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RESPONSE TO SUBMISSIONS

SCEGGS Darlingtonhurst -
Adaptive re-use of Wilkinson
House SSD-19989744

Prepared for
SCEGGS DARLINGTONHURST
27 May 2022

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Report Number	Final

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1. INTRODUCTION

This Submissions Report relates to a State Significant Development Application (**SSDA**) for the adaptive re-use of Wilkinson House (**the Site**), located on the existing main SCEGGS school ground at 215 Forbes Street, Darlinghurst. On behalf of SCEGGS Darlinghurst Limited (**the Applicant**), this Submissions Report has been prepared to address the matters raised by public agencies, local Council, the community and other relevant stakeholders throughout the public exhibition period.

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning and Environment (**DPE**) on 28 February 2022 (SSD- 19989744). The SSDA was placed on public exhibition for 29 days, which ended on the 4 April 2022.

This Submissions Report has been prepared in accordance with the DPE *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*.

1.1. EXHIBITED PROJECT

This is the first detailed SSDA under the Concept DA SSD 8993, for the adaptive reuse of Wilkinson House for general school learning areas and sport facilities to support the secondary school, including alterations and additions to the existing Wilkinson House.

The proposal has been guided by the conservation policies contained within the Wilkinson House CMP, in consultation with City of Sydney Council, the Government Architect NSW (**GANSW**) and the State Design Review Panel (**SDRP**).

Specifically, the proposed adaptive re-use of Wilkinson House seeks consent for the following works:

- Retain existing external perimeter walls/facades.
- Undertake conservation works, including restoring heritage façades by removing unsympathetic additions e.g. security bars to balconies.
- Construct extension to the south, to accommodate a lift core for equitable access, circulation and a meeting room. The extension will also connect Wilkinson House to the wider campus.
- Reconstruct mansard roof in copper with angled blades and clerestory operable windows, which reference the vertical articulation of the original Emil Sodersten elevations. The reconstruction of the roof will result in a nominal increase in height of approximately 330mm and is below the existing western brick parapet.
- Construct new level 3 within the roof space, accommodating a GLA, multi-purpose room, amenities, careers office, and a private outdoor roof terrace.
- Construct new basement sporting facility which directly connects to the existing Centenary Sports Hall to the south.
- Retain and restore existing heritage entrance lobby and lounge hall.
- Demolish internal stairs, walls, floors and ceilings to all levels.
- Construct new internal learning spaces, break out spaces, staff rooms, meeting rooms and amenities over ground, levels 1 and 2.
- Construct a wide internal stair that is naturally lit and ventilated by a glazed rear wall, which will also feature a future artwork.
- Opportunity to incorporate heritage interpretation of the former residential flat building have been explored. Interpretation could include:
 - Interpretation of the original staircase into a student led artwork, to be installed on the northern wall of GLA 9 on level 3.
 - Interpretation of placement of balconies and original rooms inlaid in ceiling and common areas, to recall the original layout of the building. As the project progresses to post approval, the project team will continue to work with City of Sydney Council before finalising the heritage interpretation strategy.

- Enclose existing balconies with recessed glazing to incorporate balcony spaces as part of the new functional, regular-shaped learning spaces
- Upgrade all services including electrical, mechanical, hydraulic, fire, etc.
- Provide a plant enclosure on top of the Joan Freeman roof (the north-eastern portion of the roof), to accommodate air condenser units. The plant enclosure has a maximum RL of 45.77, which matches the height of the existing car park exhaust located on the roof of the Joan Freeman building. The height is slightly below the roof extension of Wilkinson House.
- Erect 11 single storey temporary demountable classrooms on site to ensure the school can continue to function during the construction period. Temporary demountable classrooms are provided on grade south of the Chapel Building, at the upper level of the Centenary Sports Hall, and within the roof terrace of the Primary School (north of Thomas Street). The proposed demountable classrooms are temporary structures and will be removed once the project has completed construction.

1.2. SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following technical reports and documentation.

Table 1 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Submissions Register	Urbis
Appendix B	Updated Mitigation Measures	Urbis
Appendix C	List of Plans for Approval	Urbis
Appendix D	Updated Landscape Plan	Context
Appendix E	Landscape RtS Statement	Context
Appendix F	Heritage RtS Statement (including response to City of Sydney proposed conditions)	Urbis
Appendix G	Wilkinson House Building Façade Retention Methodology Report	Northrop
Appendix H	Traffic RtS Statement including Updated Preliminary Construction Traffic and Pedestrian Management Plan and Updated Travel Access Guide	Traffix
Appendix I	Acoustic RtS Statement	ADP
Appendix J	Updated Civil Engineering Report	ADP

2. ANALYSIS OF SUBMISSIONS

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

2.1. BREAKDOWN OF SUBMISSIONS

The SSDA was placed on public exhibition for 29 days which ended on the 4 April 2022. There were five submissions received from public agencies and the local Council, five submissions from individuals and one submission from a special interest group. In addition, subsequent feedback from Alex Greenwich, Member for Sydney were received after the exhibition period. The feedback from Alex Greenwich, Member for Sydney has been addressed in this report.

All submissions were managed by DPE, which included registering and uploading the submissions onto the 'Major Projects website'.

