



planning consultants

5 April 2019
Our Ref: 20180C.2AJC_SEARS Request

Mr Jim Betts
Secretary
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Betts,

**RE: REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT
REQUIREMENTS
PROPOSED SENIORS CAMPUS AND SPORTS CENTRE
ST LUKES GRAMMAR SCHOOL
210 HEADLAND ROAD & 800 PITTWATER ROAD, DEE WHY, AND
224 HEADLAND ROAD, NORTH CURL CURL**

1.0 Introduction & Background

DFP Planning have been engaged by The Anglican Schools Corporation (TASC) and St Luke's Grammar School (the School) to assist in the planning and design of a new senior campus for the existing St Luke's Grammar School, a K-12 co-educational school.

The existing school site is located at 210 Headland Road, Dee Why. The school proposes to expand its existing campus to incorporate 224 Headland Road, North Curl Curl and 800 Pittwater Road, Dee Why.

The proposal meets the criteria for State Significant Development (SSD) as the Capital Investment Value (CIV) of the proposal exceeds \$20,000,000 pursuant to Clause 15(2) of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD).

Accordingly, this letter constitutes a written application to obtain the Secretary's Environmental Assessment Requirements (SEARs) as required under Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulations 2000* (the Regulation).

This written application is accompanied by:

- Concept Architectural Plans prepared by Tonkin Zulaikha Greer (TZG) Architects (**Attachment 1**);
- Traffic Statement prepared by Varga Traffic Planning (**Attachment 2**);
- Cost Statement prepared by Donald Cant Watts Corke (**Attachment 3**).
- Heritage Statement prepared by CityPlan Heritage (**Attachment 4**); and
- Access Statement prepared by Funktion (**Attachment 5**).

Matters relating to the proposed development, permissibility, strategic planning context, associated impacts and justifications are discussed in detail below.

2.0 Site Description

The Site is located in the coastal suburbs of Dee Why and North Curl Curl, within the Northern Beaches Local Government Area. The Sites are irregularly shaped, with frontages to Pittwater Road, Headland Road, Tango Avenue and Quirk Street (see **Figure 1** and **Figure 2**).

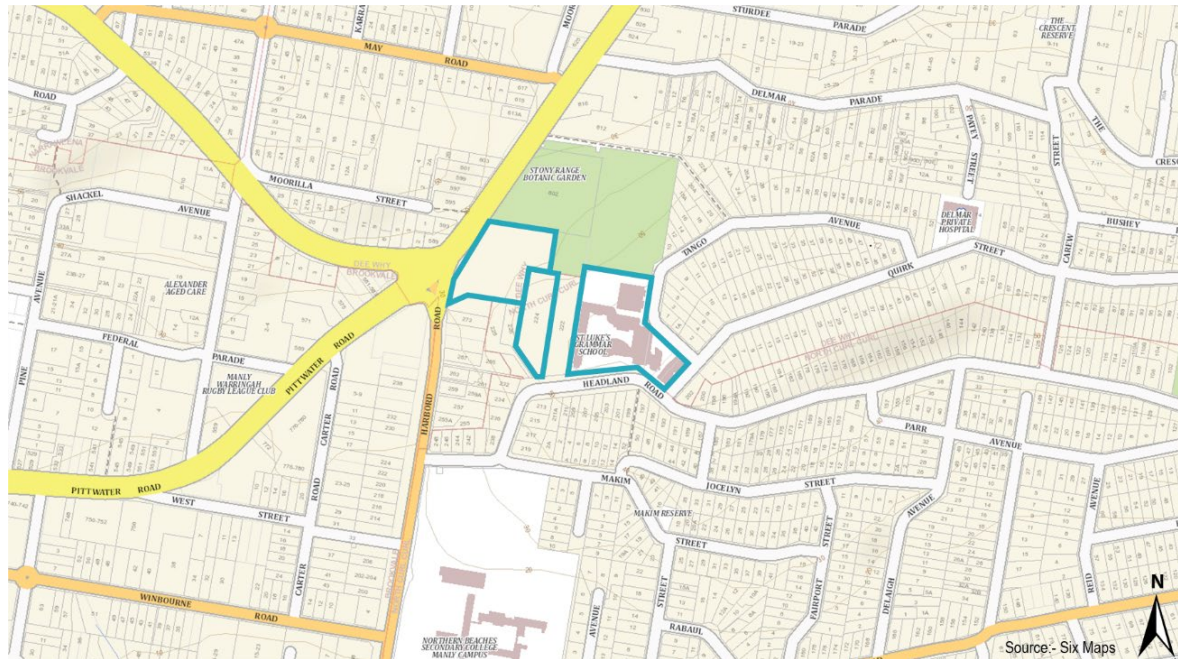


Figure 1: Site Location



Figure 2: Aerial photograph

The Site comprises a total of four (4) allotments as detailed in **Table 1** below.

Table 1 Site Description		
Property Description	Legal Address	Area (m²)
210 Headland Road, Dee Why	Lot 2112 / DP 752038	15,209
210 Headland Road, Dee Why (also known as 2-4 Tango Avenue, Dee Why)	Lot 100 / DP 1251179	
224 Headland Road, North Curl Curl	SP 45082	5,100
800 Pittwater Road, Dee Why	Lot 6 / DP 523299	10,000 (approx.)
TOTAL		30,209m² (approx.)

