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URBIS

REQUEST OF THE SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)

SCEGGS Darlinghurst- Wilkinson House Detailed
Design SSDA

Prepared for

SCEGGS DARLINGHURST LIMITED

21 May 2021

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1. INTRODUCTION

This Scoping Report has been prepared by Urbis on behalf of SCEGGs Darlinghurst Limited (**the applicant**) to prepare a State Significant Development Application (**SSDA**) for the adaptive re-use of Wilkinson House, located on the existing main school ground at 215 Forbes Street, Darlinghurst.

Conditional Development Consent was granted by the Independent Planning Commission (**IPC**) on 22 May 2020 to the Concept DA (SSD 8993) for the redevelopment of SCEGGs at its main campus located at 215 Forbes Street, Darlinghurst (**the Campus**), excluding St Peter's Precinct and 217 Forbes Street.

Development Consent was not granted for Stage 1 works to Wilkinson House, including the demolition of existing Wilkinson House, excavation of a basement and construction of a new 4 storey building for general school purposes. The Concept Approval only approved the existing building envelope of the Wilkinson House.

This is the first detailed SSDA under the Concept Approval (SSD 8993), for the adaptive reuse of Wilkinson House (**the Site**) for general school learning areas and sport facilities to support the senior school, including alteration and additions to the existing Wilkinson House.

The design development of Wilkinson House is being informed by a site wide Heritage Conservation Management Plan (**CMP**) and a CMP for Wilkinson House, which is currently been prepared by an independent heritage consultant and will be submitted to accompany the EIS. The project team has had preliminary discussion with City of Sydney Council in relation to the CMP and will continue to consult with Council.

A concurrent Modification to Concept Approval (SSD 8993) will be submitted with the SSDA to amend the existing building envelope and associated conditions for Wilkinson House.

Figure 1 Site Location (Wilkinson House outlined in red)



Source: Six Maps

As per clause 12 of the *State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)*, any subsequent stage of a Concept DA is a State Significant Development unless stated otherwise in the Concept approval:

Part 2 State significant development

12 Concept development applications

If—

(a) development is specified in Schedule 1 or 2 to this Policy by reference to a minimum capital investment value, other minimum size or other aspect of the development, and

(b) development the subject of a concept development application under Part 4 of the Act is development so specified,

any part of the development that is the subject of a separate development application is development specified in the relevant Schedule (whether or not that part of the development exceeds the minimum value or size or other aspect specified in the Schedule for such development).

The Concept Approval (SSD 8993) did not specify that subsequent stages of the Concept DA can be lodged as any other form of development application. Consequently, the proposed SSD application for Wilkinson House will be classified as a State Significant Development under section 4.22 of the Environmental Planning and Assessment Act 1979 (**EP&A Act**).

As stated, a concurrent modification will be required to be lodged with the SSDA to ensure it is consistent with the Concept Approval (as modified).

2. PROJECT ALTERNATIVES

Under the provisions of *Environmental Planning and Assessment Regulation 2000*, Schedule 2, Clause 7 there is a requirement to analyse any feasible alternatives to the proposed manner of carrying out the development, including the consequences of not carrying out the development.

SCEGGs identified project alternatives which were considered in respect to the identified need for the proposal. Each of these options is listed and discussed in the following table.

Table 1 Project Alternatives

Option	Assessment
Do Nothing	Alternatives to the proposed concept plan include the ‘do nothing’ scenario which would not achieve the project objectives. The consequences of not carrying out the project are far reaching and include: ▪ Failure to provide safe, accessible and modern/flexible learning facilities for pupils in adequate quality and number; ▪ Failure to provide safe/suitable working conditions for staff; ▪ Failure to create a more accessible campus for staff, pupils, and visitors; ▪ Failure to restore the external appearance of Wilkinson House and enhancing the heritage importance of the streetscape; ▪ Inferior to the environmental amenity of the existing building. ▪ Failure to better utilise the existing constrained school site and buildings; ▪ Increased maintenance costs of degraded sub-standard buildings.
Re-use of the building as administration office	The SCEGGs 2040 Masterplan “Our Path Ahead”, gives form to the school’s vision for the future needs of the school to meet contemporary and evolving learning and education standards. Aligned with the vision and in consideration of the site constraints and limited site area, there is an immediate need to upgrade buildings that are reaching the end of their practical lifespan, to provide sufficient classrooms, including the Wilkinson House, which is currently incompatible with the School’s teaching facility needs. Therefore, using Wilkinson House as an administration office will not respond to the School immediate need for large and flexible classrooms for the senior school. In addition, by fragmenting the existing centralised administration zone located at the centre of the school, will also result adversely on the functionality and operational efficiency of the School.
Alternative Design	Since the IPC determination, SCEGGs has explored a range of options for the adaptive re-use of the existing Wilkinson House via a 4 months voluntary architectural concept design competition process. A

Option	Assessment
	heritage consultant was also engaged to provide input into the competition brief (including heritage guidance on the heritage significance of elements of Wilkinson House) and further heritage guidance to guide the design evolution process throughout the design competition process. The voluntary design competition explored concept design options that respond in a creative and inspiring way to both the appropriate treatment of heritage characteristics associated with Wilkinson House and the creation of teaching and learning facilities of the highest calibre. The invited candidates were all experienced architects, with demonstrated experience with both heritage and education projects and included: ▪ TKD (Tanner Kibble Denton); ▪ TZG (Tonkin Zulaikha Greer); ▪ John Wardle Architects; and ▪ Smart Design Studio The four concepts presented by the architects included: ▪ different internal layout options ▪ location options for the new staircase ▪ removal of existing parts of the building fabrics in various extent ▪ external additions In evaluating the 4 concept design proposals, a key consideration for the Selection Panel was the need for the concepts to demonstrate an appropriate heritage response to the adaptive re-use of Wilkinson House. Smart Design Studios were selected as the preferred architect for Wilkinson House. The selection panel believed that their proposed scheme best responds to the following design objectives: ▪ Strongly exhibits the adaptive reuse of Wilkinson House. ▪ Minor intervention on existing building fabric. ▪ Enhanced and improve the existing façade of the Wilkinson House. ▪ Provides World Class teaching and learning facilities. ▪ Illustrates contemporary and flexible working environment that can accommodate full classroom sizes. ▪ Provides, inclusive, secure and inspiring spaces for students.

