



***MODIFICATION REQUEST:
Graythwaite Stage 1 Project Application
North Sydney
(MP 10_0150 MOD 1)***

Description of Modification Request

- alterations to refurbishment works
- revised landscaping and tree removal
- revised car parking arrangements
- revised fence and gate
- revised condition relating to reflectivity

Director-General's
Environmental Assessment Report
Section 75W of the
Environmental Planning and Assessment Act 1979

June 2013

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1. BACKGROUND

This report is an assessment of a modification application (MP10_0150 MOD 1) lodged under section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act), by Sydney Church of England Grammar School (Shore, the proponent), seeking approval to modify the Stage 1 project approval for the extension of Shore school campus onto the Graythwaite site, North Sydney.

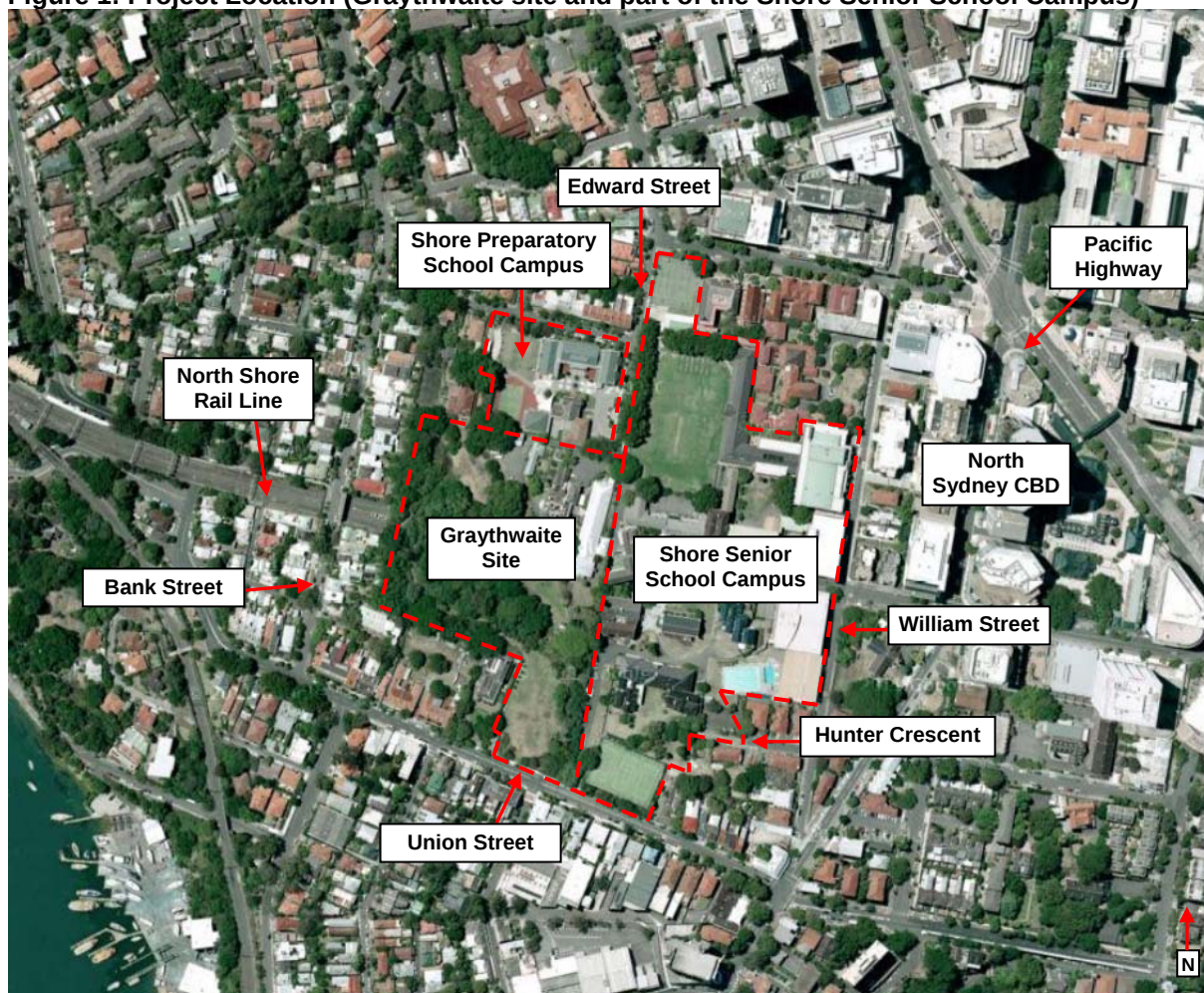
1.1 The Site

The site is located at Edward Street, Union Street, William Street and Hunter Crescent, North Sydney, in the North Sydney Local Government Area. The site comprises the Graythwaite site and part of the adjoining Sydney Church of England Grammar School (Shore) senior school campus, and is legally described as Lot 2 in DP539853 and Part of Lot 1 in DP 120268. The approved project also includes related development on the following additional lots:

- Lot 1 in DP 539853
- Lot C and D in DP 975970
- Lot 3 in DP 75717
- Lot 1 in DP 570826
- Lot 1 in DP 57339
- Lot 3 in DP 570829
- Lot 2 and 3 in DP 18725
- Lot 1 in DP 60719

The approved project location is shown in **Figure 1**.