210 Headland Road comprises the existing St Luke's Grammar School Dee Why campus. St Luke's Grammar School is an independent Anglican co-educational school catering for students from pre-kindergarten to Year 12. Current improvements on site include junior, middle and senior school buildings, along with a multi-purpose hall, playing courts, grass areas and off-street parking (approximately 112 parking spaces). A new four (4) storey junior school building is currently under construction (refer to **Section 4.1**).

224 Headland Road is a light industrial complex containing seven (7) industrial units. The proposed development excludes Unit 2, which is not under the School's ownership. Unit 7 is approved for use as a sports training facility. Units 1, 3, 4, 5 and 6 are used as storage. Access to the industrial complex is via a shared vehicular crossover with 222 Headland Road. Existing on-site parking is located along the site's western boundary.

800 Pittwater Road is an existing three (3) storey mixed-use building containing five (5) tenancies:

- Units 1 and 3: "Fitness First" gymnasium and ancillary facilities;
- Units 2 and 4: "Officeworks" retail premises; and
- Unit 5: "I-Med" health services facility.

Main vehicular access to the site is from Harbord Road. There is also pedestrian access to the site in the north-west corner close to Stony Range Botanic Garden. Existing vehicular parking on site includes a basement carpark along with parking within the building forecourt. There is a large loading dock on the southern side of the building.

Site photographs are included in the concept architectural plans prepared by TZG Architects (**Attachment 1**).

The immediate surrounding locality is characterised by large retail, commercial and light industrial development fronting Pittwater Road. Directly north of the site is the Stony Range Regional Botanic Garden. Directly south of the site are general industrial premises. East of the site is the low-density residential suburb of Dee Why.

3.0 Development Description

The proposed development comprises alterations and additions to the existing buildings at 800 Pittwater Road and 224 Headland Road. No works are proposed to the existing campus at 210 Headland Road, however it will be included in this application due to the connections between each site, functioning as part of a single educational establishment.

800 Pittwater Road

The scope of works at 800 Pittwater Road comprises the development of a new senior school campus (Years 10 – 12) including:

- Science and Maths Precinct;
- Arts Precinct;
- Design and Technology Precinct;
- Humanities Precinct;
- Wellness Precinct (including 25 metre indoor pool);
- Administration and Staff facilities;
- Social Hubs, Library Hubs and Study Hubs;
- Assembly Theatre (700 seats);
- Drama Theatre (220 seats);
- Café and Atrium;
- Staff and student parking;
- Drop-off / pick-up zone that can accommodate up to 10 vehicles; and
- New landscaping including multi-purpose court.

The proposed works are primarily contained within the existing building envelope with a new part two and part three storey addition on the southern side of the building and a new three storey addition on the eastern side of the building adjacent to the boundary with 224 Headland Road. Modifications are proposed to the glazing on the western elevation (Pittwater Road elevation) of the building.

These works will be undertaken in stages, and these stages will be detailed in all documentation supporting the Environmental Impact Statement (EIS).

224 Headland Road

The scope of works for 224 Headland Road comprises alterations and additions to provide:

- 2 x Basketball courts;
- 1 x Half sized basketball court;
- School uniform shop;
- Amended parking layout including bus turning circle and student parking; and
- New vertical circulation (comprising lift and stair) between 800 Pittwater Road and 224 Headland Road.

The proposed scope of works is illustrated in the architectural drawings prepared by TZG Architects (**Attachment 1**).

3.1 Student Numbers

The total enrolment at St Luke's Grammar School is proposed to be 1,600 students. This includes 600 senior school students (Years 10 to 12) located at 800 Pittwater Road and 1000 junior school students (Pre-kindergarten to Year 9) located at 210 Headland Road.

Facilities at 800 Pittwater Road and 224 Headland Road will be used on occasion by students from the main campus. All students from 210 Headland Road will be bused to the new campus. A Plan of Management will be prepared as part of the DA that outlines the proposed operation of all school premises, and how movements between each premises will be managed.

4.0 Previous Development Applications and Consents

4.1 210 Headland Road

There are two recent development applications and consents for 210 Headland Road, which are relevant to this application.

4.1.1 GDL180084

On 12 December 2018, a Complying Development Certificate (CDC) was approved by Group DLA under the complying development provisions of *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (the Education SEPP). The works comprised the demolition of the existing pre-school building and construction of a new four (4) storey junior school building comprising parking and storage on the ground floor; 12 classrooms, administrative / office areas on levels one to three; and pre-school and covered outdoor learning areas on level 4. The works are currently under construction.

4.1.2 MOD2018/0412

On 8 August 2018, a modification application (MOD2018/0412) was submitted to Northern Beaches Council to modify Development Consent DA 2011/0446 (as modified) to increase student enrolments from 992 to 1092. The modification application went to the Sydney North Planning Panel (SNPP) on 30 January 2019 with the panel resolving to defer the matter pending legal advice. On 19 March 2019, the matter was deferred for a second time in order to seek additional information from the applicant and Council. It is noted that Council officers have recommended refusal for reasons of traffic and parking impacts. At the time of preparation of this request for SEARs, the matter has not been determined.

4.2 224 Headland Road

On 16 December 2015, a development application (DA2015/1041) was approved for the use of Unit 7 224 Headland Road as a recreation facility.