The Department of Planning and Environment (DPE) as the consent authority has identified the following key issues to be addressed in this RtS:

- Heritage
- Visual impact of the proposed rooftop plant enclosure on Joan Freeman Building
- Opportunity for additional Landscaping
- Construction worker parking

The Government Architect of NSW (**GANSW**) also confirmed that upon undertaking a high level review of the latest CMP, the initial GANSW advice is generally still consistent and it is not necessary for the project to be reviewed again by the State Design Review Panel (**SDRP**).

Overall, there are no objections from the public agencies and local Council.

Five individuals and one special interest group objected to the project based on the community submissions received.

A breakdown of the submissions made by group and issues raised is provided in Table 2.

Table 2 Breakdown of Submissions Received

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
Public Authorities (State or Commonwealth Agencies and Council)							
Government Architect NSW (GANSW)				Potential visual and noise impact of the plant enclosure extension on top of the Joan Freeman roof.			
Transport for NSW	No objection and no further comments						
Heritage NSW (2 separate submissions for Aboriginal cultural and European heritage)		Generally supportive of the proposal and has no additional comments or recommendations based in the information provided in the ACHAR. Identification of relevant European heritage condition.					

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
Environment and Heritage Group				- No further comment on BDAR wavier - Recommendation for flood impact			
Local Council City of Sydney Council	- Heritage (including recommended conditions). - Landscape	Transport Access Guide – The guide is generally acceptable, however the chronology for the travel options to SCEGGS should be in reverse order to emphasise more sustainable transport options (i.e. Walking – Bike – Train – Bus – Car).		- Waste management - Environmental Sustainability			
Individuals – (Local <5km)	Suggested removal of the proposed attic			- Construction and operational traffic - Construction Noise impact			St Peters Street should be made accessible to the public at all times.

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
	rooftop level.			Visual impact from the lift.			- The new office building should be completely removed from the approved site masterplan. - Restoration of Barham House.
TOTAL	5 x submissions from agencies and council 6 x objections from local community*						
Feedback received from Alex Greenwich, Member for Sydney after the exhibition end date	Construction noise impact to surrounding residents						

2.2. CATEGORISING KEY ISSUES

A response to each individual submission is included within the Response to Submissions at **Section 4**.

The key issues raised in the submissions include:

- Heritage
- Visual impact of the proposed rooftop plant enclosure on Joan Freeman Building
- Opportunity for additional landscaping
- Construction impact
 - Traffic and parking
 - Noise

3. ACTIONS TAKEN SINCE EXHIBITION

In response to the key issues raised within the submissions, minor landscape design refinements and further environmental assessment have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions outlined in Section 2.

3.1. LANDSCAPE REFINEMENTS TO THE PROJECT

The following summarises the minor Landscape Plan refinements in response to submissions made to the Wilkinson House Detailed SSDA.

DPE and Council requested that SCEGGs explore alternative landscaping opportunities within or around Wilkinson House. In response to DPE and Council, two additional street trees are proposed along St Peter Street frontage, to enhance greenery in the streetscape.

The detail of the additional trees is documented in detailed Landscape Plan attached at Appendix D.

For consistency, the locations of these two additional trees are also reflected on the Landscape Masterplan submitted as part of the Concept SSD Modification Application RtS (SSD-8993-Mod-3).

Importantly, these refinements are changes that fit within the limits set by the project description. These refinements are consistent with the Concept SSD as proposed to be modified under the concurrent SSDA Modification Application (SSD-8993-Mod-3), and do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

No architectural changes are proposed.

3.2. ADDITIONAL IMPACT ASSESSMENT

Additional assessments have been prepared to respond to the issues raised within the submissions. These include:

- Heritage justification provided by Urbis Heritage
- Further assessment of the visual impact from the plant enclosure extension on the roof of Joan Freeman Building
- Landscape supporting letter.
- Further assessment of construction parking impact.
- Further assessment of construction noise impact.
- Structural Methodology Report for the retention and alteration to Wilkinson House
- Updated Civil Engineering Report to confirm that all stormwater from the site is to discharge to the OSD including landscaped.

The findings and recommendation of the additional assessments are discussed in detail within **Section 4** of this report.

4. RESPONSES TO SUBMISSIONS

This section provides the Applicant's response to the issues raised in submissions.

Detailed responses to the key issues identified in Section 2.2 are provided in section 4.4.

Responses to other issues raised by the agencies and the community are contained in section 4.5.

4.1. HERITAGE

4.1.1. Opportunity to salvage, re-use and recycling of traditional building materials and elements

As identified in the Heritage Impact Statement prepared by Urbis (dated 17 January 2022), a potential number of elements of the existing building are proposed to be either salvaged and re-used and/or salvaged and recycled.

The staircase balustrades are proposed to be salvaged and reinterpreted as part of a new art piece.

Further elements to be salvaged and reused where possible could include cornices, skirtings, architraves, picture rails, doors and windows. However, it is noted that the majority of these elements are ranked as being of Moderate and/or Little significance to Wilkinson House and are common features throughout Inter War residential flat buildings.

Final details of the elements to be salvaged and reused will be determined during the detailed design and construction phases and will be further outlined in the Schedule of Conservation Works, Salvage Methodology and Heritage Interpretation Strategy, which will need to be prepared in accordance with heritage related Conditions of Consent.

