ENVIROMENTAL IMPACT ASSESSMENT

SCEGGS Darlinghurst - Adaptive re-use of Wilkinson House (SSD-19989744)

Prepared for
SCEGGS DARLINGHURST
15 February 2022

URBIS

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Sarah Horsfield
Senior Consultant	Anna Wang
Project Code	SSD-19989744
Report Number	Final

Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.

We acknowledge, in each of our offices, the Traditional Owners on whose land we stand.

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SIGNED DECLARATION

SUBMISSION OF ENVIRONMENTAL IMPACT STATEMENT

Environmental Assessment prepared by:

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Address:	Urbis Pty Level 8, 123 Pitt Street Sydney NSW 2000
In respect of:	Sydney Church of England Girls' Grammar School (**SCEGGS**)

Applicant and Land Details:

Applicant:	Sydney Church of England Girls' Grammar School (**SCEGGS**)
Applicant address	215 Forbes Street, Darlinghurst
Land to be developed:	215 Forbes Street, Darlinghurst
Legal description:	Lot 200 DP1255617
Project Summary	Alterations and additions to support the adaptive re-use of Wilkinson House at the Sydney Church of England Girls' Grammar School (**SCEGGS**) campus in Darlinghurst. This is the first detailed application under the approved Concept Proposal (SSD 8993).

We certify that the content of the Environmental Impact Statement, to the best of our knowledge, has been prepared:

- In accordance with the Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*;
- Contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which that statement relates; and
- The information contained in this statement is neither false nor misleading.

Name/Position:	Sarah Horsfield (Director)	Anna Wang (Senior Consultant)
Signature:		
Date:	14 February 2022	14 February 2022

GLOSSARY AND ABBREVIATIONS

Reference	Description
ACHA	Aboriginal Cultural Heritage Assessment
ACHAC	The Aboriginal Health and Advisory Committee
ACHAR	Aboriginal Cultural Heritage Assessment Report
ADP	Actual Deferral Percentage
AHD	Australian Height Datum
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
BAM	Biodiversity Assessment Method
BC Act	*Biodiversity Conservation Act 2016*
BC Reg	*Biodiversity Conservation Regulation 2017*
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
CDA	Concept Development Application
CEMP	Construction Environmental Management Plan
CGI	Computer-generated imagery
CIA	Capital Investment Value
CMP	Heritage Conservation Management Plan
CPTED	Crime Prevention Through Environmental Design
CTMP	Construction Traffic Environmental Plan
CWMP	Comprehensive Wastewater Management Planning
DA	Development Application
DCP	Development Control Plan
DDA	The Disability Discrimination Act
DPC	Development Control Plans
DPIE	NSW Department of Planning, Industry and Environment
DSI	Detailed site investigation

Reference	Description
EFSG	Educational Facilities Standards and Guidelines
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EPA	NSW Environment Protection Authority
EPA Regulation	*Environmental Planning and Assessment Regulation 2000*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
ESA	Ecologically Sustainable Development
ESD	Environmental Sustainable Design
FSR	Floor Space Ratio
GANSW	The Government Architect NSW
GFA	Gross Floor Area
GLA	General Learning Area
HAIA	Historical Archaeological Impact Assessment
ICNG	Interim Construction Noise Guideline
ICOMOS	International Council on Monuments and Sites
LEP	Local Environmental Plan
LSPS	Local Strategic Planning Statement
LTEMP	Long-term environmental management plan
MNES	Matters of National Environmental Significance
NCC	National Construction Code
OEH	Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
OSD	On Site stormwater Detention
PBP	Planning for Bushfire Protection
POEO	*Protection of Environment Operations Act (1997)*
POM	Plan of Management

Reference	Description
PSI	Preliminary Site Investigation
RAP	Reconciliation Action Plans (RAP)
RL	Reduced Level
SARs	Commonwealth Supplementary Assessment Requirements
SCEGGS	Sydney Church of England Girls' Grammar School
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SLEP	*Sydney Local Environmental Plan 2012*
SOHI	Statement of Heritage Impact
SRD SEPP	*State Environmental Planning Policy (State and Regional Development) 2009*
SSD	State Significant Development
SSDA	State Significant Development Application
TfNSW	Transport for NSW
The Campus	SCEGGS
The Site	Wilkinson House at 215 Forbes Street, Darlinghurst Lot 200 DP1255617
TIA	Traffic Impact Assessment
TN	Total Nitrogen
TP	Total Phosphorous
TSS	Total Suspended Solids
WMP	Waste Management Plan
WSUD	Water Sensitive Urban Design
WWTP	Wastewater Treatment Plant

EXECUTIVE SUMMARY

The Environmental Impact Statement (**EIS**) has been prepared on behalf of SCEGGS Darlinghurst Limited **(the applicant**) in support of a State Significant Development Application (**SSDA**) for the adaptive re-use of Wilkinson House (**the Site**), located on the existing main SCEGGS school ground at 215 Forbes Street, Darlinghurst, legally described as Lot 200 DP1255617.

This is the first detailed SSDA under the Concept DA SSD 8993, for the adaptive reuse of Wilkinson House for general school learning areas and sport facilities to support the secondary school, including alterations and additions to the existing Wilkinson House. The proposal has been designed by Smart Design Studio. Smart Design Studio has won the Emil Sodersten Award for Interior Architecture awarded by the Australian Institute of Architects' 40th annual peer-reviewed national awards.

Minor alterations and additions are proposed to the approved Wilkinson House envelope (which is the existing building envelope). A concurrent Modification to Concept Approval SSD 8993 has been submitted with the SSDA to amend the existing building envelope and associated conditions for Wilkinson House.

The proposed detailed SSD is reliant on the concurrent modification application to Concept DA SSD 8993 (SSD-8993-Mod-3) being approved, due to the encroachments outside of the approved (also the existing) Wilkinson House building envelope and amendments to the approved Landscape Masterplan.

The proposed development has an estimated capital investment value of $21,280,529.49.

Figure 1 Proposed CGI

Source: Smart Design Studio

This EIS has been prepared to support the SSDA and responds to the relevant matters listed within the Secretary's Environmental Assessment Requirements (**SEARs**) issued on 21 June 2021.

BACKGROUND

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.

Whilst the IPC did not support the full demolition of Wilkinson House, the approval conditions provide opportunity for the adaptive reuse 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 has been informed by a Site Wide Conversation Management Plan (**CMP**), which was endorsed by Planning Secretary on 8 December 2021, prior to lodgement of the SSDA, and the Wilkinson House CMP which is submitted as part of the EIS (Appendix J).

The Development Consent for application SSD 8993 issued included two components. ‘Part A’ related to the administrative conditions, whilst ‘Part B’ included the conditions to be satisfied in future detailed development application(s).

The proposed Wilkinson House detailed design complies with the relevant conditions under Part A and Part B of the Concept Development Consent, and the relevant conditions have been satisfied/addressed as part of the Wilkinson House Detailed SSDA.

SITE

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 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 Site

Consistent with the Concept Approval SSD 8993, this SSD DA only applies to the main campus site, excluding 217 Forbes Street and the St Peters Precinct 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.

The school is broadly structured with the primary school to the south, administration and shared facilities within the centre of the school, and the secondary school to the north of the site. Wilkinson House is within the secondary school portion of the site.

This SSDA relates to Wilkinson House **(the site**) only, which is located within the main campus site, 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 1960 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 by SCEGGS for 61 years, with the first 41 years as boarding house for the school. In the past 20 years, the school has adaptively reused the original residential building for teaching purposes, including general learning areas, staff rooms, study and student room.

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

SCEGGS EDUCATIONAL NEED AND THE PROPOSAL'S BENEFIT

Educational need

The **SCEGGS** 2040 Masterplan "Our Path Ahead" (which informed the Concept **SSD** DA) gives form to the school's vision for the future needs of the school to meet contemporary and evolving learning and education standards.

Given the inner city location and the limited campus area, there is a competing demand for General Learning Area (GLA) across the secondary school, and a lack of good quality, large GLA**s**, especially within Wilkinson House.

Aligned with the 2040 vision and in consideration of the site constraints and limited site area, there is an immediate need to upgrade buildings, such as the Wilkinson House, which is reaching the end of the practical lifespan and is currently incompatible with the school's teaching facility needs.

More specifically, there is an immediate demand for large, regular shaped, flexible and equitable classrooms for the secondary school to support high quality education, efficient operation of the school and flexible timetable planning.

In order to support SCEGGS's educational vision, it is important to understand the educational needs of SCEGGS, including SCEGGS's criteria for a good teaching environment. These are:

- Equitable access.
- Regular shaped classrooms with a minimum area of 60sqm to comply with The Educational Facilities Standards and Guidelines (**EFSG**) for secondary school. It is acknowledged that the EFSG applies to NSW Department of Education school facilities, in this instance, the EFSG has been referred to for guidance only.
- A range of GLA**s** sizes that allow teaching for individual students or in group settings.
- Access to adequate natural light.
- Access to adequate ventilation and fresh air.
- Easy access to technology.
- Optimum room layout with flexibility and ability to utilise at least 3 of 4 walls for teaching purposes.

- Visual connections across the room and maximised sight lines.
- Adequate walking space between the space.

Wilkinson House has been used by SCEGGS for general learning purposes for 20 years. However, useability of the existing rooms is undermining the high quality outcomes for the school. The existing classrooms are undersized and poorly shaped. The internal circulation also does not comply with fire safety and accessibility requirements. It is evident that Wilkinson House is required to be upgraded to comply with current accessibility and building code, as well as to provide better quality and larger GLA**s**.

Proposal's benefit

The proposal will enable Wilkinson House to facilitate for the continuation of adaptive reuse of the building for educational purposes, which will result in the following key benefits:

- Heritage benefits:
  - Restore the heritage façade and increase the building's contribution to the streetscape by removing unsympathetic additions.
  - Ensure longevity and allow the building to continue to be used and appreciated by both SCEGGS and the broader community for future decades.
- Educational and functional benefit
  - Opportunity to create new high quality GLAs and two sports GLA's, which comply with relevant codes and standards, including EFSG requirement.
- BCA and Accessibility compliance
  - Opportunity to provide a compliant central staircase, which will provide improved access and circulation for student and a compliant fire egress route.
  - Opportunity to upgrade to a fully accessible building and provide accessible connection to Joan Freeman Science and Technology Building and the Sports Hall.
- ESD benefit
  - The reuse of the existing heritage facade of the building will reduce the project's material consumption significantly when compared to a new building. It is estimated that reusing the existing building façade and element can reduce its associated emissions by around 15%.
  - Opportunity to set a design benchmark to incorporate design principals which achieve an Australian Excellence (5 Star) rating.

In consideration of the above, the proposed adaptive reuse of Wilkinson House to continue its educational use is justified.

PROJECT DESCRIPTION

The proposal has been guided by the conservation policies contained within the Wilkinson House CMP, in consultation with City of Sydney Council and the State Design Review Panel (GANSW). The design strategy focuses on sensitive, adaptive reuse of Wilkinson House that acknowledges the heritage significance of the building, while balancing the educational needs of SCEGGS.

The objective of the proposal is to ensure the school's future use of Wilkinson House is joyful and inspiring for students and staff; and to restore the building that is able to stand the test of time, enhancing the longevity of the building as a living museum.

The primary educational objective of the proposal is to provide a greater range of new, flexible, compliant, accessible and collaborative learning spaces within Wilkinson House to improve educational outcomes, amenity for students and staff, and which meet contemporary education standards.

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

- Retain existing external perimeter walls/facades.

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

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

The proposal is not intended to increase the existing staff or student population of the School nor to increase the site area of the main campus.

STATUTORY CONTEXT

This **EIS** considers the relevant regulatory framework applicable to the site and the proposal and contains an assessment of the proposal against the following statutory controls and regulatory instruments:

- Biodiversity Conservation Act 2016
- Environmental Planning and Assessment Act 1979
- State Environmental Planning Policy (State and Regional Development) 2011

- State Environmental Planning Policy (Infrastructure) 2007
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017
- State Environmental Planning Policy No 55 – Remediation of Land
- Draft State Environmental Planning Policy (Remediation of Land)
- Draft State Environmental Planning Policy (Environment)
- Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities).
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005
- Sydney Local Environmental Plan 2012

The proposal has also been assessment in accordance with its consistency with the key planning objectives, priorities and actions outlined within relevant strategic land use and transport planning policies including:

- NSW State Priorities.
- State Infrastructure Strategy 2018 – 2038 Building the Momentum
- Future Transport Strategy 2056
- Crime Prevention Through Environmental Design (**CPTED**) Principles
- Better Placed: An integrated design policy for the built environment of New South Wales (Government Architect NSW (**GANSW**), 2017)
- Healthy Urban Development Checklist (NSW Health, 2009)
- Draft Greener Places Design Guide (**GANSW)**
- The Greater Sydney Region Plan - A Metropolis of Three Cities
- Eastern City District Plan
- City Plan 2036: Local Strategic Planning Statement

COMMUNITY AND STAKEHOLDER ENGAGEMENT

Community and stakeholder engagement has been undertaken by SCEGGS and the project team in the preparation of the SSDA. This includes direct engagement and consultation with:

- Adjoining landowners and occupants, including the strata committee of Horizon Apartment
- Department of Planning and Environment (**DPIE)**
- City of Sydney Council
- Government Architect NSW (through the NSW State Design Review Panel process)
- Transport for NSW (**TfNSW**)
- Ausgrid
- Sydney Water
- Registered Aboriginal Parties (**RAPs**)

Overall, feedback on the proposed SSDA was generally positive and supportive of the objectives of the proposal.

ENVIRONMENTAL IMPACT ASSESSMENT

This EIS assesses the proposed development in relation to relevant planning instruments and policies and considers the likely environmental impacts of the proposal, including:

Built Form and Urban Design

The detailed design of Wilkinson House has been guided by the conservation policies outlined in the Wilkinson House CMP. The proposal retains the external façades and the internal entrance foyer and lounge hall. Restoration works are also proposed to celebrate the heritage significance of the building. Proposed alterations and additions are 'light touches' to the building, which will not distract the heritage significance of Wilkinson House when viewed from the public domain.

The reconstruction of the roof is in the same form as the original, using the material of copper to create vertical ribs and standing seams, taking inspiration from Sodersten's original elevational drawings. The proposed lift addition is setback from Forbes Street. The proposed lift is clad with glass, creating a light weight and recessive element that is distinct from the heritage fabric of Wilkinson House. Overall, the proposal is sympathetic to the streetscape character and the heritage presentation of Wilkinson House along Forbes Street and St Peters Street .

Amenity

The proposed lift addition and new roof form is not anticipated to have any adverse shadow impacts compared to the existing built form. Marginal additional shadow from the proposed building additions falls within the School campus, basketball court and onto Forbes Street during the day. There are no additional overshadow to adjacent dwellings. Overall, the proposal is not anticipated to have any adverse shadow impacts compared to the existing built form on site.

The proposal has been designed to maintain visual privacy for adjoining developments through use of material, restricted trafficable area, and appropriate screening. Visual privacy will be maintained for surrounding developments.

The lighting design for the proposal aims to achieve an elegant and discreet solution that will enhance the aesthetic qualities of the new building, whilst avoiding impact to neighbours by ensuring deign compliance with Australian Standards.

Visual Impact

The potential view impacts associated with the proposed detailed design of Wilkinson House have varying degrees of impact, from nil and negligible. When compared to the existing Wilkinson House, the view from neighbouring properties is largely retained, including the protection of significant views to the Sydney skyline and iconic elements.

Transport and Parking

Given the proposal does not seek to increase staff and student number, the existing road network remains adequate to cater for the existing traffic generated. Traffic generation is expected to remain the same as previously assessed under the Concept SSDA. The modelling concluded that during the AM and PM peak hour periods, the Liverpool Street/Bourke Street intersection operates at LoS of 'B – good with acceptable delays and space capacity'. This proposal does not seek to amend the existing parking arrangements onsite.

Construction

A preliminary Construction Management Plan has been prepared, which outlines the proposed construction methodology and possible impacts. A Preliminary Construction Traffic Management Plan (**CTMP**) has also been prepared that identify measures that reduce construction traffic and pedestrian conflict. All construction works on site will be subject to finalisation of the CTMP and preliminary Construction Management Plan having regard to project programming and staging.

Ecologically sustainable development

An Ecologically Sustainable Development framework has been developed for the proposal, which combines all applicable initiatives and targets and will be implemented as part of the construction and ongoing operation phases of the development. The measures are being considered to minimise consumption of resources. SCEGGS has set a design benchmark to incorporate the design principals of an Australian Excellence (5 Star) rating.

Heritage

The design strategy demonstrates a sensitive adaptive reuse proposal. As the overall external character and form of Wilkinson House will only be minorly altered through the addition to the south and new roof, it is considered that there are no detrimental impacts to either the SCEGGS Darlinghurst campus, the East Sydney HCA or the surrounding heritage items. Overall, the proposed adaptive reuse of Wilkinson House is

considered to respect the heritage significance of the building and will ensure that a balance is met between the tangible and intangible significance of the building, while allowing for the building to be transformed into an asset for SCEGGS that will serve the educational needs of the school into the future.

Historical archaeological impact

There is low potential for the proposal to impact on archaeological resources associated with the early 19th century stone cottage and late 19th century terraces within the Wilkinson House site. In the unlikely event that evidence of these earlier structures, or associated occupational deposits are encountered during the proposed works, these may have local heritage significance and recommendations outlined in the Historical Archaeological Impact Assessment (**HAIA**) should be adopted.

Aboriginal cultural heritage

Assessment of the Aboriginal cultural heritage has demonstrated that zero Aboriginal heritage sites will be harmed by the proposed development. Mitigation measures have been included to manage any unexpected finds during the demolition and construction phases, including additional consultation and documentation if required.

Social

Due to the sensitive retention of Wilkinson House and engagement with Aboriginal culture and heritage, it is likely that the proposal will create a positive impact on the community, SCEGGS students and staff. It will further create a positive impact due to the improved and functional internal layout and increased access to sport and recreation.

The temporary loss of outdoor space, and disruption to way of life during construction raise some short term challenges on the community, SCEGGS students, staff and visitors, neighbouring residents and businesses. These impacts can be reduced through management measures already proposed, as well as additional recommendations made in EIS.

Noise and vibration

Analysis of the potential impacts arising from the demolition, construction and operational phases of the development has concluded that there will be no exceedances of noise levels during the daytime hours and night-time. Operation noise remains largely the same, as the development does not seek to intensify the use of SCEGGS and no student increase is proposed. Additional mitigation measures have been proposed to mitigate noise for after school events on the rooftop level.

Utilities

The existing utility services are adequate and/or can be extended to accommodate the needs of the proposed development. The proposal has been designed to facilitate augmenting of existing electrical services.

Stormwater and flooding

Stormwater management and soil and water management measures have been addressed in detail within the EIS. Appropriate mitigation measures have been incorporated to manage water quality and quantity. Sediment and erosion control measures will be implemented during the demolition and construction phases to avoid downstream impacts.

Overall, the building has been designed to comply with flood planning level, including at the existing Forbes Street entrance and single egress door to St Peters Street.

Waste

The demolition and construction phases of the development have been assessed in detail, with recommended measures to re-use, recycle and dispose of waste. Given SCEGGS will continue to operate under existing student capacity, the existing waste storage area within the Campus is sufficient to store the operational waste.

BCA and accessibility

The proposed internal layout of Wilkinson House greatly improves BCA and accessibility compliance for an educational establishment when compared to the existing outdated and non-compliant layout. Improvements including compliant floor to ceiling height, compliant staircase, compliant fire escape, new floors for fire safety, new accessible WC facilities, new accessible lift which will also provide accessible connection to other school facilities, such as the Sports Hall and Joan Freeman building.

Each of the recommended mitigation measures has been reviewed in detail and it is considered that they can be incorporated as conditions of consent and implemented during the demolition, construction and operational phases of the development.

EVALUATION OF PROJECT

The **EIS** demonstrates the proposal will not result in any significant departures from applicable controls on unreasonable environmental effects. The proposed development is considered appropriate and reasonable based on the following:

- The land is zoned 'R1 General Residential' under the Sydney LEP, which is a prescribed zone for the purposes of the Education SEPP. The proposed development is permissible with consent and consistent with the land use objectives of R1 zoning.
- Minor alterations and additions are proposed to the approved Wilkinson House envelope (which is the existing building envelope). A concurrent Modification to Concept Approval SSD 8993 has been submitted with the SSDA to amend the approved building envelope for Wilkinson House. This is to ensure this SSDA is consistent with the Concept Approval (as modified). The areas of concept approval variation are minor and relate to minor roof height increase (of 330mm), additional envelope extension to the south to accommodate the lift, and additional envelope for roof plant on the Joan Freeman Building.
- The proposal is consistent with state and local strategic planning policies.
- The proposal satisfies the applicable local and state development controls.
- The proposal satisfies the applicable local and state development controls. Minor departures to the local development standard - maximum building height, is required to increase the roof height by 330mm pursuant to clause 42 of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017. Whilst technically not required, a detailed Clause 4.6 variation justification is provided. Overall, the proposal largely complies with the LEP height control. The minor encroachment (the roof and the plant enclosure) would result in negligible environmental and amenity impact, including privacy, visual amenity, overshadowing and on the surrounding heritage items.
- The design of the proposal respects the heritage significance of Wilkinson House and is consistent with the policies in the Wilkinson House CMP.
- The design strategy demonstrates a sensitive adaptive reuse proposal. It is considered that the proposal will not result in detrimental impacts to either the SCEGGS Darlinghurst campus, the East Sydney HCA or the surrounding heritage items. Overall, the proposed adaptive reuse of Wilkinson House is considered to respect the heritage significance of the building and will ensure that a balance is met between the tangible and intangible significance of the building.
- External alterations and additions respond to the streetscape and provide a positive built form design outcome for the site.
- The proposal provides much needed high quality, collaborative, equitable, functional classrooms that meet contemporary educational standards. Overall, the proposal will create 4 additional general learning classrooms and 2 additional indoor sports areas.
- The proposal allows the building to be fully accessible by all students and provides equitable connection to adjacent facilities.
- The proposal does not seek to increase student and staff number. Therefore, amenity impacts including traffic and noise is minimised and is comparable to the existing condition.
- Subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unreasonable impacts on adjoining properties or the public domain in terms of construction traffic, social and environmental impacts.

- The proposal will also create temporary job opportunities in manufacturing, construction and construction management during the project’s construction phase of works.
- The proposal appropriately satisfies each item within the Secretary's Environmental Assessment requirements.

1. INTRODUCTION

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts.

1.1. APPLICANT DETAILS

The applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	Sydney Church of England Girls Grammar School
Postal Address	215 Forbes Street, Darlinghurst NSW 2010 Australia
ABN	16 001 421 727
Nominated Contact	Urbis – Sarah Horsfield
Contact Details	0438 041 844

1.1. PROJECT OVERVIEW

This EIS is submitted to the Department of Planning, Industry and Environment (**DPIE**) on behalf of the SCEGGS Darlinghurst Limited (**the applicant)** to prepare a State Significant Development Application (SSDA 19989744) for the adaptive re-use of Wilkinson House (**the Site**), 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 (**Concept 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.

Whilst the IPC did not support the full demolition of Wilkinson House, the approval conditions provide opportunity for the adaptive reuse 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). Smart Design Studios has been selected as the preferred architect for Wilkinson House. The design development of Wilkinson House has been informed by a Site Wide Conversation Management Plan (**CMP**) which was endorsed by Planning Secretary on 8 December 2021 prior to lodgement of the SSDA, and the Wilkinson House CMP which is submitted as part of the EIS (Appendix J).

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

Minor alterations and additions are proposed to the approved Wilkinson House envelope (which is the existing building envelope). 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.

The proposed detailed SSD is reliant on the concurrent modification application to Concept DA SSD 8993 (SSD-8993-Mod-3) being approved, due to the encroachments outside of the approved (also the existing) Wilkinson House building envelope and amendments to the approved Landscape Masterplan.

Figure 2 Locality Map (Wilkinson House outlined in yellow)

Source: Urbis, 2021

The proposed development has an estimated capital investment value of $21,280,529.49 (refer to Appendix A).

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).

The Minister is the consent authority for the proposal in accordance with section 4.5 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**). Accordingly, this DA is being lodged with the DPIE as an SSDA seeking development consent for the adaptive re-use of Wilkinson House.

This EIS has been prepared to support the SSDA and responds to the relevant matters listed within the SEARs issued on 21 June 2021. Response to SEARs is detailed in Table 5. This document should be read in conjunction with the supporting documents provided at Appendix A - Appendix GG.