4.3 800 Pittwater Road

Units 1 and 3 "Fitness First"

On 17 May 1993, Development Consent No. 93/189 was approved for the use of Units 1 and 3 as a gymnasium and ancillary facilities. This development consent was subsequently modified (9 September 1998) to extend the ancillary facility, being a child care centre, into part of Unit 5.

On 27 June 2014, a CDC (CDC No. 14/0987/01) was issued by Steve Watson & Partners for an internal fitout of the first floor. Subsequent CDCs have been issued for internal fitout works.

On 27 October 2017, Northern Beaches Council granted development consent (DA2017/0881) to amend the hours of operation of "Fitness First" to 24 hours of operation seven (7) days a week.

Units 2 and 4 “Officeworks”

On 27 February 1997, Development Application No.96/362 was approved for the use of Units 2 and 4 at 800 Pittwater Road as a bulky goods retail premises.

Unit 5 “I-MED”

On 19 March 2010, Unit 5 was approved for use as a medical centre (DA2009/1421).

5.0 Statutory and Strategic Context

The following legislation, policies and guidelines are relevant to the Proposal and are addressed in more detail below:

- *Environmental Planning and Assessment Act 1979;*
- *Biodiversity Conservation Act 2017;*
- *State Environmental Planning Policy No. 19 – Bushland in Urban Areas;*
- *State Environmental Planning Policy No. 55 – Remediation of Land;*
- *State Environmental Planning Policy No. 64 – Advertising and Signage;*
- *State Environmental Planning Policy (Infrastructure) 2007;*
- *State Environmental Planning Policy (State and Regional Development) 2011;*
- *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017;*
- *Draft State Environmental Planning Policy (Remediation of Land);*
- *Draft State Environmental Planning Policy (Environment);*
- *Warringah Local Environmental Plan 2011 (WLEP 2011);*
- *Warringah Development Control Plan 2011 (WDCP 2011);*
- *A Metropolis of Three Cities: Greater Sydney Region Plan 2018; and*
- *North District Plan.*

5.1 Environmental Planning and Assessment Act 1979

The assessment framework for SSD is established under Part 4 Division 4.7 of the EP&A Act with Section 4.12 requiring a Development Application (DA) for SSD to be accompanied by an Environmental Impact Statement (EIS). Matters relevant to the preparation of an EIS (including the application for SEARs) are set out under Schedule 2 of the Regulation.

Section 4.5 of the EP&A Act identifies that the Minister is the consent authority for SSD.

Under Section 4.38(3) of the EP&A Act, development consent for SSD may be granted despite the development being partly prohibited by an environmental planning instrument. The Site is zoned part R2 Low Density Residential (the R2 zone), part B5 Business Development (the B5 zone) and part IN1 General Industrial (the IN1 zone) (refer to **Section 5.11** of this letter).

Educational Establishments are prohibited in the IN1 General Industrial zone under WLEP 2011. However, Educational Establishments are permitted with consent in the R2 and B5 zones, therefore the development is partly prohibited, and development consent may be granted pursuant to Section 4.38(3).

5.2 Biodiversity Conservation Act 2017

Section 7.9 of the BC Act requires that an application for SSD under the EP&A Act must be accompanied by a Biodiversity Development Assessment Report (BDAR), unless an exemption from this requirement has been provided by DPE and OEH.

An exemption request application will be prepared by a qualified ecologist. The request will address Section 1.5 and 7.3 of the BC Act, along with Clause 1.4 of the Biodiversity Conservation Regulation 2017.

5.3 State Environmental Planning Policy No. 19 – Bushland in Urban Areas

State Environmental Planning Policy No 19 – Bushland in Urban Areas (SEPP 19) protects and preserves bushland within specified urban areas, as part of the natural heritage or for recreational, educational and scientific purposes. SEPP 19 is designed to protect bushland in public open space zones and reservations, and to ensure that bush preservation is given a high priority where new urban development takes place.

The site is adjacent to the Stony Range Regional Botanic Garden. Stony Range Regional Botanic Garden is zoned RE1 Public Recreation under WLEP 2011. Clause 9 of SEPP 19 applies to land which adjoins bushland zone or reserved for public open purposes. Development consent can't be granted unless the approval authority has taken into account:

- (c) *the need to retain any bushland on the land,*
- (d) *the effect of the proposed development on bushland zoned or reserved for public open space purposes and, in particular, on the erosion of soils, the siltation of streams and waterways and the spread of weeds and exotic plants within the bushland, and*
- (e) *any other matters which, in the opinion of the approving or consent authority, are relevant to the protection and preservation of bushland zoned or reserved for public open space purposes.*

A Flora and Fauna Report will be prepared as part of the DA by a suitably qualified ecologist that reviews the potential impacts of the Proposal on the adjacent bushland at Stony Range Regional Botanic Garden.

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

The provisions of *State Environmental Planning Policy No. 55 - Remediation of Land* (SEPP 55) apply to the Site and are a relevant matter for consideration as part of the assessment of the Proposal. The land use history of the site for industrial and commercial purposes requires the preparation of Preliminary Site Investigation Report and if required, a Detailed Site Investigation Report. These reports will address the requirements of SEPP 55 and the suitability of the site for use as educational establishment.