Figure 1: Project Location (Graythwaite site and part of the Shore Senior School Campus)



1.2 Approval History

On 9 November 2012, the Planning Assessment Commission, as delegate of the Minister for Planning and Infrastructure, approved a concept plan (MP10_0149) and a concurrent Stage 1 project application (MP10_0150) for the extension of Sydney Church of England Grammar School (Shore) onto the Graythwaite site.

The concept plan incorporated three stages, and included the following:

- conservation and refurbishment of Graythwaite House Complex, the Coach House, Tom O'Neill Centre and associated garden areas;
- development of three new buildings with a total GFA of 6,080 sqm to accommodate additional students and staff;
- additional car parking spaces and other transport, parking, traffic and access improvements and a new student pick-up facility; and
- miscellaneous works including drainage, landscaping, site fencing and gates.

The concurrent Stage 1 project approval included:

- use of the Graythwaite site and buildings as an educational establishment, being an extension to the adjoining Shore school campus;
- conservation and refurbishment of Graythwaite House, the Coach House, Tom O'Neill Centre and associated garden areas; and
- transport, traffic, parking, access, drainage, stormwater, fencing, lighting and landscaping works.

The layout of the approved concept plan is shown in **Figure 2** and the layout of the Stage 1 project approval is shown in **Figure 3**.