1.2. PROJECT OBJECTIVES

The key objectives for the proposed development and the way in which these have been achieved are summarised in the following table:

Table 2 Project Objectives

Project Objective	**Proposed Development**
Preserve the heritage significance of the building, with design that sensitively exhibits the adaptive reuse of Wilkinson House.	The design strategy focuses on sensitive, adaptive reuse that acknowledges the significance of the place. The design objective to ensure that the school's future use of Wilkinson House is joyful and inspiring for students and staff; and that it is a place they look forward to using every day and that will stand the test of time. The proposed design has been guided by the Wilkinson House CMP, including the grading of significance to each building element. The proposed design responds to the CMP heritage strategies outlined in the CMP in the following ways: ▪ Retention of all external facades. ▪ Retention of the entrance lobby and lounge hall. ▪ Restoration of the building façade, including repainting and removing intrusive elements, such as security grilles. ▪ Rebuild mansard roof in copper with angled blades and clerestory windows that reference the vertical articulation of the original Emil Sodersten elevations. ▪ Provides a lift addition that is sensitively designed, with careful selection of materiality and colour that will complement the building. The proposed glass structure is a light touch, which will make the structure appear recessive and fluid.
Provide inclusive, secure and inspiring spaces for students.	The proposed internal layout has been designed with safety design principles.

Project Objective	Proposed Development
	The proposed lift extension will greatly enhance equitable access within Wilkinson House and creates better connection with the wider campus, including equitable access to the Centenary Sports Hall and Joan Freeman building. The new staircase will be BCA and fire compliant, wider (5.4m wide) than the existing non-compliant stair, straight and streamlined, making it easier, efficient, safe and pleasant for students and staff to navigate. The proposed internal layout will allow for inviting breakout areas with social hubs. An oculus is implemented into the roof design to allow for framed views and connection to the sky, providing access to sunlight, natural ventilation and providing a unique social gathering space for both students and staff.
Deliver a functional design outcome suited for educational purposes, and to enable high-quality teaching facility beyond what Wilkinson House can currently provide.	The proposal will create larger, flexible and well-lit learning spaces that can accommodate the school's evolving teaching ambitions for the next twenty-plus years. Overall, the proposal will create 4 additional general learning classrooms and 2 additional indoor sports areas. Most importantly, regular shaped classrooms are proposed that exceed the 60sqm requirement under Educational Facilities Standards and Guidelines (**EFSG**) and will comprise the following elements: ▪ Short throw projectors on panelled walls, which means every wall is for teaching. ▪ Inlay in ceiling retains memory of former layout and use. ▪ Windows on two sides for all general learning areas (GLA**'s**) optimises access to daylight. ▪ Inset glazing reduces glare while keeping rooms bright and ambient. ▪ Operable windows system enabling cross ventilation. In addition, a sports facility is proposed in the basement, which comprise larger GLAs to accommodate more passive recreational activities, such as yoga etc. Furthermore, new staff rooms and meeting rooms are provided to accommodate secondary school staff and academic support.

Project Objective	Proposed Development
Incorporates Environmentally Sustainable Design	The proposal integrates passive sustainability solutions to optimise the performance and durability of the building. The proposed sustainability initiatives include: ▪ Reuse bricks for new walls ▪ Reconstruct all floors in concrete for fire safety, thermal mass, acoustic attenuation and durability. ▪ Central stair vents at top and bottom creating thermal chimney effect. ▪ PV solar farm on roof. ▪ Ceiling fans & natural ventilation.
Present an achievable construction process.	Smart Design Studio has over twenty years' experience in working with heritage buildings. Detailed structural and construction method has been explored in detail by the architect and project engineer to ensure safe construction while retaining the significant heritage fabric.

1.3. STRUCTURE OF THE EIS

The purpose of this report is to provide an assessment of the proposal as described above, within the EIS and the attached supporting documents.

This EIS provides the following:

- A summary of project background including description of the Concept SSD and the proposal's satisfaction of the Concept SSD DA conditions of consent.
- An outline of the SCEGGS educational needs and the need to upgrade Wilkinson House, including detailed constraint and opportunities associated with adaptive reuse of Wilkinson House and design option analysis.
- A description of the site and surrounding context; including identification of the site, existing development on the site, and surrounding development.
- A detailed description of the proposed development.
- An assessment of the proposed development against the relevant strategic and statutory planning controls.
- A detailed description of the consultation undertaken with respect to the proposal.
- An assessment of the key issues and impacts generated by the proposed development.
- Recommendations and mitigation measures based on the technical studies undertaken as part of this application.
- An assessment of the proposal against the matters of consideration listed in Section 4.15 of the Environmental Planning and Assessment Act 1979 (**EP&A** Act);
- Conclusion and Justification.

This EIS responds to the Secretary's Environmental Assessment Requirements (**SEARs**) as outlined in Section 4 of the EIS. This document should be read in conjunction with the supporting documents provided at Appendix A to Appendix II.

2. PROJECT BACKGROUND

2.1. CONCEPT SSD DA - SSD 8993

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.

2.2. MODIFICATION APPLICATIONS TO CONCEPT SSD DA

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 refence 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.

A more recent Section 4.55(1a) Modification was approved by DPIE on 6 July 2021 to amend conditions that enable the Heritage Conservation Management Plan (**CMP**) required for the site under Condition **A13** of the Concept Proposal to be undertaken in the following stages:

- a whole of site CMP to provide a high-level strategic CMP for the SCEGGS main campus – endorsed prior to any future detail SSDAs.
- individual detailed CMPs that are specific to Wilkinson House, Barham and the Chapel Building – to be submitted prior to or as part of any subsequent detailed development application(s) involving these buildings.

The site wide CMP was endorsed by the Planning Secretary on 8 December 2021.

2.3. CONSISTENCY WITH CONDITIONS OF THE CONCEPT SSD DA

The Development Consent for application SSD 8993 issued included two components. 'Part A' related to the administrative conditions, whilst 'Part B' included the conditions to be satisfied in future detailed development application(s).

Table 3 below outlines the relevant conditions that relates to Wilkinson House and to be satisfied as identified under Part A and Part B of the Concept Development Consent, including how they relate to and/or are addressed within this EIS as part of the Wilkinson House Detailed SSDA.

Table 3 Concept DA SSD 8993 Conditions of Consent to be Satisfied

Condition	Response
PART A ADMINISTRATIVE CONDITIONS	
Obligation to Minimise Harm to the Environment A1. In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.	Mitigation measures are summarised in Section 10.15 of the EIS.
Determination of Future Applications A2. In accordance with section 4.22(4) of the EP&A Act all development under the Concept Proposal must be subject of future application(s). A3. The determination of future development application(s) is to be not inconsistent with the terms of development consent **SSD** 8993 as described in Schedule 1 and subject to the conditions in Parts A and B, Schedule 2.	This is the first detailed SSDA under the Concept DA SSD 8993, for the adaptive reuse of Wilkinson House for general school learning areas and sport facilities to support the secondary school, including alterations and additions to the existing Wilkinson House. The proposal's consistency with Concept DA SSD 8993 conditions is assessed in this table.
Terms of Consent A4. The development may only be carried out: (a) in compliance with the conditions of this consent; (b) in accordance with all written directions of the Planning Secretary; (c) generally in accordance with the EIS, RtS and RRFI and SSD-8993-Mod-2; and (d) in accordance with the approved plans in the table below: ……	Minor alterations and additions are proposed to the approved Wilkinson House envelope (which is the existing building envelope). A concurrent Modification to Concept Approval SSD 8993 will be submitted with the SSDA to amend the approved Wilkinson House building envelope (including the relevant Masterplan drawings) and associated conditions to ensure this SSDA is consistent with the Concept Approval (as modified). The proposed detailed SSD is reliant on the concurrent modification application to Concept DA SSD 8993 (SSD-8993-Mod-3) being approved, due to the encroachments outside of the approved (also the existing) Wilkinson House building envelope and amendments to the approved Landscape Masterplan.
A5. The Concept Proposal envelope for the Wilkinson House part of the Site is amended to approve only the envelope shown by the dashed red line on Drawing AR. MP.3002 that represents the existing envelope of Wilkinson House. Any references to the Wilkinson House building envelope as it was proposed in the DA, or to the replacement Wilkinson House	As stated above, minor alterations and additions are proposed to the approved Wilkinson House envelope (which is the existing building envelope). A concurrent Modification to Concept Approval SSD 8993 has been submitted

Condition	Response
building shown on other drawings listed in condition A4, are not approved.	with the SSDA to amend the approved building (including the relevant Masterplan drawings). It is also proposed to remove this condition, as it becomes redundant as part of the concurrent Modification to Concept Approval SSD 8993.
A6. Consistent with the requirements in this consent, the Planning Secretary may make written directions to the Applicant in relation to: (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Planning Secretary; (b) any reports, reviews or audits commissioned by the Department regarding compliance with this approval; and (c) the implementation of any actions or measures contained in any such document referred to in (a) above.	Noted.
A7. The conditions of this consent and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A4. In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A4, the most recent document prevails to the extent of the inconsistency, ambiguity or conflict	Noted.
Limits of Consent A8. This consent lapses five years after the date of consent unless the works associated with a future stage development application have physically commenced.	Noted.
Student, childcare and Staff Numbers A9. The student population and associated full time equivalent staff numbers of SCEGGS must not exceed 942 and 158 respectively. A10. Notwithstanding condition A9, the maximum student population may exceed 942 by up to a maximum of 20 additional students to allow for unanticipated fluctuations on a temporary basis.	This proposal does not seek to modify the approved student or staff capacity. Childcare is not proposed as part of this SSDA.

Condition	Response
A11. The childcare centre must not exceed 45 childcare places and 5 staff.	
Gross Floor Area A12. A maximum GFA of 7,675.1m2 is approved comprising: ▪ Multi Purpose Building: 5,692.0m2 ▪ Administration Building: 821.2m2 ▪ Wilkinson House as existing: 1161.9m2.	As the result of the proposed external alternations, the gross floor area (**GFA**) for Wilkinson House is increased from 1,161.9sqm (existing) to 1,683.6sqm. The total maximum GFA under the Concept Approval is increased from 7,675sqm to 8,196.8 sqm. A concurrent Modification to Concept Approval SSD 8993 will be submitted with the SSDA to amend the GFA condition to be consistent as the proposed.
A13. A heritage conservation management plan (**CMP**) must be prepared for the site by a suitably qualified heritage consultant, in consultation with Council. The CMP must: (a) be the overarching strategic heritage management document for the entire Site; (b) acknowledge the Concept Proposal and all heritage components of the Site; (c) provide broad strategies for the adaptive re-use of Wilkinson House; (d) provide broad strategies for heritage conservation and management of the other significant heritage buildings within the Site including the Barham and Chapel Buildings; and (e) be submitted and endorsed by the Planning Secretary prior to the lodgement of any future development application for subsequent stages, associated with the Concept Proposal.	A site wide heritage conservation management plan has been prepared and endorsed by the Planning Secretary on 8 December 2021, prior to the submission of the Wilkinson House SSDA.
Prescribed Conditions A14. The Applicant must comply with all relevant prescribed conditions of development consent under Part 6, Division 8A of the EP&A Regulation	Noted.
Planning Secretary as Moderator A15. In the event of a dispute between the Applicant and a public authority, in relation to an applicable requirement in this approval or relevant matter relating to the Development, either party may refer the matter to the Planning Secretary for resolution. The Planning Secretary's resolution of the matter must be binding on the parties.	Noted.

Condition	Response
Legal Notices A16. Any advice or notice to the consent authority must be served on the Planning Secretary.	Noted.
Building Design B1. All future development applications for new built form must include: (a) detailed plans, elevations and sections; (b) artist's perspectives and photomontages; (c) a design statement demonstrating the design quality of the proposed development having regard to the existing buildings on site, the heritage significance of the Site, character of surrounding development and the Design Principles in Schedule 4 of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017; and (d) consideration of the Design Guidelines and Development Parameters.	Detailed plans, including artis perspectives are attached at Appendix D. A Design Statement attached at Appendix C demonstrates the design quality of the proposed development having regard to the existing buildings on site, the heritage significance of the Site, character of surrounding development and the Design Principles in Schedule 4 of the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities)* 2017; and consideration of the Design Guidelines and Development Parameters.
B2. The proposed new built form must be contained within the approved building envelopes illustrated in the approved plans referenced at Schedule 2, Conditions A4 and Condition A5.	Minor alterations and additions are proposed to the approved Wilkinson House envelope (which is the existing building envelope). A concurrent Modification to Concept Approval SSD 8993 has been submitted with the SSDA to amend the existing building envelope as proposed for consistency to ensure this SSDA is consistent with the Concept Approval (as modified).
Heritage B3. All future development applications for new built form must be accompanied by a Heritage Impact Statement and Heritage Archaeological Assessment, which considers both Aboriginal and non-Aboriginal archaeological impacts. B4. All future development applications shall be consistent with the endorsed Heritage Conservation Management Plan, referred to in Condition A13. B4A. A detailed CMP for Wilkinson House must be prepared by a suitably qualified heritage consultant. The CMP for Wilkinson House must: (a) be consistent with the endorsed overarching CMP in condition A13;	The Wilkinson House CMP is attached at Appendix J, which address conditions B4 (a) – (d). A Heritage Impact Assessment is attached at Appendix H, which assesses the proposal against the conservation polices outlined in the Wilkinson House CMP. Heritage Archaeological Assessment is attached at Appendix I. Aboriginal cultural heritage assessment is attached at Appendix K.

Condition	Response
(b) be prepared in consultation with Council; (c) include details of options for the adaptive re-use of Wilkinson House; and (d) be submitted prior to or with the future detailed development application for Wilkinson House, associated with the Concept Approval.	
Landscaping B5. All future development applications for new built form must include: (a) landscape plans and details identifying the vegetation to be retained, removed or relocated, the location of replacement trees, and additional landscaping. The plans and details must: (i) be generally in accordance with the Landscape Masterplan Rev D prepared by Context and dated September 2019 submitted with the RtS; (ii) include relevant details of the species to be planted (preferably species indigenous to the area) and the landscape treatments, including any pavement and seating areas; (iii) an analysis of appropriate inclusion of green roofs above new buildings; and (iv) be prepared by a registered landscape architect, be drawn to scale and include technical specifications. (b) an Arboricultural Impact Assessment by a qualified arborist for trees in the immediate vicinity of the development and with the potential to be affected by the development. The Assessment is to include detailed tree survey and root mapping in order to demonstrate that the proposed works will not be detrimental to the long term health of the existing trees retained on-site and along Bourke, Thompson, Forbes and St Peters Street and Thomson Lane; (c) the location and details of existing and proposed surface materials and structures on the site including, but not limited to, paved areas, walls, raised planters, balustrade ,infill pit lids, furniture, removable bollards, bike racks, light poles, signage, drainage, services, pergola, shade structures, other features, and all associated footings.	Landscape plans and details, including species are addressed in 10.2 and attached at Appendix F. Existing trees are retained on-site and along Forbes and St Peters Street. The detailed landscape design for Wilkinson House is largely consistent with the Landscape Masterplan approved under the Concept SSD. Following a detailed investigation into the viability and performance of the light well planting proposed as part of the Landscape Masterplan under the Concept Approval SSD 8993, it was found that this location is not the most optimal location for landscaping, therefore it is proposed to be removed. A modification to the Landscape Masterplan is proposed as part of the Section 4.55 (1a) Modification to the Concept Approval, to ensure this SSDA is consistent with the Concept Approval (as modified).
Ecologically Sustainable Development B6. All future development applications for new built form must demonstrate how the principles of Ecologically Sustainable	Ecologically Sustainable Development (**ESD)** is addressed in Section 10.5 of the EIS and ESD report is attached at Appendix P.

Condition	Response
Development have been incorporated into the design, construction and on-going operation of the new buildings. B7. All future development applications for new built form must consider opportunities for the incorporation of green roofs.	Due to the limitation of heritage facade and restriction on roof type, a green roof area is not possible for Wilkinson House. Despite this, vegetation has been incorporated within the roof design at the north-western corner of the roof (also known as the Oculus). Further, solar panels are proposed on the roof, which will provide ESD benefits.
Amenity B8. All future development applications for new built form must include an assessment of amenity impacts including solar access (including detailed overshadowing diagrams), noise, visual privacy, view loss and light spill (including a lighting plan).	Solar access is addressed in Section 10.3.1 of the EIS. Noise impact is addressed in Section 10.10.3 of the EIS and detailed in Appendix R. Visual privacy is addressed in Section 10.3.3 of the EIS and modelled in Appendix E. Lighting impact is addressed in Section 10.3.4 of the EIS and detailed in Appendix G.
Community Use B9. All future development applications for new built form must clarify whether there is any change to the existing arrangements for community use of school facilities/infrastructure. Where a change is proposed, details of operation, use, hours of operation, noise, traffic and amenity impacts must be provided.	No changes are proposed to the existing community use of the school facilities.
Disability Access B11. All future development applications for new built form must be accompanied by a Disability Access Review to demonstrate an appropriate degree of accessibility in accordance with the Disability (Access to Premises - buildings) Standards 2010 (the Premises Standards).	Accessibility is addressed in Section 10.14.2 of the EIS and attached at Appendix Y. The proposal greatly improves the accessibility of Wilkinson House and provide equitable connection to existing school facilities.
Traffic, Access, Car and Bicycle Parking B12. All future development applications for new built form must be accompanied by: (a) a Traffic Impact Assessment that considers the traffic, transport and parking impacts associated with the construction and operation of the proposed development;	Traffic Impact Assessment is addressed in Section 10.4 and attached at Appendix L. An updated Green Travel Plan is attached at Appendix L.

Condition	Response
(b) an updated Green Travel Plan outlining the measures to reduce private vehicle usage; (c) an Operational Transport and Access Management Plan; and (d) a Road Safety Evaluation. ….. B14. The maximum number of additional on-site car parking spaces must not exceed 15 spaces, comprising: (a) 12 childcare centre spaces; and (b) 3 service vehicle spaces. Note: the above car parking maximum does not apply to existing car parking spaces on the site or the potential relocation of any existing car parking spaces within the site. surface car park, which must not include car parking. …..	Operational Transport and Access Management Plan is attached at Appendix M. For the purpose of this development, the project traffic engineer recommended that a design-based Road Safety Audit is the most appropriate tool to consider both the physical road-based changes as well as the traffic and pedestrian-generation impacts of the development. Accordingly, it is proposed to amend condition B12 (d) of the Concept Approval and seek to replace the requirement of Road Safety Evaluation (**RSE**) with a design-based Road Safety Audit (**RSA**). This is requested and addressed in the Section 4.55(1A) modification application to Concept DA (SSD 8993) concurrently lodged with this detailed SSD. No changes are proposed to onsite car parking.
Waste B17. All future development applications for the new built form must include a Waste and Recycling Management Plan, addressing the requirements of the City of Sydney Guidelines for Waste Management in New Developments 2018 and the waste and recycling generation rates for schools in Appendix F of the EPA Better Practice Guide for Resource Recovery In Residential Developments 2019.	Waste and Recycling Management Plan is addressed in Section 10.13.1 and attached at Appendix V.
Utilities B18. All future development applications for new built form must address the existing capacity and any augmentation requirements of the development for the provision of utilities including staging of infrastructure through the preparation of an Infrastructure Management Plan in consultation with relevant agencies and service providers.	Utilities requirements are addressed in Section 10.11 and detailed in the Utilities Report attached at Appendix CC.
Stormwater and Flooding B19. All future development applications for new built form must be accompanied by a Stormwater Management Plan detailing an assessment of any flood risk on site and consideration of any relevant provisions of the NSW Floodplain Development Manual 2005, stormwater and drainage	Stormwater and flooding are addressed in Section 10.12 and detailed in the Civil Engineering Report attached at Appendix W.

Condition	Response
infrastructure, and details demonstrating that water sensitive urban design measures have been incorporated into the development.	Overall, the design of Wilkinson House complies with the flood planning level.
Construction B20. All future development applications for new built form must provide an analysis and assessment of the impacts of construction and include a: (a) Construction Pedestrian and Traffic Management Plan (CPTMP), prepared in consultation with TfNSW Sydney Coordination Office, Transport Management Centre and TfNSW (RMS). The CPTMP must detail vehicles routes, numbers of trucks, hours of operation, access arrangements and traffic control measures and cumulative construction impacts (i.e. arising from concurrent construction activity); (b) Construction Noise and Vibration Impact Assessment that identifies and provides a quantitative assessment of the main noise generating sources and activities during construction, and any noise sources during operation. Details are to be provided outlining any mitigation measures to ensure the amenity of adjoining sensitive land uses is protected throughout the construction and operational periods; (c) Community Consultation and Engagement Plan; (d) Construction Waste Management Plan; (e) Water Quality Impact Assessment and an Erosion and Sediment Control Plan (including water discharge considerations); (f) Geotechnical Assessment Report with details of proposed mitigation measures during excavation works and measures to control impacts on adjoining properties due to vibration or changes to groundwater or drainage during construction; and (g) Acid Sulphate Soil Assessment and Management Plan.	A preliminary Construction Pedestrian and Traffic Management Plan is attached at Appendix O. Construction Noise and Vibration Impact Assessment is addressed in Section 10.10.1 and detailed in Appendix R. A Preliminary Construction Management Plan is attached at Appendix DD, which includes strategy for community consultation during construction. Construction Waste Management is addressed in Section 10.13.2 and detailed in Appendix V. Water Quality Impact Assessment and an Erosion and Sediment Control Plan is attached at Appendix U. A Geotechnical Assessment Report is attached at Appendix T. Acid Sulphate Soil Assessment is attached at Appendix II, which confirms that the site is not impacted by acid sulfate soil.
Contamination B21. All future development applications for new built form must be accompanied by a detailed site contamination investigation and, as necessary, a Remedial Action Plan	Contamination is addressed in Section 8.7 of the EIS and Site Investigation Report is attached at Appendix Q. Based on the findings of the detailed contamination investigation, it is considered that the Wilkinson House site is suitable for the proposed educational use, subject to implementation of the recommendations outlined in the Site Investigation Report

Condition	Response
Wilkinson House B22. Any future development application that includes loss of fabric of Wilkinson House must include consideration of: (a) Heritage impacts; (b) Streetscape impacts including the loss of contributory values and an appropriate design response; (c) A thorough analysis of all the constraints and benefits associated with the adaptive re-use of the building; (d) The allocation of uses on the Site, and the GFA available in the Multi-Purpose and Administration Building envelopes and the need for additional uses at Wilkinson House; and (e) Taking into consideration items (a) - (d) above whether the loss of any fabric is justified in light of the educational benefits that would result. B23. Any references in the conditions in Schedule 2 above relating to requirements for future development applications for 'new built form', also apply to any future development application that includes works to Wilkinson House.	Heritage Impact is addressed in Section 10.6 of the EIS and is detailed in the Heritage Impact Assessment attached at Appendix H. Streetscape impact is addressed in Section 10.1 of the EIS and is illustrated in the Design Report attached at Appendix C. The allocation of uses and GFA is detailed in Section 3 of the EIS. The GFA analysis demonstrates that the existing school buildings and approved building envelope cannot replace the number of general learning classrooms within Wilkinson House, or additional classrooms that are: ▪ High quality ▪ Flexible and modern ▪ 60sqm+ Therefore, Wilkinson House has been selected as the most appropriate location to continue the adaptive reuse of the building for general learning purposes. The following section details: ▪ The educational needs of SCEGGS. ▪ Constraint and benefit of adaptive reuse of Wilkinson House ▪ Design option analysis

3. SCEGGS EDUCATIONAL NEEDS AND ADAPTIVE REUSE OPTION ANALYSIS

The SCEGGS 2040 Masterplan “Our Path Ahead” (informed the Concept SSD DA), gives form to the school’s vision for the future needs of the school to meet contemporary and evolving learning and education standards.

As outlined within the SCEGGS Darlinghurst 2040 Masterplan, the school is broadly structured with the primary school to the south, administration and shared facilities within the centre of the school, and the secondary school to the north of the site. Wilkinson House is within the secondary school portion of the site.

Given the inner city location and the limited campus area, there is a competing demand for General Learning Areas (GLA**s**) across the secondary school, and an under-supply of good quality GLAs including those currently within Wilkinson House, which are small, dark and irregular in shape and layout.

Aligned with the vision and in consideration of the site constraints and limited site area, there is an immediate need to upgrade facilities that are reaching the end of their practical lifespan and to provide a sufficient number of high-quality classrooms, including those within Wilkinson House, which currently does not meet with the School’s teaching facility needs.

In order to support SCEGGS’s educational vision, it is important to understand the educational needs of SCEGGS, including SCEGGS’s criteria for high quality teaching environments and the current under-supply of GLA’s across the SCEGGS campus.

