to provide permanent authorised traffic controllers at peak periods on Forbes and Bourke Street (3 responses) • Condition of consent should require SCEGGS to provide 7-day week access to the public to use St Peters Street (7 responses) • Make St Peters Street the only street for pick up and drop off of students (2 response) • Remove planters along St Peters Street to allow for greater and quicker drop off and pick up of students from vehicles and buses (3 responses) • What alternate transportation methods are proposed to offset or improve the congestion levels of private vehicles in the area (3 responses) • Parents and buses are consistently ignoring traffic rules, trespass on private properties to turn around and block roads (12 responses) • No information about how buses that frequent the school will function (1 response)	changes are proposed to the existing public transport arrangements surrounding the School. The School already employs a dedicated traffic warden and traffic controller alongside regular staff to monitor and control the flow of traffic and pick-up and drop-off zones. St Peters Street is a Council owned road and is closed to ensure the safety of students during the day and general amenity during the night. Pick-up and drop-off zones are not proposed to change. Planters along St Peters Street are not proposed to be removed. A Green Travel Plan, Transport Access Guide and Traffic and Pedestrian Management Plan have been prepared to encourage future public transport provision and utilisation. The existing bus movements will remain the same under the proposed scheme. Bus movements will remain as existing.	
Concerns about reduction in parking: • Concerned about reduction in car parking spaces along Forbes Street (3 responses) • Concern regarding increased allocation of street parking along Bourke Street to SCEGGS; decreasing parking for residents (1 response)	The Forbes Street car park will be relocated to within the basement of the Multi-purpose building. The number of parking space will not change. There will be no increase in the allocation of on-street parking on Bourke Street. The School will be relocating three (3) of the nine (9) pick-up and drop-off spaces from the from the northern end to the southern end of the spaces.	Section 3.5, and Appendix H

Topic/ Issue	Response	Refer to
• Traffic management plan does not detail the impacts of any redevelopment of the site to residents of the horizon (1 response)	The Traffic Impact Assessment does to address specific developments nearby. While the Horizon Building may be impacted by additional traffic impacts during construction the draft Construction Traffic Management Plan addresses general impacts and mitigation measures to be implemented.	
Construction		
Concerns regarding truck movements: • Want no truck movement along Thomson Street (4 responses) • Want more information about daily truck movements and times of peak movement (4 responses) • Students ability to learn outside could be compromised due to noise and air pollution caused by construction (1 response) • Safety of pedestrians will be compromised by truck movements (1 response)	As per the draft Construction Traffic Management Plan, Thomson Street and Thomson Lane will have no truck movements. Construction will take place during the standard construction hours of 7am-7pm weekdays. The anticipated truck frequencies range between two trucks per day (2 in, 2 out) to a maximum of 16 trucks per day (16 in, 16 put). Section 3.5 shows the routes that the trucks will be travelling during the construction of Wilkinson House. Noise and vibration mitigation measures will be put in place to minimise disruption to students and staff during the construction period as outlined within the Revised Construction and Operational Noise Report. Student and pedestrian safety will not be compromised by truck movements, measures will be put in place as per the CTMP prepared with each stage.	Section 3.5, and Appendix H
Concerns regarding construction workforce vehicle parking: • Do not want them to park along Thomson Street or other back streets (5 responses) • No information about where work vehicles will be parked (4 response)	On-street parking is a public asset and enforcement of parking restrictions for construction workers is impractical. The use of public transport is emphasised in the CTMP and once the builder is appointed a voluntary prohibition of parking on certain streets could be implemented.	Appendix H
Concerns regarding potential damage to heritage buildings during construction: Potential structural and vibration damage to adjoining heritage properties during construction –ongoing monitoring and remedial actions where needed (3 responses)	This is addressed in the Construction impacts section of **Appendix A** above.	Appendix V