Option	Assessment
	▪ Incorporates Environmentally Sustainable Design features ▪ Delivers a functional design outcome. ▪ Relies on an achievable construction process
The Proposal (preferred option)	It is considered that the proposed scheme prepared by Smart Design Studios presents as the most appropriate and viable of all the options. The proposal will: ▪ Preserve the majority of Wilkinson House façade (with some additions proposed to the southern elevation of the building to allow for a new lightweight glass lift to provide accessibility connectivity and connections to the broader campus, as well as a new copper roof which has a similar form to existing but results in a minor height increase of approximately 200mm) and presents an opportunity to: a. sensitively interpret previous wall layouts in new floor and ceiling finishes, b. reinterpret the light well in a new light filled BCA compliant stair well; and c. reinterpret the internal non-compliant staircase through artwork. ▪ Conserve and adaptively reuse Wilkinson House for teaching purposes (noting it has been used by SCEGGs for teaching purposes for the last 20 years). ▪ Provide classrooms within the senior school that accommodate a full classroom size and will meet the relevant accessibility standards. ▪ Provide learning spaces and associated facilities that will meet contemporary learning standards. ▪ Provide additional collaboration recreation and sporting facilities within the Wilkinson House footprint. ▪ Provide better connectivity to the broader campus and safer internal connectivity within Wilkinson House.

To support the request for SEARs, this Scoping Report provides the following:

- An overview of the site and context.
- A description of the proposed development.
- An overview of the relevant statutory and strategic framework; and
- An overview of the likely environmental and planning impacts.

Preliminary concept plans prepared by Smart Design Studio accompany the Scoping Report is in Appendix B. These plans will be refined during the preparation of the EIS, including heritage interpretation, further detailed investigations and assessment of key issues identified within the SEARs.

3. STRATEGIC CONTEXT

3.1. STRATEGIC ALIGNMENT

NSW State Priorities is the State Government's plan to guide policy and decision making across the State. The proposal is consistent with key objectives contained within the plan, including:

The proposal will create temporary job opportunities in manufacturing, construction, and construction management during the project's construction phase of works.

The proposal will provide high quality facilities, learning spaces and equipment for use by students and teaching staff. This will provide students with greater opportunities to learn and improve their numeracy and literacy skills.

The proposal is also consistent with the vision of the *Greater Sydney Regional Plan*. The proposal seeks to update the facilities of an existing school within an established neighbourhood. By doing so, it will help maintain the vibrant mix of people and activities within Darlinghurst.

In addition, the proposal aligns with the planning priorities of the *Eastern City District Plan* in the following ways:

- The School benefits from good access to public transport, specifically through bus links and proximity to the Kings Cross station. The students, staff and visitors benefit from well-connected walkways and bicycle lanes adjacent to the School. The proposal therefore proposes improved school facilities within a highly accessible, walkable location.
- SCEGGs Darlinghurst is upgrading social infrastructure to meet the changing requirements of students and trends in learning methods. Specifically, flexible, larger learning spaces will be provided. The proposal also seeks to comply with universal design standards to cater to students, staff and visitors that may have special needs.
- The proposal respects the district's heritage by proposing adaptive re use of a heritage building, with minimal changes to the heritage façade, which was recommended by the IPC.
- The design of the proposed Wilkinson House incorporates ecologically sensitive materials. It will be designed to harness natural lighting and ventilation. The planned design, construction, operation and maintenance of the proposed redevelopment will be assessed against Green Building Council of Australia.

3.2. THE SCEGGS CAMPUS

The SCEGGs Darlinghurst campus is located between Forbes and Bourke Streets within the inner-city suburb of Darlinghurst. The total SCEGGs Darlinghurst campus comprises the area highlighted in Figure 2 and includes the main school campus, a single terrace at 217 Forbes Street, and properties within the St Peters Precinct. The main school campus comprises both a primary and secondary school, accessed from Bourke Street and Forbes Street respectively.

The total SCEGGs Darlinghurst campus comprises several parcels and has a total land area of 13,676sqm. The total campus includes frontages to St Peters Street, St Peters Lane, and Thomson Street.

The SSD DA however only applies to the main campus site, excluding 217 Forbes Street, which comprises one lot outlined in Table 2 and has a total land area of 11,519sqm. The main campus site has the following street frontages:

- 133 m eastern frontage to Forbes Street
- 62 m northern frontage to St Peters Lane
- 84 m western frontage to Bourke Street
- 10 m southern frontage to Thomson Street

The main campus site has significant level changes with a fall of approximately 11.3m from the southern end of Forbes Street to the northern intersection with St Peters Street.

Figure 2 – Campus Location



Table 2 – Campus Description

Site Address	Legal Description	Existing Development
165-215 Forbes Street, Darlinghurst	Lot 200 DP1255617	Main School site including: ▪ Wilkinson House ▪ Joan Freeman Science Building ▪ Centenary Sports Hall ▪ Yellow Building ▪ Barham Building ▪ Chapel Building ▪ Old Gym ▪ Library Building and Science Building ▪ Primary School
159-163 Forbes Street Darlinghurst	Lot 1 DP557311	Great Hall Place House Diana Bowman Performing Arts Centre
217 Forbes Street Darlinghurst	Lot 1 DP586075	

3.3. THE SITE - WILKINSON HOUSE

Wilkinson House (the site) is located within lot 200 DP1255617 and is bounded by Forbes Street to the east and St Peters Street to the north. Centenary Sports Hall is located directly to the south of the site, and Diana Bowman Performing Arts Centre is located on the opposite side of St. Peter Street.

Wilkinson House was designed by Emil Sodersten and is representative of 1920s apartment buildings. Whilst the site is listed as a local heritage item under the SLEP 2012, the building has been identified as comprising moderate heritage significance due to the social significance of being associated with SCEGGs boarders and for its historical significance associated with Emil Sodersten.

The School purchased the building in 1962 and subsequently used it as a boarding house. Following the cessation of boarding requirements at the main school campus, Wilkinson House was converted into staff facilities and learning spaces. The adaptation of the building for classroom required the creation of new openings in divisional walls and altering the internal layout of the building.

Wilkinson House has been used for 20 years by SCEGGs for teaching purposes, including general learning areas, staff rooms, study and student rooms. The useability of these rooms for full senior school classes is challenged, and the internal circulation currently does not comply with fire safety and accessibility requirements.

Wilkinson House comprises a maximum four storeys and 1,161.90sqm of GFA.

Figure 3 Wilkinson House as viewed from Forbes Street.



3.4. PLANNING APPROVAL HISTORY

Conditional Development Consent was granted by the IPC on 22 May 2020 to the Concept DA (SSD 8993) for the redevelopment of SCEGGs at its main campus at 215 Forbes Street, Darlinghurst, excluding St Peter's Precinct and 217 Forbes Street.

Specifically concept approval was granted for:

- demolition of Science and Library Building, Old Gym Building, part of additions to Barham Building;
- conservation works to the existing Barham Building for use for general school purposes;
- three building envelopes and land use comprising:
 - maximum six storey Multi-Purpose Building envelope for general school purposes and childcare centre and including pick-up/drop-off and car parking facilities;
 - four storey Wilkinson House building envelope for general school purposes (as Amended by Condition A5); and
 - maximum three storey Administration Building Envelope for general school purposes.