As a general principle, any items that cannot be reused within the building would first be identified to be utilised at other locations of the campus, and if not possible, they would be transferred to a second hand materials dealer.

4.1.2. Justification for proposed floor level

The ongoing use of the existing spaces for learning and teaching facilities within Wilkinson House has reached the end of its practical lifespan, with spaces within Wilkinson House being the least desirable for learning, and not meeting the School's high quality learning criteria.

The existing floor levels cannot be retained because:

- Current ceiling height are lower than the minimum National Construction Code required 2400mm, and well below the minimal NSW Department of Education required ceiling height of 2.7m. This means that internal teaching spaces are dark and not optimally ventilated.
- No equitable access is provided to Wilkinson House from the wider campus. Access to Wilkinson House is via an arrangement of narrow ramps between Wilkinson House southern facade and the Centenary Sports Hall, and wayfinding is not clear. Entry into Wilkinson House is via a narrow side entry door on each level.
- No equitable access is provided within Wilkinson House. Access within Wilkinson House is via narrow corridors and a narrow stair that do not properly cater for the volume of students moving between classes or two-way circulation, which results in bottlenecks.

It is proposed to reconstruct the floor levels to similar RLs to the existing floor levels. Whilst we acknowledge the floor level has changed, the proposed floor level will provide an improved amenity outcome because:

- The proposed floor levels are required to achieve the minimum floor to ceiling heights of 2650mm (without significantly increase the overall height of the building), the increased ceiling height improves light and natural ventilation amenity.

The following locations for the extension were explored by Smart Design Studio and service consultants, which were deemed unsuitable.

1. Small metal roof located on Level 00 in the existing lightwell between Wilkinson House and Joan Freeman and immediately to the south of the fire stair.
 - This location was dismissed as the services consultants advised that this location is unsuitable as it does not provide adequate air-flow for equipment. Currently there are small condenser units on this roof, which are difficult to access, with maintenance staff having to climb over a stair into the lightwell.
2. The L03 breakout area in the new lift extension
 - This location was dismissed as it is a prominent part of the building, which is located above the pedestrian entry into Wilkinson House, and is therefore visually and acoustically undesirable to have a plant area in this location.
3. Roof of the Centenary Sports Court
 - This location was dismissed as it would reduce amenity for students, for both curriculum and recreation activities. It will also have visual and noise impacts for students and neighbouring properties. There will also be a construction programming clash, as the temporary demountable classrooms will be placed in this location for the duration of the Wilkinson House's construction.
4. The Joan Freeman basement carpark
 - This location was dismissed as it is unsuitable due to the heat generated by plant equipment and the lack of airflow. It is not feasible to ventilate the area and it is also not an environmentally sustainable option.
5. The flat part of the roof of the Joan Freeman Centre to the west
 - This location was dismissed as it is too remote from where the services are required, and will require extensive pipework which will be inefficient and unattractive.

The proposed location is therefore the most suitable location and will not be readily visible from the street, because:

- A height has already been established by the existing carpark exhaust riser, therefore the extension will blend in with existing service structure.
- The location of the plant enclosure is setback from the street and the façade of Wilkinson House and Joan Freeman building. The plant enclosure will be screened, using dark brick treatment to ensure its recessive character.
- The CGI (refer to Figure 2) clearly demonstrates that the plant enclosure is hardly perceivable from the streetscape and will not create any visual impact.

In addition:

- The noise impact of the proposed plant enclosure has been assessed as part of the acoustic assessment (refer to Appendix R of the EIS). The assessment concluded that the air condenser units within the plant enclosure will be able to comply with noise criteria for nearby sensitive receivers.
- This location will provide the required space and airflow and there is an existing safe access to this location.

Accordingly, the proposed plant enclosure is at the most suitable location, which will not create any adverse visual impact from the street and is able to comply with noise criteria to nearby sensitive receivers.

Figure 2 Wilkinson House CGI as viewed form the corner of Forbes Street and St Peter Street



Sources: Smart Design Studio

4.3. OPPORTUNITY FOR ADDITIONAL LANDSCAPING

The project team has explored opportunities to provide additional landscaping on level 3 terrace and the roof area, however it was considered not feasible because of the following reasons:

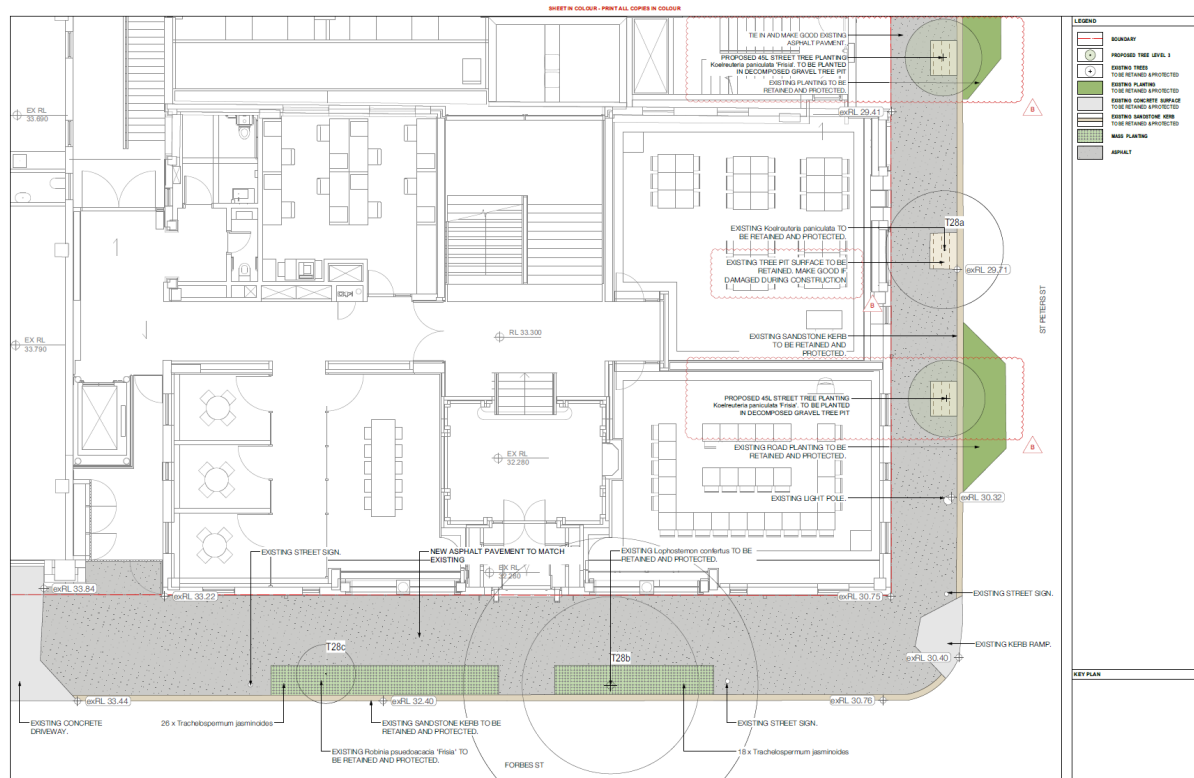
- The level 3 courtyard area only occupies a small portion of the level 3 floor space, therefore the area to provide additional landscaping is limited. In addition, given the heritage constraints of the building, additional landscaping may also create adverse structural impact.
- Any increase to landscaping may create adverse view impact to surrounding residents.
- The roof space is occupied by solar panels as part of the important Green Star /sustainability initiative. The remaining space on the roof is already occupied by the proposed rooftop tree.

In lieu of providing additional landscaping within Wilkinson House it is proposed to include two additional street trees along St Peter Street frontage, to enhance greenery in the streetscape (refer to Figure 3).

The tree species proposed is consistent with City of Sydney Street Tree Master Plan, and is also consistent with the existing street trees along St Peter Street.

The proposed street trees are consistent with the Concept SSD Landscape Masterplan as proposed to be modified in the concurrent SSDA Modification Application (SSD-8993-Mod-3)

Figure 3 Proposed Street Tree



Source: Context

4.4. CONSTRUCTION IMPACT

4.4.1. Traffic and parking

The Preliminary Construction Traffic and Pedestrian Management Plan (**CTMP**) has been updated by Traffix and includes a Construction Worker Transportation Strategy (refer to Appendix H.

The Construction Worker Transportation Strategy provides high level measures to minimise the demand for construction worker car parking. These measures include:

Worker induction

In the Project's Subcontract conditions and through the site induction process, all site personnel will be encouraged to car pool or utilise the public transport facilities in close proximity to the site, in lieu of driving to the Site to minimise parking demand and the impact of construction activities on street parking.

In the event that specific personnel have no alternative options other than to use private vehicles travelling to and from site, then there are several public car parks which can be utilised within the immediate vicinity (within 750m) of the Site, including Wilson Parking located at 70 Riley Street Darlinghurst and Parkable at 203 Victoria St, Potts Point.

Monitoring:

A monitoring and review process for the CTMP will be set by the Construction Project Manager to ensure that the CTMP is implemented correctly and updated where required to reflect any changes during the actual construction process. The Construction Project Manager will be in constant communication with the School to address any issues that may arise from the construction process.

Community consultation:

The Construction Project Manager will be the main point of contact for all enquiries, complaints and feedback during the construction process. Community consultation during construction may include distributing notification letters to nearby residents. Specifically the disruption of existing travel routes will be explicitly made known to the community so that their safety is not compromised. The details of the Site Construction Manager will be provided on all notification letters and displayed on site signs during construction.

The Preliminary Construction Traffic and Pedestrian Management Plan and the Construction Worker Transportation Strategy will be finalised by the appointed contractor in consultation with City of Sydney and prior to the issue of Construction Certificate.

4.4.2. Noise

Additional construction noise assessment has been undertaken by ADP (attached at Appendix I), which:

- Identify the possible construction equipment and use duration
- Confirm the noise criteria compliance to residential receivers at 184 Forbes Street
- Proposes additional construction noise mitigation measures to reduce the airborne noise exceedances

Possible construction equipment and use duration

The proposed equipment that produces high noise levels (highly noise intrusive works) will mostly be used as below. It is important to note that the equipment will not be used for the entire duration of the construction period (which is estimated to be 12 – 15 months) and will only be used for certain activities.