3.1. SCEGGS ASPIRATION FOR A GOOD QUALITY TEACHING ENVIRONMENT

The best learning outcomes occur when a student and teacher are fully engaged with the learning process within a high-quality learning environment. High quality learning environments incorporates a range of features, including:

- Equitable access across the GLAs and throughout the building in which they are located.
- Regularly shaped classrooms with a minimum area of 60sqm to comply with *The Educational Facilities Standards and Guidelines* (**EFSG**) for secondary school.
- Lage GLAs that allows flexible layout configurations for teaching of individual students, smaller groups or entire classes.
- Access to adequate natural light.
- Access to adequate ventilation and fresh air.
- Easy access to technology (e.g. Wi-Fi, Smartboards, projection equipment etc.).
- Optimum room layout with the ability to utilise at least 3 of 4 walls for teaching purposes (e.g. for the use of projectors or white board).
- Visual connections across the room and maximised sight lines. Visual access is important for teaching purposes, student engagement and for adequate supervision of all students within the classroom.
- Adequate walking space between chair, tables, whiteboards and digital displays to facilitate “immersive” teaching.

3.1.1. The lack of sufficient sized secondary school GLAs across the SCEGGS campus

Currently, the maximum class size for the secondary school is 27 students, and under the EFSG for secondary school, the minimum GLA area is 60sqm for the capacity of 27 students. Maximum class sizes are frequently required for core subjects such as English and Mathematics etc. Some specialist classrooms (such as science labs) require larger area. There is also demand for concurrent spaces for ‘homeroom’ classes, which occur every day. However, specialist classrooms cannot always be scheduled for non-specialist subjects (for instance English cannot be taught in a science lab).

SCEGGS secondary school currently has a total of 50 GLAs that are timetabled across the campus (The 50 GLAs are located across seven existing buildings, including Wilkinson House. Only 24 of these (48%) are GLA's that can accommodate 27 students each (Wilkinson House currently has 4 of these 24 classrooms). A further 21 (42%) of these are specialist classrooms. The remaining GLAs (5 GLAs) are undersized.

There are 25 periods per week (five periods per day) and the timetable runs over a 10 day (2 week) cycle. Therefore, over any two week cycle, there are 24 classrooms with 27 student capacity and 50 (5/day x 5 days x 2 weeks) total periods. This equates to a maximum number of 1,200 timetable 'slots' every 2 weeks that can accommodate a class size of 27 students.

The availability of 60sqm+ classrooms (for maximum class size) and equitable access are two of the main criteria when SCEGGS coordinates its timetable for their students.

Considering the above there are some limitations on how classes can be assigned to the 1,200 available slots including:

- NSW Education Standard Authority (NESA) specifies how many teaching hours need to be allocated to each subject in order to complete the required syllabus. Different subjects therefore require varying allocations throughout the 2 week cycle.
- Subjects need to be evenly distributed across the 10 day cycle. At most, one 80 minutes lesson per subject per day.
- Subjects need to be evenly distributed over the periods within a day (e.g. a mix of AM and PM allocations is required as learning during afternoon periods is more difficult than learning during morning periods due to fatigue).
- Some students with specific accessibility requirements cannot access every available classroom, as some classrooms do not provide accessible access, e.g. lift.

Despite these challenges with timetable allocations, in 2021, 1,043 of the 1,200 available slots (87%) were allocated over the 2 week cycle. This is a significant occupancy rate as the 157 unallocated periods across the 2 week cycle represents 157 periods over 24 classrooms each 10 days or an average vacancy rate of only 0.65 periods per classroom per day [(157/24)/10].

Such a high allocation of existing classrooms leaves no flexibility or capacity to improve timetabling and learning outcomes, which highlights the current need for additional high quality GLA's with 27 student capacity.

Accordingly, there is an immediate demand for large, desirable and equitable classrooms for the secondary school to support high quality education, efficient operation of the school and flexible timetable planning.

3.1.2. Allocation of secondary school GLAs across the SCEGGS campus – within existing and approved facilities

The existing SCEGGS campus comprises an array of different buildings developed over the last century. Each of the existing facility across the campus is highly utilised and currently scheduled for near maximum usage throughout the school term. In order to replace the existing teaching and learning facilities within Wilkinson House, alternate locations would be needed to accommodate the following existing facilities;

- Minimum 4 GLA's with 27 Student capacity (existing allocations is 179/200 periods each 2 week cycle)
- Two GLA's with an 18 student capacity (existing allocation is 52/200 formal periods each 2 week cycle plus up to 140 study period allocations each 2 week cycle)
- Year 12 Common Room
- Academic Support Staff room
- Indigenous Co-ordinators' office
- Four individual Counsellors' offices
- 8 x W.C's
- Careers Centre and Advisors' Office

There are only three existing buildings (excluding Wilkinson House) on campus that are physically capable of housing additional GLAs of 60sqm.

Old Gym Building

The ground level of the old gym building currently provides a large open space for active recreation. This space could potentially be replaced with two GLAs, however the old gym building is not serviced by an accessible lift or equivalent access provision.

More importantly, if this active recreation space is to be replaced with GLA, the existing floorplate dimensions of Wilkinson House could not accommodate a recreational facility to replace the one in the old gym building. The two new GLAs will not make up for the loss of five GLAs in Wilkinson House. On balance, this option is not realistic or feasible as there will be a loss of recreational facility and deficit of three GLA**s**. Lastly, the Concept SSD 8993 also approves the future demolition of the Old Gym Building to enable the construction of a multi-purpose building which will include a range of facilities including additional GLA's.

The Old Gym Building therefore does not provide an opportunity to replace the GLAs in Wilkinson House or accommodate additional GLAs in the short and long term.

Sports Centre

The existing Sports Centre was constructed in 1995 and houses an indoor multipurpose sports court, spectator seating, change facilities and is serviced by a lift. The roof of the Sports Centre accommodates an external sports court with a synthetic grass surface.

The existing Sports Centre provides the only weatherproofed and full size sports courts on campus. Repurposing this space for GLAs would mean:

- The loss of significant sports facility on site.
- The need to secure and additional expense to hire additional 'offsite' sport facilities.
- Result in additional bus traffic to transfer students to the external facility – additional burden to surrounding road network.

The existing Sports Centre therefore does not provide a realistic or viable opportunity to replace the GLAs in Wilkinson House or accommodate additional GLAs.

Auditorium within the Joan Freeman Science & Technology Building

The existing Joan Freeman Building comprise an existing lecture theatre. The theatre is approximately 271sqm and has ceiling height varying from 2.7m to 7.5m. This theatre can potentially accommodate three GLAs with a 27 student capacity and associated access controls.

The existing Wilkinson House has a total GFA of 1,161sqm. Therefore the Joan Freeman building cannot replace the floorspace and teaching facilities within the existing Wilkinson House. In addition, Wilkinson House cannot replace the lecture theatre, due to its heritage constraint, the existing floor level and low ceiling height.

Accordingly, the existing facilities do not have the capacity to replace the GLAs and other existing facilities provided within Wilkinson House or accommodate additional GLA without the great expense to replace the loss of other significant school facilities (e.g. sports and recreational facility).

As part of the Concept SSD 8993, building envelopes for a new administration building and a multipurpose building were approved and will be designed as the subsequent stages of the Concept Approval SSD 8993. GLA allocation has also been investigated in these future building envelopes:

The New Administration Building

The Administration Building envelope will be used as a purpose-built Administration Building which will be designed to replace the 1900 -1930s unsympathetic ad hoc additions to Barham and the Chapel Building. The new administration building envelope is located at the heart of the school and provides centralised administration functions.

The building is envisaged to comprise:

- Revitalised school entry, to provide a welcoming, accessible and secure entry to the school campus

- Main reception.
- Consolidated administrative and staff facilities over 4 levels.

The area of the existing ad hob additions to Barham Building approved for demolition has a GFA of 481.7sqm. The approved area of the new Administration Building has a GFA of 821.2sqm, which provide a net increase of 339.5sqm GFA.

Relocation of some of the existing and centralised administration functions to a detached location, such as Wilkinson House would reduce efficiency and increase administration costs due to an incremental duplication of some purposes.

The approved footprint of the Administration Building is inefficient, which lends itself to smaller layout division, such as for office and workplace. Large format classrooms will not be efficiently arranged across the approved floorplate leading to wasted spaces.

More importantly, the additional GFA (339.5sqm) of the new Administration Building cannot accommodate the additional nine GLAS and additional facilities provided within the proposed Wilkinson House building (with an GFA of 2,035sqm), such as large format GLAs, sports GLAs, staff office, amenities and meeting rooms.

Accordingly, the new administration building is not an appropriate location for additional GLAs.

The new Multipurpose Building

The location for the Multi-Purpose Building envelope is the only remaining location on SCEGGS's campus with an area that allows for large and wide building footprints, which provide the opportunity for large floorplates, double height tiered learning areas and other larger educational and/or sporting facilities.

Specific uses have not been fully determined within the Multi-Purpose Building envelope. However, it is envisaged that the future building will accommodate parking and may comprise a childcare, indoor swimming pool, multimedia room, creative hubs and library. These facilities all require large floorplates on a single level, which only the multi-purpose building envelope can accommodate.

Whilst some GLAs may be located within the multi-purpose building envelope, the approved demolition of the old gym building and the science and library/language buildings (approved under Concept SSD 8993) will also result in the loss of at least 9 GLAs of the existing 50 GLAs, and 7 large spaces which could also be used for GLAs.

The school could not function properly with only 41 classrooms. Therefore, the multi-purpose building envelope will need to replace these six GLAs in addition to providing the other much needed facilities that require large floorplate and meet contemporary educational needs.

Accordingly, given the primary function of the Multipurpose Building is for special facilities that require large floor plates and to replace existing GLAs in the gym building and the science and learning buildings, the Multipurpose Building will not be able to accommodate additional GLAs to replace the classrooms in Wilkinson House.

Adaptive reuse of Wilkinson House building as administration office

As outlined above, the School has an immediate demand for high quality and compliant GLAs. Using Wilkinson House as an administration office will not respond to the School's immediate need for large and flexible classrooms for the secondary 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. The reasons why Wilkinson House cannot be used solely for administration purposes is outlined below:

- Administration functions need to be located near the main access point of the campus, for purposes such as reception/visitor sign in, enrolment inquires, mail delivery etc.
- Splitting the administration functions of the school across multiple sites is inefficient and does not serve the needs of a school.
- By fragmenting the existing centralised administration zone located at the centre of the school, will adversely impact on the functionality and operational efficiency of the School and the required access by

the students, parents, and teachers to various administrative functions. Therefore, admin use will be consolidated in a purpose built building (New Administration Building) which is centrally located.

- It is important to note that Wilkinson House has been used for teaching purposes for 20 years.
- The retained Barham House combined with the new Administration Building are not large enough to replace the GFA proposed within the Wilkinson House (which is to accommodate large, regular shaped GLAs for secondary school and ancillary amenity and staff facilities).

Accordingly, Wilkinson House should not be used for administration purposes and should continue to be used as a building for teaching purposes.

Overall and in consideration of the above, high quality, 60sqm+ and sufficient number of GLAs cannot be accommodated within the existing and future built form within SCEGGS campus. In order to address SCEGGS immediate need for good quality learning environment and to accommodate adequate number of secondary school GLAs, Wilkinson House has been selected as the most appropriate location to continue the adaptive reuse of the building for general learning purposes.

3.2. THE NEED TO UPGRADE WILKINSON HOUSE

Wilkinson House was purchased by the School in 1960. The building has formed part of the SCEGGS Darlinghurst campus for 61 years. The School converted the former residential flat building into boarding facilities in 1962. Upon the closure of on-site boarding facilities in 2001, Wilkinson House was adaptively reused for classroom and staff facilities.

In the past 20 years, the school has adaptively reused the original residential building for teaching purposes, including general learning areas, staff rooms, study and student rooms.

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

The current Wilkinson House has the following constraints:

- **Generally suffers from a lack of adequately sized, large flexible GLAs** – Currently, Wilkinson House accommodates five learning spaces varying in size from 41sqm to 57sqm, which do not comply with EFSG requirements.

  In addition, the School's experience from using Wilkinson House since 2001 is that the layout of the learning spaces do not work well, because they are:

  – Dark, irregular spaces with pockets and corners of spaces obscuring visual connection and surveillance of students.

  – Inadequate sightlines and difficult to access

  – Irregular room shapes hinder flexibility in setting up varied learning configurations.

- **The existing building is not BCA/construction code compliant**

  – Egress width through the main stair is only 900mm, compared to the BCA minimum requirement of 1000mm for egress.

  – The balustrade to the main circulation stair is only 950mm high, compared to the BCA minimum requirement of 1000mm minimum for safety.

  – The main stair does not provide compliant riser heights, making movement through unsafe.

  – The use of combustible material such as timber for the balustrade is not compliant and poses a fire hazard.

  – The building structure does not comply with current codes (e.g. earthquake codes).

  – Current ceiling height are lower than the minimum National Construction Code required 2400mm, and well below the minimal NSW Department of Education required ceiling height of 2.7m

- **The building does not provide equitable access:**

- No equitable access is provided to Wilkinson House from the wider campus. Access to Wilkinson House is via an arrangement of narrow ramps between Wilkinson House southern facade and the Centenary Sports Hall, and wayfinding is not clear. Entry into Wilkinson House is via a narrow side entry door on each level.
- No equitable access is provided within Wilkinson House. Access within Wilkinson House is via narrow corridors and a narrow stair that do not properly cater for the volume of students moving between classes or two-way circulation, which results in bottlenecks.
- The main circulation stair does not incorporate compliant handrails, contrasting nosing and tactile indicators.
- SCEGGS has a number of students with mobility issues and the lack of equitable access in Wilkinson House creates a major issue for timetabling. More importantly it means it cannot be accessed by all school students.

- **Poor building amenity:**
  - The façade, windows, doors and the roof of the existing building are poorly insulated with non-compliant thermal performance resulting in higher levels of heat gain and heat loss. The lack of shading on windows results in blinds being drawn for the majority of the day. The environmentally inefficient nature of the façade and roof results in high energy usage and any simple addition of insulation to perimeter surfaces will further reduce the size of available learning spaces.
  - The existing façade contains small 'domestic' windows originally designed for a series of smaller residential spaces which provide low levels of natural light and inadequate natural ventilation. The lack of shading results in the blinds on poorly performing glass windows being closed as a result of solar heat gain and solar glare.

Considering the above, it is evident that Wilkinson House is required to be upgraded to comply with current accessibility and building code, as well as to provide better quality GLAs in order to facilitate for the continuation of adaptive reuse of this building over time for educational purposes.

The section below will explore the constraint and benefits associated with the adaptive re-use of Wilkinson House for educational purposes.

3.3. CONSTRAINTS AND BENEFITS ASSOCIATED WITH THE ADAPTIVE RE-USE OF WILKINSON HOUSE

3.3.1. The Constraints

- High cost associated with restoring and retaining the building:

  Response: the School is committed to undertake restoration works and investing in additional construction funds to retain the building's key heritage elements, particularly the building elements that have a significance to the streetscape or internal building elements that have being identified as significant to the building.

- Existing building structural constraints, including structural load.

  Response: Construction and structural methods can be investigated to ensure the retained heritage fabric is protected during construction.

- Loss of heritage fabric.

  Response: Any proposed changes to Wilkinson House will be guided by Wilkinson House CMP policies, which will ensure the preservation of the most significant elements, including the façade and internal lobby. Other elements can be interpreted, such as room layout and central stairs in compliance with the policies forming part of the CMP for Wilkinson House.

- The existing building envelope limits spatial planning flexibility.

  Response: future design will need to consider the existing footprint and floorplate of Wilkinson House and adapt internal layout planning within the existing footprint of the building, with some degree of flexibility provided via heritage sensitive minor additions.

- Working with an existing heritage building may limit the incorporation of passive heating and cooling systems.
- Response: creative and contemporary design solutions can be explored to improve amenity of the building, guided by qualified heritage and sustainability consultants. A highly efficient façade insulation system can be explored to mitigate the constraints of the existing heritage fabric and reduce heat gains while maximising natural daylight into classroom spaces.

Overall, despite the constraints associated with adaptive reuse of Wilkinson House, SCEGGS and its project design team is committed to exploring and adopting construction and design responses to minimise intervention to the significant building fabric. These associated constraints can therefore be resolved to preserve elements of high heritage significance and still meet the basic educational needs of the school (more large, flexible classrooms).

3.3.2. The Benefits/Opportunities

- Heritage benefits
  - Opportunity to restore the heritage façade and increase the building's contribution to the streetscape by removing unsympathetic additions (e.g. security bars).
  - Adaptive reuse will ensure longevity of the building, so the building can continue to be used and appreciated by both SCEGGS and the broader community for future decades.
  - Opportunity for the preservation of the heritage significant building elements (as identified by the Wilkinson House CMP).
  - Opportunity to provide a visual link to the past history for future generations. Heritage value can be enhanced not just from the retention of heritage elements, but also from their adaptation into accessible and useable places.
- Educational and functional benefit
  - Opportunity to create nine new high quality GLAs and two sports GLA's, which comply with relevant codes and standards, including EFSG requirement and provide high quality and accessible learning environments.
  - Opportunity to provide compliant and accessible ancillary facilities, including staff support offices, toilets, meeting rooms and breakout rooms.
  - Opportunity to provide large flexible, collaborative learning spaces that meet the functional requirement for contemporary learning environments.
  - Opportunity to provide additional active recreational learning and sports training for a very space constrained inner-city school.
- BCA and Accessibility
  - Upgrade opportunities to meet BCA compliance, including the provision of a compliant 5.4m wide central staircase, which will provide improved access and circulation for student volumes and double as a compliant fire egress route.
  - Opportunity to upgrade to a fully accessible building via a lift addition and accessible amenities, which is a key objective for all schools.
  - Wilkinson Houses is located between the existing Joan Freeman Science and Technology Building and the Sports Hall. This location provides great opportunity to enhance equitable pedestrian links to other existing educational facilities within the campus. This will enable the secondary school to have more equitable linkages between facilities and spaces for all students.
  - Opportunity to minimise the level change between the north and south parts of the building, with the aim to provide equitable access to as much of the building as possible.
- Amenity benefits
  - Opportunity for new operable windows and doors to provide vastly improved natural ventilation.

  - Opportunity for new concrete structures which will provide compliant fire safety, thermal mass, acoustic attenuation and durability.
  - Opportunity for glazing to provide more natural light and ventilation.
- ESD benefits
  - The reuse of the existing heritage facade of the building will reduce the project's material consumption significantly when compared to a new building, which will reduce the construction waste and carbon emission. It is estimated that reusing the existing building façade and element can reduce its associated emissions by around 15%.
  - Opportunity to set a design benchmark to incorporate design principles which achieve an Australian Excellence (5 Star) rating.
  - Opportunity to incorporate PV solar farm on the roof to achieve sustainability targets.
- CPTED benefits
  - Opportunity to replace existing narrow corridors, blind corners and small rooms. This will ensure way finding is easier and safer for staff, students, and visitors and provides more opportunities for natural surveillance.
  - Opportunity for the internal floorplan to be designed as open plan demonstrates good territorial reinforcement, so it is welcoming and encourages use and social interaction between students and staff.
  - Opportunity to remove security bars from the windows of Wilkinson House will reduce obstruction of sightlines both into and from the building, maximising natural surveillance and reduce the number of potential foot or hand-holds for perpetrators of crime who may intend to scale the building.

Overall, the constraints associated with the adaptive reuse of the building can be resolved, and is justified in light of the above mentioned benefits (including educational benefits) that would result with the adaptive reuse of the building. In conclusion, the number of benefits outweighs constraints, and the proposed adaptive reuse of Wilkinson House for educational purposes is justified.

3.4. ALTERNATIVE DESIGN OPTION ANALYSIS

To respond to the SEARs requirement of project alternatives and in order to better preserve the heritage significance of the building alternative design options were considered. These include:

- Alternative Design options for the adaptive reuse of Wilkinson House
- Design options for the location of the lift and stair

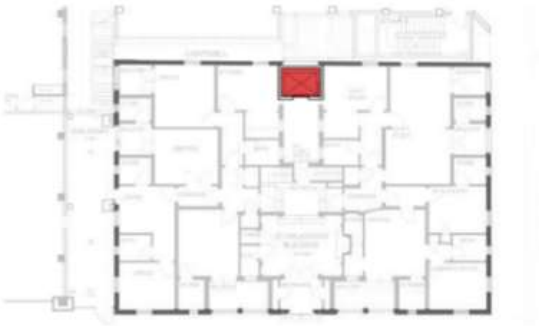
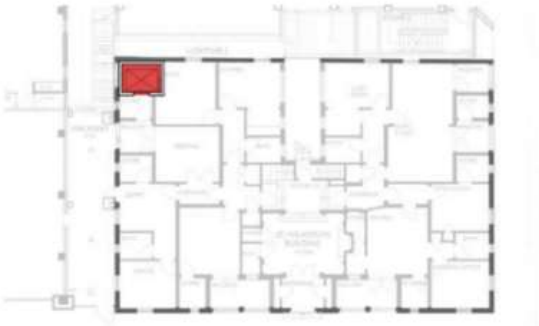
Each option was developed with input from a specialist consultant team to a level of detail that allows the impact and implications of each option to be appropriately analysed and understood.

Table 4 Alternative Design Options

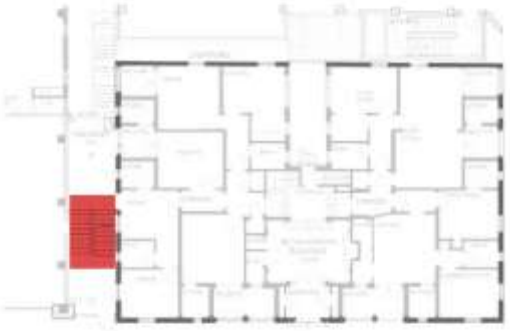
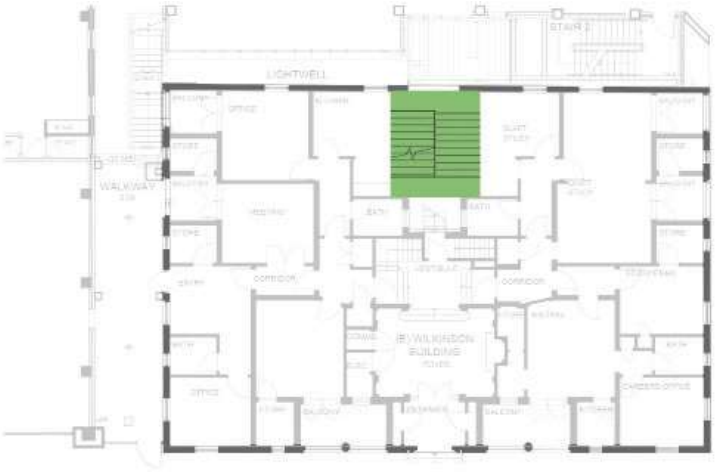
Option	Assessment
Alternative Design options for the adaptive reuse of Wilkinson House	Since the IPC determination, SCEGGS has explored a range of options for the adaptive re-use of the existing Wilkinson House via a 4 month voluntary architectural concept design competition process. Urbis Heritage was 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.

Option	Assessment
	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 ▪ 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 (which include Urbis Heritage) 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 functional teaching and learning facilities. ▪ Illustrates contemporary and flexible working environment that can accommodate full classroom sizes. ▪ Provides, inclusive, secure and inspiring spaces for students. ▪ Incorporates Environmentally Sustainable Design features. ▪ Delivers a functional design outcome. ▪ Relies on an achievable construction process. ▪ 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 Wilkinson House façades, with additions proposed to the southern elevation of the building to provide accessible connections to the broader campus, including Sprots Hall and Joan Freeman. – 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 learning spaces and associated facilities that will meet contemporary learning standards.