Development Consent was not granted for Stage 1 works to Wilkinson House, including the demolition of existing Wilkinson House, excavation of a basement and construction of a new 4 storey building for general school purposes. The Concept Approval only approved the existing building envelope of the Wilkinson House.

Since the IPC Conditional Concept Approval, a Section 4.55(1) Modification was approved by DPIE on 15 January 2021 to amend Condition A5 and A13 of the consent to:

- correct an administrative error in a plan reference in Condition A5; and
- remove the requirement for endorsement of the CMP by Heritage NSW, Department of Premier and Cabinet (**Heritage NSW**) in Condition A13. Noting that the site subject to the SSD is a local heritage time, Heritage NSW does not have a role in endorsing CMPs for local heritage items and since the date at which the project was determined, no longer review or endorses CMPS for state heritage items.

SCEGGs is currently seeking to modify condition A13 *Heritage Conservation Management Plan* via a Section 4.55(1A) Modification Application. To stage the Heritage CMP for the entire site and to prepare detailed CMPs for Wilkinson House, Barham and Chapel Buildings.

The staging of the CMPs is proposed as follows:

- Prior to the lodgement of any future development application, a Whole Site CMP as the overarching heritage strategic management document for the entire site is to be endorsed by the Secretary.
- As part of the Detailed Development Application for Wilkinson House:
 - Prepare a detailed CMP for Wilkinson House is to be prepared as an appendix to the entire site CMP and should address the adaptive re-use of Wilkinson House.
- As part of any subsequent Detailed Development Application associated with the Concept SSD 8993:
 - Prepare further detailed CMPs relating to Barham and/or Chapel Buildings - which ever the subject of the detailed development application.

The Modification Application is currently under assessment.

4. PROJECT DESCRIPTION

As detailed in the original SSDA for the site, SCEGGs lack adequately sized flexible learning spaces. Wilkinson House has been used for 20 years by SCEGGs for teaching purposes but is undermining the high quality outcomes for the school, with undersized and poorly shaped classrooms. Whilst the IPC did not support the demolition of Wilkinson House, the approval conditions provide opportunity for the adaptive re-use of Wilkinson House. A more sensitive heritage response to Wilkinson House will provide SCEGGs with a significant opportunity to resolve their immediate need for fit-for-purpose, large and flexible learning spaces for current and future students.

Since the IPC determination, SCEGGs has explored a range of options for the adaptive re-use of the existing Wilkinson House via a voluntary architectural concept design competition process (4 months process).

As detailed above, Smart Design Studios has been selected as the preferred architect for Wilkinson House. The design development of Wilkinson House is informed by a CMP for Wilkinson House, which is currently well underway by an independent heritage consultant.

The design development of the Wilkinson House is at its preliminary stage. The design will be further refined to respond to heritage interpretation in consultation with Council.

The proposed adaptive re-use of Wilkinson House is likely to include the following works (only concept ideas):

- External glass brick extension to the south, to accommodate a lift core for equitable access, corridor and a meeting room. The extension will also connect the building to the wider campus.
- Demolish walls of the existing lightwell and rebuild naturally lit and compliant stairwell.
- Rebuild mansard roof in copper with angled blades and clerestory windows. To utilise the roof space to provide for a large multipurpose space and potential for an outdoor terrace. The roof is proposed to be approximately 200mm higher than the existing roof to facilitate the required floor to ceiling height. This may result in a very minor breach of the 15m building height control at a minor portion of the site.
- Demolish existing timber floors and replace with concrete slabs for thermal mass, fire resistance, acoustic attenuation and structural integrity.
- Enclose existing balconies and remove the balcony walls to incorporate the spaces as part of the new functional, regular-shaped classrooms.
- Other minor external alterations, including restoring heritage façade by removing unsympathetic additions e.g. security bars.
- Following consultation with Council, to further investigate the maximum retention of the existing Forbes Street foyer.
- Provide a basement new sporting facility, which will connect to the existing Centenary Sports Hall directly to the south.
- Internal alterations and additions to accommodate for new classrooms, breakout space, multipurpose common room and staff rooms.
- 10 demountable classrooms are proposed to be erected on the site during construction to ensure the school can continue to function during the construction period. Demountable classrooms are provided on grade south of the Chapel Building, at the upper level of the Centenary Sports Hall, and at the terrace west of Thomson Street.

SCEGGs is also committed to adopting best practice ESD measures during construction and to encourage sustainable behaviour during the use of the building.

Design principles and indicative drawings have been prepared by Smart Design Studios and is attached at Appendix B.

SCEGGs is not proposing any increase in existing student or staff numbers as a result of this development.

4.1. CONCURRENT MODIFICATION

The preliminary design proposed for Wilkinson House comprise minor external additions, including a new copper roof to allow for utilisation of the roof space (which will increase the overall roof height by approximately 200mm), basement extension and a new lift lobby (extent of additions are shown in Figure 4). The additions will increase the existing GFA but will not significantly modify the building envelope.

Given the Concept Approval only approved the existing building envelope of Wilkinson House, the proposed minor external additions will require a modification to the building envelope approved under the Concept DA prior to determination of the SSDA.

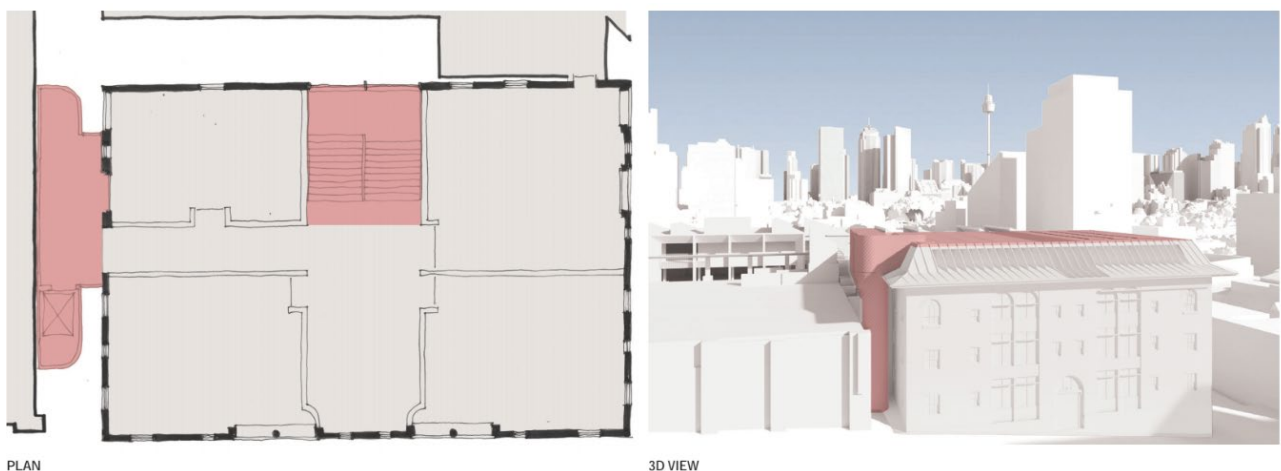
A Section 4.55 (1A) Modification will be lodged concurrently with this Detailed SSDA to vary the approved Concept DA building envelope, thus, ensuring consistency of the proposed development with the parameters of the Concept Approval.