- Rock saws, rock breakers and jackhammers will mostly be used during demolition and excavation periods (up to 8 months).
- Concrete pump will mostly be used during construction of new slabs and columns (approximately 3 months).

No construction works will occur during public holidays.

As detailed in the Noise Impact Assessment prepared by ADP (submitted with the EIS), airborne noise exceedances from the highly noise intrusive works to the residential receivers at 184 Forbes Street have been calculated to be up to 12dB.

It should be noted that the calculated noise levels to the nearest noise sensitive receivers are the highest predicted levels based on conservative assumptions. The noise levels will be lower than predicted when equipment is used further away from the receivers

In addition, the northern and eastern masonry facades of the existing building will be retained. These facades will act as noise barriers for noise emissions to the nearest northern and eastern receivers.

It is important to note that there were no exceedances of the highly noise affected management levels, which otherwise may trigger the requirement for respite periods.

Although it is not required to provide respite periods, the following mitigation measures are proposed to reduce the airborne noise level to these residents.

Construction noise mitigation measures

In addition to the recommendations in the Noise Impact Assessment report (which was based on the Interim Construction Noise Guideline (ICNG) for exceedances of the airborne noise), the following measures are proposed to further reduce the noise impact:

Management controls for airborne noise impacts

- Highly noise intrusive works should not take place prior to 8am where noise levels would significantly exceed the construction noise management levels at the residential receivers. This

would typically apply to hammering operations and use of excavators in the proximity of the residence.

- Additionally, a respite period is to be implemented where excavator mounted hydraulic hammering works are required and will generate noise levels exceeding construction noise management levels. Recommended hours are as below:

- Monday to Friday 9am – 12pm.
- Monday to Friday 2pm – 5pm.
- Saturday 4 hours between the hours of 9am – 12pm and 2pm – 3:30pm.

The above hours may be modified in consultation with the surrounding receivers to minimise impact while not reducing the overall allowable hours per day.

- Notification to the most affected residential receivers should be undertaken (via flyer or similar)
- Install noise measurements at surrounding properties at the beginning of the demolition works should be undertaken to quantify the level of noise typically emitted from the site and confirm the predictions/respice periods applied.
- There will be periods of approximately 45 minutes to 1 hour per day for workers breaks. It is recommended that all workers doing noisy works (such as use of jackhammer or impact drill) take their break at the same time, to provide more effective respice to the sensitive receivers.

Management controls for ground borne noise and vibration impacts:

- Where feasible, pulverisers and other non-percussive methods should be used to demolish concrete structures.
- Prior to the commencement of any activity likely to generate significant ground vibration (typically hammering), attended vibration monitoring is to be undertaken to establish “safe” working distances from the structures around the site.

Management controls for vehicular noise

- Trucks and forklifts in general on site are to use a non-tonal reversing beacon where possible (subject to OH&S requirements) to minimise potential disturbance of surrounding receivers.
- Trucks, trailers and delivery vehicles are to turn off engines when idling to reduce noise impacts (unless required for concrete pumping or similar).

Provided the mitigation recommendations and procedures in the Noise Impact Assessment and the additional management controls presented above are adopted, construction noise impact to surrounding land uses can be adequately minimised.

4.5. RESPONSE TO OTHER ISSUES RAISED

Table 3 Response to other agencies and community submissions

Summary of Issue Raised	Response	Supporting Document
ENVIRONMENT AND HERITAGE GROUP		
Flooding EHG recommends that hazardous materials be stored above the flood planning level (FPL). A freeboard would be needed on top of the 1% AEP flood level. For critical services the greater level of the FPL and the probable maximum flood level would apply.	No hazardous materials are proposed to be stored.	N/A
HERITAGE NSW		
All internal works to the building should be undertaken after detailed consultation with the City of Sydney Council. Consultation with City of Sydney Council should be undertaken to minimise impacts to locally listed items in the vicinity.	Prior to and during the EIS preparation phase, the project team have consulted extensively with City of Sydney Council, both with the planning team and the heritage team. The project team consulted with Council on: ▪ 14 April 2021 ▪ 17 August 2021 ▪ 30 September 2021 ▪ 21 October 2021 Consultation with Council mainly focused on the Site Wide and Wilkinson House CMP and the proposed design for Wilkinson House.	Heritage response to Council's submission is provided in Section 4.1 and Appendix F.

Summary of Issue Raised	Response	Supporting Document
	Furthermore, Council also provided comments on the submitted EIS Package. Response to Council’s submission is discussed in Section 4.1. The project team will continue to consult with Council post approval of the SSDA, on matters such as heritage interpretation strategy.	
Conditions recommended for historical archaeology shall remain applicable for all works related to this site including the Stage 1 detailed proposal for Wilkinson House.	Noted. This SSDA will be subject to conditions in accordance with the recommendations contained in the Historical Archaeological Impact Assessment.	N/A
Heritage NSW would strongly advocate the use of mitigation measures to reduce any adverse impacts of the proposal on the significance of the locally listed items within the site and in the vicinity	Noted This SSDA will be subject to conditions in accordance with the recommendations contained in the Heritage Impact Assessment.	
CITY OF SYDNEY COUNCIL		
Heriage Demountable classrooms – These are to be removed within 3 months of occupation.	SECGGs will accept a condition that requires the removal of the temporary demountable classrooms within three months of the final occupation of the new Wilkinson House building.	N/A
Floor levels - As proposed, the ceiling level sits below the lintel level of the window openings. A condition is recommended that requires the proposed floor levels to match the existing levels, so that the relationship	We object to Council’s request to include a condition to require the proposed floor levels to match the existing levels. Justification is detailed in Section 4.1 Detailing of ceilings adjacent to existing openings shall incorporate setback bulkheads where required to avoid any visual impact to the existing window openings.	