Figure 2: Concept Plan

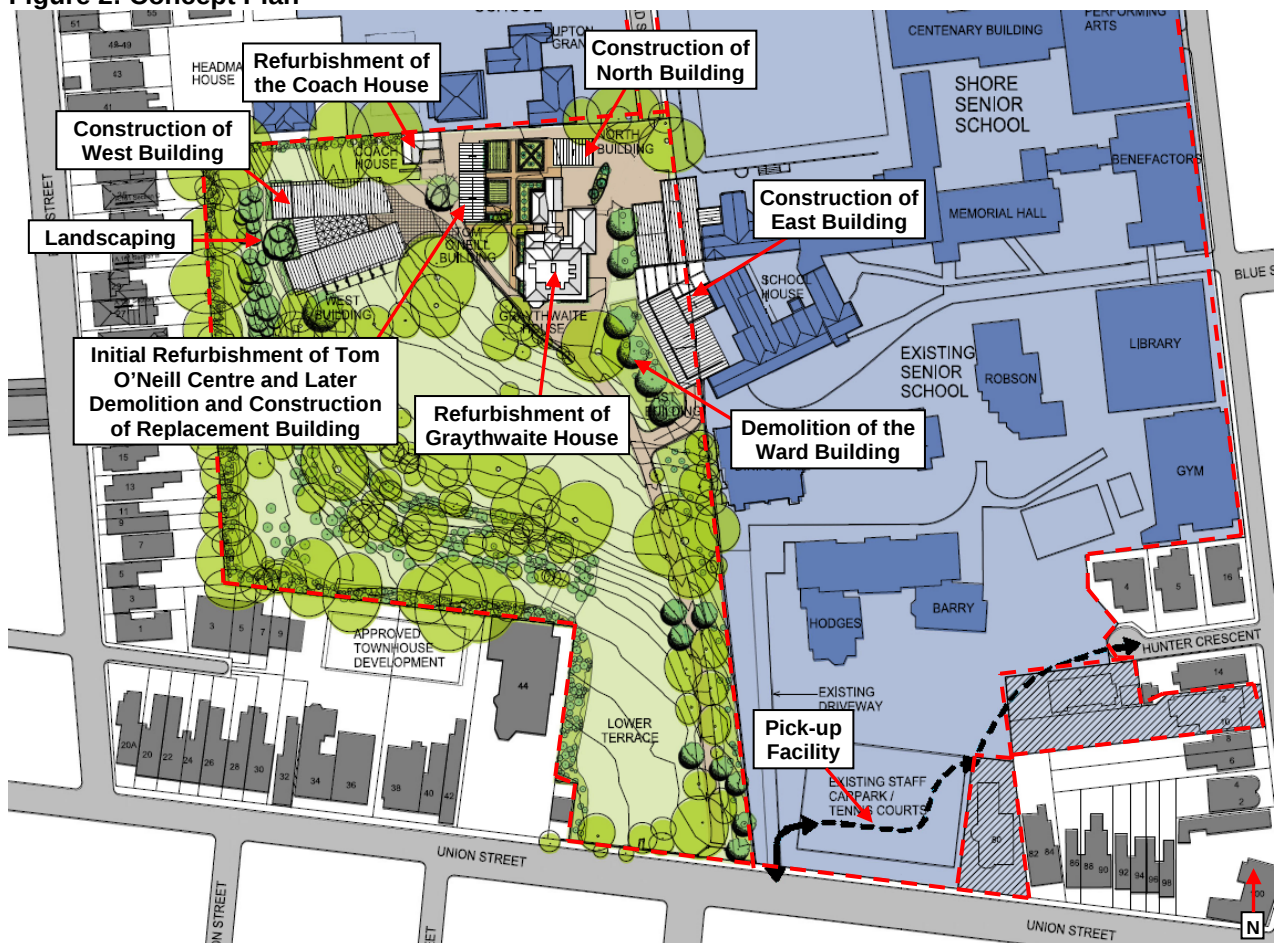


Figure 3: Stage 1 Project Approval



2. PROPOSED MODIFICATION

2.1 Modification Description

The modification application seeks approval for minor internal and external modifications to the approved refurbishment works to Graythwaite House, the Stables Building, the Coach House and the Tom O'Neil Centre. Revised landscaping works and additional tree removal, revised car parking arrangements (including the provision of a temporary at-grade car park area), revised fence and gate at the Edward Street site entry, and modification of condition B8 Reflectivity is also proposed.

A detailed description of the proposed modifications is provided below:

Graythwaite House complex

- Exterior
 - installation of glass awning above door on the east elevation of the Kitchen Wing;

- modifications to the design of the approved disabled access walkway to the entry on the eastern verandah; and
- modified lift façade treatment and lowered lift shaft height.
- Basement
 - demolition of non-original timber stairs and installation of new BCA compliant basement stairs and fire-rated enclosing lobby, required for Code compliance.
- Ground Floor
 - demolition and replacement of deteriorated, structurally unsound timber framed section of floor in Entry Hall room G13;
 - removal of an original door in room G4, installation of new doors within an existing opening in room G6 and new partitions in rooms G2, G3 and G4;
 - forming of an opening within a sandstone wall and installation of new glazed doors to form an airlock in Stables Museum room G19c; and
 - partial demolition of non-original internal brick to enlarge an existing opening in Stables Museum G19a and b.
- First Floor
 - demolition of original wall between the rooms to create an office space in Foundation Office room F11 and F12;
 - removal of flooring and floor structure and the installation of new partition wall to form an airlock in Stables Museum room F17b; and
 - minor interior alterations including installation of new doors and partitions to rooms F5, F9, F11 and F17b.
- Attic and Roof
 - new roof deck and associated structural steel framing on Widow's Walk; and
 - new roof space maintenance access doors in each Attic room, and partial removal of the original wall between rooms A3 and A4.

Coach House

- Exterior
 - removal of a non-original door and steps and reconstruction of a timber-framed window to match the original on the west elevation; and
 - replacement of non-original (c1970s) timber-framed doors with timber framed glazed door and sidelight on the east elevation.
- Ground Floor
 - demolition of a non-original concrete slab and replacement with a new timber framed floor to assist in minimising rising damp in room G1.

Tom O'Neill Centre

- Use
 - previously proposed to be adapted for music class rooms, the building is now proposed to be used to store the School's archival collection.
- External
 - minor demolition and external alterations including removal of the non-original verandah and infilling of a non-original door opening.
- Ground Floor
 - demolition of non-original walls.

Landscaping

- Upper Terrace
 - new garden arbour within the proposed formal garden to the east of the Tom O'Neill Centre.
- Driveway
 - installation of a hydrant tank and enclosure on the eastern side of the driveway;
 - construction of a brick drain along either side of the driveway; and
 - removal and replacement of four Camphor Laurel trees at the bottom of the driveway with Brush Box.
- Boundary
 - construction of additional timber paling fences at the existing substation and along the northern and western site boundary;
 - construction of a new pathway on the eastern boundary providing pedestrian access to the adjoining Senior School; and
 - additional planting of mature Ornamental Plums along the side boundary to Kailoa (44 Union St).

Car parking

- the provision of an interim location for the six at-grade car parking spaces to the west of Graythwaite House (shown in **Figure 4** of this report), with the relocation of these spaces to a permanent location to the south-east of Graythwaite House (between Graythwaite House and the future East Building) to be implemented as part of the detailed design in the future development application for Stage 2.