Conditions A4 (drawing reference) and Condition A5 (building envelope for Wilkinson House) will also need to be amended as part of this Modification to reflect the changes.

Further, Condition A12 of the Concept Approval (SSDA 8993) for SCEGGs Darlinghurst approved a maximum gross floor area (**GFA**) for 7,675.1sqm for the subject site, including a maximum GFA of 1,161.9sqm for Wilkinson House (which reflects the existing building).

The concurrent Section 4.55 (1A) Modification to the Concept Approval (SSDA 8993) would therefore also need to amend Condition A12 to increase the overall approved GFA for the site and the maximum approved GFA for Wilkinson House. It is noted that the total FSR/GFA approved for the site is slightly less than the maximum FSR permitted for the subject site under *Sydney Local Environmental Plan 2012 (SLEP)*.

Figure 4 Extent of addition



Source: Smart Design Studio

5. STATUTORY CONTEXT

The site is located within the City of Sydney Local Government Area (**LGA**). As such, the relevant Acts and environmental planning instruments (**EPIs**) relating to the site and relevant considerations for the SSDA are as follows:

- *Biodiversity Conservation Act 2016*
- *Environmental Planning and Assessment Act 1979 (EP&A Act)*
- *State Environmental Planning Policy (State & Regional Development) 2011*
- *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*
- *State Environmental Planning Policy No.55 – Remediation of Land*
- *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005*
- *Sydney Local Environmental Plan 2012*

The key statutory requirements that are relevant to the site and the project are summarised in the table below:

Table 3 Summary of key Statutory Requirements

Matter	Guidance
Power to grant consent	The EP&A Act establishes the framework for the assessment and approval of development and activities in NSW. The EP&A Act also facilitates the making of environmental planning instruments which guide the way in which development should occur across the State, this is inclusive of State environmental planning policies and local environmental plans. Clause 4.36 of the EP&A Act provides for a process where development can be declared SSD either by a SEPP or Ministerial order published in the Government Gazette. Clause 4.38 of the EP&A Act provides that the Minister is the consent authority for SSD. Part 4, Division 4.7 of the EP&A Act sets out the provisions which apply to the assessment and determination of development applications for SSD. The proposal is subject to clause 4.38 Consent for State Significant Development.
Permissibility	The site is zoned R1 General Residential under <i>Sydney Local Environmental Plan 2012 (Sydney LEP 2012)</i>. Education establishment is permissible with consent within the R1 zone (by virtue of not being prohibited). The R1 General Residential zone is also a prescribed zone for the purposes of the Education SEPP. Therefore the proposal is permissible with consent.
Other approvals	The proposal does not require approval or is exempt from the following Acts: ▪ NSW National Parks & Wildlife Act 1974 (NPW Act) ▪ NSW Heritage Act 1977 (Heritage Act)

Matter	Guidance
	▪ NSW Roads Act 1973 (Roads Act) ▪ NSW Water Management Act 2000 (WM Act) ▪ NSW Rural Fires Act 1997 (Rural Fires Act) ▪ NSW Protection of the Environment Operations Act 1997 (POEO Act)
Pre-conditions to exercising the power to grant approval	SEPP No. 55 – Remediation of Land (SEPP 55) SEPP 55 requires the consent authority to consider whether the subject land of any rezoning or development application is contaminated. If the land requires remediation to ensure that it is made suitable for a proposed use or zoning, the consent authority must be satisfied that the land can and will be remediated before the land is used for that purpose. Contamination will be considered and investigations will be undertaken and included in the EIS to ensure the site is suitable for the proposed educational use.
Mandatory matters for consideration	Biodiversity Conservation Act (BC Act) In accordance with section 7.9(2) of the BC Act, an SSDA is required to be accompanied by a biodiversity development assessment report (BDAR). The biodiversity assessment undertaken part of the Concept SSDA was for the entire main School campus, including the Wilkinson House site. The assessment concluded that there is not likely to be any significant impact on biodiversity values as defined under the Biodiversity Conservation Act 2016 and Biodiversity Conservation Regulation 2017. As a result of this assessment the Department of Planning and Environment and the Office of Environment and Heritage each confirmed in letters dated 20 September 2018 that the development is not likely to have any significant impact on biodiversity values, and therefore the Concept SSDA was not required to be accompanied by a Biodiversity Development Assessment Report. As such, this Detailed Design proposal is not required to be accompanied by a Biodiversity Development Assessment Report and meets the requirements of the Biodiversity Conservation Act 2016. SEPP (Infrastructure) 2007 (ISEPP) The ISEPP identifies the environmental assessment category into which different types of infrastructure and services development are classified. The ISEPP requires certain traffic generating developments to be referred to Transport for NSW (TfNSW). The SSDA does not seek to increase student or staff capacity or car parking on site, therefore the proposal will not result in additional traffic generation, therefore it is not considered to be a traffic generating development. Accordingly, the application does not need to be referred to TfNSW.

Matter	Guidance
	The SSDA may also be referred to the relevant utility service providers to confirm that the siting and layout of the proposed development will not impact on relevant easements and/or infrastructure corridors. Sydney Harbour Catchment Regional Environmental Plan 2005 (SHREP 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 SREP aims to ensure that the catchment, foreshores, waterways and islands of Sydney Harbour are recognised, protected, enhanced and maintained for existing and future generations. Of the matters for consideration in Part 3, Division 2 of the SREP, the relevant items to the proposal are biodiversity, ecology and environment protection, and the maintenance, protection and enhancement of views. These will be addressed and discussed in the EIS. State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 The Education SEPP aims (amongst other things) to streamline the planning system for education and childcare facilities. Schedule 4 of the Education SEPP outlines the design quality principles that are to be considered in the design of a facility. The proposal will respond to the design quality principles as follows: ▪ Principle 1 – context, built form and landscape: The proposal will consider the relationship between existing buildings on the site and the surrounding context. A Landscaping Plan/Statement will accompany the EIS to address Condition B5 of Concept SSD. ▪ Principle 2 – sustainable, efficient and durable: The proposal will adopt a range of ESD initiatives, and an ESD Report will accompany the EIS. The proposal will also provide positive social and economic benefits for the local community by ensuring that teaching facilities are meeting contemporary educational needs. ▪ Principle 3 – accessible and inclusive: The proposal is capable of complying with relevant provisions for accessibility, and an Accessibility Report will accompany the EIS. ▪ Principle 4 – health and safety: Crime Prevention Through Environmental Design (CPTED) measures will be incorporated into the design, operation and management of the site to ensure a high level of safety and security for students and staff. A CPTED Report will accompany the EIS. ▪ Principle 5 – amenity: The proposal will contain high quality facilities, spaces and equipment for use by students and staff. These will provide students with an enhanced learning environment.