Option	Assessment
	– Provide additional collaboration recreation and sporting facilities within the Wilkinson House footprint. – Provide opportunity to sensitively interpret previous wall layouts in new floor and ceiling finishes and reinterpret the internal non-compliant staircase through artwork.
Design options for the location of the lift and stairs	In accordance with the Conservation Management Plan for Wilkinson House, and as part of the detailed design process, alternative design options for the lift extension and internal staircase have been explored by Smart Design Studio. This is illustrated in the design report attached at Appendix C and discussed in the following sections. The following criteria have been established to test the location of the new lift: ▪ Can be articulated as new built form to complement existing heritage building ▪ Does not break the roof form of Wilkinson House ▪ Does not block the original entry of Wilkinson House ▪ Does not take up internal floorspace required for large GLAs ▪ Facilitates strategic location of main stair and resulting circulation Three locations have been tested and assessed against these criteria. The preferred and proposed option is to locate the lift addition adjacent to the southern façade. This location was selected as: ▪ It can accommodate a stretcher for emergencies, independent to Wilkinson House. ▪ The required lift overrun, which rises above Wilkinson House, does not interfere with the roof form. ▪ The location of the lift frees up internal space for large and flexible GLAs

Option	Assessment
	LIFT TEST OPTION 1 ☒ Strategic location ☑ Does not take up internal floorspace required for large GLA ☒ Does not break roof form of Wilkinson House ☒ Does not block original entry of Wilkinson House ☒ Can be articulated as new built form to complement existing buildings ☑ Facilitates strategic location of main stair and resulting circulation  **LIFT TEST OPTION 2** ☒ Strategic location ☑ Does not take up internal floorspace required for large GLA ☑ Does not break roof form of Wilkinson House ☑ Does not block original entry of Wilkinson House ☑ Can be articulated as new built form to complement existing buildings ☒ Facilitates strategic location of main stair and resulting circulation  **LIFT TEST OPTION 3** ☒ Strategic location ☒ Does not take up internal floorspace required for large GLA ☒ Does not break roof form of Wilkinson House ☑ Does not block original entry of Wilkinson House ☑ Can be articulated as new built form to complement existing buildings ☒ Facilitates strategic location of main stair and resulting circulation  **LIFT BEST OPTION** ☑ Strategic location ☑ Does not take up internal floorspace required for large GLAs ☑ Does not break roof form of Wilkinson House ☑ Does not block original entry of Wilkinson House ☑ Can be articulated as new built form to complement existing buildings ☑ Facilitates strategic location of main stair and resulting circulation 

Option	Assessment
	The following criteria have been established to test the location of a compliant internal staircase: ▪ Preserves impression and function of lightwell ▪ Preserves heritage entrance lobby and lounge hall ▪ Does not take up internal floorspace required for large GLA ▪ Location allows wide stair ▪ Allows natural light and ventilation ▪ Does not block original entry of Wilkinson House ▪ Central location facilitates clear, logical and safe circulation Three locations have been tested and assessed against the above criteria. The preferred and proposed location of the new staircase was selected as: ▪ A new, compliant stair is proposed in the location where the original lightwell is located. This will preserve the historical function and impression of the lightwell in its current location. ▪ The location of the stair sets up a clear circulation strategy that allows the creation of the largest number of large, flexible GLAs within the envelope of Wilkinson House. ▪ The circulation strategy echoes and simplifies the original circulation pattern of Wilkinson House whilst preserving the function of the lightwell.

Option	Assessment
	STAIR TEST OPTION 1 ☒ Strategic location ☑ Does not take up internal floorspace required for large GLA ☑ Location allows wide stair ☒ Allows natural light and ventilation ☒ Does not block original entry of Wilkinson House ☑ Preserves impression and function of lightwell ☑ Central location facilitates clear, logical and safe circulation ☒ Preserves heritage entrance lobby and lounge hall  **STAIR TEST OPTION 2** ☑ Strategic location ☑ Does not take up internal floorspace required for large GLA ☒ Location allows wide stair ☑ Allows natural light and ventilation ☑ Does not block original entry of Wilkinson House ☑ Preserves impression and function of lightwell ☒ Central location facilitates clear, logical and safe circulation ☑ Preserves heritage entrance lobby and lounge hall  **STAIR TEST OPTION 3** ☒ Strategic location ☒ Does not take up internal floorspace required for large GLA ☒ Location allows wide stair ☒ Allows natural light and ventilation ☑ Does not block original entry of Wilkinson House ☑ Preserves impression and function of lightwell ☒ Central location facilitates clear, logical and safe circulation ☑ Preserves heritage entrance lobby and lounge hall  

4. SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The following table provides a summary of the SEARs and outlines where the requirements are addressed in the main body of the report or appendices (i.e. specialist consultant report).

Table 5 Summary of SEARs

SEARs Requirement	Response
General Requirements	
The Environmental Impact Statement (**EIS**) must be prepared in accordance with and meet the minimum requirements of clauses 6 and 7 of Schedule 2 the Environmental Planning and Assessment Regulation 2000 (the Regulation). In addition, the EIS must include: (a) an executive summary. (b) a complete description of the development, including: – the need for the development. – justification for the development. – suitability of the site. – alternatives considered. – likely interactions between the development and existing, approved and proposed operations in the vicinity of the site. – a description of any proposed building works. – a description of existing and proposed operations, including: – staff and student numbers, hours of operation, and details of any proposed before/after school care services and/or community use of school facilities. – details of how the school would continue to operate during construction activities, including proposed site management and mitigation measures to ensure the safety of users. – site survey plan, showing existing levels, location and height of existing and adjacent structures / buildings and site boundaries. – a detailed constraints map identifying the key environmental and other land use constraints	Executive summary is provided at the front of the EIS. The need for the development, justification for the development and alternatives are discussed in Section 3. Suitability of the site is discussed in Section 11.7. Description of the proposal is provided in Section 7. The proposal does not seek to change the existing and approved staff and student number. Operation details, including after hour use is describes in Section 7.1.6. Construction management measures including decanting strategy is described in Section 7.1.7. Site survey is attached at Appendix B. Constraint is detailed in Section 3.3.1.

SEARs Requirement	Response
that have informed the final design of the development. – plans, elevations and sections of the proposed development. – cladding, window and floor details, including external materials. – a site plan showing all infrastructure and facilities (including any infrastructure that would be required for the development, but the subject of a separate approvals process). – plans and details of any advertising/business identification signs to be installed, including size, location and finishes. – a description of any proposed construction or operational staging including relevant timing and dependencies. – details of construction and decommissioning including timing. – an estimate of the retained and new jobs that would be created during the construction and operational phases of the development along with details of the methodology to determine the figures provided. (c) a detailed assessment of the key issues identified below, and any other significant issues identified in the risk assessment, including: – a description of the existing environment, using sufficient baseline data and methodology to establish baseline conditions. – an assessment of the potential impacts of all stages of the development on all potentially impacted environments, sensitive receivers, stakeholders and future developments. The assessment must consider any relevant legislation, policies and guidelines. – consideration of the cumulative impacts due to other related development proposed or underway on the site, including development progressed under other assessment pathways and all other developments in the vicinity (completed, underway or proposed).	Architectural plan, including site plan and material and colour schedule is attached at Appendix D. No signage is proposed as part of this application. No construction or operational staging is required for this proposal. Details on construction and decommissioning including timing is provided in Section 7.1.7. Estimated construction job is detailed in the quantity surveyors statement attached at Appendix A. The proposal will not result in the creation of operational jobs. Assessment of the key issues identified is detailed in Section 10.

SEARs Requirement	Response
– identification of all proposed monitoring or required changes to existing monitoring programs. – measures to avoid, minimise and if necessary, offset predicted impacts, including detailed contingency plans for managing any significant risks to the environment and triggers for each action. – details of alternative measures considered. (d) a consolidated summary of all the proposed environmental management and monitoring measures, identifying all commitments included in the EIS. (e) the reasons why the development should be approved and a detailed evaluation of the merits of the development, including consequences of not carrying out the development.	Mitigation measures are summarised in Section 10.15 of the EIS. Evaluation of the proposal is provided in Section 11 of the EIS.
The EIS must be accompanied by a report from a qualified quantity surveyor providing a detailed calculation of the capital investment value (**CIV**) (as defined in clause 3 of the Regulation) of the proposal, including details of all assumptions and components from which the CIV calculation is derived.	Detailed calculation of the capital investment value is attached at Appendix A.
Key issues	
1. Statutory Context, Strategic Context and Policies Address the statutory provisions contained in all relevant legislated and draft environmental planning instruments, including but not limited to: ▪ State Environmental Planning Policy (State and Regional Development) 2011. ▪ State Environmental Planning Policy (Infrastructure) 2007. ▪ State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017. ▪ State Environmental Planning Policy No 64 – Advertising and Signage. ▪ State Environmental Planning Policy No 55 – Remediation of Land. ▪ Draft State Environmental Planning Policy (Remediation of Land). ▪ Draft State Environmental Planning Policy (Environment).	Statutory provision, including relevant environmental planning instrument and projects compliance is assessed in Section 8 of the EIS.

SEARs Requirement	Response
▪ Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities). ▪ Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 ▪ Sydney Local Environmental Plan 2012. Having regard to the relevant environmental planning instruments: ▪ address the permissibility of the development, including the nature and extent of any prohibitions. ▪ identify compliance with the development standards applying to the site and provide justification for any contravention of the development standards. ▪ adequately demonstrate and document how each of the provisions in the listed instruments are addressed, including reference to necessary technical documents. Address the relevant planning provisions, goals and strategic planning objectives in all relevant planning policies including but not limited to the following: ▪ NSW State Priorities. ▪ State Infrastructure Strategy 2018 – 2038 Building the Momentum. ▪ Future Transport Strategy 2056. ▪ Crime Prevention through Environmental Design (**CPTED**) Principles. ▪ Better Placed: An integrated design policy for the built environment of New South Wales (Government Architect NSW (**GANSW**), 2017). ▪ Healthy Urban Development Checklist (NSW Health, 2009). ▪ Draft Greener Places Design Guide (**GANSW**). ▪ The Greater Sydney Region Plan - A Metropolis of Three Cities. ▪ Eastern City District Plan. ▪ City Plan 2036: Local Strategic Planning Statement. ▪ Sydney Development Control Plan 2012.	Strategic context and polices are discussed in Section 6 of the EIS.

SEARs Requirement	Response
2. Concept Proposal for the Redevelopment of SCEGGS Darlinghurst (SSD- 8993) In accordance with the Environmental Planning and Assessment Act 1979, demonstrate that the proposal is consistent with the approved Concept Proposal for the redevelopment of the SCEGGS Darlinghurst (**SSD**-8993).	The proposal's consistency with the approved Concept Proposal for the redevelopment of the SCEGGS Darlinghurst (SSD-8993) is assessed in Section 2.3 of the EIS.
3. Built Form and Urban Design Assess how the proposed built form is consistent with and located in accordance with the built form, urban design and landscaping conditions imposed under SSD-8993. Address: ▪ the height, density, bulk and scale, setbacks and interface of the development in relation to the surrounding development, topography, streetscape and any public open spaces. ▪ design quality and built form, with specific consideration of the overall site layout, streetscape, open spaces, façade, rooftop, massing, setbacks, building articulation, materials and colour palette. ▪ how good environmental amenity would be provided, including access to natural daylight and ventilation, acoustic separation, access to landscape and outdoor spaces and future flexibility. ▪ how design quality will be achieved in accordance with Schedule 4 Schools – design quality principles of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 and the GANSW Design Guide for Schools (GANSW, 2018). ▪ how services, including but not limited to waste management, loading zones, and mechanical plant are integrated into the design of the development. Provide: ▪ a visual impact assessment that identifies any potential impacts on the surrounding built environment and landscape including views to and from the site and any adjoining heritage items.	Built form and urban context of the proposal is addressed in Section 10.1 of the EIS and detailed in the Design Report prepared by Smart Design Studio and is attached at Appendix C. Consistency with Schedule 4 Schools – design quality principles of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 and the GANSW Design Guide for Schools (GANSW, 2018) is detailed in the Design Report prepared by Smart Design Studio and is attached at Appendix C. View impact is assessed in Section 10.3.2 of the EIS and is modelled in the view Impact assessment provided at Appendix E.
4. Trees and Landscaping Provide:	No trees are proposed to be removed as part of the application. Therefore, an arboricultural impact assessment is not required.

SEARs Requirement	Response
▪ where relevant, an arboricultural impact assessment prepared by a Level 5 (Australian Qualifications Framework) Arborist, which details the number, location and condition of trees to be removed and retained, includes detailed justification for each tree to be removed and details the existing canopy coverage on-site. ▪ Where relevant, a detailed landscape plan prepared by a suitably qualified person. Relevant Policies and Guidelines: ▪ Australian Standard 4970 Protection of trees on development sites. ▪ Draft Greener Places Design Guide (**GANSW**). ▪ Objective 30 of The Greater Sydney Region Plan - A Metropolis of Three Cities. ▪ Technical Guidelines for Urban Green Cover in NSW (Office of Environment and Heritage (**OEH**), 2015). ▪ Greening Sydney Plan 2020 ▪ City of Sydney Landscape Code Volume 2. ▪ City of Sydney Green Roof and Walls Policy.	Landscape plan is provided at Appendix F and landscape design is detailed in Section 7.1.4.
5. Environmental Amenity Assess amenity impacts on the surrounding locality, including addressing conditions imposed under SSD-8993. Provide: ▪ shadow diagrams. ▪ a view analysis, where relevant, of the site from key vantage points and streetscape locations and public domain including photomontages or perspectives showing the proposed and likely future development. ▪ an analysis of proposed lighting that identifies lighting on-site that will impact surrounding sensitive receivers and includes mitigation management measures to manage any impacts. ▪ a view impact assessment that has been prepared in accordance with the established planning principles.	Shadow diagram is provided in Appendix D. Shadow impact is assessed in Section 10.3.1 of the EIS. Streetscape and visual analysis are detailed in Section 10.1 of the EIS. Lighting impact is discussed in Section 10.3.4 of the EIS and is detailed in the Lighting Strategy attached at Appendix G. View impact is assessed in Section 10.3.2 of the EIS and is modelled in the View Impact assessment provided at Appendix E.
6. Transport and Accessibility (a) Address the Traffic, Access, Car and Bicycle Parking conditions imposed under SSD-8993.	Traffic, Access, Car and Bicycle Parking conditions imposed under SSD-8993 have been addressed in the Traffic and Parking Report attached at Appendix L.

SEARs Requirement	Response
(b) analysis of the impacts due to the operation of the proposed development, including: – proposed modal split for all users of the development including vehicle, – pedestrian, bicycle riders, public transport and other sustainable travel – modes. (c) a clear explanation and justification of the: – assumed growth rate applied. – volume and distribution of proposed trips to be generated. – type and frequency of vehicles accessing the site.	Traffic and parking assessment is provided in Section 10.4 of the EIS.
(d) adequacy of the existing / proposed pedestrian infrastructure to enable convenient and safe access to and from the site for all users. (e) analysis of the impacts of the traffic generated during construction (if any) of the proposed development, including: – construction vehicle routes, types and volumes. – construction program (duration and milestones). – on-site car parking and access arrangements for construction, emergency and construction worker vehicles. – cumulative impacts associated with other construction activities in the locality (if any). – road safety at identified intersections and level crossings near the site due to conflicts between construction vehicles and existing traffic in the locality. – measures to mitigate impacts, including to ensure the safety of pedestrian and cyclists during construction. (f) a preliminary Construction Traffic and Pedestrian Management Plan. Note: Further guidance is provided in the TfNSW advice attached to the SEARs. Relevant Policies and Guidelines:	Operational transport and pedestrian access management plan is attached at Appendix M. A preliminary Construction Traffic and Pedestrian Management Plan is attached at Appendix O.

SEARs Requirement	Response
(g) Guide to Traffic Generating Developments (Roads and Maritime Services, 2002). (h) EIS Guidelines - Road and Related Facilities (Department of Urban Affairs and Planning (**DUAP**), 1996). (i) Cycling Aspects of Austroads Guides. (j) NSW Planning Guidelines for Walking and Cycling (Department of Infrastructure, Planning and Natural Resources (**DIPNR**), 2004). (k) Guide to Traffic Management Part 12: Integrated Transport Assessments for Developments (Austroads, 2020). (l) Australian Standard 2890.3 Parking facilities, Part 3: Bicycle parking (AS 2890.3).	
7. Ecologically Sustainable Development (ESD) ▪ Address the Ecologically Sustainable Development conditions imposed under SSD-8993. ▪ Identify: – proposed measures to minimise consumption of resources, water (including water sensitive urban design) and energy. – how environmental design will be achieved in accordance with the GANSW Environmental Design in Schools Manual (GANSW, 2018). ▪ Provide: – an assessment against an accredited ESD rating system or an equivalent program of ESD performance. This should include a minimum rating scheme target level. Relevant Policies and Guidelines: ▪ City of Sydney Design for Environmental Performance Template.	ESD measures is outlined in Section 10.5 of the EIS and is detailed in the ESD report attached at Appendix P. The ESD report also address the ESD conditions imposed under SSD-8993.
8. Heritage ▪ Address the conditions imposed under SSD-8993 in relation to Heritage and Wilkinson House. ▪ Provide a Statement of Heritage Impact (**SOHI**) prepared by a suitably qualified heritage consultant in accordance with the guidelines in the NSW Heritage Manual (Heritage Office and DUAP, 1996) and Assessing Heritage Significance (OEH, 2015). The SOHI is to address the	Heritage impact, including addressing conditions under SSD 8993 is discussed in Section 10.6 and detailed in the Heritage Impact Assessment attached at Appendix H. The Heritage Impact Assessment also outlines how the proposal is consistent

SEARs Requirement	Response
impacts of the development on the heritage significance of the site and adjacent areas and is to identify: – how the development is consistent with any relevant Conservation Management Plan. – all heritage items (state and local) within the vicinity of the site including built heritage, landscapes and archaeology, curtilage and setting of the items, detailed mapping of these items, and assessment of why the items and site(s) are of heritage significance. – the impacts of the development on heritage item(s), heritage significance or cultural heritage values of the site, including visual impacts, required BCA and DDA works, new fixtures, fittings and finishes, any modified services. – the attempts to avoid and/or mitigate the impact on the heritage item(s), heritage significance or cultural heritage values of the site. – the attempts to interpret the heritage significance identified into the development. – justification for any changes to the heritage fabric or landscape elements including any options analysis.	with the policies within the Wilkinson House CMP.
▪ If the SOHI identifies impact on potential historical archaeology, a historical archaeological assessment should be prepared by a suitably qualified archaeologist in accordance with the Archaeological Assessment Guidelines (NSW Heritage Office, 1996) and Assessing Significance for Historical Archaeological Sites and 'Relics' (Heritage Council of NSW, 2009). This assessment should identify what relics, if any, are likely to be present, assess their significance and consider the impacts from the development on this potential archaeological resource. Where harm is likely to occur, it is recommended that the significance of the relics be considered in determining an appropriate mitigation strategy. If harm cannot be avoided in whole or part, an appropriate Research Design and Excavation Methodology should also be prepared to guide any proposed excavations or salvage programme.	A historical archaeological assessment has been prepared by a suitably qualified archaeologist and is attached at Appendix I.
9. Aboriginal Cultural Heritage ▪ Provide an Aboriginal Cultural Heritage Assessment Report (**ACHAR**) that:	An Aboriginal Cultural Heritage Assessment is discussed in Section 10.8 of the EIS and attached at Appendix K

SEARs Requirement	Response
– identifies and describes the Aboriginal cultural heritage values that exist across the site. – includes surface surveys and test excavations where necessary. – has been prepared in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH, 2010). – incorporates consultation with Aboriginal people in accordance with Aboriginal Cultural Heritage Consultation Requirements for Proponents (Department of Environment, Climate Change and Water, 2010). – documents the significance of cultural heritage values of Aboriginal people who have a cultural association with the land. – identifies, assesses and documents all impacts on the Aboriginal cultural heritage values. – Demonstrates attempts to avoid any impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR and EIS must outline measures proposed to mitigate impacts. – demonstrates attempts to interpret the Aboriginal cultural heritage significance identified into the development. Any Aboriginal objects recorded as part of the Aboriginal Cultural Heritage Assessment Report must be documented and notified to the Aboriginal Heritage Information Management System (**AHIMS**) within Heritage NSW of the Department of Premier and Cabinet.	
10. Social Impacts Provide a Social Impact Assessment prepared in accordance with the draft Social Impact Assessment Guideline 2020. Relevant Policies and Guidelines: Draft Social Impact Assessment Guideline 2020 (Department of Planning, Industry and Environment)	Social Impact is discussed in Section 10.9 of the EIS and is detailed in Appendix BB.

SEARs Requirement	Response
11. Noise and Vibration ▪ Provide a noise and vibration impact assessment that: – includes a quantitative assessment of the main noise and vibration generating sources during demolition, site preparation, bulk excavation and construction. – details the proposed construction hours and provide details of, and justification for, instances where it is expected that works would be carried out outside standard construction hours. – includes a quantitative assessment of the main sources of operational noise, including consideration of any public-address system, school bell, mechanical services (e.g. air conditioning plant) and any out of hours community use of school facilities. – outlines measures to minimise and mitigate the potential noise impacts on nearby sensitive receivers. – considers sources of external noise intrusion in proximity to the site (including, road rail and aviation operations) and identifies building performance requirements for the proposed development to achieve appropriate internal amenity standards. – demonstrates that the assessment has been prepared in accordance with polices and guidelines relevant to the context of the site and the nature of the proposed development. Relevant Policies and Guidelines: ▪ NSW Noise Policy for Industry 2017 (NSW Environment Protection Authority (**EPA**). ▪ Interim Construction Noise Guideline (Department of Environment and Climate Change, 2009). ▪ Assessing Vibration: A Technical Guideline 2006 (Department of Environment and Conservation, 2006).	Noise and vibration impact assessment is discussed in Section 10.10 of the EIS and Appendix R.
12. Biodiversity Provide a Biodiversity Development Assessment Report (BDAR), that assesses the biodiversity impacts of the proposed development in accordance with the requirements of the Biodiversity Conservation Act 2016, Biodiversity	DPIE and the Office of Environment and Heritage each confirmed in a letter dated 2 July 2021 (refer Appendix GG) that the development is not likely to have any significant impact on biodiversity values,

SEARs Requirement	Response
Conservation Regulation 2017 and Biodiversity Assessment Method, except where a BDAR waiver has been issued in relation to the development or the development is located on biodiversity certified land. Where a BDAR is not required, because a BDAR waiver has been issued, in relation to the development, provide: ▪ a copy of the BDAR waiver and demonstrate that the proposed development is consistent with that covered in BDAR waiver. ▪ an assessment of flora and fauna impacts where significant vegetation or flora and fauna values would be affected by the proposed development.	and therefore the SSD DA is not required to be accompanied by a Biodiversity Development Assessment Report. As such, the proposal meets the requirements of the *Biodiversity Conservation Act* 2016 and the proposal will not impact on any significant vegetation or flora and fauna value.
13. Contributions Identify: ▪ any Section 7.11/7.12 Contribution Plans, Voluntary Planning Agreements or Special Infrastructure Contribution Plans that affect land to which the application relates or the proposed development type. ▪ any contributions applicable to the proposed development under the identified plans and/or agreements. Justification is to be provided where it is considered that the proposed development is exempt from contribution. ▪ any actions required by a Voluntary Planning Agreement or draft Voluntary Planning Agreement affecting the site or amendments required to a Voluntary Planning Agreement affected by the proposed development.	The site is covered by the City of Sydney's Development Contributions Plan. It is important to note that the proposal will not increase student or staff population. Therefore contribution should be calculated based on the additional GFA proposed to Wilkinson House. Development contribution under section 7.11 of the EP&A Act will be paid to Council in relation to the Sydney Development Contributions Plan 2015 for the additional gross floor area of 521.7 square metres (Proposed 1,683.6sqm – existing 1,161.9sqm) as the result of the proposed Wilkinson House detailed design.
14. Staging Assess impacts of staging where it is proposed and detail how construction works, and operations would be managed to ensure public safety and amenity on and surrounding the site.	The construction and operation is not proposed to be staged.
15. Utilities Address the Utilities conditions imposed under SSD-8993.	Utilities is addressed in Section 10.11 of the EIS and is detailed in Appendix CC.
16. Stormwater and flooding Address the Stormwater and Flooding conditions imposed under SSD-8993. Relevant Policies and Guidelines:	Stormwater and flooding are addressed in Section 10.12 of the EIS and detailed in Appendix W.

SEARs Requirement	Response
▪ NSW Floodplain Development Manual (DIPNR, 2005). ▪ City of Sydney Interim Floodplain Management Policy. ▪ City of Sydney Stormwater Drainage Manual.	
17. Soil and Water Provide: ▪ an assessment of potential impacts on surface and groundwater (quality and quantity), soil, related infrastructure and watercourse(s) where relevant. ▪ Details of measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles. ▪ an assessment of salinity and acid sulphate soil impacts, including a Salinity Management Plan and/or Acid Sulphate Soils Management Plan, where relevant. **Relevant Policies and Guidelines:** ▪ Managing Urban Stormwater - Soils and Construction Volume 1 (Landcom, 2004). ▪ Acid Sulfate Soil Manual, (NSW Acid Sulfate Soil Management Advisory Committee, 1998). ▪ Acid Sulfate Soils Assessment Guidelines (DoP, 2008). ▪ 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).	Sediment, erosion and dust control plan is attached at Appendix U. Acid sulfate soil is addressed in section 8.8 of the EIS and is attached at Appendix II.
18. Waste Address the Waste conditions imposed under SSD-8993. Relevant Policies and Guidelines: ▪ Waste Classification Guidelines (**EPA**, 2014). ▪ City of Sydney Guide to Waste Minimisation in New Development 2015.	Construction and operation waste management plan is detailed in Appendix V and summarised in Section 10.13 of the EIS.
19. Contamination Address the Contamination conditions imposed under SSD-8993. Relevant Policies and Guidelines:	Contamination is addressed in Section 8.7 and a detailed site investigation assessment is attached at Appendix Q.