Fence and Gate

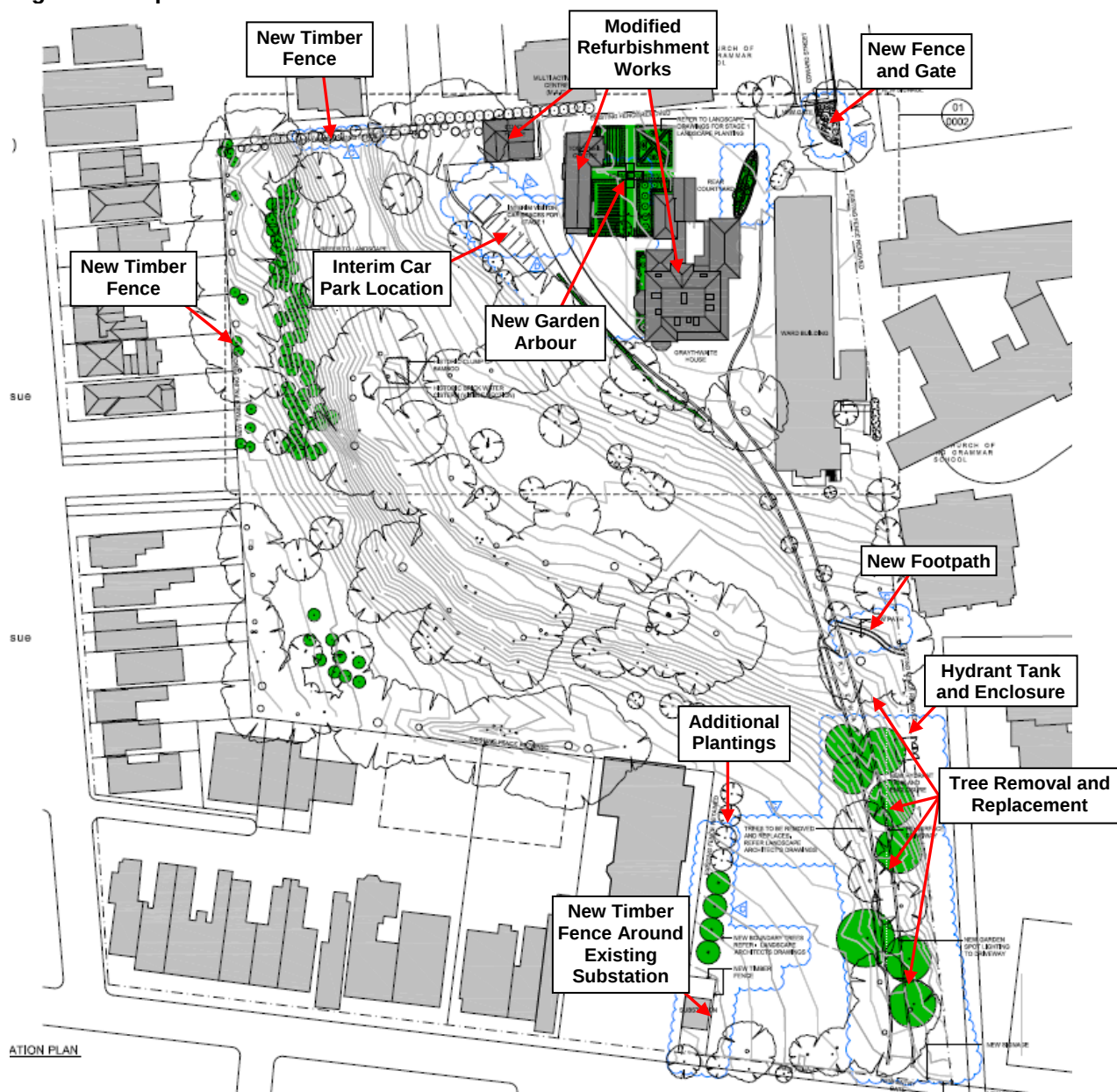
- construction of a new sandstone wall (at a height of 1.8 m) and gate fronting the Edward Street site entrance.

Condition B8 Reflectivity

- the modification includes an alternative lift façade treatment to the upper portion of the lift shaft on Graythwaite House. The modified lift façade treatment incorporates the use of Pigmento zinc cladding, which has a reflectivity 22 percent.
- condition B8 of the project approval prescribes a maximum reflectivity of 20 percent for building materials, however the proponent seeks approval to modify the condition to allow the use of the zinc cladding for the lift shaft.

The location of the proposed modifications are identified in **Figure 4**.

Figure 4: Proposed Modifications



3. STATUTORY CONTEXT

3.1 Modification of the Minister's Approval

In accordance with clause 3 of Schedule 6A of the EP&A Act, section 75W of the EP&A Act as in force immediately before its repeal on 1 October 2011 and as modified by Schedule 6A, continues to apply to transitional Part 3A projects.

Section 75W(2) of the EP&A Act provides that a proponent may request the Minister to modify the Minister's approval of a project. The Minister's approval of a modification is not required if the approval of the project as modified would be consistent with the original approval. As the proposal involves alterations to refurbishment works, revised landscaping and tree removal, revised car parking arrangements, revised fence and gate and a revised condition B8, the modification requires the Minister's approval.

3.2 Environmental Assessment Requirements

Section 75W(3) of the EP&A Act provides the Director General with scope to issue Environmental Assessment Requirements (DGRs) that must be complied with before the matter will be considered by the Minister. Environmental Assessment Requirements were not issued for this modification as the proponent had addressed the key issues in the modification request.