Summary of Issue Raised	Response	Supporting Document
	Therefore, a condition of consent is not required to setback the glazing further as the roller blinds will not create any adverse visual impact.	
Structural integrity - The applicant has not yet provided a structural methodology for the significant demolition and excavation, whilst retaining and protecting the heritage fabric. Preparation of a detailed structural methodology report is recommended.	A Structural Methodology Report has been prepared by Northrop and is attached at Appendix G. The report outlines the anticipated ground conditions, proposed footing solutions and proposed superstructure solutions. The report concludes that provided the works described in the methodology statement and precautions taken as per the geotechnical report are carried out in a professional workmanlike manner, the façade and excavation works can be carried out successfully.	Refer to Appendix G
Salvage, reuse and recycling of materials – It is recommended that any traditional building materials be salvaged and reused on the project	Refer to 4.1	
Additional standard conditions of consent relating to Conservation Work Schedule requirements, preparation of a Heritage Interpretation Plan, Photographic Archival Documentation, use of a heritage consultant and preparation of a Cyclical Maintenance Plan are also recommended.	Detailed response to Council's recommended conditions is contained in Appendix F. We would like DPE to consider the response to conditions and adopt our recommendations.	Refer to Appendix F
Public domain A revised Flood Assessment Report which includes recommended flood planning levels	A Stormwater Management and Civil Report has been prepared by Northrop and is enclosed at Appendix W of the EIS.	Refer to Appendix W of the EIS.

Summary of Issue Raised	Response	Supporting Document
that are compliant with the City's Interim Floodplain Management Policy.	This report was prepared in accordance with City's Interim Floodplain Management Policy and confirmed that the building has been designed to comply with the relevant flood planning level.	
Public Domain survey plans are requested to enable confirmation of levels and grades at Forbes Street entrances and St Peters Street.	The survey submitted with the EIS confirms the levels and grades at Forbes Street entrances and St Peters Street, which was incorporated as part of the architectural plans.	Refer to Appendix B of the EIS.
Landscape Plans are required to be submitted.	An updated landscaped plan is provided at Appendix D.	Appendix D
Detailed calculation of the project cost.	The CIV was submitted to DPE. However, it is not published online. This can be provided to Council separately if required by DPE.	N/A
Landscape Level 3 tree planter A single tree (Melaleuca linariifolia) is proposed in a low raised planter. As designed, there is insufficient soil depth and volume (approx. <1m ³) to support healthy tree growth and meet minimum compliance with the City of Sydney's Landscape Code.	The Level 3 rooftop planter has been designed with a 550mm soil build-up as a response to the restricted loading capacity of the terrace. The Melaleuca linariifolia 'Snow in Summer' is a smaller variety and survives well in a shallow rooted environment. It will be viable, provided appropriate irrigation and regular maintenance and monitoring is implemented. Furthermore, the available soil depth will also serve to control the tree's height below the rooftop level.	Refer to Appendix E
The stormwater report does not provide any information about planter drainage and connections to the stormwater system.	Connection of all site water, including planter drainage was always intended to be made via the OSD system. The Civil Engineering Report has been updated to clarify this.	Refer to Appendix J
It is unclear if the new Level 3 slab is designed to support the wet soil loads for a	The structural engineer has confirmed that the slab is designed to support the wet soil loads of the tree planter.	N/A

Summary of Issue Raised	Response	Supporting Document
tree planter. If there is a new slab, then allowance for an amended design with a 1m high tree planter with adequate soil volume with a wall mounted perimeter seat should be made.		
Transport and access Transport Access Guide – The guide is generally acceptable, however the chronology for the travel options to SCEGGS should be in reverse order to emphasise more sustainable transport options (i.e. Walking – Bike – Train – Bus – Car).	Transport Access Guide has been updated to emphasise more sustainable transport options: Walking – Bike – Train – Bus – Car.	Refer to updated Transport Access Guide attached Appendix H.
Waste Management - Clarify whether the waste storage area will be storing waste from only Wilkinson House or both the SGEGBs larger site and Wilkinson House. - The Architectural Plans should identify the location of the waste storage area and clearly mark the sizes and locations of all bins that will be stored at any given time. - Bulky waste storage is to be provided in accordance with Council's Guidelines.	There are two existing centralised waste storage areas that service the entire campus. Waste from Wilkinson House will be taken to the existing waste storage area on Forbes Street (refer to diagram below), retaining the current waste management procedure. The waste storage area will be able accommodate the waste from Wilkinson House and other buildings within the campus. No additional waste storage area is proposed for Wilkinson House.	Refer to Appendix V Waste Management Plan of the EIS.