Matter	Guidance								
	▪ Principle 6 – whole of life, flexible and adaptive: The proposal involves new classrooms and associated facilities, which will be designed to ensure flexibility and longevity. ▪ Principle 7 – aesthetics: The proposal will respond to the heritage and residential context. When constructed the proposal will have high quality external finishes. A further detailed assessment of the proposal against the Education SEPP will be undertaken within EIS. Sydney Local Environmental Plan 2012 The Sydney Local Environmental Plan 2012 (SLEP) is the primary environmental planning instrument that applies to the site. The relevant provisions are extracted and presented in Table below. <table border="1"> <thead> <tr> <th>Provision</th><th>Comment</th></tr> </thead> <tbody> <tr> <td>Zoning</td><td>The site is zoned R1 General Residential. Educational establishment is permissible with consent within the R1 zone (by virtue of not being prohibited).</td></tr> <tr> <td>Building height</td><td> The site is subject to a building height limit of 15m. The Detail DA works propose a minor roof addition (approximately 200mm), which may exceed the height limit (subject to further detailed analysis), however, the new roof RL will not exceed the existing brick parapet which is at RL 45.890. It is noted that clause 42 of the Education SEPP notes that for a school classified as SSD development consent may be granted even though the proposal would contravene a development standard imposed by an environmental planning instrument. Despite this, the EIS will address the objectives of the development standards identified in the SLEP 2012. </td></tr> <tr> <td>Floor space ratio</td><td> Maximum floor space ratio (FSR) of 1.5:1 for the majority of the School campus. The Joan Freeman Science Building site is subject to a FSR of 2:1. When the FSR is measured across the consolidated lot subject to the SSDA, then the total FSR/GFA approved for the site is slightly less than the maximum FSR permitted for the site under SLEP 2012. This detailed SSDA will result in a minor addition of GFA to the Wilkinson House, which </td></tr> </tbody> </table>	Provision	Comment	Zoning	The site is zoned R1 General Residential. Educational establishment is permissible with consent within the R1 zone (by virtue of not being prohibited).	Building height	The site is subject to a building height limit of 15m. The Detail DA works propose a minor roof addition (approximately 200mm), which may exceed the height limit (subject to further detailed analysis), however, the new roof RL will not exceed the existing brick parapet which is at RL 45.890. It is noted that clause 42 of the Education SEPP notes that for a school classified as SSD development consent may be granted even though the proposal would contravene a development standard imposed by an environmental planning instrument. Despite this, the EIS will address the objectives of the development standards identified in the SLEP 2012.	Floor space ratio	Maximum floor space ratio (FSR) of 1.5:1 for the majority of the School campus. The Joan Freeman Science Building site is subject to a FSR of 2:1. When the FSR is measured across the consolidated lot subject to the SSDA, then the total FSR/GFA approved for the site is slightly less than the maximum FSR permitted for the site under SLEP 2012. This detailed SSDA will result in a minor addition of GFA to the Wilkinson House, which
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Matter	Guidance	
		will further increase the total site GFA. The total is not yet known as the design development is still underway. However, this will be detailed and assessed as part of the EIS.
	Heritage	The site is identified as a local heritage item (I301) being the <i>“Sydney Church of England Girls Grammar School Group including Barham, Church Building and Wilkinson House and their interiors and grounds”</i>. The site is located also within the Darlinghurst heritage conservation area (C13) and is located adjacent to a series of heritage items, including though not limited to Bourke Street terrace group (I219), “The-Roma Penda House” and “Waratah House” (I218), the State listed Former St Peter’s Church of England group (I300), Thompson Street terrace group (I473), and “Nelson House” (I303). A whole of site CMP and a detailed CMP for Wilkinson House are currently being prepared. In addition, a Heritage Impact Assessment (HIA) will be prepared as part of the EIS to assess the impact of the proposed development on locally listed items within the site and the conservation area.
	Design Excellence Provisions	Clause 6.21(5) requires that development consent must not be granted for a development that requires a development control plan (DCP) to be prepared unless a competitive design process has been held in relation to the proposed development. Clause 7.20(2) notes that for land outside of Central Sydney that is not zoned for B6 Enterprise Corridor or IN1 General Industrial, development of a site area greater than 5,000sqm would trigger the requirement for the preparation of a development control plan. As such, the proposed development would trigger the requirement for a competitive design process to be held. However, it is noted that as the proposed works have a capital investment value of less than \$50 million, the prerequisite to undertake a competitive design process prior to granting development consent <u>does not apply</u> to this application pursuant to clause 35(8) of the Education SEPP.

Matter	Guidance	
		Further as detailed in the SSDA the Education SEPP in fact turns off the requirements for a DCP or design competition required under SLEP.

6. ENGAGEMENT

6.1. ENGAGEMENT CARRIED OUT

6.1.1. Scoping Meeting with DPIE

In accordance with DPIE's protocol of conducting 'scoping meetings' prior to formal lodgement of SEARs, a meeting was held on 13 May 2021 via Teams between the members of the project team and the team at DPIE including:

- Brent Devine, DPIE
- Rita Hatem, DPIE
- William Smart, Smart Design Studio
- Warwick Smith, Sandrick Project Directions
- Sarah Horsfield, Urbis
- Anna Wang, Urbis
- Keira Kucharska, Urbis

The key areas of discussion included the following:

- Project brief of the proposed development.
- Importance and urgency of the proposed works to SCEGGs.
- Strategy to concurrently lodge the Detailed SSDA and the building envelope modification to Concept SSD 8993
- Consultation requirements.
- Confirm if the SSD need to be reviewed by NSW Government Architects or undertake the State Design Review Process.

The Concept SSD 8993 proposed to demolish Wilkinson House and replace Wilkinson House with a new built form. It should be noted that the Government Architect was consulted on the overall Concept Proposal including the proposed new built form.

The Concept SSD did not undertake a State Design Review Process, and the Government Architect's (GA) office advised that the State Design Review Panel and GA's will undertake a desktop review of the EIS during public exhibition and provide written advice as part of the assessment process.