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

State Environmental Planning Policy No. 64 - Advertising and Signage (SEPP 64) sets out provisions relating to the assessment of development which comprises signage, including business identification signs. It is likely that there will be some minor signage included in the proposal to display the school name and to provide wayfinding, although the location, size and content of any such signage has not yet been determined. Details will be provided with the DA and the provisions of SEPP 64 will be considered as part of the EIS.

5.6 State Environmental Planning Policy (Infrastructure) 2007

5.6.1 Clause 101 – Development with frontage to classified road

Clause 101 of *State Environmental Planning Policy (Infrastructure) 2007* (Infrastructure SEPP) applies to the Site as it fronts two Classified Roads (Pittwater Road and Warringah Road). Clause 101 provides as follows:

- “(2) The consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that:*
- (a) where practicable, vehicular access to the land is provided by a road other than the classified road, and*
 - (b) the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of:*
 - (i) the design of the vehicular access to the land, or*
 - (ii) the emission of smoke or dust from the development, or*
 - (iii) the nature, volume or frequency of vehicles using the classified road to gain access to the land, and*
 - (c) the development is of a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road.”*

The proposal does not include any changes to the existing vehicular access from Harbord Road. This vehicular access can currently accommodate up to 12.5m long Heavy Rigid Vehicles. A detailed Traffic and Parking Assessment Report will be prepared by Varga Traffic Planning Pty Ltd as part of the DA that addresses the requirements of clause 101 of the Infrastructure SEPP. Preliminary advice from Varga Traffic Planning Pty Ltd is included as part of this SEARS request (**Attachment 2**).

5.6.2 Clause 102- Impact of road noise or vibration on non-road development

Clause 102 of the Infrastructure SEPP applies to development for the following purposes that is on land adjacent to a road with an annual average daily traffic volume of more than 20,000 vehicles (based on the traffic volume data published on the website of Roads and Maritime Services) and that the consent authority considers is likely to be adversely affected by road noise or vibration:

- (a) a building for residential use;
- (b) a place of public worship;
- (c) a hospital;
- (d) an educational establishment or child care centre.

The proposed development is for an education establishment and both Pittwater Road and Warringah Road have an annual average daily traffic volume of more than 20,000 vehicles. Therefore, an acoustic assessment by a suitably qualified acoustic consultant will be prepared as part of the DA that addresses the requirements of Clause 102 of the Infrastructure SEPP.

5.7 State Environmental Planning Policy (State and Regional Development) 2011

Clause 15(2) of Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) identifies the proposal as SSD as it will have a CIV in excess of \$20,000,000, as set out in the CIV Statement (**Attachment 3**).

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

The Education SEPP aims to streamline the planning system for education and child care facilities and the delivery of new schools.

The proposal entails the development of a new school and applicable clauses of the Education SEPP are identified and briefly discussed below:

5.8.1 Clause 35 – Schools – development permitted with consent

Development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone. The Site is zoned part R2, part B5 and part IN1 zone under the Warringah Local Environmental Plan 2011 (discussed below in **Section 5.11**). The R2 and B5 zones are prescribed zones for the purpose of the SEPP in accordance with Clause 33. The IN1 zone is not a prescribed zone for the purpose of the SEPP, therefore the provisions of Section 4.38(3) of the EP&A Act apply and enable the Consent Authority to grant development consent for a partly prohibited development.

This clause also provides that the consent authority must take into consideration:

- The design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4; and
- Whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.

The design quality principles of Schedule 4 and details of any proposed shared use of facilities with the community will be addressed within the DA and considered as part of the EIS.

5.8.2 Clause 42 – State significant development for the purposes of schools – application of development standards in environmental planning instruments

Clause 42 provides that development consent may be granted for development for the purpose of a school that is SSD even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted.

5.8.3 Clause 57 – Traffic Generating Development

Under the provisions of Clause 57 of the Education SEPP, the Proposal is classified as traffic generating development as the school is an educational establishment and has size or capacity of 50 or more students with access to any road. As the Proposal involves up to 600 students it must be referred to NSW Road and Maritime Services (RMS) for comment as part of the assessment process.

5.9 Draft State Environmental Planning Policy (Remediation of Land)

Draft State Environmental Planning Policy (Remediation of Land), forms part of the review program by the NSW Government and is intended to replace SEPP 55. Public consultation on the policy closed on 13 April 2018, accordingly as the proposed environmental planning instrument has been the subject of consultation it must be taken into consideration during the assessment of any future DA. The EIS will address the requirement of the draft policy.

5.10 Draft State Environmental Planning Policy (Environment)

Draft State Environmental Planning Policy (Environment) (Environment SEPP) was exhibited from 31 October 2017 to the 31 January 2018. The draft SEPP proposed to repeal certain

SEPPs and SREPs including SEPP 19. Amendments include the transfer of some provisions of SEPP 19 to the draft Environment SEPP, updating references, and updating or removing definitions to be consistent with the Standard Instrument.

5.11 Warringah Local Environmental Plan 2011

The Site is subject to the provisions of the Warringah Local Environmental Plan 2011 (WLEP 2011) and the key provisions of the LEP are briefly discussed below.