Topic/ Issue	Response	Refer to
Concerns about general construction impacts to neighbouring properties: • Damage to surrounding properties caused by building excavation (6 responses) • Noise from construction will disrupt residents (5 responses) • Construction will impact property value (1 response) • Post construction increase in traffic will impact property value (2 responses) • Construction and staging will negatively impact surrounding amenity (11 responses) • No construction management plan provided (1 response) • Dirt and noise for an extended period of time will impact work, home, quality of life and health (8 response)	This is addressed in the Construction impacts section of **Appendix A** above. Dilapidation reports will be prepared in line with standard conditions of consent. Noise, vibration and dust mitigation measures will be put in place as outlined in **Section 5.7** to manage negative construction impacts to neighbours. The proposed new buildings will improve the quality and amenity of the streetscape and are unlikely to impact property values. Notwithstanding, property values are not a relevant matter of planning consideration. Construction noise and vibration mitigation measures will be put in place as outlined in **Section 5.7** to manage negative construction impacts to neighbours. A CTMP has been prepared as part of the Revised Traffic Impact Assessment for the new Wilkinson House development, subsequent CTMPs will be prepared at each stage. Noise from construction sites across the city do have some impact on surrounding receivers. As such a quantitative preliminary assessment of construction noise has been conducted in accordance with the EPA's Interim Construction Noise Guideline. The assessment has identified exceedances of Noise Management Objectives which is consistent with most construction sites in the Sydney LGA. The potential noise producing activities have been reviewed and measures to minimise the impact at surrounding residences have been identified. These consist of physical and procedural measures that have been included in the assessment. In addition, a Revised Construction and Operational Noise Report has been included in **Appendix J** to be used by the successful contractor to identify risks, determine mitigation and monitor noise and vibration so that impacts are minimised at surrounding receivers. It is important to note that the exact method of construction is not known until a successful contractor has been engaged following tender of the project. At that	Section 3.6, Section 5.7 and Appendix J

Topic/ Issue	Response	Refer to
	time the details of noise and vibration management can be clearly defined and managed. This is consistent will all large construction projects.	
Landscaping		
Concerns about trees and landscaping buffers: • Trees at the end of Thomson Street should be maintained with setbacks and protection zones around the trees (5 responses)	Trees at the end of Thomson Street are unable to be retained due to the significant impact they will face from the construction works. Replacement trees have been placed in the same area to help offset the loss of the trees and green walls have also been included to increase the privacy and amenity levels for the Thomson Street dwellings.	Appendix K and Appendix X
Noise/ Acoustic impacts		
Concerns about noise from students and school: • Doesn't like noise from students during lunch and sports times (1 response) • Increased number of students will increase noise levels (1 response) • Rooftop air-conditioning and other services should be silenced (1 response) • No indication of the future use of the multi-purpose building so impacts of future noise have not been assessed or considered (1 response) • Rooftop level on the proposed multi-purpose building could be utilised for after school hour activities which may have noise impacts to the surrounding properties (1 response)	As there is no proposed increase in the number of students there will be not increase in noise levels associated with students. All new mechanical plant will be silenced where necessary to meet the established noise criteria. Measures such as silencers, lined duct and barriers will be determined when the detailed design and selection of plant is known. General future uses of the Multi-purpose building were specified as part of the proposal, none of the proposed activities were classified as 'acoustically significant' and are able to be contained within the fabric of the future building. The future DA for the building will specify any specific noise mitigation measures needed. The rooftop level is not proposed to be used for after-hours functions. Although if this were to be considered in the future Detailed SSD DA, an acoustic screen would be required to protect the amenity of the nearby residences. Such a measure could be included in any future DA should the roof terrace use be proposed.	Appendix J

Topic/ Issue	Response	Refer to
• Acoustic Impact Report does not make reference to the number of students (1 response)	As there is no change in students, there will be no acoustic change in student noise levels. Therefore, the number of students was not needed to be included in the report.	
Other		
Concerns about consultation conducted: • No consultation conducted (3 response) • Insufficient consultation conducted, with consultation views and objections not considered or taken seriously (12 responses)	As outlined in the EIS, consultation has occurred with the local community and neighbouring residents and landowners. Various strategies were employed to maximise community involvement in the project. Community consultation included stakeholder meetings with the Eastern Suburbs Neighbourhood Association (meeting 4 October 2017 and 11 October 2018), stakeholder meetings with the Horizon Building Strata Committee (17 October 2017 and 18 September 2018), stakeholder meetings with the Thomson Street residents (11 October 2018 and 16 January 2019), and a community information session held at SCEGGS Darlinghurst on 16 October 2018. Further, a community update was sent to 2,383 properties in the locality, the SCEGGS Darlinghurst webpage was created, and a project email and hotline were created for the project. Additional consultation was conducted post lodgement on 8 March 2019 and 1 April 2019. The proposed design has been reduced and amended in response to the submissions received during the exhibition period of the SSD DA. Therefore, it is considered that sufficient and meaningful engagement has occurred during the development process.	Section 1.4.1 and Appendix U
Concerns about potentially incorrect drawings, reports or images • *"As seen in Photo 6* [**Figure 30**]*(SCEGGS Masterplan Page 50 "View Looking North from No.10 Thomson St) the proposed MPB's eastern perimeter adjoins "blue sky" (see circle) which is not the case. By manipulating this image it makes the MPB look less imposing given it is seen to be adjoining open space and blue sky."*	The drawing shown does show a building behind the proposed Multi-purpose building, and the image has not been manipulated. The Multi-purpose building has been reduced in scale will be less imposing than the submitted design.	Appendix C and Appendix D