3.3 Delegated Authority

On 14 September 2011, the Minister delegated his powers and functions under section 75W of the EP&A Act to Directors in the Major Projects Assessment Division where:

- a) the relevant local council has not made an objection, and
- b) a political disclosure statement has not been made, and
- c) there are less than 10 public submissions in the nature of objections.

The modification application complies with the terms of that delegation as North Sydney Council has not made an objection, a political disclosure statement has not been made and only two public submissions were received on the modification request which did not object, but provided comments on the modification application. Therefore the Director, Metropolitan and Regional Projects North can determine the application.

4. CONSULTATION AND SUBMISSIONS

4.1 Exhibition

In accordance with section 75X(2)(f) of the EP&A Act and clause 8G of the EP&A Regulations, the modification request was made available on the department's website for 14 days. The modification request was also referred to North Sydney Council and the Heritage Council of NSW for comment. The department also notified a number of adjoining landowners and members of the general public who made submissions on the original application. Due to the minor nature of the proposed modification, the modification request was not exhibited by any other means.

The department received two submissions from public authorities and two submissions from the general public. A summary of the issues raised in submissions is provided in Section 4.2 and 4.3 below.

4.2 Public Authority Submissions

A summary of submissions received from public authorities is provided below:

North Sydney Council

Council provided the following general comments and recommendations for the department's consideration:

- Council raised no objection to the proposed minor internal and external modifications to the refurbishment works to Graythwaite House, the Stables Building, the Coach House and Tom O'Neil Centre, and identified that the modifications have been designed to limit the removal of significant fabric within the buildings and improve the setting of Graythwaite House.
- Council identified that the proposed changes to the landscaping are refinements to the original design and that the works will have a minor, but

acceptable, impact on the heritage significance of the Graythwaite site buildings.

- Council initially raised concern with the proposed revised car parking arrangements, and identified that the provision of the at-grade car parking spaces to the west of Graythwaite House is not supported due to potential impacts on the visual curtilage and setting of Graythwaite. However, following further clarification from the proponent that the car spaces were being provided in that location on an interim basis, and that they were not in addition to car parking already approved, council advised that the relocation of car parking to the west as an interim measure, and eventually to the east of the house is acceptable.
- council identified that the car parking in both locations (interim and permanent) should be provided within a landscaped setting, and recommended that the landscaped island and tree which formed part of the original approved landscaping be reinstated following relocation of the interim spaces to their permanent location.

Comment

The department has given consideration to the comments provided by council and is satisfied the proponent's response to submissions and additional information has satisfactorily addressed the matters raised by council. Further consideration of council's comments and recommendations is provided in Section 5 of this report.

Heritage Council of NSW

The Heritage Council provided the following general comments and recommendations for the department's consideration:

- the Heritage Council raised no objection to the minor internal and external modifications to the refurbishment works or the proposed changes to the landscaping.
- the Heritage Council raised concern with both the interim and permanent location of car parking on the Graythwaite site, and identified that any proposal for car parking in the heritage curtilage should have regard to the policies in the endorsed Conservation Management Plan for the site. The Heritage Council identified that the proposed interim at-grade car parking to the west of Graythwaite House would materially affect the heritage significance of the site, and the permanent car parking to the south-east of Graythwaite House would affect significant view corridors and landscaped areas.
- The Heritage Council recommended that the proponent consider siting the car parking in the vicinity of the Edward Street entry, to the north of Graythwaite House.

Comment

The department has given consideration to the comments provided by the Heritage Council and is satisfied that the proponent's response to submissions and additional information has satisfactorily addressed the matters raised by the Heritage Council. Further consideration of the Heritage Council's comments is provided in Section 5 of this report.

4.3 Public Submissions

Two public submissions were received on the modification request. One submission raised concern with the construction fencing along Union Street, which could

potentially create noise reflection from passing traffic on to residences along the southern side of Union Street. The submission recommended the planting of vegetation along the boundary to mitigate these impacts.

The second submission supported the proposed modifications and identified that the modifications will be beneficial to the school, nearby neighbours and the community in general. The submission also identified that the removal of Camphor Laurel trees and replacement with brush box trees is reasonable and the slight modifications to refurbishment works are acceptable.

Comment

The department has given consideration to the comments provided by the general public.

4.4 Response to Submissions

The proponent provided a response to submissions. The response included clarification that the six at-grade car parking spaces located to the west of Graythwaite House were being provided on an interim basis, with the permanent location to be between Graythwaite House and the East Building. The proponent also identified that the permanent car parking would be implemented as part of the detailed design in the future development application for Stage 2.

Additionally, the response to submissions included a minor amendment to the modification request to include the construction of a new sandstone wall (at a height of 1.8 m) and gate fronting the Edward Street site entrance. This additional component is already referred to in the detailed description of the proposed modifications in Section 2.1 of this report.

The department is satisfied that the response to submissions and additional information satisfactorily addressed the issues raised in submissions and that the minor amendments to the modification are acceptable.