5.11.1 Clause 2.2 – Zoning

The following zones apply to the site (**Figure 3**):

- 800 Pittwater Road is zoned B5 Business Development (the B5 zone);
- 224 Headland Road is zoned IN1 General Industrial (the IN1 zone); and
- 210 Headland Road is zoned R2 Low Density Residential (the R2 zone).

Educational Establishments are permitted with consent in the B5 and R2 zones. Educational Establishments are not permitted in the IN1 zone. The provisions of Section 4.38(3) of the EP&A Act permit the granting of consent to a development which is partly prohibited.

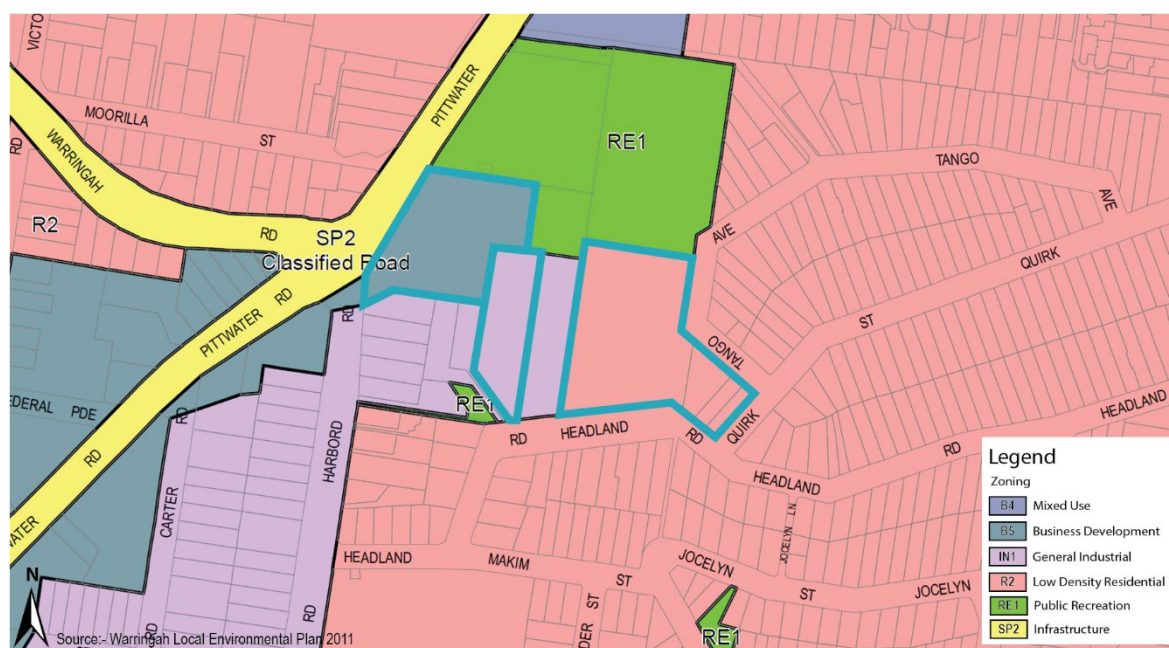


Figure 3: Extract from Zoning Map

5.11.2 Clause 4.3 – Height of Buildings

The Height of Buildings Map identifies a maximum height of buildings development standard of 11 metres for 800 Pittwater Road and 224 Headland Road (**Figure 4**). 210 Headland Road has a maximum height of buildings development standard of 8.5 metres. It is noted that the existing building at 800 Pittwater Road has a maximum building height of approximately 12.3m above existing ground level.