Summary of Issue Raised	Response	Supporting Document
	SCEGGS Darlington currently run a 4 stream waste management system. The following sorting is done on-site into the following streams; 1.Co-Mingled 2.Paper/Cardboard 3.General Waste / land fill 4. Wet Waste & Food No changes are proposed to these waste steam and the waste from Wilkinson House will be sorted in accordance with the existing streams. The Waste Management Plan attached at Appendix V of the EIS provides details of the bin size required for Wilkinson House. The bins will be placed throughout Wilkinson House at internal fit-out stage of the project.	
Environmental Sustainability ▪ It is requested that a note be added to Roof Plan - DA104 to clearly specify the details of the PV panels as per the ESD prepared by Northrop. ▪ The City also requests that the ESD Report prepared by Northrop be referenced in any development consent issued by DPE.	At the current stage of the project, it is premature to determine/confirm the product type and details of the PV panels. The detailed of the PV panels will be further developed at design development stage (post approval) and will be shown on the plan for construcion. However, the selected panel will ensure that the recommended 30kW peak capacity can be achieved. Noted. The ESD report will be implemented and form part of the condition of consent.	N/A

Summary of Issue Raised	Response	Supporting Document
INDIVIDUAL SUBMITTERS The submissions have been grouped into the following topic areas		
Operational traffic A new traffic impact assessment and updated green travel plan for the site should be prepared. It is recommended to have a lollipop man at the Forbes Street crossing to manage traffic.	A Transport and Accessibility Report has been prepared by Traffix and is attached at Appendix L of the EIS. The report also contains an updated Green Travel Plan. During the morning drop-off period on Forbes Street, the school currently has a dedicated crossing supervisor to manage traffic and ensure safety for students, staff, all pedestrian and surrounding residents	Refer to Appendix L Traffic and Transport Impact Assessment of the EIS.
A condition of consent should be that St Peters Street is made accessible to the public at all times, and that the bollards be removed from the end of Forbes Street. Liaise with the City of Sydney regarding its traffic management review of Forbes and Bourke Streets. This needs to be considered in the approval requirements for this site.	This request is outside the scope of this project. St Peter Street and Forbes Street are owned and maintained by City of Sydney Council and any changes proposed to the public road will need to be managed by City of Sydney Council. The current management of St Peter Street originated with the closure of a number of small roads and laneways in the Sydney/Darlinghurst area, to improve safety and security of the local area and in response to residents' concerns. We are aware that the possible opening of St Peter's Street has been discussed by Council before, but has been strongly opposed by the residents of terraces in Forbes Street and in other local streets. It is therefore not a matter for this project, but a separate issue for the City of Sydney Council and residents. SCEGGs is currently consulting with City of Sydney Council on improving traffic and parking issues along Forbes Street and other changes to the local parking/bus	N/A

Summary of Issue Raised	Response	Supporting Document
	zones/traffic flow issues. This is part of SCEGGs ongoing consultation with Council and is outside the scope of Wilkinson House SSDA.	
Design Overall supportive of the adaptive use of Wilkinson House and the beautiful design by Smart Design Studio. Adverse visual impacts of the lift structure for the residential properties. If attic level rooftop is provided for the Wilkinson House building, the other proposed new office building should be completely removed from the approved site masterplan.	The proposed lift is a well-considered improvement to the existing bridge links into Wilkinson House, from a design, equitable access and amenity perspectives. The proposal has carefully considered the previous advice from GANSW and the SDRP, on the form, articulation and materiality of the lift structure. Visual impact of the lift structure has been carefully assessed in Section 10.1 of the ES, including the design evolution of the lift addition. The adopted design presents a more simplified rectilinear form, introducing glazing and a steel frame. This enforces the light touch approach and reduces the visual impact from the street. In summary, the proposed form and materiality are contemporary, and is distinct with the heritage fabric of Wilkinson House. The use of glazing is light and recessive in form when viewed from Forbes Street, which will not create any adverse visual impact to the street or nearby residents. The lift well is not expected to be artificially illuminated and the lift car is expected to have occupancy lighting. Therefore the lift will not create adverse light spill to nearby residents. The proposed roof area comprises much needed general teaching space, multipurpose common room, breakout space, and careers office. It will not be used purely for administration purpose only, therefore it cannot be removed as it will accommodate teaching needs of the school. The Concept Approval granted consent for the building envelope for which a future Administration Building would be sited. The design and construction of the building will be subject to further assessment as part of a separate SSD application. The future	Refer to EIS.

Summary of Issue Raised	Response	Supporting Document
	admin building will be a purpose built building for administration purposes. This building is vital to the future operation of the school and cannot be removed from the Concept SSDA.	
Heritage The eastern and northern facades of Barham House should be restored.	Proposed works to Barham House was approved under Concept SSD-8993 and will be the subject of a separate detailed SSDA. The works proposed to Barham House will be guided by a Conservation Management Plan specifically for Barham House, which will carefully consider the heritage significance of the building and the relationship between the new and the retained portion of Barham House.	N/A

5. UPDATED PROJECT JUSTIFICATION

This section provides an updated justification and evaluation of the project as a whole.