5. ASSESSMENT

The department considers the key issues to be:

- heritage;
- reflectivity; and
- boundary fence.

5.1 Heritage

The Graythwaite site is a place of exceptional heritage significance and is listed as a heritage item on the State Heritage Register, North Sydney Local Environmental Plan 2001, the National Trust Register and the Register of the National Estate. A Conservation Management Plan (CMP) for the site was endorsed by the Heritage Council of NSW in June 2011.

A comprehensive assessment of heritage issues was undertaken as part of the assessment of the original concept plan and stage 1 project application, including an assessment of the change of use of the site, demolition works, refurbishment works, building additions, new buildings, landscaping and tree removal, fencing and gates and BCA compliance.

The proposed modification seeks approval for minor changes to the approved internal and external refurbishment works to Graythwaite House, the Stables Building, the Coach House and the Tom O'Neil Centre. Additionally, the proposed modification seeks approval for minor amendments to the approved landscaping, additional tree removal, revised car parking arrangements and a revised fence and gate. The modification request was supported by a Heritage Impact Statement (heritage report) which addressed the changes proposed in the modification application.

Consideration of each component of the modification request with regard to heritage is provided below.

Refurbishment Works

The modification application includes minor internal and external modifications to the approved refurbishment works, including partial demolition of some original walls to create new openings, and changes to doors and windows. The proposed changes also include an alternative lift façade treatment and revisions to the Widows Walk. The proponent identified that the changes are largely proposed to achieve BCA compliance and would improve the servicing and use of the buildings.

The heritage report identified that the proposed revised refurbishment works would not result in any additional adverse impacts on the heritage significance of the Graythwaite site and buildings. Additionally, the heritage report identified that the minor additional loss of original or early fabric would result in only a negligible impact on the contribution that each of the buildings makes to the overall significance of the site, while delivering benefits to their future continued use. Notwithstanding, the heritage report recommended a number of mitigation measures to minimise potential impacts to the heritage significance of the site, including:

- archival recording prior to demolition works;
- storage of removed original heritage significant fabric;
- retention of design elements to allow interpretation of the original design; and
- design incorporating reversibility to enable original elements to be reinstated in the future, if required.

As identified in Section 4.2 of this report, North Sydney Council and the Heritage Council of NSW raised no objection to the proposed revised refurbishment works, and North Sydney Council identified that the modifications have been designed to limit the removal of significant fabric within the buildings.

Whilst acknowledging the proposed modified refurbishment works would result in the removal of some additional original heritage significant fabric, particularly internally on the ground floor and first floor of the Graythwaite House Complex, the proposed modifications have been sensitively designed and potential heritage impacts would be mitigated through the measures detailed in the heritage report (referred to above). The department is also satisfied that the proposed modified refurbishment works reasonably satisfy the policies in the endorsed CMP for the site, including the key policies relating to assessing heritage impacts, records and maintenance of change, statutory compliance, Graythwaite House Complex, the Coach House, the Tom O'Neil Centre, alterations and additions.

The department therefore considers the proposed modified refurbishment works to be acceptable.

Landscaping and Tree Removal

The modification application seeks approval for a number of revisions to the approved landscaping, including a new garden arbour within the formal garden, installation of a hydrant tank and enclosure, a new brick drain along either side of the driveway, a new pedestrian pathway on the eastern boundary, and new timber paling fences around the existing substation and along the north-west site boundary, and construction of a new sandstone wall at a height of 1.8 m and gate fronting the Edward Street site entrance. The modification request also seeks approval to remove four Camphor Laurel trees which are identified as having moderate heritage significance in the CMP, and replacement planting with four Brush Box trees as well as additional plantings of mature Ornamental Plums.

The heritage report identified that the proposed revised garden arbour is based on historical records, and would result in a positive heritage outcome for the site. The the proposed new sandstone wall is intended to provide a solid screen for concealment of the sliding entry gate when in the open position and to partly conceal a fire hydrant booster valve and gas meter. Additionally, the 'L' shaped configuration of the wall is also intended to provide interpretation of the visual alignment of the historic boundary between Graythwaite and the Shore senior school campus. The heritage report identified that the proposed changes to the landscaping works would not result in any significant heritage impacts to the site.

The proponent identified that the four Camphor Laurel trees along the driveway are proposed to be removed as they have wide spreading root networks which are causing uplifting and damage to the driveway kerb, gutter and asphalt. The modification request was accompanied by an arborist report which supported the removal of the four trees on the basis that three of the trees are in poor condition, and removal of the fourth tree was warranted to make way for consistent replacement plantings of Brush Box. The heritage report also identified that the removal of the Camphor Laurel trees would not unacceptably diminish the heritage significance of the Graythwaite site and the replacement planting with Brush Box is a variety more consistent with the proposed landscape plan for Graythwaite.

Heritage Council of NSW and North Sydney Council raised no objection to the proposed revised landscaping or additional tree removal, and North Sydney Council identified that the proposed changes to the landscaping are generally refinements to the original design.