SEARs Requirement	Response
▪ Managing Land Contamination: Planning Guidelines - SEPP 55 Remediation of Land (DUAP, 1998). ▪ Sampling Design Guidelines (EPA, 1995). ▪ Consultants Reporting on Contaminated land – Contaminated Land Guidelines (EPA, 2020). ▪ National Environment Protection (Assessment of Site Contamination) Measure (National Environment Protection Council, as amended 2013).	
Plans and Documents	
The **EIS** must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Regulation. Provide these as part of the EIS rather than as separate documents. Any plans and diagrams included in the EIS must include key dimensions, RLs, scale bar and north point. In addition to the plans and documents required in the General Requirements and Key Issues sections above, the EIS must include the following: ▪ Section 10.7(2) and (5) Planning Certificates (previously Section 149(2) and 5) Planning Certificate). ▪ Design report to demonstrate how design quality would be achieved in accordance with the above Key Issues including: – architectural design statement. – diagrams, structure plan, illustrations and drawings to clarify the design intent of the proposal. – detailed site and context analysis. – analysis of options considered to justify the proposed site planning and design approach. – summary of feedback provided by GANSW and NSW State Design Review Panel (**SDRP**) and responses to this advice. – summary report of consultation with the community and response to any feedback provided. ▪ Geotechnical and Structural Report. ▪ Accessibility Report.	Planning certificate is attached at Appendix FF. Design report is attached at Appendix C. Geotech and structural report is attached at Appendix T. Accessibility report is attached at Appendix Y.

SEARs Requirement	Response
Consultation	
During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups, relevant special interest groups, including local Aboriginal land councils and registered Aboriginal stakeholders and affected landowners. In particular, you must consult with: ▪ the relevant Council. ▪ Government Architect NSW (through the NSW SDRP process). ▪ Transport for NSW. Consultation should commence as soon as practicable to inform the scope of investigation and progression of the proposed development. The **EIS** must describe and include evidence of the consultation process and the issues raised and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided. Targeted consultation in accordance with the draft Social Impact Assessment Guideline 2020 (Department of Planning, Industry and Environment) must also occur where there is a requirement to prepare and submit a Social Impact Assessment.	Consultation is detailed in Section 9 of the EIS. A Community Consultation Outcome Report is also attached at Appendix X.

5. THE SITE AND SURROUNDING CONTEXT

5.1. 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 3 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.

Table 6 Campus Description

Site Address	Legal Description	Existing Development
165-215 Forbes Street, Darlinghurst (the part of the site subject to the Concept Approval and this SSDA)	Lot 200 DP1255617	▪ Main School site including: ▪ Wilkinson House (the site) ▪ Joan Freeman Science Building ▪ Centenary Sports Hall ▪ Old Girls building ▪ Barham Building ▪ Chapel Building ▪ Old Gym ▪ Library Building and Science Building ▪ Primary School
159-163 Forbes Street Darlinghurst	Lot 1 DP557311	▪ Great Hall ▪ Play House ▪ Diana Bowman Performing Arts Centre
217 Forbes Street Darlinghurst	Lot 1 DP586075	▪ Administration office

Consistent with the Concept Approval SSD 8993, the SSD DA relates to the main campus site, excluding 217 Forbes Street and the St Peters Precinct, which comprises one lot (Lot 200 DP1255617) as outlined in Figure 3 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 3 Campus Location

SCEGGS Darlinghurst has been located on the main campus site since 1901. Since this time, the School has progressively adaptively reused and altered existing buildings on the site and immediate surrounds and constructed new purpose built educational facilities on the site. These buildings have been progressively completed, rebuilt, and redeveloped over the almost 120-year history of the School on the site to continually respond to changing educational needs. The existing buildings on the site are illustrated in Figure 3 above.

The existing buildings on the site vary in scale from two to three storeys (Barham) to six storeys (Old Science and Library buildings). While the Old Science and Library buildings on Bourke Street contain the tallest buildings on the site, given the location of a cliff edge running through the site, the original Chapel Building on Forbes Street remains the 'highest' building on the site with a maximum four storey rise on Forbes Street and a maximum RL of 56.21m.

The existing buildings on the site comprise a total 13,949sqm of gross floor area (**GFA**).

5.2. THE SITE - WILKINSON HOUSE

This SSDA relates to Wilkinson House (the site) development area only, which is located within the main campus site, and is bounded by Forbes Street to the east and St Peters Street to the north. Centenary Sprots Hall is located directly to the south of the site, Joan Freeman building is located directly to the west on St Peters Street 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.

Wilkinson House has been used by SCEGGS for 61 years, with the first 41 years as boarding house for the school. In the past 20 years, the school has adaptively reused the original residential building for teaching purposes, including general learning areas, staff rooms, study and student room. The useability of these rooms for full secondary school classes is undermining the high quality outcomes for the school, with undersized and poorly shaped classrooms, and the internal circulation currently does not comply with fire safety and accessibility requirements.

Wilkinson House comprises four storeys and 1,161.90sqm of GFA. Wilkinson House has a maximum height measured to the existing roof of RL 45.52.

Figure 4 Wilkinson House as viewed from Forbes Street.

Source: Urbis, 2021

5.3. SURROUNDING CONTEXT

The site is located within the highly urbanised inner-city Sydney suburb of Darlinghurst. Darlinghurst is located approximately 1.5km east of the Sydney CBD. The locality is characterised by two-three storey terrace houses, cafes and restaurants, and high rise residential towers including the Horizon Apartments, which is located on the opposite side of Forbes Street.

Immediately surrounding the Wilkinson House site are:

- To the north: St Peters Street . Further to the north is the Diana Bowman Performing Arts Centre.
- To the east: three to four storey residential flat buildings, and the Horizon Apartments complex.

- To the south: Centenary Sport Hall and further to the south is the Barham and Chapel Building.
- To the west: Joan Freeman Science Building and further to the east are terrace houses fronting Bourke Street.

The site is highly accessible by public transport being located adjacent to bus stops on Bourke Street and being in close proximity to bus stops along William Street, Stanley Street, and Darlinghurst Road. The site is also located approximately 400m from Kings Cross train station

5.4. SITE ACCESS

The primary pedestrian access to Wilkinson House is via the main school entry located further south of Forbes Street. The building entrance off Forbes Street is only used at special events. The primary pedestrian access to the secondary school site is from Forbes Street, with secondary access provided from St Peters Street. Secondary school pick-up and drop off zones are located on the western side of Forbes Street and south of St Peters Street. The secondary school has a primary vehicular access point from St Peters Street, with three minor vehicular access points from Forbes Street.

Pedestrian and vehicular access to the primary school site is from Bourke Street, at the southern portion of the site. Primary school pick-up and drop off zones are located on the eastern side of Bourke Street, south of Stanley Street.

5.5. PARKING

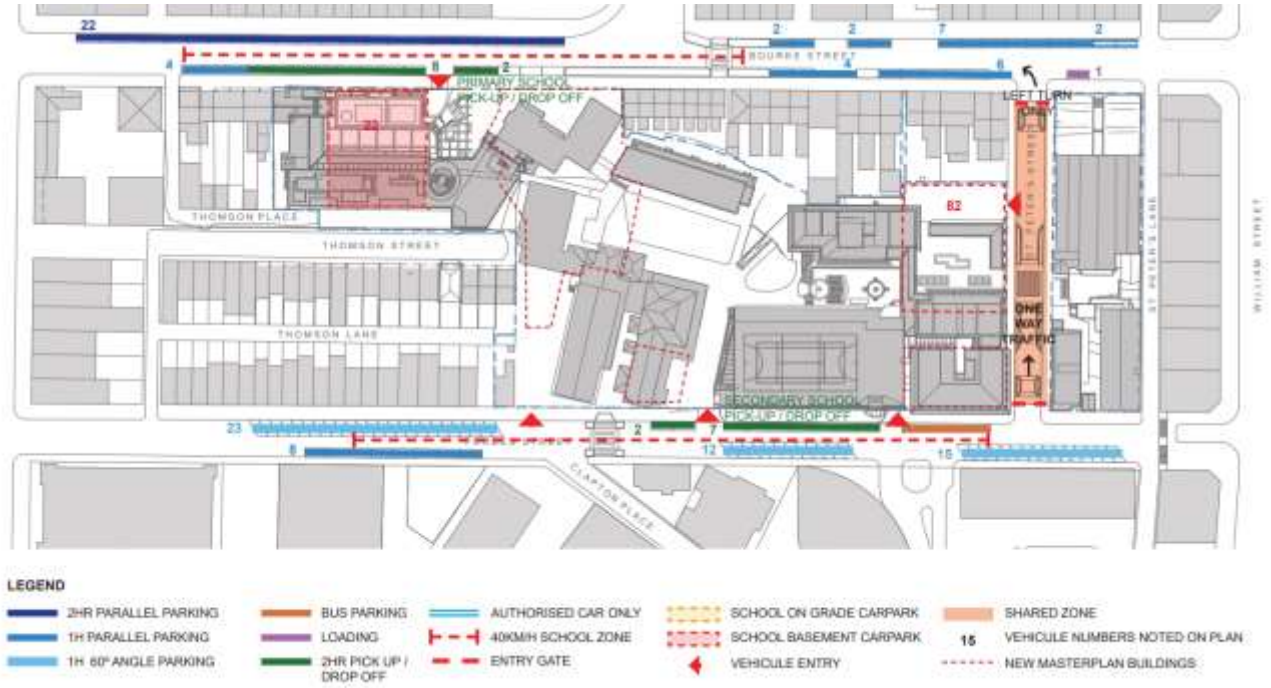
The secondary school has 90 car parking spaces for staff, visitors and delivery. The primary school site currently includes 22 staff on site car parking spaces. This proposal does not seek to amend the existing parking arrangement onsite.

It is important to note that Concept SSD 8993 approved for the following parking, drop off and pick up arrangement across the SCEGGS campus (refer to Figure 5):

- Retention of 105 off-street parking spaces, comprising:
  - 22 x parking spaces, with access via Bourke Street; and
  - 83 x parking spaces, with access via St Peters Street.
- Retention of 18 leased on-street parking spaces from the neighbouring private car park, located at 184 Forbes Street, Darlinghurst.
- Retention of 18 on-street pick-up and drop-off spaces, comprising:
  - 9 x spaces on Bourke Street; and
  - 9 x spaces on Forbes Street.
- Relocation of seven (7) off-street parking spaces from the alternate car park off Forbes Street to the basement of the future multipurpose building.
- Construction of a basement car park within the multipurpose building with access from Bourke Street, comprising:
  - 7 x school staff spaces, relocated from the Forbes Street car park;
  - 3 x school service vehicle spaces;
  - 6 x child care pick-up and drop-off spaces;
  - 5 x child care staff spaces; and
  - 1 x child care long-term visitor space

The removal of car spaces and construction of basement car park does not form part of this SSD application. This **SSD** application does not seek to alter the existing and approved parking arrangements on site.

Figure 5 Site access arrangement as approved under SSD 8993.



Source: Traffix, 2020

In addition to parking spaces, SCEGGS currently provides the following bicycle parking and end of trip facilities for staff and students:

- Dedicated lockable bike storage areas:
  - 1 car bay dedicate for bike storage for staff that accommodates 7 bicycles;
  - 1 lockable bike cupboard on top of the gym that can accommodate 12 student bicycles.
- Shower locations:
  - 5 in the sports hall for staff and student use;
  - 4 in the Joan Freeman building, including 1 accessible;
  - 1 in the old gym building;
  - 1 in Barham;
  - 2 in the Primary School basement, including 1 x accessible.
  - 1 in the Diana Bowman building for accessible use

5.6. SERVICES

The site currently contains and is connected to all necessary services including electricity, gas, water, communications, drainage and sewage.

5.7. ACCESSIBILITY

5.7.1. Road Network

The site is directly serviced by the following local roads:

- St Peters Street: Directly adjacent to the north;
- Forbes Street: Directly adjacent to the east; and
- Bourke Road: Directly adjacent to the west.

St Peters Street is a one-way local road that functions as a shared zone, closed to vehicular traffic except for peak drop-off and peak hours for the school, open between 6:30am – 9:00am and 2:30pm and 7:30pm weekdays. Forbes and Bourke Streets are local roads running in a north-south direction, accommodating a single lane for traffic in each direction.

The site is also surrounded by major roads of Oxford Street, Darlinghurst Road, and William Street.

5.7.2. Public Transport

The site is well serviced by various forms of public transport as outlined below.

Trains:

The site is located approximately 400m from Kings Cross Station. Kings Cross Station is served by the R4 Eastern Suburbs and Illawarra Line by Sydney Trains, and some NSW Trainlink services.

Buses:

The site is located close to multiple bus stops operating the following State Transit bus services:

- 200 – Bondi Junction to Chatswood
- 311 – Millers Point to Central Railway Square via Darlinghurst and Potts Point
- 324 – Watsons Bay to Walsh Bay via Old South Head Road
- 325 – Watsons Bay to Walsh Bay via Vaucluse Road
- 389 – Bondi Junction to Pyrmont
- L24 – Vaucluse to City Wynyard

5.7.3. Cycleways

Bourke Street comprises a dedicated two-way cycleway on the western side of the street. The dedicated cycleway is generally available the entire length of Bourke Street and connects to multiple other off-site and shared bicycle paths within the inner-city suburbs of Sydney including Darlinghurst, East Sydney, and Surry Hills.

5.8. CUMULATIVE IMPACTS WITH FUTURE PROJECTS

The site is located within East Sydney heritage conservation area, and it is anticipated that minimal construction activities occur in the vicinity of the site. The following developments have been approved recently:

- 184 Forbes Street – approved 21 May 2021
  - Construction of two balconies on the northern elevation
- 162 Bourke Street – approved 24 September 2021
  - Alterations and additions to residential development, including roof replacement of terrace buildings 164, 164B and 164C.

It is noted that no large development directly adjacent to the site have been approved in the last three years, and the construction activities of neighbouring developments are not expected to conflict with the construction works of the proposed development.

The potential cumulative impacts of the project are addressed in Section 10 of the EIS in accordance with the DPIE *Assessing Cumulative Impacts* guidelines.

6. STRATEGIC CONTEXT

The strategic planning policies and design guidelines identified in the SEARs that need to be addressed include:

- NSW State Priorities.
- State Infrastructure Strategy 2018 – 2038 Building the Momentum
- Future Transport Strategy 2056
- Crime Prevention Through Environmental Design (**CPTED**) Principles
- Better Placed: An integrated design policy for the built environment of New South Wales (Government Architect NSW (GANSW), 2017)
- Healthy Urban Development Checklist (NSW Health, 2009)
- Draft Greener Places Design Guide (GANSW)
- The Greater Sydney Region Plan - A Metropolis of Three Cities
- Eastern City District Plan
- City Plan 2036: Local Strategic Planning Statement

The proposal is consistent with the following planning strategies, district plans and adopted management plans as detailed below.

6.1. NSW STATE PRIORITIES

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

Creating Jobs: Create 150,000 new jobs by 2019

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

Building Infrastructure: Infrastructure projects to be delivered on time and on budget across the state

The proposal provides a development opportunity for the State that will create 50 new full time construction related jobs and will help secure existing jobs, stimulate economic activity, and deliver important social infrastructure.

Improving Education Results: Increase the proportion of NSW students in the top two NAPLAN bands by eight per cent

The proposal will contain 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.

Overall, it is considered that the proposal is consistent with the goals and objectives set out within the NSW State Priorities.

6.2. STATE INFRASTRUCTURE STRATEGY 2018 – 2038 BUILDING THE MOMENTUM

State Infrastructure Strategy 2018-2038 sets out Infrastructure NSW's independent advice on the current state of NSW's infrastructure and the needs and priorities over the next 20 years. It looks beyond the current projects and identifies policies and strategies needed to provide infrastructure that meets the needs of a growing population and a growing economy.

The Strategic objective for the Education sector is to '*deliver infrastructure to keep pace with student numbers and provide modern, digitally-enabled learning environments for all students.*'

The proposed development will help meet this objective by improving the school's teaching and recreational facilities, enabling **SCEGGS** to provide a better learning environment for its current and future students.

6.3. FUTURE TRANSPORT STRATEGY 2056

Future Transport Strategy 2056 is the NSW Government's update of the 2012 NSW Long Term Transport Master Plan and was finalised on 18 March 2018.

The focus of the plan is to enable people and goods to move safely, efficiently and reliably around Greater Sydney, including having access to their nearest centre within 30 minutes by public transport, 7 days a week. The transport system will also support the liveability, productivity and sustainability of places on our transport networks.

The SCEGGS campus, including Wilkinson House benefits from being near the Kings Cross train station, which is 400m from the site. The campus is also serviced by multiple bus routes with bus stops located within the surrounding streets.

SCEGGS is within 10 minutes train ride to Sydney CBD and 40min train ride to Paramatta CBD, as well as other local centres. Therefore, Students benefit from a highly accessible location in terms of public transport. This is reflected in the fact that students come from all over Sydney, with a large proportion of students (43% of students in the mornings and 62% of the students in the afternoons) travelling to the campus by public transport.

6.4. CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN (CPTED) PRINCIPLES

A Crime Prevention Through Environmental Design (**CPTED**) has been undertaken by Urbis and attached at Appendix AA.

The CPTED assessment identifies and analyses potential improvements to design which may help to reduce crime and anti-social behaviour. The design of a proposed development is assessed against four key CPTED principles, which are embedded in the C*rime Prevention and Assessment of Development of Application Guidelines,* issued by the then Department of Planning and Environment in 2001.Where CPTED risks are identified, an assessment makes recommendations to reduce the likelihood of the crime from occurring.

The assessment found that the proposed adaptive re-use of Wilkinson House incorporates the four CPTED principles of: surveillance, access control, territorial reinforcement, and space management.

To further increase safety and reduce crime risk, the following recommendations should be implemented:

- Ensure all entrances, stairwells, elevators, communal areas, and walkways are well lit in accordance with Australian Standards. Effective lighting can improve visibility, increase activity, reduce fear and increase the likelihood that offenders will be detected.
- Use balanced lighting and appropriate glazing between internal and external spaces to avoid a mirroring effect at night and allow for a continuation of sightlines from and into the building.
- Install clear and legible universally legible wayfinding signage consistent with the wider campus.
- Ensure the Melaleuca tree and understory planting proposed for the rooftop courtyard are maintained to protect sightlines from excess plant growth.
- Install security hardware on all back of house areas, storage rooms and plant rooms to restrict unauthorised access by students and non-staff members.
- Maintain all access points, including fire exits and stairs, to ensure they remain in good working order and are inaccessible from the outside. Magnetic door locking systems linked to fire sprinkler alarms can ensure that fire exits are used for emergencies only. Fire exits and stairs can often be targets for offenders.
- When access is provided between Forbes Street and Wilkinson House during special functions, ensure organised surveillance is provided by the stationing of a staff member within clear sight of the entrance.

- Use clear signage and lighting to create legible and inviting entrances to Wilkinson House both from within the Campus and from Forbes Street, when in use.
- Natural guardianship of the space and surrounding streets could potentially be provided through scheduled activities outside normal operational hours, such as evenings and weekends.
- Implement safety procedures for workers and contractors accessing the site, including working with children checks and a sign in/out requirement at the entry to the site.
- Ensure all fixtures and surfaces are repaired promptly. Routine maintenance is a strong indicator of area control and safety. Well maintained spaces encourage regular use and in turn create natural surveillance. Particular note should be given to large areas of blank external walls which will be particularly susceptible to graffiti of nuisance.
- Continue to provide spaces within the Campus for other user groups outside school hours. This could include extracurricular academic and physical activities. Providing scheduled use of the campus and its facilities outside school hours would ensure greater activity and social connection between the wider community and the SCEGGS community.

6.5. BETTER PLACED: AN INTEGRATED DESIGN POLICY FOR THE BUILT ENVIRONMENT OF NEW SOUTH WALES (GOVERNMENT ARCHITECT NSW (GANSW), 2017)

Better Placed – An integrated design policy for the built environment of NSW 2017 is the NSW Government Architect's Office policy to guide design. Better Placed provides clarity on what the NSW Government means by good design and outlines processes for achieving this. The Strategic Planning Document is based on seven objectives that define the key considerations in the design of the built environment:

1. *Better fit: contextual, local and of its place*
2. *Better performance: sustainable, adaptable and durable*
3. *Better for community: inclusive, connected and diverse*
4. *Better for people: safe, comfortable and liveable*
5. *Better working: functional, efficient and fit for purpose*
6. *Better value: creating and adding value*
7. *Better look and feel: engaging, inviting and attractive*

The seven objectives are also adopted in the Better Placed: Design Guide for Schools, which is a part of this broader Better Place suite and is intended to be used as a best practice guide to support the delivery of good design for schools across NSW.

The Urban Design Report at Appendix C respond to the Design Guide for School and discuss how the proposal has adopted the seven objectives into the design process

6.6. HEALTHY URBAN DEVELOPMENT CHECKLIST (NSW HEALTH, 2009)

The Healthy Urban Development Checklist by NSW Department of Health seeks to ensure that communities in the State are created to promote healthy habits and active mobility. The proposal for Wilkinson House satisfies a range of items contained to the checklist, including:

- *Promote opportunities for walking, cycling and other forms of active transport;*
- *Reduce car dependency and encourage active transport;*
- *Consider crime prevention and sense of security*
- *Promote quality streetscapes that encourage activity and*

- *Promote a sense of community and attachment to place*

The proposal therefore aids in promoting a healthy and sustainable built environment.

6.7. DRAFT GREENER PLACES DESIGN GUIDE (GANSW)

The draft Greener Places Policy has been produced by **GANSW** to guide the design, planning and delivery of green infrastructure across NSW.

The draft policy defines green infrastructure as the network of green spaces, natural systems and semi-natural systems including parks, rivers, bushland and private gardens that are strategically planned, designed, and managed to support good quality of life in the urban environment.

The aim is to create healthier and more liveable cities and towns by improving community access to recreation and exercise, supporting walking and cycling connections, and improving the resilience of our urban areas.

The proposal responds to the following principles:

Integration: a landscape plan has been developed for Wilkinson House, which is generally consistent with the Master Landscape Plan approved for the wider campus (and as modified by the concurrent Modification to the Concept Approval SSD 8993). The streetscape landscaping and rooftop terrace proposed for the building promotes healthy and active living. More importantly, it is an important element to the wellbeing of the students and staff.

Multifunctionality: The proposed outdoor roof terrace area is designed to facilitate a variety of uses such as social interaction, education and learning and sitting/ study areas.

Participation: the proposed landscape design incorporates the input from project architect, the School's community including the schools Aboriginal Liaison Officer and technical consultants. To ensure the design process is open to all and incorporates the knowledge and needs of all parties.

6.8. GREATER SYDNEY REGION PLAN: A METROPOLIS OF THREE CITIES

The Greater Sydney Region Plan provides the overarching strategic plan for growth and change in Sydney. It is a 20-year plan with a 40-year vision that seeks to transform Greater Sydney into a metropolis of three cities - the Western Parkland City, Central River City and Eastern Harbour City. It identifies key challenges facing Sydney including increasing the population to eight million by 2056, 817,000 new jobs and a requirement of 725,000 new homes by 2036.

The Plan includes objectives and strategies for infrastructure and collaboration, liveability, productivity and sustainability.

As mentioned in other parts of the EIS, temporary jobs will be provided in manufacturing and construction. Sustainability is likewise a key consideration, particularly in the proposed design, construction, and operation of the buildings.

A key objective of the Region Plan is creating 30-minute cities within Greater Sydney, by increasing access through different modes of transport and providing a rich mix of uses and amenities across the metropolitan area. Education facilities are considered as vital infrastructure in the city. The proposal seeks to update the facility of an existing school within an established neighbourhood. By doing so, it will help maintain the vibrant mix of people and activities within Darlinghurst.

6.9. OUR GREATER SYDNEY 2056: EASTERN CITY DISTRICT PLAN

The Eastern District Plan is a 20-year plan to manage growth in the context of economic, social and environmental matters to implement the objectives of the Greater Sydney Region Plan. The intent of the District Plan is to inform local strategic planning statements and local environmental plans, guiding the planning and support for growth and change across the district.

The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level. The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.

Planning priorities that directly relate to the proposed redevelopment of SCEGGS Darlinghurst include:

• *Planning for a city supported by infrastructure*

The School benefits from good access to public transport, specifically through bus links and the Kings Cross station. It will benefit further from the connections of these links to the committed transport investments by the Commission. The Plan encourages active transport modes such as walking and cycling. The students, staff and visitors benefit from well-connected walkways and bicycle lanes adjacent to the School.

• *Providing services and social infrastructure to meet people's changing needs*

With this proposed development, SCEGGS Darlinghurst is adapting to changing requirements of students and trends in learning methods, including modern and flexible learning spaces to be provided in Wilkinson House. The proposal also seeks to comply to universal design standards to cater to students, staff and visitors that may have special needs. The proposal is designed to improve accessibility, quality of classroom and wayfinding.

• *Fostering healthy, creative, culturally rich and socially connected communities*

The proposal respects the district's heritage by proposing adaptive re use of a heritage building, with minimal changes to the external heritage façade, which was recommended by the IPC.