Topic/ Issue	Response	Refer to
Figure 30 – Extract from Public Submission  Photo 6 - SCEGGS Masterplan Page 50 "View Looking North from No.10 Thomson St		
• Drawing No. AR.MP.4003 – shows incorrect height of proposed building outline compared to the existing building (7 responses) • Incorrect statement about Forbes Street continuing to the north in the Traffic Impact Statement when it does not (2 responses) • Traffic Impact Report says that St Peters Street is a local road despite is only being open for short periods in the AM and PM making Forbes Street into a large dead-end street (1 response) • No mention is made as to how the school is used outside of school hours (3 responses)	The error has been corrected in the proposed design changes, updated Architectural Plans at Appendix C show the submitted design against the existing built envelope and the new reduced scheme. This statement has been corrected. St Peters Street is only open during peak traffic periods to maximise safety for the students walking the School facilities on either side of the street. This closure was made in agreement with the City of Sydney Council as it is a Council owned road. The application does not propose any additional outside of hours activities, existing activity schedules will be maintained as there will be no increase in the number of students. If in future outside school hours activities are proposed separate development consent will be sought.	

Topic/ Issue	Response	Refer to
Concerns regarding CIV and design competition: • Review of CIV is sought as it is so close to the amount to require a design competition (21 responses) • *"…whether the provisions of the competitive design process have been complied with pursuant to SLEP 2012"* (2 responses)	The main concern regarding the calculation of CIV raised in the submissions was the project exemption from a competitive design process. This mechanism to exempt development with a CIV less than $50 million from requiring a competitive design process is provided in clause 35(8) of the Education SEPP. Despite the reviewed CIV estimate being more than $50 million, the detailed design of the proposed development remains exempt from a competitive design process under the SLEP 2012 as none of the triggers in clause 6.21(5) apply to the development.	Section 3.8
Concerns regarding development contributions: • Object exemption from the s94 contributions as the money will benefit the local community and residents (4 responses)	Under the City of Sydney Development Contributions Plan, contribution is required if a development results in a net population increase. The redevelopment of Wilkinson House does not increase student population on the site, notwithstanding a minor increase in GFA associated with these 'Stage 1' works. Contributions for the multi-purpose building and new administration building should be determined as part of the Detailed SSD DA.	Section 3.9
Concerns surrounding increase in number of school students: • Want more information and further assessment about the impacts an increase in students and teachers will have on the surrounding area (33 responses) • Lack of clarification about whether there will be an increase in the number of students is unclear (16 responses) • Childcare centre and increase in student numbers is in breach of the agreement to not increase student numbers (22 responses) • 'Statement of Intent' is not good enough to show that the school is not planning on increasing its student population in the future (5 responses)	There is no proposed increase in student or staff numbers. There will be no increase in the number of students or staff as part of this proposal. The childcare centre is not included in the number of students at the School. The number of places at the childcare centre has been reduced from 90 to 45 children. Additional information has been provided to clarify need for additional floorspace for current student population.	

Topic/ Issue	Response	Refer to
• Inconsistency between numbers of students and teachers between EIS and Traffic Impact Assessment (5 responses) • Want childcare centre removed from the proposal (5 responses)	This error has been corrected. The proposed childcare centre use remains a part of the 2040 Masterplan, however the number of places will be reduced from 90 to 45 children in response to submissions received.	
Concerns regarding sustainability and Green Star Rating: • Disparity between the architectural response and ESD response – more information about how it achieved the 4-star rating sought (1 response) • Seek clarification as to how the demolition of the heritage items contribute to the star rating (1 response)	Green Star targets environmental initiatives in areas of management, indoor environment quality, energy, transport, water, materials, land use and ecology, and emissions. Existing buildings present a challenge in obtaining some Green Star initiatives. Retained fabric leaves little room for refurbishment projects to target various materials, energy, and thermal comfort requirements. This is due to existing building fabric, and natural light design not likely meeting current industry's standards. 4 Star Green Star may still be achievable by focusing on other requirements directly related to the scope of the refurbishment activities such as furniture and fittings, new services systems, etc. However, there is a risk in targeting 4 Star Green Star based on the existing development as a proportion of Green Star credits are not achievable. 5 Star Green Star has a higher level of environmental attributes when compared to a 4 Star Green Star certification. New buildings are able to target a wider variety of requirements with more flexibility. For instance, specific requirements include energy efficient HVAC and lighting systems, high performance building fabric using passive design principles (ie. insulation, glazing, shading), water efficient fixtures and fittings, health-conscience construction materials such as low VOC paints or low formaldehyde wood products, high quality indoor environment such has thermal comfort and acoustic comfort, and furniture and fixtures with consideration of its life cycle impacts. Therefore, if Green Star is considered early in the design of the new development, there is a higher chance of obtaining the targeted certification. Further, a 5 Star Green Star building would incorporate a larger amount of environmental initiatives in comparison to a 4 Star Green Star building.	Appendix O