In consideration of the above and the limited amount of external works proposed, we do not believe this Detailed SSDA needs to undertake the State Design Review Process. Given that the adaptive re-use of the Wilkinson House only comprises minor external changes, (including a new roof and a new external lift addition), which in comparison to what was proposed in the Concept SSDA is minor works and considering that the proposal will preserve the heritage character and the existing streetscape presentation, a State Design Review Process is not considered to be appropriate or required for this Detailed SSDA. Indeed, it is unnecessary and unreasonable to burden the resources of State Design Review Panel with a proposal of this nature.

We propose to only consult with Government Architect, which is the appropriate level of engagement given the nature of the proposal and the recent Concept SSD consultation experience.

6.1.2. Consultation with City of Sydney Council

SCEGGs met with the Council virtually on 14 April 2021 to discuss the staging of the CMP (as part of the Concept SSDA Modification) and to provide an overview on the concept design progress of the Wilkinson House.

We understand that Council will be further consulted by DPIE during the assessment process of the CMP modification application. The project team will also continue to consult with Council and provide copies of the

draft whole site and Wilkinson House CMPs for Council's review before submitting to DPIE for endorsement (noting that the whole site CMP will be endorsed prior to submission of this SSDA).

Council also advised SCEGGs in the recent meeting that they had not being inside Wilkinson House (not even as part of the IPC proceedings). A joint site visit with Council's representative (Tony Smith - Urban Design and Heritage Manager) and the project team was held on 3 May 2021.

Council was supportive of the propose external changes, including the minor roof addition, the lift core addition and the minor façade changes. Council expressed that the foyer of the Wilkinson House is the key heritage component and should be conserved. Council also recommended heritage interpretation options, e.g. reusing the original stair for artwork.

The comments have been taken on board by Smart Design Studio, and the team will further investigate the maximum retention of the existing Forbes Street foyer in consultation with Urbis Heritage.

The project team will continue to consult with Council on the proposed SSDA development and the preparation of the CMP.

6.1.3. Consultation with Registered Aboriginal Parties

Consultation has also begun with Registered Aboriginal Parties (**RAPs**) to ensure that the proposed design has no impacts on items of Aboriginal significance on the site.

6.2. ENGAGEMENT TO BE CARRIED OUT

It is recognised that there will be a number of stakeholders who will require consultation throughout the preparation of the EIS. These may include but are not limited to:

- The local community, particularly neighbouring residents- this will commence in June 2021.
- City of Sydney Council
- Environment Protection Authority
- Office of Environment and Heritage and Heritage Council
- Government Architect NSW
- Community Groups including members of the local aboriginal community.
- The School's internal community, including students, staff and parents.

In accordance with the Regulations, the EIS will also be placed on formal public exhibition once the Department of Planning & Environment review the document as being 'adequate' for this purpose. Following this exhibition period, the applicant will respond to matters raised by notified parties.

7. PROPOSED ASSESSMENT OF IMPACTS

7.1. BUILT FORM AND URBAN DESIGN

It is not the intention of the proposal to significantly increase the amount of floor space within the footprint of the Wilkinson House, rather to ensure that the site can be made more usable for contemporary teaching practices with improved amenity for students and staff.

As the proposed development will include loss of fabric to Wilkson House, consideration will be given to:

- Enhancing the respecting the contribution of the northern and eastern facades make to the streetscape;
- a thorough analysis of all the constraints and benefits associated with the adaptive reuse of the building;
- whether the loss of any fabric is justified in light of the significant educational benefits that would result.

As identified in Section 4 of this report, the site is subject to a 15m maximum height of building control and a maximum floor space ratio (FSR) of 1.5:1 for the majority of the School campus. The Joan Freeman Science Building site is subject to a FSR of 2:1.

The Detail DA works propose a minor roof addition (approximately 200mm), which may exceed the height limit (subject to further detailed analysis), however, the new roof RL will not exceed the existing brick parapet which is at RL 45.890.

It is noted that clause 42 of the Education SEPP notes that for a school classified as SSD development consent may be granted even though the proposal would contravene a development standard imposed by an environmental planning instrument. Despite this, the EIS will address the objectives of the development standards identified in the SLEP 2012.

When the FSR is measured across the consolidated lot subject to the SSDA, then the total FSR/GFA approved for the site is slightly less than the maximum FSR permitted for the site under SLEP 2012.

This detailed SSDA will result in a minor addition of GFA to the Wilkinson House, which will further increase the total site GFA. The total is not yet known as the design development is still underway. However, this will be detailed and assessed as part of the EIS.

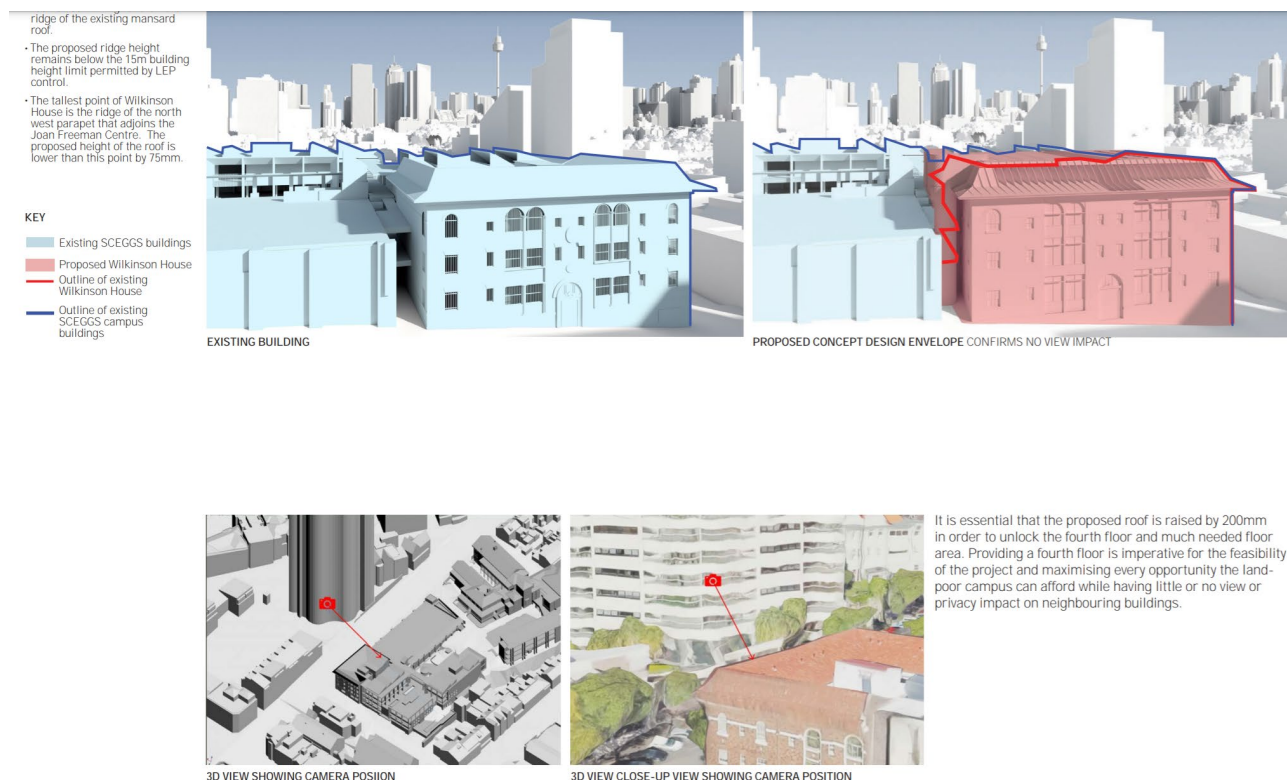
Where variations are proposed to these building standards, the EIS will outline:

- Contribution to the streetscape and conservation area;
- Potential impact on views and view corridors;
- Functional requirements of the school;
- Provision of open space and landscaping across the site; and
- Interconnection between the proposal and existing buildings on site.

7.2. VIEW AND VISUAL PRIVACY

Given the proximity of the site to the Sydney CBD and the undulating topography of the locality, impact on view corridors from surrounding properties is a key amenity consideration. Preliminary view analysis were prepared by Smart Design Studio, which demonstrated that the minor height increase as a result of the new roof (approximately 200mm) will not impact on view corridor from nearby properties, including view corridor from the fourth floor of the Horizon Building (refer to Figure 5).

Figure 5 preliminary View Impact analysis



Source: Smart Design Studio

A detailed view impact assessment will be provided as part of the EIS to demonstrate the potential impacts on views and provide recommendations to mitigate where possible these impacts.

7.3. HERITAGE

7.3.1. European and Archaeological heritage

The SCEGGS site (main campus) in its entirety is listed as a locally listed heritage item under the SLEP and is included within the East Sydney Special Character and Conservation Area (c13).

Wilkinson House is identified as one of the buildings on the SCEGGS site in schedule 5 of SLEP 2012: 1301 – *Sydney Church of England Girls Grammar School group including Barham, Church Building and Wilkinson House and their interiors and grounds*. Wilkinson House is also identified as a Contributory item under the Sydney DCP 2012.

A whole of site CMP and a detailed CMP for Wilkinson House are currently being prepared. The whole of site CMP will be endorsed prior to the formal submission of this SSDA. The Wilkinson House CMP is informing the design development of the Wilkinson House. This allows for a more iterative and concurrent process of the design development of Wilkinson House and CMP.

In addition, a Heritage Impact Assessment (HIA) be prepared as part of the EIS to assess the impact of the proposed development on locally listed items within the site and the conservation area. The whole of site CMP and detailed Wilkinson House CMP will be the key consideration for the preparation of the HIA.

A Heritage Archaeological Assessment, which considers both Aboriginal and Non Aboriginal archaeological impacts will also be prepared to support the SSDA.

7.3.2. Aboriginal heritage

As noted in Section 6, preliminary consultation with RAPs has begun on site. An Aboriginal Cultural Heritage Assessment (ACHA) will be prepared as part of the EIS to assess the impact of the proposed development on Aboriginal heritage items on the site with continued consultation with RAPs.

7.4. TRAFFIC AND PARKING

Traffic and parking assessment for the entire School site and the proposed developments was assessed under Concept DA SSD-8993. Given this proposal does not intend to increase student or staff populations on the School, traffic generation is expected to remain the same as assessed under the Concept Approval (SSD- 8993). The proposed development will not result in the removal of any onsite car parking or changes to car parking on site. Access will be retained at Bourke Street and Forbes Street in the same location as existing.

A Car Parking and Traffic Impact Assessment will be prepared by a suitably qualified consultant for inclusion in the EIS. It will demonstrate that the existing drop off and pick up, parking and public transport arrangements will be sufficient to serve the proposal. The report will also address condition B12 of SSD 8993.

Any cumulative construction impacts from other nearby construction activity will be incorporated into the Car Parking and Traffic Impact Assessment and Construction Management Plan for inclusion in the EIS.

7.5. NOISE AND VIBRATION

As the proposal does not propose to increase student capacity and is essentially an upgrade of existing teaching facilities, it is not anticipated there will be any associated acoustic impacts on the surrounding residential land uses. Notwithstanding, a Construction and Operational Noise Report will be provided as part of the EIS. The report will provide a detailed assessment of potential noise and vibration impacts caused by the proposed construction and the operations activities associated with the proposal, together with recommendations to mitigate against these.

7.6. AIR QUALITY

It is not anticipated that there will be any adverse impacts associated with air quality. During construction, air quality will be managed through appropriate dust mitigation measures through use of an Air Quality Management Plan.

7.7. PUBLIC INFRASTRUCTURE

All required services for the proposed development are available and some augmentation may be required. Further information will be provided as part of the EIS.

7.8. BCA AND ACCESS

A Building Code of Australia (**BCA**) Report will be submitted as part of the EIS to confirm that the proposal will be capable of complying with the relevant provisions of the BCA.

An Access Statement will be prepared by a qualified accessibility consultant to ensure the proposed development will be capable of providing universal access to all required areas in accordance with relevant Australian Standards.

7.9. GEOTECHNICAL AND CONTAMINATION

A Phase 1 Preliminary Site Investigation (**PSI**) report was provided by Douglas Partners and submitted with the Concept SSDA. The PSI specifies the findings of a preliminary investigation of the main School Campus, including the Wilkinson House site in accordance with the contaminated land planning guidelines.

The potential sources of contamination and contaminants of concern can be summarised as filling and impacted surficial soils, and current buildings on site. Sampling undertaken as part of the PSI included six boreholes and two surface samples collected from the basement areas of the existing Wilkinson House. The findings of the preliminary contamination investigation show that there is a **low risk** of widespread gross contamination of the site.

The EIS will accompany a detailed site investigation and include remediation recommendations.

Appropriate geotechnical investigations will be addressed in the EIS to enable structural design and address statutory contamination requirements.

7.10. STORMWATER MANAGEMENT

There is a minor amount of flooding on Forbes Street, including less than 100mm ponding in front of Wilkinson House at the 1 in 100year ARI flood event. This minor flooding is contained in the kerb and gutter system.

Stormwater impacts will be assessed by a qualified consultant and the assessment will be provided with the submission of the EIS. A Stormwater Management Plan and Sediment & Erosion Control Plan will assess the flood risk on site, including stormwater and water runoff management, potential expected rise in ground water level, water conservation and on-site detention, water quality, pedestrian safety and the integration of drainage management responses.