• *Reducing carbon emissions and managing energy, water and waste efficiently*

The design adopts a strong commitment to energy efficiency through:

- A highly efficient façade system that leverages the constraints of the existing heritage fabrics to both manage heat gains while promoting the entry of daylight into classroom spaces.
- Low impact materials selections with the project maximising the reuse of onsite materials and minimise the upfront carbon emissions associated with the project.
- The use of highly efficient water fixtures and fittings, alongside a waterless heat rejection system and connection to the adjacent Joan Freeman Centre's non potable water supply.
- An optimised air conditioning system to provide good provision of outside air while maintaining thermal comfort in the classroom areas.

The planned design, construction, operation and maintenance of the proposed redevelopment will be assessed against minimum of 4-star best practice rating of the Green Building Council of Australia.

6.10. CITY PLAN 2036: LOCAL STRATEGIC PLANNING STATEMENT

City Plan 2036 is the draft Local Strategic Planning Statement (**LSPS)** for the City of Sydney and links the state and local strategic plans with the planning controls to guide future development and the Local Environmental Plan review. The City Plan sets 13 priorities to achieve the City's Green, Global, Connected vision and guide future changes to the City's planning controls, of which the following are notably relevant:

3. Supporting community wellbeing with social infrastructure

The proposal will result in improved social infrastructure consistent with the LSPS priorities. Overall, the proposal will enable the School to provide access to a higher quality of educational facilities. The proposed Wilkinson House detailed design can accommodate new state-of-the-art teaching facilities and spaces. This will enable high-quality teaching beyond what can currently be provided on site.

11. Creating better buildings and places to reduce emissions and waste, and use water efficiently

The proposal will contribute positively to energy efficiency and environmental sustainability. The design has incorporated many ESD features to reduce energy consumption during the life of the proposed development.

7. PROJECT DESCRIPTION

The following sections of the EIS summarise the key numeric components of the proposed development and describe the demolition, site preparation, construction and operational phases in further detail.

1.2. PROJECT OVERVIEW

Wilkinson House presents a rare opportunity to preserve and adaptively reuse a historically significant building for SCEGGS, to ensure its future conservation, management and ongoing use.

As a heritage-listed building originally constructed in 1928 and designed by architect Emil Sodersten, the building can no longer meet the current or future educational needs of the school, and does not comply with current codes and standards, which impose safety and accessibility risk for students.

The primary educational objective of the proposal is to provide a greater range of large, flexible, compliant, accessible and collaborative learning spaces within Wilkinson House to meet contemporary education needs.

Balancing the heritage significance of the building and contemporary educational needs, the design strategy has been underpinned by the policies outlined in the Wilkinson House CMP.

The overall design strategy is to retain and restore all external facades and incorporate modest and recessive exterior additions, to retain the visual prominence of the Wilkinson House from the streetscape and maintain legibility of the heritage building. The well-preserved building exterior fronting Forbes and Saint Peters Streets is to be rejuvenated by removing unsympathetic additions. The entrance lobby and lounge hall will be retained and internal layout of the building is to be reconstructed to accommodate larger classrooms and amenities. Opportunities for heritage interpretation strategy have also been explored and incorporated in the design.

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

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

– Interpretation of placement of balconies and original rooms inlaid in ceiling and common areas, to recall the original layout of the building.

As the project progresses to post approval, the project team will continue to work with City of Sydney Council before finalising the heritage interpretation strategy.

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

The proposal will ensure the school's future use of Wilkinson House is joyful and inspiring for students and staff. The design response is able to preserve and restore the heritage significance of the building, so it is able to stand the test of time, enhancing the longevity of the building as a living museum.

A copy of the architectural drawings is attached as Appendix D.

Figure 6 Wilkinson House CGI.

Source: Smart Design Studio, 2021

7.1. DETAILED DESCRIPTION

7.1.1. Demolition and Excavation

Internal alterations and demolition of the existing Wilkinson House internal walls is proposed as part of this SSD DA. The reconstructed floor levels will be retained at similar RLs to the existing floor levels.

The existing lower ground slab RL is proposed to be dropped 700mm from its current level, and the extent of the lower ground level will continue for the full length of the building, excluding the zone below the existing ground level foyer and entry hall. The proposal requires excavation be taken to a depth of approximately 2.5-3 metres within the southern portion of the Wilkinson House site to accommodate a larger basement footprint than currently exists.

The lower ground level is to accommodate the basement sports hall.

7.1.2. Building structure

The Structure Report prepared by Northrop (attached at Appendix S) establishes the structural framework for the proposed demolition and construction works, including the structural design principles and design parameters to be adopted in detailed design stage.

In order to maintain stability to the existing masonry façade after the existing timber floors and loadbearing masonry walls are removed, the structure report recommends a temporary structure be installed prior to any demolition.

The temporary structure will consist of a structural steel frame that will have horizontal elements installed above the existing floor level. These horizontal members will clamp the existing façade, through the existing windows that will be removed. The horizontal members will span back to vertical trusses that will provide the lateral stability to the façade. The steel frame will temporarily support the vertical weight of the wall over. Once the new building has been constructed, the existing column will be rebuilt, and the temporary steel frame will be removed.

7.1.3. Materials and Finishes

A selection of sensitive material and sympathetic detailing is proposed to preserve and complement the heritage building:

- The new lift addition will be clad in glass with a darker frame. The glass is a light touch and will appear recessive, while the colour scheme connects with Wilkinson House and Sports Hall.
- The roof will be constructed with pressed copper cladding, which is sympathetic to the surrounding context yet uniquely contemporary.
- The enclosed balconies will have a powder coated finished with white steel frames and glazing, recessed from the existing façade.
- Grey terrazzo is used for the internal stair with a 1m high datum to acknowledges traditional detail and protect walls at low level. Terrazzo is durable and elegant to the internal layout.

7.1.4. Landscaping

As illustrated at Appendix E, the proposed landscaping includes public domain treatment to Forbes Street and St Peters Street, including the retention of the existing street tree. Additional landscaping is proposed on the rooftop terrace where improved landscape performance can be achieved as a result of the better solar access.

An oculus proposed on the rooftop, creates the opportunity to connect with Sky and nature on a dense, inner-city site (refer to Figure 7). The oculus is proposed to feature a Snow in Summer tree. This tree species was selected in consultation with SCEGGS Indigenous Student Liaison Officer. The tree is recognised for its Aboriginal cultural significance and traditional medical uses and will be a great cultural educational tool for students.

No trees are proposed to be removed as part of the application.

Figure 7 Roof Terrace Landscape Treatment.

Source: Smart Design Studio, 2021

7.1.5. Parking and Access

Pedestrian Access

Primary pedestrian access to Wilkinson House will remain from south of Forbes Street and within the Campus from corridors on the southeast corner of the building. The addition of the new glass infill lift structure and subterranean corridor on the southern side of the building will allow for greater circulation of staff and students between Wilkinson House and the wider campus. The lift addition greatly improves accessibility across the campus, and for the first time provides equitable access connection between Joan Freeman Building, the Sports Hall and Wilkinson House.

The ground floor entry and foyer off Forbes Street will be retained and will not be used during regular operation. However, this foyer will be retained as an entrance to the building during special functions, which is the same as the current operation of Wilkinson House.

Parking

No existing car parking spaces are proposed to be removed under this SSD application and the existing total of 112 car parking spaces are retained. No changes are proposed to the approved parking arrangement under Concept SSD-899 (to be constructed under future detailed SSD applications).

Drop off and Pick Up

The local roads surrounding the school also provide a total of 27 on-street pick-up and drop off spaces signposted with ‘No Parking’ restrictions during school peak periods, comprising:

- 9 x kerbside spaces along the Forbes Street frontage;
- 3 x kerbside spaces along Forbes Street, which also serves as a bus zone for the school;
- 10 x kerbside spaces along the Bourke Street frontage; and
- 5 x kerbside spaces on the northwest corner of St Peters Street.

The school will continue to implement a number of measures to improve the efficiency of pick-up and drop off activities during the peak morning and afternoon periods. These measures are detailed in the Operational Transport Management Plan attached at Appendix M.

No changes are proposed to the current drop off and pick up arrangement as illustrated in Figure 8.

Figure 8 Pickup and Drop off Arrangement.

Source: Traffix, 2021

Bus Parking

Forbes Street currently provides an on-street bus parking area during school days that is signposted 'No Parking 8am-6pm School Days Buses Excepted'. At a meeting in March 2021, the City of Sydney and

members of the local community raised concerns relating to current set-down and pick-up operations (including bus operation) along Forbes Street.

In response, remedial measures have been explored as part of this application, to improve efficiency and student safety, by prioritising bus parking. While parents and carers can continue to utilise other available on-street parking spaces for pick-up and drop-off activities.

The following measures are proposed to Forbes Street (illustrated in Figure 9):

- Provision of a 54m long dedicated 'Bus Zone between 7:30-9am and 2:30-4pm SCHOOL DAYS'. The proposed bus zone can accommodate approximately 3-4 buses. It is noted that this restriction will extend across the driveway crossover adjacent to the Sports Hall entrance. The school has confirmed that driveway crossover only services a storage room used for sporting equipment and no vehicle access is required during bus operating periods.
- Amending the existing bus parking area to provide 31m of 'No Parking 9am-2:30pm and 4- 6pm SCHOOL DAYS BUSES EXCEPTED'. This will provide sufficient parking for buses returning to the site after sporting events, whilst still allowing parents/caregivers to park for up to 2 minutes. It is also proposed to extend this restriction to replace the existing 'No Parking' area adjacent the Sports Hall driveway crossover.
- Retention of the existing '2P 9am-2:30pm Mon-Fri' parking restriction. It is noted that the school welcomes an investigation to alternative timeframes such as a 1P parking limit, noting the Horizon building provides 50 dedicated on-site visitor parking spaces.
- Retention of the existing parking restrictions south of the southern driveway crossover.
- Reduction in the 'No Parking 7:30-9am and 2:30-3:30pm SCHOOL DAYS' restriction from 39m to 16m to accommodate the proposed bus zone.
- In the event when the kerbside is at capacity, bus drivers will be instructed to re-circulate around St Peters Street, Bourke Street and Liverpool Street and will be instructed not to double park at any time. The bus companies are also encouraged to stagger arrival times as much as possible to reduce the number of buses on Forbes Street at any one time.

These measures are detailed in the Operational Transport Management Plan attached at Appendix M. It is noted that the proposed measures are required to be approved by the City of Sydney Local Pedestrian, Cycling and Traffic Calming Committee.

Figure 9 Proposed Bus Parking Arrangement along Forbes Street.

Source: Traffix, 2021

7.1.6. Operational Details

The proposed Wilkinson House will be used for general learning areas to support the secondary school.

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

The community use of the SCEGGS campus remains unchanged within the existing building and as proposed under Concept SSDA. The redeveloped Wilkinson House will operate as per the current School operation.

After school sports will be accommodated in the new Wilkinson House sports centre, and the rooftop terrace may be used for after hour school activities, which are currently been hosted within other parts of the school campus. No new after hour or community shared facility is proposed under this SSDA.

Uses within Wilkinson House are summarised in the table below:

Table 7 Wilkinson House Operational details

Activities	Hours / Frequency	Location
The majority of current school activities are during typical school operating hours of 8.20am to 6.00pm. All students are on campus for core school hours, with many students also participating in a range of co-curricular programs before and after school and utilising the campus for after school personal study. Special events such as open days, meetings, exhibitions, staff functions, information sessions, co-curricular ceremonies, assemblies and parent teacher evenings will occur periodically throughout the year outside school hours. The after school activities noted above currently occurs within the existing Wilkinson House building, and will continue to occur within the redeveloped Wilkinson House.		

Activities	Hours / Frequency	Location
Extra-curricular sport training for SCEGGS students	6: 45am – 8: 20am and 6pm – 9.00pm Monday to Friday 7.00am – 4.30pm on Saturdays during school terms	Sports Centre
Vacation care or community activities	School holidays Based on demand	Within Wilkinson House
Small school functions	As per the current School operation, and will conclude at 9.30pm at the latest.	Within Wilkinson House and Rooftop terrace

7.1.7. Construction Details

A Preliminary Construction Management Plan has been prepared by TBH Consultancy (enclosed at Appendix DD), which outline the proposed construction methodology and possible impacts. These impacts, such as traffic, noise or waste are further discussed in Section 10, including recommended construction mitigation measures to be incorporated in the final Construction Management Plan.

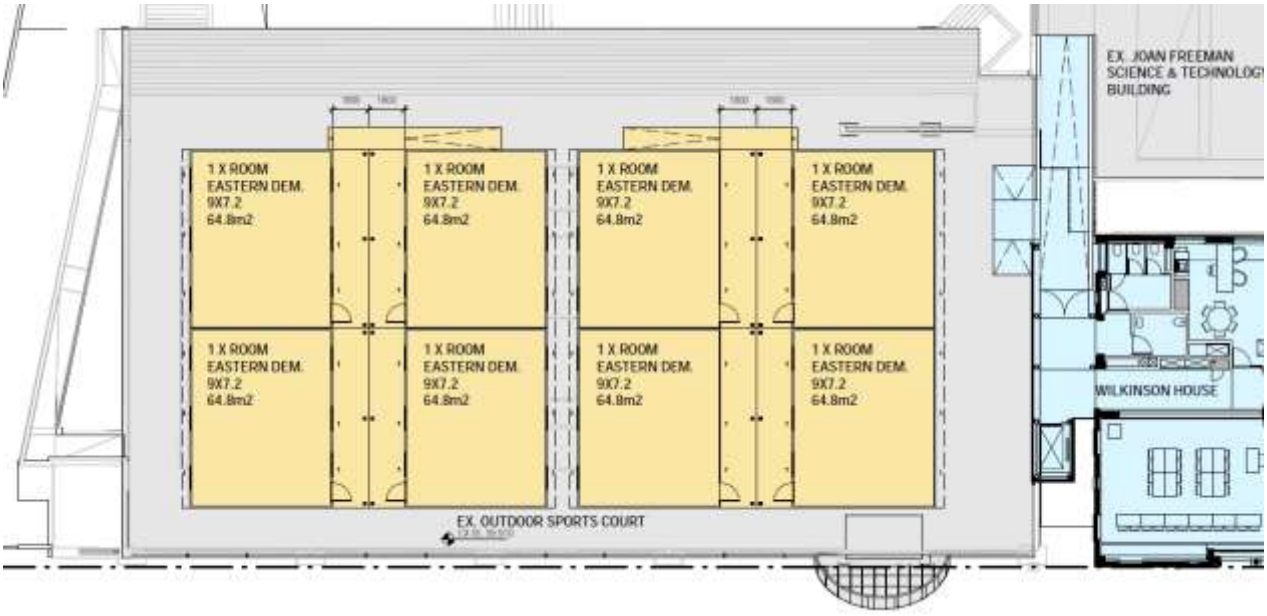
The proposed construction details are outlined below.

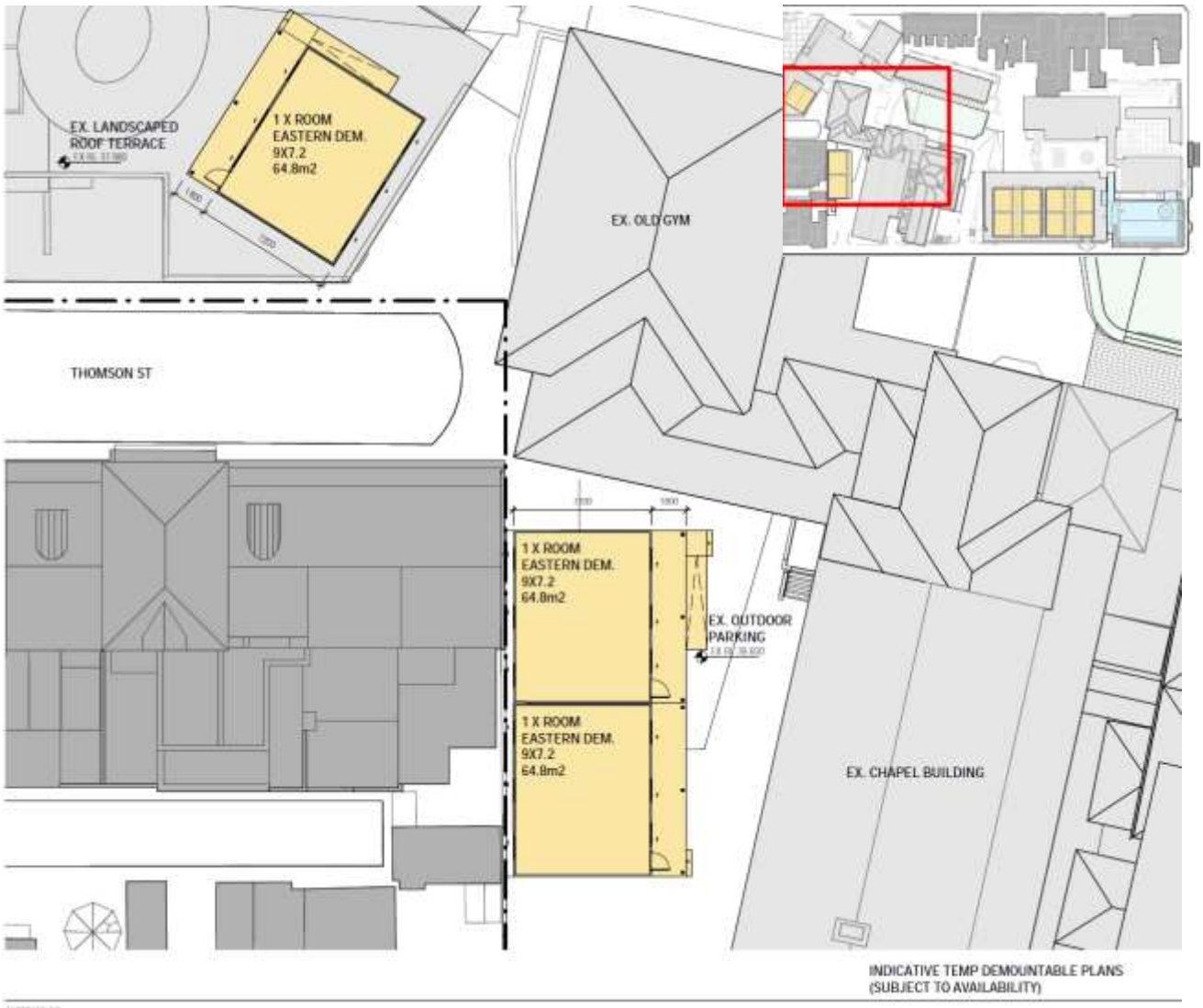
7.1.7.1. Decanting Strategy

11 single storey temporary demountable classrooms are proposed to be erected on the site during construction to ensure the school can continue to function during the construction period. Temporary demountable classrooms are located in the following locations (refer to Figure 10)

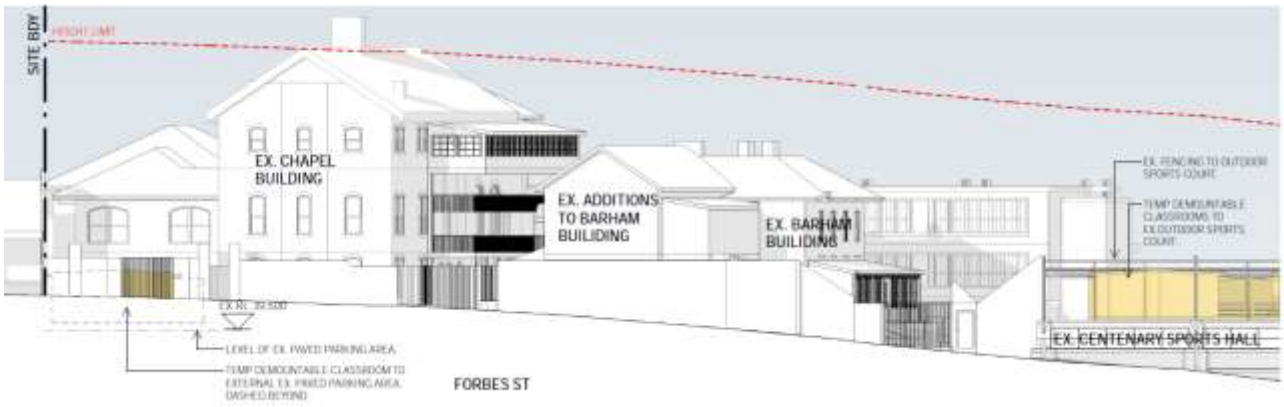
- 1 x temporary demountable classroom on the roof terrace of the Primary School (north of Thomas Street).
- 2 x temporary demountable classrooms on grade south of the Chapel Building (in existing visitor carparking area).
- 8 x temporary demountable classrooms on top of Centenary Sports Hall.

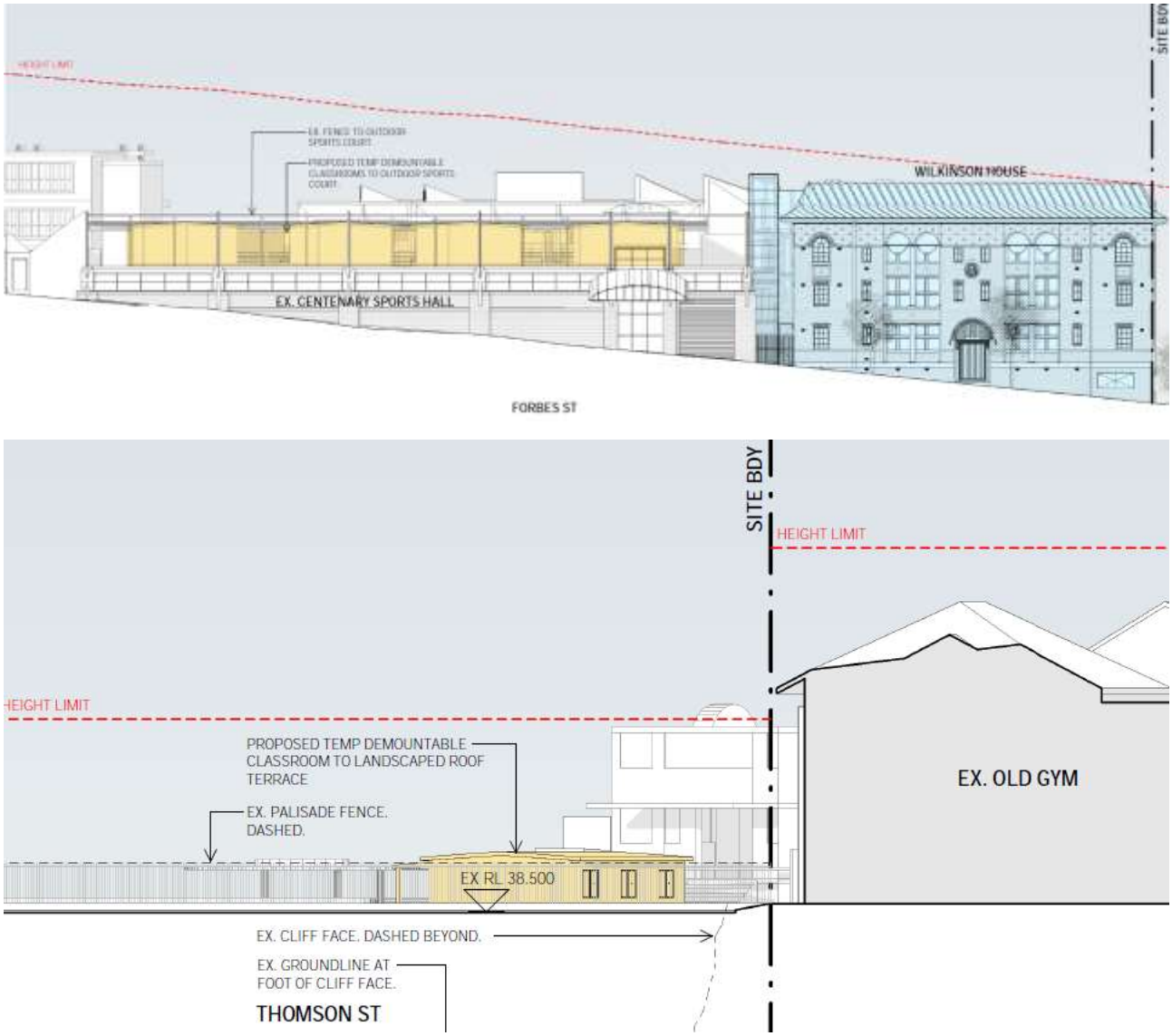
Figure 10 temporary demountable classrooms locations





INDICATIVE TEMP DEMOUNTABLE PLANS (SUBJECT TO AVAILABILITY)





Source: Smart Design Studio, 2021

The proposed demountable are temporary structures and will be removed once the project has completed construciton.

It is expected that the temporary demountable classrooms will be installed before any internal demolition works start to ensure a smooth transition of students and staff from Wilkinson House.