Topic/ Issue	Response	Refer to
	During design, the feasibility of targeting a 4 Star Green Star certification will be further investigated, with the potential of achieving 5 Star Green Star if the development is re-built in its entirety. The proposed development achieves a Green Star rating notwithstanding the demolition of the existing building not as a result of the demolition.	
Other concerns: • “I already feel like SCEGGS have created a "SCEGGS ZONE" inside Darlinghurst and almost feel intimidated when walking along Forbes St, St Peters, and Bourke St around SCEGGS. I'm not sure this is a good thing for the community and the proposed development will just make this worse” (1 response) • Lack of rational for overall development as to why it is necessary and will be worth all of the disruption and negative impacts (10 responses) • Want uses of green roofs maximised (2 responses) • Minimise reflective materials used on roof tops (3 response) • Lighting of construction works and school upon completion of works should not impact neighbouring residences (1 response)	The school will continue to operate with the existing arrangements for shared use of facilities with the community. Any future proposed shared uses within the multi-purpose building will be determined as part of the Detailed SSD DA. The proposed works will improve the integration and presentation of the school into the streetscape and surrounding locality. This is addressed in detail at **Section 3.10**. A green roof is not proposed for Wilkinson House. The submission for the Administration and Multi-purpose building is for building envelope approval only. A green roof will be addressed at detailed submission for each stage. There is opportunity for part building roofs to be green roofs. On the Multi-purpose building opportunity for new planting has been shown the Level 3 and 4 terraces facing Bourke Street. The roof for Wilkinson house will be a low pitch light coloured Colourbond metal roof, no different to the adjacent surrounding buildings, such as the Joan Freeman Building, Diana Bowman Performing Arts Centre and the low-rise section of the Horizon Apartments. The submission for the Administration and Multi-purpose buildings is for building envelope approval only. The finish to the roof will be addressed at detailed submission, however materials could consist of ballast, light concrete pavers, or a section of green roof Wilkinson House will generally be used during the day during normal school hours. Any use in the evenings would be limited and internal lighting would be controlled by window blinds. Light spill would be minimal and within acceptable limits. The submission for the Administration Building is for building envelope	

Topic/ Issue	Response	Refer to
	approval only, however no lighting is proposed to the Administration Building Roof. The submission for the Multi-purpose building is for building envelope approval only. Any lighting to the terraces will be addressed at detailed DA submission, lighting would need to be designed to meet council and Australian Standards to limit light spill to neighbouring properties.	
• Believe that the EIS and supporting reports have not adequately addressed the SEARs, particularly the Traffic Impact Report (1 response)	Additional assessment and consultant reports accompany this RTS to address all submissions and the proposed design amendments.	

APPENDIX C AMENDED ARCHITECTURAL PLANS

APPENDIX D ARCHITECTURAL DESIGN REPORT

APPENDIX E SUPPLEMENTARY STATEMENT OF HERITAGE IMPACT

APPENDIX F REVISED VISUAL IMPACT STUDY

APPENDIX G CLAUSE 4.6 VARIATION REQUEST

APPENDIX H REVISED TRAFFIC IMPACT ASSESSMENT

APPENDIX I TRAFFIC AND PEDESTRIAN MANAGEMENT PLAN

APPENDIX J REVISED CONSTRUCTION AND OPERATIONAL NOISE REPORT

APPENDIX K REVISED LANDSCAPE PLAN

APPENDIX L DETAILED SITE (CONTAMINATION) INVESTIGATION

APPENDIX M WILKINSON HOUSE STRUCTURAL OPTIONS

APPENDIX N SUPPLEMENTARY ENERGY EFFICIENCY INFORMATION

APPENDIX O SUPPLEMENTARY GREEN STAR INFORMATION

APPENDIX P SUPPLEMENTARY RAINWATER INFORMATION

APPENDIX Q SUPPLEMENTARY WATER AND SEWER DEMAND INFORMATION

APPENDIX R ADDITIONAL FLOOD STATEMENT

APPENDIX S REVIEW OF ESTIMATED CIV

APPENDIX T CIV RESPONSE

APPENDIX U COMMUNITY CONSULTATION RESPONSE

APPENDIX V CONSTRUCTION IMPACTS – RESPONSE TO SUBMISSIONS

APPENDIX W SYDNEY WATER RESPONSE

APPENDIX X ARBORICULTURAL IMPACT ASSESSMENT

APPENDIX Y ADDITIONAL BOURKE STREET VIEW

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