Overall, the responses within this RtS and the supporting documents submitted is considered appropriate for the site and warrants approval by the minister for planning for the following reasons:

- The site is zoned Zone R1 General Residential under the Sydney LEP. The proposed land use is 'educational establishment' which is permissible with development consent in the R1 zone under the Sydney LEP.
- No changes are proposed to student capacity, staff number or approved access and parking arrangements.
- The staircase balustrades are proposed to be salvaged and reinterpreted as part of a new art piece which will be made by students of the school. Further elements to be salvaged and reused where possible could include cornices, skirtings, architraves, picture rails, doors and windows. However, it is noted that the majority of these elements are ranked as being of Moderate and/or Little significance to Wilkinson House and are common features throughout Inter War residential flat buildings.
- Final details of the elements to be salvaged and reused will be determined during the detailed design and construction phases and will be further outlined in the Schedule of Conservation Works, Salvage Methodology and Heritage Interpretation Strategy, which will need to be prepared in accordance with heritage related Conditions of Consent.
- The draft conditions provided by City of Sydney Council have been reviewed by the heritage consultant with condition wording changes provided within the RtS for any proposed conditions which cannot be agreed to.
- The rooftop plant above the Joan Freeman building is considered to be acceptable and will not result in any adverse visual impact and is hardly perceivable from the street or from adjacent residential premises.
- The proposed Landscape Plan provide for additional street tree to enhance the streetscape and is consistent with the Concept SSDA Modification as proposed to be modified in the concurrent SSDA Modification Application (SSD-8993-Mod-3).
- The Preliminary Construction Traffic and Pedestrian Management Plan (CTMP) has been updated by Traffix and includes a Construction Worker Transportation Strategy, which provides high level measures to minimise the demand for construction worker car parking.
- In addition to the recommendations in the Noise Impact Assessment report (which was based on the Interim Construction Noise Guideline (ICNG) submitted with the EIS, additional measures are proposed to reduce the exceedances of the airborne construction noise to nearby residents. These measures include restriction of working hours for highly noise intrusive works, e.g. no noise intrusive work before 8am etc.

An updated table of proposed mitigation measures is provided at **Appendix B** which has regard to construction impacts of the proposal.

Having considered all relevant matters, there will be no additional environmental impacts as a result of the proposed landscape refinements. Additional heritage and construction impact assessment ensures any previously known and assessed impacts will be appropriately managed and mitigated where relevant.

Overall, the modification application is appropriate to the site and surrounding context, is in the public interest and should be approved by the DPE subject to conditions of consent.

6. DISCLAIMER

This report is dated 27 May 2022 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 (**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 RtS (**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.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

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

SUBMISSIONS REGISTER

Submissions Register

Group	Name ⁱ	Relevant Section
Public Authorities (State or Commonwealth Agencies and Council)	Transport for NSW	No objection and no further comments
	Environment and Heritage Group	N/A
	Heritage NSW x 2 (Aboriginal cultural heritage and European heritage)	Refer to Section 4 of the report.
	Government Architect NSW (GANSW)	Refer to Section 4 of the report.
Council	City of Sydney Council	Refer to Section 4 of the report
Individuals	Polly Seidler	Refer to Section 4 of the report
	Timothy Brooker	
	The Horizon	
	Marlyn Robertson	
	JC and RD Ellinson	
	Peter Morton	

APPENDIX B

UPDATED LIST OF PLANS FOR APPROVAL

6.1. Updated list of plans for approval

The updated list of landscape plans for approval have been listed in below.

Landscape Drawings Prepared by Context			
Drawing No.	Rev	Name of Plan	Date
L_0001	B	COVER SHEET	25/05/2022
L_0002	B	PLANTING SCHEDULES	25/05/2022
L_1001	B	LANDSCAPE PLAN GROUND FLOOR	25/05/2022
L_1002	A	LANDSCAPE PLAN LEVEL 3	25/05/2022
L_7001	B	TYPICAL DETAILS	25/05/2022

APPENDIX C

UPDATED MITIGATION MEASURES

Updated Construcion Mitigation Measures as per below, new mitigation measure noted in red

Issue	Potential Impact	Approach	Residual Impact
Construcion	Construction Impacts associated with public safety, visual amenity, noise, waste and traffic management in the locality during construction. Finalisation and implementation of the draft Construction Environmental Management Plan. N/A	Finalisation and implementation of the draft Construction Environmental Management Plan to include the relevant construction mitigation measures contained within the: ▪ Updated Preliminary Construction Traffic and Pedestrian Management Plan prepared by Traffix dated May 2022 ▪ Noise Impact Assessment Acoustics Report Prepared by ADP dated 15 October 2021 and Acoustic Statement prepared by ADP dated 4 May 2022	Low

APPENDIX D

UPDATED LANDSCAPE PLAN

APPENDIX E

LANDSCAPE RTS STATEMENT

APPENDIX F

HERITAGE RTS STATEMENT (INCLUDING RESPONSE TO CITY OF SYDNEY PROPOSED CONDITIONS)

APPENDIX G

WILKINSON HOUSE BUILDING FAÇADE RETENTION METHODOLOGY REPORT

APPENDIX H

TRAFFIC RTS STATEMENT

APPENDIX I

ACOUSTIC RTS STATEMENT

APPENDIX J

UPDATED CIVIL ENGINEERING REPORT