It is expected that the temporary demountable classrooms will be removed for transition back to Wilkinson House in the school year commencing in 2024. Based on this anticipated timeline, the temporary demountable classrooms will be used for around 16-17 months.

The Temporary Demountable location plan and elevation plan are included as part of the Architectural Plan attached at Appendix D.

Impact assessment of the temporary demountable classrooms

- The proposed temporary demountable are approximately 3.5m high, and will all fully comply with the 15m LEP height limit (as shown on Figure 10).
- The proposed demountable are temporary structures, which are not new built form and are unlikely to result in adverse amenity. The temporary demountable are:
- Considered to be a construction management measure.
- Will not result in change in school capacity (staff or student population).

- Would be dismantled and removed from the site within three months of the first occupation of the new Wilkinson House building.
- It should be noted that the similar number of temporary demountable and locations were proposed as part of the previous Concept SSD and stage 1 works. However because the new built form for Wilkinson House was not approved, the demountable were also not approved. Nevertheless, DPIE's previous assessment report did confirm that the Department considers the temporary demountable classrooms to be acceptable and recommended approval of the temporary structures to the Independent Planning Commission. Therefore the previous assessment should remain valid for this proposal.
- We would accept a condition that requires the removal of the temporary demountable classrooms within three months of the occupation of the new Wilkinson House building.
- Temporary demountable are usually permitted as exempt development for schools under the ESPP, as they are considered to have minimal impact. However, given this site is highly constraint with limited location available for the placement of the temporary structures they cannot meet the relevant thresholds for an exempt development planning pathway, and are therefore proposed to be approved as part of the SSDA.
- The temporary structures have no material heritage impact and will allow the school to continue to operate as a school.
- Will not result in any unreasonable amenity impacts, such as view, privacy, parking or solar access as assessed below:
  - Views: As demonstrated by the view impact assessment attached at Appendix E, the temporary demountable will not impact on significant views from adjacent development, including views from Horizon Apartment, 196 Forbes Street, 4 Thomson Street and 16 Thomson Street. When compared to the existing situation, the view from neighbouring properties is retained, including the protection of significant views to the Sydney skyline and iconic elements.
  - Privacy: the proposed temporary demountable will not create privacy impact. The temporary demountable located above the roof terrace of the Primary School and on top of Centenary Sports Hall are separated by a street and are will not overlook any residential development. The temporary demountable located to the south of the Chapel Building is adjacent to 217 Forbes Street, which is owned and used by SCEGGs as an admin building. In summary, the temporary demountable will retain privacy for nearby residential development.
  - Parking: The erection of the temporary demountable will result in the temporary loss of 7 visitor car parking spaces. This is supported by a statement prepared by Traffix and attached at Appendix L. The temporary loss of visitor car spaces will not result in significant parking impact and is supported for the following reasons:
    - The loss of visitor parking is temporary and will only be during the construciton period. The subject parking spaces are typically used outside of weekday evening peak periods, therefore there is no additional parking impact during peak periods.
    - The site is within walking distance to a number of public transport options, including buses and train station. These public transport option will give visitor alternative and convenient mode of transport during the construction period, and reduce the need for onsite visitor parking.
    - A temporary service bay will be created between the temporary classrooms and Forbes Street Gates. The space will be separated from school activities to ensure student safety. Vehicle movement will be managed by the school to minimise impact on street parking demand associated with couriers/trades etc.
  - Solar access: As demonstrated on the shadow diagram attached at Appendix D, the proposed temporary demountable will not create additional shadow impact to primary open space area or living room windows of adjacent development. No external impact is created. All proposed shadows are minor and fall within the site and setback areas within the site.

Therefore, the temporary demountable are acceptable and the proposal remain consistent with the Concept SSD and condition of consent.

7.1.7.2. Construction Hour

Proposed construction hours are in accordance with City of Sydney regulations (for sites outside CBD):

- Monday to Friday: 7.30 am – 5.30pm
- Saturday: 7.30am to 3.30pm
- Sunday or public holiday: no construction activities

7.1.7.3. Sequence

Indicative construction sequence and indicative construction timeframe is summarised below. Construction commencement date and timeframe is to be confirmed post approval and will be subject to the preparation of a final Construction Management Plan.

1. Temporary demountable classroom - commence in August 2022 and will continue for approximately 11 months.
2. Site establishment - commence in August 2022 and will continue for approximately 2 weeks
3. Demolition Works - commence in September 2022 and will continue for approximately 22 weeks
4. Wilkinson House Construction (including Material Handling (Tower Crane)) – commence in February 2023 and will continue for approximately 59 weeks
    - 4.1. Earthworks and substructure
    - 4.2. Ground floor
    - 4.3. Building envelope and External façade works
    - 4.4. Lift installation and internal services and finishes

8. STATUTORY CONTROLS

Various legislative and statutory planning instruments require consideration in the assessment of the proposal. In accordance with the SEARs, this EIS considers the following applicable to the proposal:

- Biodiversity Conservation Act 2016
- Environmental Planning and Assessment Act 1979
- State Environmental Planning Policy (State and Regional Development) 2011
- State Environmental Planning Policy (Infrastructure) 2007
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017
- State Environmental Planning Policy No 55 – Remediation of Land
- Draft State Environmental Planning Policy (Remediation of Land)
- Draft State Environmental Planning Policy (Environment)
- Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities).
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005
- Sydney Local Environmental Plan 2012

The permissibility of the proposed development and the application of the relevant statutory planning instruments that apply to the site and the proposed development are addressed in detail below.

8.1. BIODIVERSITY CONSERVATION ACT 2016

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

Clause 2 of section 7.9 of the *Biodiversity Conservation Act* 2016 requires a DA for SSD to be accompanied by a biodiversity assessment. As part of the Concept SSD application, a Biodiversity Assessment Report was prepared by Ecoplanning (Appendix GG). The study area assessed by the biodiversity assessment included the boarder SCEGGS campus located at 215 Forbes Street, Darlinghurst, which comprise the Wilkinson House development area.

As noted within the biodiversity assessment, no native vegetation communities occur within or adjacent to the subject site. The Concept and detailed proposal are therefore not likely to have a significant impact on vegetation integrity, as the vegetation on the subject site has very low integrity and is not in a natural or near natural state.

The habitat on the subject site is unsuitable for the majority of threatened species that could occur within the locality. Two Ficus macrophylla were identified which provide potential foraging habitat for two threatened species, the Powerful Owl and the Grey-headed Flying-fox. However, these trees have been retained and the School is committed to their preservation. Both species are wide-ranging and mobile and more suitable habitat occurs in the locality, particularly in the Royal Botanic Gardens and Centennial Park. The low level of habitat suitability on the subject site may decrease during the construction proposed by the concept plan, but this impact is not likely to be significant.

The biodiversity 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 a letter dated 2 July 2021 (refer Appendix GG) that the development is not likely to have any significant impact on biodiversity values, and therefore the SSD DA is not required to be accompanied by a Biodiversity Development Assessment Report. As such, the proposal meets the requirements of the Bi*odiversity Conservation Act 2016* and the proposal will not impact on any significant vegetation or flora and fauna value.

8.2. ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 (EP&A ACT)

Pursuant to Section 4.36(2) of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**):

> *(2) A State environmental planning policy may declare any development, or any class or description of development, to be State significant development*

The proposal is classified as SSD as detailed in Section 8.3 below.

Table 8 below provides an assessment of the proposal against the objectives contained within Section 1.3 of the EP&A Act.

Table 8 Objectives of the EP&A Act

Objectives	**Comment / Response**
To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources.	The proposal promotes the social and economic welfare of the community through the delivery of the adaptive re-use of Wilkinson House, which comprise high quality learning spaces for the enhancement of education.
To facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about the environmental planning and assessment.	This detailed proposal is committed to achieving high standards of ecologically sustainable development as outlined in the ESD Report in Appendix P. ESD measures are also discussed in Section 10.5 of the EIS.
To promote the orderly and economic use and development of land.	The proposal promotes the orderly and economic development of the land by the adaptive re-use of a heritage building for educational needs.
To promote the delivery and maintenance of affordable housing.	N/A
To protect the environment, including the conservation of threatened and other species of native animals and plants, ecologically communities and their habitats.	The proposal is located within an established urban environment and relates to the adaptive reuse of a heritage item. A BDAR waiver has been issued from the DPIE which determined the proposal will have no impact on threatened species or their habitats.
To promote sustainable management of built and cultural heritage (including Aboriginal cultural heritage).	The site is identified as a local heritage item (I301) being the "Sydney Church of England Girls Grammar School Group including Barham, Church Building and Wilkinson House and their interiors and grounds". The site is located also within the East Sydney 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

Objectives	Comment / Response
	(I300), Thompson Street terrace group (I473), and “Nelson House” (I303). The proposed altertaion and addtion to Wilkinson House has been guided by the endorsed whole of site CMP and a detailed CMP for Wilkinson House (attached at Appendix J). Both CMPs guide the conservation and management of the significant elements of the SCEGGS Darlinghurst campus, including detaield conservation policies for Wilkinson House. In addition, a detailed assessment of the heritage impacts of the proposal is provided within the Heritage Impact Assessment attached at Appendix H and summarised in Section 10.6 of the EIS.
To promote good design and amenity of the built environment.	The detailed design of Wilkinson House exhibits design excellence and mitigates adverse amenity impacts. The proposal responds to design and amenity objectives which has been detailed in the design report attached at Appendix C and discussed in further detail in Section 10.1 of the EIS.
To promote proper construction and maintenance of buildings, including the protection of the health and safety of their occupants.	Construction traffic impact assessment and management are discussed in Section 10.4 of the EIS. Construction waste assessment and management are discussed in Section 10.13.2 of the EIS. Construction noise and vibration assessment and management are discussed in Section 10 of the EIS. A Construction Environmental Management Plan is attached at Appendix DD.
To promote the sharing of responsibility for environmental planning and assessment between different levels of government in the State.	Relevant government agencies have been consulted throughout the concept and detailed design processes. Stakeholder engagement is detailed in Section 9.2 of this EIS.
To provide increased opportunity for community participation in environmental planning and assessment.	An inclusive public consultation strategy has been implemented throughout the project design process (refer to Section 9 of the EIS and Consultation Outcome Report attached at Appendix X)

Overall, the proposed development is consistent with the objects and general terms of the EP&A Act.

8.3. STATE ENVIRONMENTAL PLANNING POLICY (STATE & REGIONAL DEVELOPMENT) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* (**SRD SEPP**) has the purpose of identifying development that is SSD and regionally significant development.

The Concept DA (SSD 8993) was classified as SSD under Section 4.36 of the EP&A Act as the development has a CIV in excess of $30 million.

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 regardless of CIV, 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. Accordingly, all subsequent detailed DAs to be sought under the Concept Approval (SSD 8993) are considered SSD, including this first detailed application for the adaptive reuse of Wilkinson House.

As stated, a concurrent modification has been lodged to support the SSDA to ensure it is consistent with the Concept Approval (as modified).

In accordance with clause 8A of the SRD SEPP the Independent Planning Commission is designated as the consent authority if there is a Council objection to the DA or there are more than 50 unique submissions. Unless otherwise declared, the Minister will be the consent authority for the detailed SSDA (under section 4.5(a) of the EP&A Act.

8.4. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

S*tate Environmental Planning Policy (Infrastructure) 2007* (**ISEPP**) provides the legislative planning framework for infrastructure and the provision of services across NSW.

Clause 102 of the Infrastructure SEPP relates to the impacts of road noise or vibration on nonroad development, and is triggered for land which adjoins a road corridor with an annual average daily traffic (AADT) volume of more than 40,000 vehicles. If triggered, it requires the consent authority to consider the potential effects of road noise or vibration on an educational establishment.

The site is not located in close proximality to roads with a volume of more than 40,000 vehicles. Notwithstanding, the detailed Acoustic Impact Assessment (Appendix R) includes recommendations on acoustic performance of the façade at Wilkinson House, to minimise noise intrusion to the school facility.

8.5. STATE ENVIRONMENTAL PLANNING POLICY (EDUCATIONAL ESTABLISHMENTS AND CHILD CARE FACILITIES) 2017

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

The Education SEPP establishes consistent State-wide assessment requirements and controls, that override development standards contained within other environmental planning instruments. Part 4 of the Education SEPP identifies school specific development controls, with clause 35 Schools—development permitted with consent containing the relevant controls.

The proposal has been assessed against the relevant provisions of Part 4 within the following table.

Table 9 Education SEPP Compliance Table

Clause	Proposal	Compliance
Clause 35 Schools—development permitted with consent		
(1) Development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone.	The proposed development is in Zone R1 General Residential which is a prescribed zone for the purposes of the Education SEPP.	YES
(2) Development for a purpose specified in clause 39 (1) or 40 (2) (e) may be carried out by any person with development consent on land within the boundaries of an existing school.	Development consent is sought for the proposed works.	YES
(5) A school (including any part of its site and any of its facilities) may be used, with development consent, for the physical, social, cultural or intellectual development or welfare of the community, whether or not it is a commercial use of the establishment.	The proposed Wilkinson House is not intended for community use. The existing community use within the wider SCEGGS campus remains.	N/A
(6) Before determining a development application for development of a kind referred to in subclause (1), (3) or (5), the consent authority must take into consideration: (a) the design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4, and (b) whether the development enables the use of school facilities (including recreational facilities) to be shared with the community.	The EIS addresses the design quality of the development. A formal response to the Schedule 4 School Design Principles is included in the Design Report prepared by Smart Design Studio (Appendix C).	YES
(7) Subject to subclause (8), the requirement in subclause (6) (a) applies to the exclusion of any provision in another environmental planning instrument that requires, or that relates to a requirement for, excellence (or like standard) in design as a prerequisite to the granting of development consent for development of that kind.	The CIV of the proposal is less than $50 million, a competitive design process is not required. Notwithstanding the above, as part of the consultation process, the proposal was presented to the State Design Review Panel for comments. This is further discussed in Section 9.2 of the EIS and addressed in the Design Report attached at Appendix C .	YES
(8) A provision in another environmental planning instrument that requires a competitive design process to be held as a prerequisite to the granting of development consent does not apply to development to which subclause (6) (a) applies that has a capital investment value of less than $50 million.	The CIV of the proposal is less than $50 million, a competitive design process is not required.	N/A

Clause	Proposal	Compliance
(9) A provision of a development control plan that specifies a requirement, standard or control in relation to development of a kind referred to in subclause (1), (2), (3) or (5) is of no effect, regardless of when the development control plan was made.	Notwithstanding this provision, relevant sections of the Sydney Development Control Plan 2012 have been considered through the development of the detailed SSDA.	N/A
(10) Development for the purpose of a centre-based child care facility may be carried out by any person with development consent on land within the boundaries of an existing school.	No centre based childcare is proposed as part of this Detailed SSDA.	N/A
(11) Development for the purpose of residential accommodation for students that is associated with a school may be carried out by any person with development consent on land within the boundaries of an existing school.	The proposal does not include any residential accommodation.	N/A

Clause 42 of the Education SEPP allows the proposal to contravene a development standard imposed by the Education SEPP or any other environmental planning instrument under which the consent is granted:

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

The development proposes to reconstruct the existing roof of Wilkinson House, to accommodate a rooftop terrace and to rebuild mansard roof in copper with angled blades and clerestory windows that restore/reference the vertical articulation of the original Emil Sodersten elevation. The proposed roof result in a nominal increase in height of approximately 330mm. The proposed roof height exceeds the Height of Building development standard which applies to the Site (noting that the existing building already exceeds the height limit). However, as per Clause 42 of the Education SEPP, development consent may still be granted, without the need for a formal clause 4.6 Variation to either development standard. Height non-compliance is discussed further in Section 8.11 and Clause 4.6 Statement attached at Appendix HH.

Clause 35(6) requires the consent authority to consider the design quality principles set out in Schedule 4 of the Education SEPP prior to determination. Detailed response is provided within the Design Report prepared by Smart Design Studio attached at Appendix C.

8.6. DRAFT STATE ENVIRONMENTAL PLANNING POLICY (EDUCATIONAL ESTABLISHMENTS AND CHILD CARE FACILITIES).

DPIE is currently conducting the first review of the Education SEPP since its introduction in 2017. The review is part of a larger policy review program driven by an initiative of the NSW Government to ensure faster delivery of Government and infrastructure projects, including education facilitates.

The proposed changes, outlined in the Explanation of Intended Effect (**EIE**) were on exhibition from 20 November until 17 December 2020, and the amendments are currently under consideration.

One of the key amendments is to amend Subclause 15(2), Schedule 1 of the *State and Regional Development SEPP* to increase the capital investment value for alterations and additions to existing schools from $20 million to $50 million, and to permit demolition and redevelopment of an existing school via this clause.

Although the proposal has a CIV less than $50 million, because 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, all subsequent detailed DAs, including this proposal are considered SSD.

Overall, the proposed amendments will not have any material impact on the proposed development, and the proposal would be able to comply with any relevant future provisions relating to the site.

8.7. STATE ENVIRONMENTAL PLANNING POLICY NO.55 – REMEDIATION OF LAND

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

Land Contamination

A detailed site investigation (**DSI**) of Wilkinson House was undertaken by Douglas Partners in August 2019 as part of the Concept SSD DA. An updated report has been prepared by Douglas Partners and is attached at Appendix Q. The updated report:

- Reviews the previous stage 1 report
- Reviews the current proposal under this detailed SSDA
- Site walkover to identify accessible sampling locations and site features;
- Drill/ excavate five sample locations.
- Collect and analysis disturbed soil and/or bedrock samples from all sampling locations, including field sampling and laboratory analysis with reference to standard environmental protocols.
- Undertake assessment with reference to NSW EPA endorsed guidance and assesses the site's suitability for the proposed development.

Based on the scope of the works undertaken and results presented in the DSI, Douglas Partner concluded that the contamination on the site is limited to lead and B(a)P present in the fill on the site. These contaminants are non-volatile and hence a vapour intrusion pathway into buildings will not create any health concern. The primary source of concern is from a direct contact perspective. The exceedances in the fill can be mitigated during construction through either:

- Remove all fill from the building footprint; or
- Retain the fill beneath the building footprint with the ground level and / or basement floors (existing and proposed) acting as a cap and hence removing the potential complete source - pathway - receptor linkages. This option will require the implementation of a long-term environmental management plan (**LTEMP**) for the building footprint.

These options should be considered as part of the construction process.

Additionally, the following is recommended prior to or following demolition of existing structures (excluding the areas to be retained such as the external façade and existing foyer):

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

Based on the findings of this detailed contamination investigation, it is considered that the Wilkinson House site is suitable for the proposed educational use, subject to implementation of the above recommendations.

Groundwater

The regional groundwater table is expected to be well below the bedrock surface. During construction, seepage or perched groundwater would be expected along strata boundaries and through joints or partings within the rock. Seepage may also occur along the soil-rock interface.

Drainage measures will need to be provided in subsurface structures to allow seepage water to flow around the structures rather than exert hydrostatic pressures against them. Conventional drainage that ultimately diverts water into the local stormwater system is suitable for this purpose.

Acid Sulfate Soils (**ASS**)

A review of the Sydney 1:100,00 Geology Sheet indicates that the site is underlain by Triassic Hawkesbury Sandstone. Previous intrusive investigations on the site confirm the geological mapping with Hawkesbury Sandstone at shallow depths below the surface, as well as exposed sandstone bedrock observed beneath the Wilkinson House building.

Review of the NSW 1:25,000 Acid Sulfate Soil Risk Mapping (1994-1998), indicates the site is not in a mapped area for ASS occurrence. Additionally, a review of the CSIRO ASRIS ASS Mapping indicates that the site is mapped as having a low probability of ASS occurring. The area 50 m to the north of the site (which is located down-gradient and at a lower RL AHD) is classified as extremely low probability (1-5%) of ASS occurring.

The on-site ASS Plan Class is Class 5. The nearest soil class is Soil Class 2, 217 m to the north, which would only present an environmental risk if the proposed works lowered water table in that area below 1 m AHD. However, the permanent water table within the intact bedrock at the site is expected to be at many metres below the current site level and proposed design basement level and thus unlikely to be impacted by the proposed development.

Therefore, based on the mapped and observed geology, and the site (and proposed development levels for the building) sits above 25 m AHD, Douglas Partner s confirms that ASS are not considered to be of risk for the site.

8.8. DRAFT STATE ENVIRONMENTAL PLANNING POLICY (REMEDIATION OF LAND)

The *Draft State Environmental Planning Policy (Remediation of Land)* is the proposed new land remediation **S**EPP set to replace SEPP 55. Public exhibition of the 'explanation of intended effect' for the Draft Remediation SEPP and draft planning guidelines was completed in April 2018.

The Draft Remediation SEPP will retain the objectives of SEPP 55 and reinforce the successful aspects of the framework. In terms of relevant changes applicable to development applications, clause 7 of SEPP 55 is proposed to be incorporated into the Draft Remediation SEPP. In addition, the list of potentially contaminating activities and the purpose of a 'preliminary site investigation' (**PSI**) and 'detailed site investigation' (**DSI**) will be integrated into clause 7 of the Draft Remediation SEPP.

As discussed in the previous section, a DSI has been undertaken by Douglas Partners for the Site. Based on the scope of the works undertaken and results presented in the DSI, Douglas Partner concluded that the contamination on the site is limited to lead and B(a)P, these contaminants are non-volatile and hence will not create operational health risk. Therefore, it is considered that the Wilkinson House site is suitable for the proposed educational use, subject to implementation of the recommendations during construction.

8.9. DRAFT STATE ENVIRONMENTAL PLANNING POLICY (ENVIRONMENT)

The *Draft State Environmental Planning Policy (Environment)* (**Draft Environment SEPP**) is the new SEPP seeking to consolidate, repeal and replace the following seven existing SEPPs:

- State Environmental Planning Policy No. 19 – Bushland in Urban Areas
- State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011
- State Environmental Planning Policy No. 50 – Canal Estate Development
- Greater Metropolitan Regional Environmental Plan No. 2 – Georges River Catchment

- Sydney Regional Environmental Plan No. 20 – Hawkesbury-Nepean River (No.2-1997)
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005
- Willandra Lakes Regional Environmental Plan No. 1 – World Heritage Property.

Public exhibition of the Draft Environment SEPP was completed in January 2018. The Draft Environment SEPP will deliver a policy instrument that contains a single set of planning provisions for catchments, waterways, bushland and protected areas.

The land is not subject to most of the abovementioned SEPPs, nor is it identified as being attributed to, waterways, bushland or protected areas. Impact to Sdyney Harbour Catchment is discussed below.

8.10. SYDNEY REGIONAL ENVIRONMENTAL PLAN (SYDNEY HARBOUR CATCHMENT) 2005

SCEGGS Darlinghurst is located within the Sydney Harbour Catchment, as indicated in the map of Gazette No 38 of 7 April 1989 at page 1841. The *Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005* (**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 are addressed by the SSDA and discussed in Section 10 of the EIS.