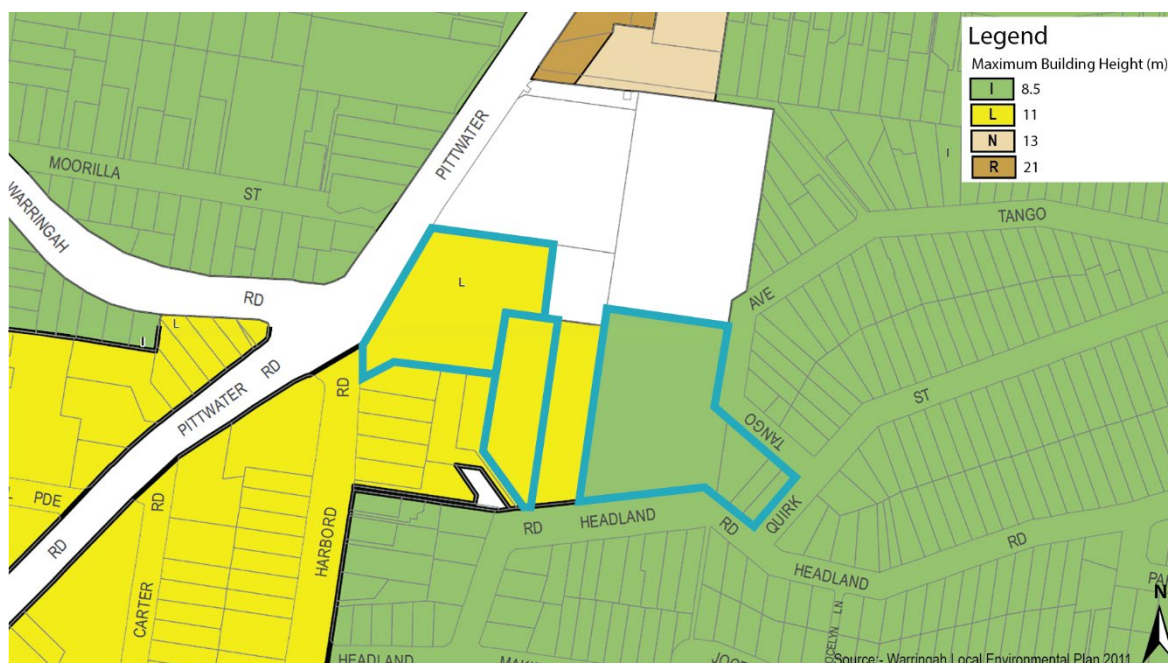


Figure 4: Extract of Height of Buildings Map

5.11.3 Clause .4.4 – Floor Space Ratio

WLEP 2011 does not include any development standards relating to maximum Floor Space Ratio.

5.11.4 Clause 5.10 – Heritage Conservation.

800 Pittwater Road is identified as local heritage item (Item I49 “Former Wormald Building (front entrance, tower and curved former canteen only)) under Schedule 5 of WLEP 2011 (**Figure 5**). It is also located within the vicinity of a local heritage item (Item I5 Bus Shelter) and landscape conservation area (Item C6 Stony Range Flora Reserve).

Preliminary advice has been sought of a suitably qualified heritage consultant as outlined in the heritage review letter prepared by CityPlan Heritage (**Attachment 4**). As part of the DA, a Heritage Impact Statement will be prepared that assesses the likely heritage impacts of the proposed works and provides recommendations on the mitigation measures.

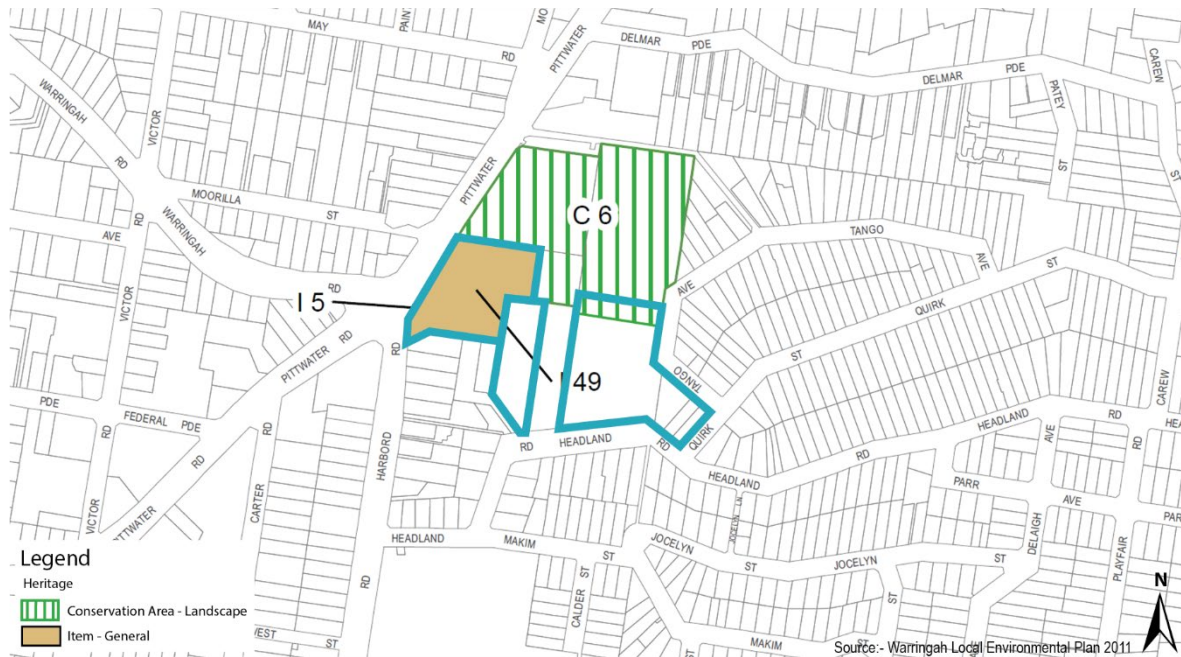


Figure 5: Extract Heritage Map

5.11.5 Clause 6.4 – Development on sloping land

The Site is identified as part Area A (Slope less than 5 degrees) and part Area B (Slope between 5 and 20 degrees) (**Figure 6**). The following site investigations will be prepared as part of the DA:

- Geotechnical Report;
- Salinity and Groundwater Investigation Report;
- Stormwater Plans and Reports.

These reports will address the requirements of Clause 6.4 of WLEP 2011.