7.11. CONSTRUCTION MANAGEMENT

A Preliminary Construction and Environmental Management Plan (**CEMP**) will be submitted with the EIS and will outline the key management measures to be implemented during construction of the proposed development. Any cumulative construction impacts from other development occurring nearby the site will be incorporated into the CEMP.

7.12. WASTE MANAGEMENT

A Construction Waste Management Plan and an Operational Waste Management Plan will be prepared and accompany the EIS. The plans will detail proposed waste management practices including storage, collection points and method for removal. Where possible, all demolition, construction and operational waste will be reused or recycled.

7.13. SAFETY AND SECURITY

The EIS will outline how specific CPTED principles (surveillance, access control, territorial re-enforcement and space/activity management) have been integrated into the design of the School to deter crime, manage space and create a safe environment for students, staff and visitors.

7.14. SOCIAL AND ECONOMIC IMPACT

SCEGGs Darlinghurst has been located on the main campus site since 1901 and Wilkinson House has been used for 20 years by SCEGGS for teaching purposes but is undermining the high quality outcomes for the school, with undersized and poorly shaped classrooms.

The proposal will enable the School to provide higher quality of educational facilities. The proposed Wilkinson House detailed design can accommodate high-quality teaching facilities beyond what can currently be provided on site.

The adaptive reuse of the Wilkinson House building will include additional functional indoor and outdoor recreation space to improve the health, physical education, and wellbeing of future students and staff.

The heritage significance of high value heritage building will be retained and further enhanced through more sensitive building additions, restoration and heritage interpretation.

The potential disruption to the educational environment during construction will be mitigated through effective communication and implementation of a CEMP.

In addition, the proposal will also be assessed against the Crime Prevention Through Environmental Design guidelines and addressed in the EIS.

8. CONCLUSION

The purpose of this report is to request SEARs for the preparation of an EIS for the adaptive re-use of Wilkinson House, located on the existing main school ground at 215 Forbes Street, Darlinghurst. The Applicant is committed to working with key stakeholders, including State government agencies and City of Sydney Council to deliver a high-quality development.

This SEARs request outlines the approval pathway for the application, the legislative framework and the key matters for consideration in the assessment of the application. The EIS will demonstrate how the proposal is suitable for the site and the potential environmental impacts can be appropriately mitigated, minimised or managed to avoid any unacceptable impacts.

We trust that the information detailed in this letter is sufficient to enable the Department to issue the SEARs to guide the preparation of the EIS.

9. DISCLAIMER

This report is dated 19 May 2021 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 Limited (**Instructing Party**) for the purpose of Request for SEARs (**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

SCOPING SUMMARY TABLE

Level of assessment	Matter	CIA	Engagement	Relevant government plans, policies and guidelines	Scoping report reference
Detailed	Amenity - noise	N	General	- Construction Noise Strategy (Transport for NSW, 2012) - Interim Construction Noise Guideline (Department of Environment, Climate Change and Water, 2009) - NSW Industrial Noise Policy (Environment Protection Authority, 2000) - NSW Road Noise Policy (Environment Protection Authority, 2011) - Assessing Vibration: A Technical Guideline (Department of Environment and Conservation, 2006) - German Standard DIN 4150-3: Structural Vibration – Effects of Vibration on Structures - Environmental Noise Management Assessing Vibration: A Technical Guideline (Department of Environment and Conservation, 2006) - Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration (Australian and New Zealand Environment Council, 1990)	Section 7.5
Minor	Social	N	General	Refer to Scoping Report	Section 7.14
Detailed	Heritage – historic	N	General	- Heritage Act 1977 - Sydney Local Environmental Plan - Australia ICOMOS Charter for the Conservation of Places of Significance, Burra Charter 2013 - Assessing Significance for Historical Archaeological Sites and 'Relics' 2009	Section 7.3

Level of assessment	Matter	CIA	Engagement	Relevant government plans, policies and guidelines	Scoping report reference
				Skeletal Remains; Guidelines for Management of Human Skeletal Remains 1998	
Detailed	Heritage – Aboriginal	N	Consultation required with RAPs	- National Parks and Wildlife Act 1974 - Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW 2011 - Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 - Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010	Section 7.3.2
Detailed	Amenity – visual	N	General	- Draft Guidelines for Landscape and Visual Impact Assessment (3rd edition) - Refer to Scoping Report	Section 7.2
Detailed	Hazards and risk – land contamination	N	General	- Protection of the Environment Operations Act 1997 - Contaminated Land Management Act 1997 - Managing Land Contamination: Planning Guideline (SEPP 55) - Guidelines on the Duty to Report Land Contamination - SEPP 55 – Remediation of Land - National environment protection (assessment of site contamination) measure	Section 7.9
Detailed	Hazards and risk –	Y	General	Refer to scoping report	Section 7.11

Level of assessment	Matter	CIA	Engagement	Relevant government plans, policies and guidelines	Scoping report reference
	construction management				
Standard	Access – Traffic and Parking	Y	General	- State Environmental Planning Policy (Infrastructure) 2007 - Guide to Traffic Management – Part 3 Traffic Studies and Analysis (Austroads, 2013) - NSW Bicycle Guidelines (RTA, 2003) - Guide to Traffic Generating Developments Version 2.2 (RTA, 2002).	Section 7.4
Standard	Hazards and risk – stormwater management	N	General	- Managing Urban Stormwater: Soils and Construction Volume 1 (Landcom 2004) and Volume 2 (A. Installation of Services; B. Waste Landfills; C. Unsealed Roads; D. Main Roads; E. Mines and Quarries) (DECC 2008) - NSW Government's Floodplain Development Manual (2005).	Section 7.10
Minor	Air – Construction Air Quality	N	General	Refer to Scoping Report	Section 7.6
Standard	Hazards and risks - waste	N	General	- Waste Classification Guidelines (DECCW, 2009) - Refer to Scoping Report	Section 7.12
N/A	Biodiversity – native vegetation and native fauna	N	General	The biodiversity assessment undertaken part of the Concept SSDA was for the entire main School campus, including the Wilkinson House site. The assessment concluded that there is not likely to be any significant impact on biodiversity values as defined under the Biodiversity Conservation Act 2016 and Biodiversity Conservation Regulation 2017.	Section 5

Level of assessment	Matter	CIA	Engagement	Relevant government plans, policies and guidelines	Scoping report reference
				As a result of this assessment the Department of Planning and Environment and the Office of Environment and Heritage each confirmed in letters dated 20 September 2018 that the development is not likely to have any significant impact on biodiversity values, and therefore the Concept SSDA was not required to be accompanied by a Biodiversity Development Assessment Report. As such, this Detailed Design proposal is not required to be accompanied by a Biodiversity Development Assessment Report and meets the requirements of the Biodiversity Conservation Act 2016.	

APPENDIX B

PRELIMINARY PLANS



APPENDIX C

SURVEY