The department is satisfied that the proposed minor revisions to the landscaping would not result in any significant additional impacts to the heritage significance of the site. The department also considers the removal of the four Camphor Laurel trees to be acceptable and the replacement planting with Brush Box (which have less invasive root networks) would allow a smooth even gradient in the road surface.

Accordingly, the department considers the proposed modified landscaping and tree removal to be acceptable.

Car Parking

The original approval included the provision of seven at-grade car parking spaces on the Graythwaite site in Stage 1, including one space adjoining the Coach House, and six spaces located generally to the south of Graythwaite House Complex. The proposed modification seeks approval for revised car parking arrangements, including the provision of an interim location for the six at-grade car parking spaces to the west of Graythwaite House (shown in **Figure 4** of this report), with the relocation of these spaces to a permanent location to the south-east of Graythwaite House (between Graythwaite House and the future East Building) to be implemented as part of the detailed design in the future development application for Stage 2.

The proponent identified that the relocation of the car parking (on an interim basis) is required whilst refurbishment works are occurring to Graythwaite House and whilst construction of the future East Building is occurring so that area can be used for associated construction traffic movements and material storage.

The heritage report identified that the proposed interim location for at-grade car parking does not impact on key views to Graythwaite House from the upper driveway and potential visual impacts have been minimised through incorporating the spaces within a turf margin boarding the upper terrace. The heritage report identified that the car parking would visually read as part of the landscaping when not in use, with the exception of the accessible car space, which is required to be located on hard stand space.

North Sydney Council initially raised concern with the provision of at-grade car parking to the west of Graythwaite House due to potential impacts on the visual curtilage and setting of Graythwaite. However, following further clarification from the proponent in the response to submissions that the spaces were being provided in that location on an interim basis, and they were not in addition to car parking already approved, council later advised that the revised car parking arrangements were acceptable, provide the car parking was provided within a landscape setting, and that the approved landscaping was reinstated following relocation of the interim spaces to their permanent location.

The Heritage Council raised concern with both the interim and permanent location of car parking on the Graythwaite site. The Heritage Council identified that the proposed interim at-grade car parking to the west of Graythwaite House would materially affect the heritage significance of the site, and the permanent car parking to the south-east of Graythwaite House would affect significant view corridors and landscaped areas. The Heritage Council recommended that the proponent consider siting the car parking in the vicinity of the Edward Street entry, to the north of Graythwaite House.

The proponent responded to the Heritage Council's comment's by identifying that the potential visual impacts of the interim spaces would be relatively minor and vehicles parked in the spaces would intrude only slightly when viewing the Graythwaite House from the upper driveway. The proponent also identified that the current approval provides for permanent car parking to the south of Graythwaite House, and that the proponent intends to locate the permanent car parking along the margins of the landscaped areas in this part of the site to minimise impacts on key views of the house from the upper driveway. The proponent identified that this arrangement would result in a substantial visual improvement over the approved car parking

arrangement locating the spaces to the south of Graythwaite House, which was the arrangement when the site was formally owned and occupied by NSW Health.

The proponent also responded to the Heritage Council's recommendation to locate the car parking in the vicinity of the Edward Street entry, to the north of Graythwaite House. The proponent identified that car parking in the northern part of the site would impact on the interpretation of an early garden bed enclosing the area to the rear of Graythwaite House and the Stables Building, and from a heritage perspective, the presence of cars parked in the northern part of the site would result in greater negative heritage impacts than either the approved permanent location or the proposed interim location for car parking. Additionally, the proponent identified that car parking in the northern part of the site could impact on the construction of the approved North Building, and that the northern part of the site is a key pedestrian intersection for staff and students circulating between the Graythwaite site and the adjoining Shore preparatory and Shore senior school campuses. Accordingly, the proponent advised that the suggested car parking in the northern part of the site was not appropriate.

The department has considered the information in the heritage report and additional information provided by the proponent during the assessment, as well as the comments by North Sydney Council and the Heritage Council of NSW. The department acknowledges the concerns of the Heritage Council regarding the provision of an interim at-grade car park to the west of Graythwaite House. However, any impacts associated with the car park would be on a temporary basis as the car park would be relocated to a permanent location elsewhere in the site. Accordingly, from a long term heritage perspective, the interim car park would not materially affect the heritage significance of the site. The proponent has also minimised potential visual impacts of the interim car park through incorporating the spaces within a turf margin boarding the upper terrace (with the exception of the accessible car space) so that the car park would visually read as part of the landscaping when not in use. The department therefore considers the proposed interim car park to be acceptable, and in accordance with the recommendations of North Sydney Council, the department has recommended a condition for the proponent to reinstate the approved landscaping in that part of the site following relocation of the interim spaces to their permanent location.

The proposed modification also seeks approval to implement the relocation of the interim spaces to a permanent location to the south-east of Graythwaite House (between Graythwaite House and the future East Building) as part of the detailed design in the future development application for Stage 2.