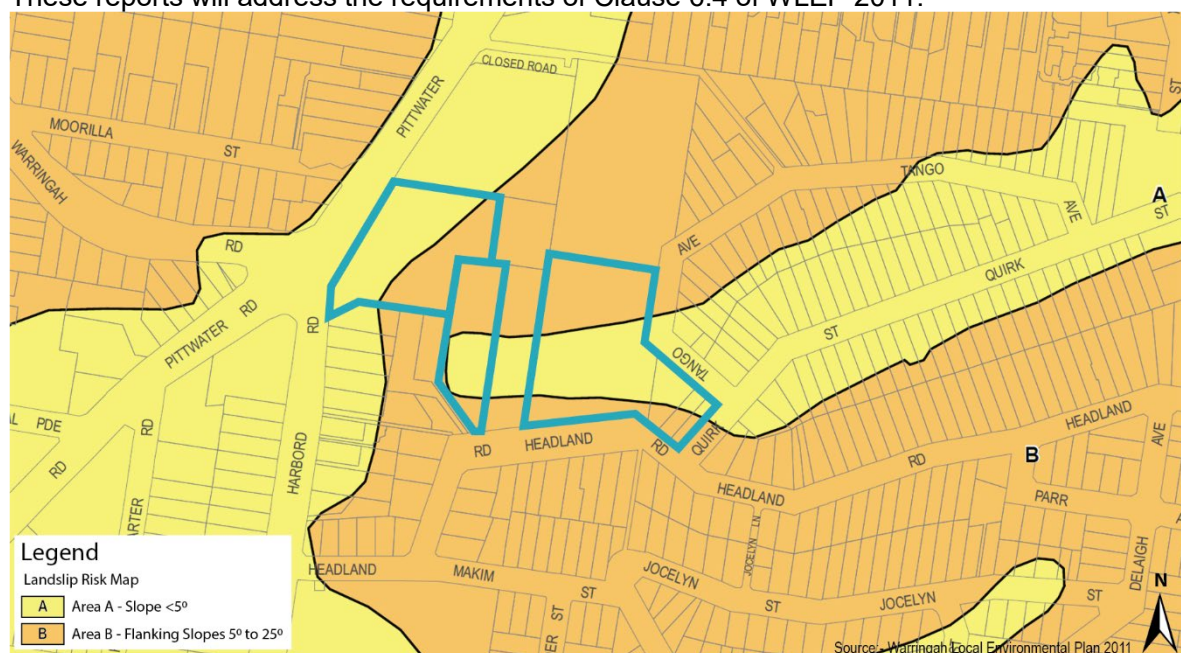


Figure 6: Landslip Risk Map

5.12 Warringah Development Control Plan 2011

The Warringah Development Control Plan 2011 (the DCP) applies to the site although it does not contain controls specific to schools. Where possible, the design of the Proposal will have regard to provisions of the DCP that may be deemed relevant (such as parking, landscaping, heritage and stormwater) although pursuant to Clause 11 of SEPP SRD, DCPs (whether made before or after the commencement of the SEPP) do not apply to SSD.

5.13 A Metropolis of Three Cities

A Metropolis of Three Cities - The Greater Sydney Region Plan (the Plan) sets out a vision of Sydney comprising of 'three cities' where most residents live within 30 minutes of their jobs, education and health facilities, services and the like. The proposal is consistent with the Plan's directions for 'Infrastructure and Collaboration' and 'Liveability' by assisting in providing infrastructure (i.e. improved school facilities) in walking distance from residential and commercial precincts, supporting predicted population growth to support in the creation of strong communities.

5.14 North District Plan

The Site is located within *North District Plan* (the ND Plan) area which covers the City of Ryde, Hornsby, Hunters Hill, Ku-ring-gai, Lane Cove, Mosman, North Sydney, Northern Beaches and Willoughby Local Government Areas (LGAs). This ND Plan seeks to manage growth in the context of economic, social and environmental matters. It contains the planning priorities and actions for implementing the Greater Sydney Region Plan, *A Metropolis of Three Cities*, at a district level and is a bridge between regional and local planning. The EIS will address the planning priorities of the ND plan with the proposal consistent with those concerning 'Infrastructure and Collaboration' and 'Liveability'.

6.0 Preliminary Impact Identification and Assessment

The key likely impacts of the Proposal are discussed below and will be addressed in detail within the EIS required to accompany the SSD DA submission.

6.1 Traffic and Parking

Traffic and car parking will be a key consideration for the proposal. As noted in the Traffic and Parking Statement prepared by Varga Traffic Planning (**Attachment 2**):

A detailed Traffic and Parking Assessment Report will be prepared to assess the traffic and parking implications of the proposed senior school facilities. The report will include peak hour traffic surveys at the nearby Pittwater Road/Warringah Road/Harbord Road and Harbord Road/Headland Road intersections as well the existing site access driveways to enable before/after SIDRA capacity analysis to be undertaken.

A Green Travel Plan will also be developed to encourage travel behaviour change and raise awareness of alternatives to private vehicle use.

*Our preliminary assessment however, suggests that the senior school uses proposed on the site are likely to represent a **less intensive** use of the site in traffic-terms when compared with the existing Office Works retail outlet, gymnasium and swim school uses currently occurring on the site.*

Access for students between 210 Headland Road, 224 Headland Road and 800 Pittwater Road will be addressed in an Operational Management Plan, Access Report and Traffic and Parking Assessment Report.

6.2 Heritage Conservation

800 Pittwater Road is identified as a local heritage item (Item I49) under schedule 5 of WLEP 2011. It is also located in the vicinity of a local heritage item (Item I5) and a landscape conservation area (Item C6). A suitably qualified heritage consultant has been engaged from the start of the project to ensure that the values of the local heritage item are protected and maintained. A detailed scope of documentation requirements and key heritage considerations has been prepared by City Plan Heritage (**Attachment 4**). A Heritage Impact Statement and Archaeological Assessment (Aboriginal and European) will be prepared as part of the DA.

6.3 Built Form and Streetscape

800 Pittwater Road is a significant local landmark located at the intersection of Pittwater and Warringah Roads. The adaptive re-use of the building as an educational establishment provides an opportunity to enhance the landmark qualities of the building whilst protecting its heritage values. The proposal will be designed to respond to the design quality principles of the Education SEPP.

6.4 Acoustic Impacts

Acoustic impacts are a key matter for the project in light of the commercial / light industrial setting surrounding the site. The proposal will include measures to minimise the potential for adverse acoustic impact to the school and to ensure the amenity of the locality is not compromised. According, the proposal and future SSD will be supported by an acoustic impact assessment.

6.5 Access

A preliminary accessibility review has been undertaken by Funktion (**Attachment 5**). The accessibility review identifies the main planning considerations for the Proposal to ensure that accessible paths of travel can be provided to and within all appropriate area of the buildings and that accessible facilities are provided. One of the key challenges is linking 800 Pittwater Road and 224 Headland Road due to the considerable change in ground levels of the two sites. A new lift and circulation core has been identified to provide an accessible path of travel.

6.6 Construction and Operational Impacts

Given the commercial and industrial setting of the Site, the potential impacts of construction works will be considered within the EIS, including:

- Dust control during any demolition and construction;
- Erosion and sediment control measures;
- Noise and vibration during construction; and
- Traffic impacts associated with construction vehicles, particularly to Pittwater Road and Warringah Road including local traffic control measures where relevant.

6.7 Staging

The works are proposed to be undertaken in multiple stages. A Staging Report will be prepared as part of application that discusses in detail the following components of the proposal at each stage:

- Demolition and construction works;
- Mitigation of impacts arising from demolition and construction works;

- Operation arrangements for both school and commercial/retail uses; and
- Mitigation of impacts arising from combined operations.

7.0 Justification

The need for improved school facilities within Sydney's Northern Beaches is important in meeting the educational needs of the growing residential population of the Dee Why and Brookvale area and more broadly throughout the Northern Beaches LGA. The proposal will provide residents in the area and the broader school community with a new senior school campus that provides improved school facilities with exceptional access from surrounding residential areas, the Brookvale-Dee Why Strategic Centre and public transport.

The Proposal will provide an opportunity to provide public access to school facilities (outside of School hours) such that the wellbeing and experiences of the broader community are being improved as well as those of the School community.

The Site is considered to be able to accommodate a development of this nature with potential land use conflicts with surrounding development (i.e. traffic, heritage and acoustic impacts in particular) able to be minimised.

8.0 Consultation

DFP Planning has undertaken preliminary authority discussions in relation to the Proposal, being informal pre-SEARs discussions with DPE staff, and an attempt to reach out to Council for a preliminary briefing meeting. A formal meeting will be held with Northern Beaches planning staff following the lodgement of the request for SEARs, benefiting from more detailed documentation which enables more detailed input from Council.

During the preparation of the EIS, the following consultation is proposed:

- Community information drop-in session(s);
- Mail-drop of information brochures/flyers to surrounding residences and properties;

Whilst our client has not undertaken any consultation with the local community on this specific proposal the community is aware of the school's intention to undertake developments on the Site.

Furthermore, the school is also intending to engage the services of a professional Public Relations Company to undertake required consultation throughout the preparation of the EIS, the construction phase and 12 months post completion of the development, which will be a requirement of the DA consent conditions.

8.1 Scoping Meeting

A Scoping Meeting was held with DPE on 26 March 2019. The following matters were discussed at the meeting:

- Nature and scale of the proposed development;
- Assessment pathway;
- Engagement approach;
- Level of assessment required; and
- Forecast date for submission of the SEARs request.

The following key assessment issues were identified:

- Parking and access;
- Heritage; and
- Staging.

8.2 NSW Government Architects (NSWGA) Review

An initial meeting was held with staff from the NSW Government Architect's office on 27 February 2019. The meeting resolved that the Proposal will be the subject of the in-house design review process in lieu of the State Design Review Panel process. It was recommended that one or two reviews occur prior to the lodgement of the DA. Further liaison with NSWGA will be carried out following issuing of the SEARs and progression of the design documentation.

9.0 Conclusion

The Proposal is classified as SSD as it falls within the requirements of Clause 15(2) of Schedule 1 of SEPP SRD, being *"Development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school"*.

TASC and the school requests that the Secretary of the DPE issue the SEARs for the proposed new school development to facilitate the preparation of the EIS to accompany the DA.

If you should have any questions regarding this request for SEARs, please contact the undersigned on 9980 6933.

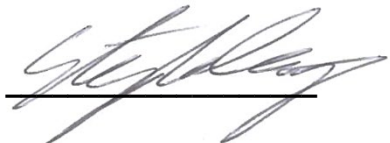
Yours faithfully

DFP PLANNING PTY LTD



AMY CROPLEY
PROJECT URBAN DESIGNER / PLANNER
acropley@dfpplanning.com.au

Reviewed: _____



Attachment 1: Architectural plans
Attachment 2: Traffic Statement
Attachment 3: Cost Statement
Attachment 4: Heritage Statement
Attachment 5: Access Statement