The department acknowledges the concerns of the Heritage Council regarding the permanent car parking location, however the existing approval already provides for car parking immediately to the south of Graythwaite House Complex. The department considers that the indicative location of the permanent car parking along the margins of the landscaped areas to the south and east of Graythwaite House would minimise impacts on key views of the house from the upper driveway, and would be an improvement from the existing approval.

Notwithstanding, as the proponent has sought to resolve the final permanent location of the six parking spaces as part of the detailed design for the Stage 2 application, pursuant to the requirements of the concept approval, the proponent would need to consult with North Sydney Council and the Heritage Council of NSW as part of the detailed design in the future development application for Stage 2, including the resolution of the permanent location of the six parking spaces. Accordingly, the Heritage Council would have an opportunity in the future to further refine the final location of the permanent car parking and ensure significant view corridors and landscaped areas of the site are protected. The department has recommended a condition to ensure that further consultation occurs with the Heritage Council, and that the permanent car parking is implemented prior to issue of an occupation certificate of the East Building.

5.2 Reflectivity

Condition B8 of the Stage 1 project approval identifies that the light reflectivity from any building materials used on the façades of buildings within the site is not to exceed 20 percent, and must be designed so as not to result in glare that causes any nuisance or interference to any person or place.

The proposed modification seeks approval to amend condition B8 to accommodate the use of an alternative lift façade treatment to the upper portion of the lift shaft on Graythwaite House. The modified lift façade treatment incorporates the use of pigmento zinc cladding, which has a reflectivity 22 percent.

The modification request identified that the zinc cladding is a high quality material commensurate with the exceptional aesthetic significance of Graythwaite House, and the colour best complements the building's sandstone exterior. Additionally, the modification request identified that the use of an alternative zinc colour, with a reflectivity of less than 20 percent, would not be the best heritage/architectural outcome.

The department notes that Graythwaite House and the associated lift shaft is sited centrally within the combined Graythwaite site, and existing Shore senior school and preparatory school campuses, and accordingly, there is significant separation distance between the lift shaft and the nearest surrounding residential dwelling houses on Bank Street, Union Street, Edward Street and Lord Street, and surrounding roads. Additionally, the site topography, existing and proposed vegetation, and existing buildings and approved building envelopes within the subject site would substantially block the majority of views of the lift shaft from surrounding residential areas. The department therefore does not consider that the use of the zinc cladding will give rise to any substantial adverse glare nuisance or interference to surrounding residential areas or roads.

Accordingly, the department considers the proposed modification to condition B8 to be acceptable and has recommended amending the condition accordingly.

5.3 Boundary Fence

The modification application seeks approval for a new timber paling fence along the western boundary of the site (boundary with Bank Street residential properties), the northern boundary of the site (boundary with the Shore headmaster) and around the existing substation in the south of the site.

Condition A9 of the existing project approval requires the provision of a boundary fence along the western boundary of the Graythwaite site with Bank Street residences, and the fence is to be the subject of negotiations between the proponent and Bank Street residents, with the proponent to pay reasonable costs.

The department considers that the provision of the boundary fence along the western boundary of the Graythwaite site should be undertaken in accordance with the requirements of condition A9, rather than being provided through the modification application. The department therefore recommends that the boundary fence not be approved and that the fencing be undertaken in accordance with the condition A9.

The new timber paling fence along the northern boundary of the site (boundary with the Shore headmaster) and the fence around the existing substation in the south of the site is supported.

6. CONCLUSION

The modification application seeks approval for minor internal and external modifications to the approved refurbishment works to Graythwaite House, the Stables Building, the Coach House and the Tom O'Neil Centre, revised landscaping works and additional tree removal, revised car parking arrangements, including the provision of a temporary at-grade car park area, revised fence and gate at the Edward Street site fence, and modification to condition B8 Reflectivity.

The proposed modifications will not result in any significant impacts to the heritage significance of the Graythwaite site and will result in improved BCA compliance and will improve the servicing and use of the buildings.

The revised car parking arrangement will also allow the car parking to be relocated on an interim basis whilst refurbishment works are occurring to Graythwaite House and whilst construction of the future East Building is occurring so that area of the site can be used for associated construction traffic movements and material storage.

Accordingly, the department recommends that the modification request be approved, and the project approval be amended accordingly.

7. RECOMMENDATIONS

It is recommended that the Director, Metropolitan and Regional Projects North:

- a) **Consider** the findings and recommendations of this report
- b) **Approve** the modification, subject to conditions, under section 75W of the *Environmental Planning and Assessment Act 1979*, and
- c) **Sign** the attached instrument of modification approval (**TAG A**).

Prepared by:

 12/6/13

Ben Eveleigh
Planner
Metropolitan and Regional Projects North

Endorsed by:

 12/6/13

David Gibson
Team Leader
Metropolitan and Regional Projects North



Heather Warton
Director
Metropolitan and Regional Projects North