8.11. SYDNEY LOCAL ENVIRONMENTAL PLAN 2012

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

8.11.1. Land Zoning and Permissibility

The site is zoned R1 General Residential within the SLEP. The proposed lands use on the site includes '*educational establishment'* which is permissible with development consent in the R1 General Residential zone. The proposal is consistent with the objectives of the R1 General Residential zone as it:

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

8.11.2. Development Standards

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

Table 10 Relevant SLEP Development Standards

Consideration	Control	Proposal	Compliance
Clause 4.3 Height of Buildings	Maximum 15 metres.	The proposed alternation and addition to Wilkinson House has the following maximum RLs: ▪ A lift core with RL 46.44, which complies with the 15m height control. ▪ The roof extension has a maximum parapet height of RL45.85. The roof extension exceeds the 15m height	Largely complies – refer to justification at Appendix HH

Consideration	Control	Proposal	Compliance
		limit by 0.12m at the corner of the roof along Forbes Street. Due to the sloping topography of the site, the roof exceeds the 15m height limit by 1.37m at the western corner of the St Peters Street. It should be noted that due to the sloping topography, the existing building also exceeds the height control along St Peters Street. The proposal result in a nominal increase in total building height of approximately 330mm when compared to the existing roof form. The proposed roof takes reference from the vertical articulation of the original Emil Sodersten elevations, therefore restoring the roof form to its original design. ▪ A plant enclosure on top of the eastern portion of Joan Freeman roof with RL 45.77, which exceeds the 15m height limit by approx., 1.4m. The proposed extension is to accommodate a plant enclosure for air condensers. It should be noted that the proposed plant enclosure finishes at the same RL as the existing carpark exhaust enclosure and is slightly below the height of the new Wilkinson House roof. ▪ Due to the significant natural fall in land across the site from south to north and east to west, the existing Wilkinson House building marginally exceeds the 15m height of building standard at the western corner of the St Peters Street frontage by 1.37m. Overall, the proposal largely complies with the LEP height control. The minor encroachment (the roof and the plant enclosure) would result in negligible environmental and amenity impact, including privacy, visual amenity,	

Consideration	Control	Proposal	Compliance
		overshadowing and on the surrounding heritage items. The minor height noncompliance is justified within the Clause 4.6 height variation request attached at Appendix HH.	
Clause 4.4 Floor Space Ratio **(FSR)**	Maximum FSR of 1.5:1 for the majority of the SCEGGS site. The Joan Freeman Science Building site is subject to FSR of 2:1.	Based on a site area of 11,519sqm and the varying FSR controls for the site, the maximum available GFA available on the site is 17,729sqm. The proposed addition and alteration to Wilkinson House indicatively accommodate 1,683.6sqm of GFA (including existing envelope GFA and additional GFA accommodated within the building additions). The total GFA of the SCEGGS campus, including the additional GFA in Wilkinson House has an approximate GFA of 17,268sqm, which equates to a FSR of 1.5:1, complying with the maximum FSR controls for the site.	YES
Clause 5.10 Heritage Conservation	The site is identified as local heritage item (I301) “SCEGGS including Barham, Church Building and Wilkinson House and their interiors and grounds”. The site is also within the East Sydney heritage conservation area (C13)	The proposal includes alterations and additions to Wilkinson House. No works are proposed to other SCEGGS buildings. The design of the Wilkinson House is guided by the Conservation Management Plan for Wilkinson House (attached at Appendix J) prepared by Urbis. A Heritage Impact Statement prepared by Urbis is attached at Appendix H. The Heritage Impact Statement concluded that: ▪ CMPs for both the SCEGGS Darlinghurst Campus and Wilkinson House have been prepared by Urbis in November and December 2021. The CMP for Wilkinson House updated the previous CMP prepared for the place as prepared by GML in 2001. The proposed adaptive reuse of Wilkinson House has been informed by these CMPs and their	Complies Refer to Appendix H and Section 10.6 of this EIS

Consideration	Control	Proposal	Compliance
		relevant policies have been addressed. ▪ The proposed adaptive reuse of Wilkinson House has been designed to be sympathetic to Wilkinson House and the SCEGGS Darlinghurst campus, the East Sydney HCA and the surrounding heritage items. ▪ The proposed development will not change the existing topography and will maintain the existing district and street corridors. The scale of additions is small in scale, bulk and height and will reinforce the existing status quo. ▪ The proposed new lift addition to the south of Wilkinson House has been designed to be subservient. It has been sufficiently setback from Forbes Street and is overall a narrow unobtrusive addition that allows the new addition to be read as a distinct element that links Wilkinson House to the Centenary Sports Hall and JFTSC. The overall height, setback and alignment is complementary to the locality, Wilkinson House and the SCEGGS Darlinghurst campus. ▪ The proposal is not expected to unreasonably impact on the heritage significance of the site and the conservation area. Heritage impact is discussed in Section.10.6 of the EIS.	
Clause 6.21 Design Excellence Provisions	Development consent must not be granted for a development that requires a development control plan to be prepared unless a competitive design process has been held.	As part of the consultation process, the proposal was presented to the State Design Review Panel (**SDRP**) and has been amended to respond to comments from the SDRP to ensure design excellence is achieved. A competitive design process is not required under clause 6.21 (5) of the SLEP, as: - The proposal is less than 25m - The CIV is less than $100,000,000	Yes

Consideration	Control	Proposal	Compliance
		- Clause 7.20 of the SLEP does not apply to the proposal (this is discussed in detail below) - Further, cl 35(8) of the Education SEPP turns off the requirement of clause 6.21 of SLEP for a competitive design process for any school development that has a CIV of less than $50 million. Notwithstanding the above, a 4 months voluntary architectural concept design competition process was held by SCEGGS, to explore concept design options. This is further discussed in Section 6.2 of the EIS and addressed in the Design Report attached at Appendix C.	
Clause 7.9 Car Parking	The maximum number of car parking spaces for education facilities is 1 space for every 200sqm of GFA used for those purposes.	No changes are proposed to the existing car parking number and the car park arrangement approved under Concept SSD 8993.	N/A
Clause 7.14 Acid Sulfate Soils	Class 5	A Phase 1 Preliminary Site Investigation (**PSI**) report was provided by Douglas Partners which accompanied the Concept SSD DA. The PSI report provided acid sulphate soil assessment across the main SCEGGS campus, including the Wilkinson House site. The main SCEGGS campus is classified as having a low probability (6-7%) of Acid Sulfate Soils occurring. The permanent water table within the intact bedrock is expected to be at many tens of metres below the current site level, and so there is very minimal environmental risk present. Based on the previously observed geology, site topography and mapping, ASS do not represent an environmental constraint for the future development on the site.	Yes
Clause 7.15 Flood Planning	The flood planning level that applies to any flood affected lot is the level of a 1:100 ARI flood event plus 0.5m freeboard	Flood impact and management strategy is discussed in the Civil Engineering Reprot prepared by Northrop and attached at Appendix W. There is a minor amount of flooding on Forbes Street, including less than	Yes Refer to Appendix W and

Consideration	Control	Proposal	Compliance
		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. The flood planning level for the Wilkinson Building is taken as the invert of the kerb on Forbes Street plus 0.5m. The invert level of the kerb in front of the current Forbes Street entrance to the Wilkinson House Building is approximately 31.78m AHD. This results in a Flood Planning Level of RL32.38m AHD for this entrance of the Wilkinson Building. The ground floor of the Wilkinson Building has a finished floor level of RL 33.30m AHD, which complies with the flood planning level. The building additionally has a proposed lower ground floor with a single egress door to St Peters Street at the north-western corner of the building. There is no overland flow path identified on the southern side of St Peters Street . The invert of gutter opposite this door is 28.62 AHD, this results in a flood planning of 29.22 AHD. The proposed basement floor level is at RL 29.68m AHD, which is also compliant with the flood planning level. The design of Wilkinson House complies with flood planning level.	Section 10.12 of the EIS.
Clause 7.20 Development requiring or authorising preparation of a DCP	A site specific DCP or Concept Plan application is required for a site exceeding 5,000sqm in area	Clause 8(1) of the Education SEPP states that (subject to clause 8(2)) if there is an inconsistency between the Education SEPP and another EPI, the Education SEPP prevails to the extent of the inconsistency. Clause 8(2)(i) of the Education SEPP states that the provisions of clause 7.20 of the SLEP do not apply to development carried out under the Education SEPP. In any case, the SSD DA is consistent with Concept SSD 8993 (as modified) and satisfies this requirement.	Yes

8.12. PLANNING AGREEMENTS AND DEVELOPER CONTRIBUTIONS

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

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

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

The proposed Detailed DA does not include an increase in the population of staff or students. Therefore contribution should be calculated based on the additional GFA proposed to Wilkinson House.

Development contribution under section 7.11 of the EP&A Act will be paid to Council in relation to the Sydney Development Contributions Plan 2015 for the additional gross floor area of 521.7sqm (Proposed 1,683.6sqm – existing 1,161.9sqm) as the result of the proposed Wilkinson House detailed design.

8.13. SYDNEY DEVELOPMENT CONTROL PLAN 2012

Sydney Development Control Plan 2012 (**SDCP**) provides detailed controls for specific development types and locations. Most controls in the SDCP relate to character, streetscape and public domain works. However, under Clause 11 of *State Environmental Planning Policy (State and Regional Development) 2011,* the application of local development control plans is excluded when assessing DAs for SSD projects. Notwithstanding this, the proposal has been assessed against the key relevant controls of the SDCP in the table below.

Table 11 Sydney DCP 2012 Compliance Table

Reference	Provision	Proposal	Compliance
Section 2 – Locality Statement			
2.4.9 East Sydney	Development is to respond to and complement heritage items and contributory buildings within heritage conservation areas, including streetscapes and lanes.	The proposed alterations and additions have been guided by the polices outline within the Wilkinson House CMP. The proposal retains the existing Wilkinson House façades and built form. The proposed lift extension is setback from the street. Further, the materiality of the proposed lift extension is lightweight and is recessive to the main built form. The lift portion extends past the roof form of Wilkinson House, ensuring the roof form is uninterrupted. The existing tiled mansard roof is to be reconstructed which results in a nominal increase in height of approximately 330mm. Despite the minor increase in height, the proposed roof takes reference from the vertical articulation of the original Emil Sodersten roof form,	Yes

Reference	Provision	Proposal	Compliance
		therefore restoring the roof form to its original design. The design also replaces the eaves soffit to match existing. The proposed external additions are able to complement the existing Wilkinson House building and continue to respond to the existing streetscape of Forbes Street.	
	Maintain the building heights of SCEGGS Darlinghurst to allow local views from adjacent houses along Thomson Street.	The proposed lift addition is below the 15m height limit and will not obstruct view from surrounding properties. The proposed maximum roof height exceeds the existing roof height by 330mm, which is minor and can continue to relate to the existing maximum height of other buildings across the SCEGGS site. The plant enclosure on top of the eastern portion of Joan Freeman roof has a of RL 45.77, which finishes at the same RL as the existing carpark exhaust enclosure and is slightly below the height of the new Wilkinson House roof. The height of the plant enclosure will read as part of the existing built form onsite. Notably within the Concept Approval, the highest building on the SCGGs site will remain as the Chapel Building, with all other buildings, including the proposed Wilkinson House positioned to be subservient to the prominent Chapel Building. Overall, the proposal will not have a significant impact on views towards the Sydney CBD with iconic Sydney city skyline views maintained.	See Section 10.3.2 of this EIS for further assessment of view impacts.
Section 3 – General Provisions			

Reference	Provision	Proposal	Compliance
3.2.1.1 Sunlight to publicly accessible spaces	Shadow diagrams are to be submitted indicate the existing condition and proposed shadows at 9am, 12 noon and 2pm on 14 April and 21 June.	Shadow Diagrams have been prepared by Smart Design Studio. Refer to Appendix D.	See Section 10.3.1 of this EIS for further assessment.
3.2.1.2 Public views	Buildings are not to impede views from the public domain to highly utilised public places, parks, Sydney Harbour, Alexandra Canal, heritage buildings and monuments including public statues, sculptures and art.	The proposed addition does not impede views from public places. Potential view impacts on private properties are considered at Appendix E and Section 10.3.2 of this EIS.	Yes
3.2.2 Addressing the street and public domain	Buildings are to be designed to maximise the number of entries and visible internal uses at ground level.	The existing building entrance from Forbes Street is currently only used for special occasions due to security requirements of the School, and this arrangement is proposed to be retained. Primary entry to Wilkinson House is via the main school entry from further south of Forbes Street or within the school.	Existing street entrance from Forbes Street is retained.
3.2.7 Reflectivity	Light reflectivity from building materials used on facades must not exceed 20%.	The façade of the Wilkinson House building has been retained. Alterations and new additions, such as the lift is designed to impropriate materials and finishes which cause minimal reflectivity.	Yes
3.3.1 Competitive Design Process	Development in which a development control plan is required to be prepared under Clause 7.20 of the SLEP must be subject to a competitive design process.	Pursuant to Clause 35 (8) of the Education SEPP, the prerequisite does not apply.	N/A
3.5.2 Urban Vegetation	Development applications are to include a Landscape Plan, except where they are for single dwellings, terraces and dual occupancies. Locally indigenous species are to be used where possible and in accordance with the City's Landscape Code.	A Landscape Plan is attached at Appendix F The plan proposes to plant native Australian plant, and other vegetation species on the ground floor and the roof terrace in accordance with the City of Sydney's Landscape Code.	Yes
3.6 **ESD**	Development is to be designed and constructed to reduce the need for active heating and cooling.	An ESD Report is attached at Appendix P. The report confirms that the proposal will meet the	Yes

Reference	Provision	Proposal	Compliance
	Apply principles and processes that contribute to ESD. Generally, water used for irrigation of public and private open space is to be drawn from reclaimed water or harvested rainwater sources.	City of Sydney and NSW Government's requirements for sustainability. When considered against the Green Star benchmark the project would exceed a 4 Star rating or Australian Best Practice Sustainability. SCEGGS has set a design benchmark to incorporate the design principals of an Australian Excellence (5 Star) rating.	
3.7 Water and Flood Management	Apply sustainable water use practises. Assist in the management of stormwater to minimise flooding and reduce the effects of stormwater pollution on receiving waterways. Ensure that development manages and mitigates flood risk	The proposal has been suitably designed to manage stormwater discharge and prevent adverse flood impacts. See Section 10.12 of EIS for further discussion and Appendix W.	**Yes**
3.9.1 Heritage Impact Assessment	Where the development application proposes the full or substantial demolition of a heritage item, the Heritage Impact Statement is to: demonstrate why the building is not capable of retention or re-use include a statement from a quantity surveyor comparing the cost of demolition to the cost of retention if the demolition is recommended primarily on economic grounds	A Heritage Impact Assessment has been prepared by a qualified heritage consultant (Urbis Heritage) and the design has bene assessed against the Wilkinson House CMP. See Appendix H and Section 10.6 of this EIS.	Yes
3.11.1 Managing Transport Demand	A Transport Impact Study is required to address the potential impact of the development on surrounding movement systems	Traffic Impact Assessment has been prepared and is Appendix L. See Section 10.4 of this EIS for detailed discussion.	Yes
3.11.3 Bike Parking and Associated Facilities	Provide 1 space per 10 staff and 1 space per 10 students on-site.	The proposal does not propose to increase staff or student population. No change is proposed to the existing bike storage facility for staff and student.	Yes
3.12 Accessible Design	All development must comply with: All Australian Standards relevant to accessibility, the Building Code of Australia access requirements, and *Disability Discrimination Act 1992*.	The proposal greatly improves accessibility and has been inclusively designed in accordance with the relevant Standards. Refer to the	Yes

Reference	Provision	Proposal	Compliance
		Accessibility Assessment at Appendix Y and BCA Assessment Report at Appendix Z.	
3.13.1 CPTED	The proposed development must be designed in accordance with the NSW Department of Planning and Environment's CPTED principles.	The proposal has been appropriately designed in accordance with the principles. Refer to Section 6.4. of EIS for the assessment.	Yes
3.14 Waste Management	A Waste and Recycling Management Plan is to be submitted with the Development Application and will be used to assess and monitor the management of waste and recycling during construction and operational phases of the proposed development.	An Operational Waste Management Plan has been prepared. Refer to Appendix V.	Yes

9. COMMUNITY AND STAKEHOLDER ENGAGEMENT

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS.

9.1. ENGAGEMENT CARRIED OUT

The following public authorities and community groups were consulted during the preparation of the EIS:

- Adjoining landowners and occupants, including the strata committee of Horizon Apartment
- Department of Planning and Environment (**DPIE**)
- City of Sydney Council
- Government Architect NSW (through the NSW **SDRP** process)
- Transport for NSW (**TfNSW**)
- Ausgrid
- Sydney Water
- Registered Aboriginal Parties (**RAP**s)

9.2. STAKEHOLDER VIEWS

A summary of the responses to issues raised by stakeholders during the engagement process is provided in the table below.

Table 12 Stakeholder Engagement: Issues and Responses

Issues Raised	**Response**
City of Sydney Council Prior to and during the EIS preparation phase, the project team have consulted extensively with City of Sydney Council, both with the planning team and the heritage team. Consultation with Council mainly focused on the Site Wide and Wilkinson House CMP and the proposed design for Wilkinson House.	
14 April 2021 The following items were discussed: CMP Strategy and proposed timing (this change was included as part of the 2nd Modification Application to SSD-8993 and approved by DPIE on 6 July 202) Update on the internal design competition and concept design principles for Wilkinson House Timing of upcoming applications: Modification Application for CMP timing and SSDA for the Wilkinson House	
SCEGGS team invited Council for a site visit.	Council heritage representative – Tony Smith attended the site visit with SCEGGS project team on 2 May 2021.
Council questioned that detailed design work was leading the CMP, and requested for CMP to be finalised prior to commencing detailed design work for Wilkinson House.	SCEGGS responded that the CMP has been well progressed and is guiding the detailed design as it progresses.

Issues Raised	Response
	The SCEGGS project team noted that the presentation was for indicative design ideas and they would like to engage with Council further to progress heritage interpretation. The site wide CMP contains board adaptive reuse strategy for Wilkinson House, and grading of significance, which has been guiding the design of Wilkinson House.
17 August 2021 To discuss draft site wide CMP	
To satisfy the consultation requirement as per condition A13, consultation with City of Sydney Council has been documented in the supplementary documents that accompanied the site wide CMP, formally lodged to DPIE for endorsement on 8 September. This includes two letters providing response and justification to Council's comments. The final CMP has been updated in accordance with Council's review comments. Where comments are not been addressed in the CMP, detailed justification is provided in the response letter.	
30 September 2021 To discuss Wilkinson House CMP	
To satisfy the consultation requirement as per condition B4a(b), consultation with City of Sydney Council has been documented in Appendix JJ. This includes a letter from Urbis providing a detailed response and justification to Council's comments. The final Wilkinson House CMP has been updated in accordance with Council's review comments. Where comments are not been addressed in the CMP, detailed justification is provided in the response letter.	
21 October 2021 To present Wilkinson House Design.	
Council supported the external change/additions to Wilkinson House and that the overall changes, externally, would result in no significant heritage impact.	Noted.
Council noted that the design as presented is likely to comply with the policies of the CMP.	Noted.
Council confirmed the location of the lift is appropriate, minimal visual impact to the street and a sensitive addition.	Noted.
Council appreciate the amount of work that has gone in to resolve the shape of the lift, material and colour selection.	Noted.
The external conversation work is positive, e.g. reconstruction of the roof – noted that	Noted.

Issues Raised	Response
the original roof form is retained, the material is not original so change in material is supported. Replacement of eaves soffit (to match existing) was supported.	
The linking of the eaves and the lift addition is supported and sensitive	Noted.
The recessed balcony, the passive control, steel frame and sun control blinds are positive and contribute to enhancing the internal amenity and will clearly be read as new insertions.	Noted.
The proposed new location of the staircase was positively received being in the location of the former lightwell.	Noted.
Council asked about the angle of the solar panels and potential view impact.	Solar panels will be mounted flat to minimise view impact.
Council would like the applicant to address the loss of significant fabric vs. the benefit of the proposal, however, acknowledged that the project had a collision of briefs with education needs conflicting with heritage fabric. The approach taken was considered to be a constructional reality.	The loss of heritage fabric and the benefit of the proposal is addressed in Section 3.3.2 of the EIS and detailed in the Heritage Impact Assessment attached at Appendix H. Overall, the proposal is able to retain the most significant heritage fabric, including the external façade, the lounge hall and lobbies. The benefit of the proposal, including providing BCA/fire compliant and high quality classrooms outweighs the loss of internal heritage fabric, and is therefore justified.
Council mentioned that because the proposal is demolishing all internal layout, the inside is a complete new building, the proposal should consider more internal interpretation – and improve the experience of using the space – adding a layer of richness to it, telling a storey, especially relating to the spatial relationship of the foyer. Precedent example: foyer of the MLC building.	Opportunity to incorporate heritage interpretation of the former residential flat building have been explored. Interpretation could include: ▪ Interpretation of the original staircase into a student led artwork, to be installed on the northern wall of GLA 9 on level 3. ▪ Interpretation of placement of balconies and original rooms inlaid in ceiling and floor of the common areas, to recall the original layout of the building. As the project progresses to post approval, the project team will continue to work with City of Sydney Council before finalising the heritage interpretation strategy.
More internal fabric could be considered for interpretation and use, including reuse of joinery (skirtings, architraves, picture rails, doors etc.) and further interpretation of	The perforated acoustic ceilings are proposed with a smooth finish, tracing the former plans. This treatment was initially only shown for the GLA's, but following consultation with City of Sydney Council, the project team

Issues Raised	Response
original layouts in floor inlays for the common spaces where terrazzo is proposed (bronze inlays suggested).	agree that the common areas would benefit from another layer of detail to tell the story of the building's past life. Therefore opportunity for the inlays to be incorporated on the floor finish of the common areas will be explored post approval. As the project progresses to post approval, the project team will continue to work with City of Sydney Council before finalising the heritage interpretation strategy.
The selection of grey terrazzo for the stairs is encouraged	Noted.
Council asked if floor level has been retained. Where new floor levels clash with the window openings, it was requested that these details be further resolved (such as reducing ceiling height).	New concrete slabs are proposed with floor levels being at similar RL's to existing.
Council asked about the retention of foyer area and if any excavation below is proposed. Details on how the foyer will be retained during demolition and construction will need to be detailed at a later stage.	Foyer has been retained and no excavation below is proposed. Preliminary structural advice has been obtained and will continually be developed to ensure that the existing fabric and lounge hall/ entry is protected and retained.
Interpretation of original staircase was supported and encouraged to think about how the stair interpretation can be included as part of the proposal. E.g. Wynyard train station, while acknowledge that it will need to be worked through with an artist.	As the project progresses to post approval, the project team will continue to work with City of Sydney Council before finalising the heritage interpretation strategy. The interpretation of the staircase maybe a student led artwork project.
Government Architect NSW	
A meeting was held with the Government Architect's Office (**GANSW**) State Design Review Panel (**SDRP**) on 4th August 2021 to discuss the proposed development. The meeting minutes are attached at Appendix EE. Detailed architectural response to the SDRP comments are included in the Design Report attached at Appendix C. SCEGGS and the Project architect have incorporated the recommendations made by SDRP, in particular: ▪ SCEGGS is engaging with Aboriginal community members and representatives of the school to establish an indigenous interpretation strategy to ensure that the aboriginal cultural value of the area is reflected. Options are being explored and may include signage and native planting on the roof, which can be used to start a conversation with students and provide education about the traditional owners of the land.	

Issues Raised	Response
▪ SCEGGS will continue to reconciliate and support Aboriginal education programme, including the offering of scholarships. ▪ European heritage interpretation will continue to be explored and resolved in the detailed design process. ▪ The rooftop terrace space is designed to hold smaller groups of students. The space is located adjacent to the Multipurpose space, which utilises sliding glass doors to provide flexibility to connect both areas and hold larger groups of students and staff or school events. ▪ The project team explored and tested materials for the lift, such as bricks and copper cladding. In testing these materials, it became apparent that the material needed to be more recessive and secondary to Wilkinson House. The lift addition has progressed to a glass structure that delicately sits within the streetscape. The use of material is recessive and will not distract the heritage value of Wilkinson House. ▪ Glazing setback has been increased, providing 450-500mm from existing brick face to face of window. To further enforce the shadow quality and rhythm of the existing façade. ▪ The horizontal sunshades have been removed. ▪ Infill glazing has bene further developed. The proposed steel frame windows are detailed to create interest and plays on the original elevations by Emil Sodersten. The arrangement draws on the original breakup of the existing timber windows. ▪ Energy efficiency has been considered throughout the project schematic design and will continue to heavily influence the design development process. SDRP has noted that subject to the endorsement of the Site Wide CMP and review of the EIS package during the public exhibition period, a further SDRP session may be held post exhibition if necessary.	
Department of Planning and Environment (DPIE)	
In addition to the Scoping Meeting held with DPIE's School Infrastructure Assessments team and ongoing liaison with this Team, the project team have consulted with DPIE's Infrastructure Management team extensively for the endorsement of the Ste Wide CMP. Consultation includes, phone discussion, providing response to review comments and two iteration updates on the Site Wide CMP. Representatives from the Infrastructure Management team also attended a site visit dated 18 November 2021, which helped the officer to better understand the school heritage, its siting and intended construction works.	
Transport for NSW (TfNSW)	
SCEGGS project traffic engineer emailed TfNSW on 13 September 2021 and requested preliminary comments on the proposal. TfNSW responded on 15 September 2021 and confirmed that based on the information that they have been provided with and considering the nature of the development, TfNSW currently have no objection to the development. Unless there are specific traffic issues, TfNSW would like to review any preliminary Traffic Impact Assessment first and provide any detailed comments then.	

Issues Raised	Response
Correspondence between Traffix and TfNSW is attached to the Transport Impact Assessment (Appendix L) The Traffic Impact Assessment will be exhibited with the EIS and the project team will address any comments received post exhibition and during the Response to Submission stage.	
Ausgrid	
An 'Alternation to existing connection' application has been submitted by ADP to Ausgrid on 10 November 2021. This application confirms the preliminary estimate of the anticipated electricity demand from the development. Copy of the application confirmation is attached at Appendix A of the Service Report. At the time of writing this EIS, no further information has been provided by Ausgrid. The project service consultant will liaise with Ausgrid when further information on these applications has been received.	
Sydney Water	
A Pressure and Flow application has been submitted to Sydney Water Corporation, which shows the existing connections to the water main are adequate to service the new development. A Feasibility Assessment application has been submitted to Sydney Water, to confirm if Sydney Water requires any upgrades of the water mains. A copy of the application confirmation is attached at Appendix B of the Service Report. At the time of writing this EIS, no further information has been provided by Sydney Water. The project service consultant will liaise with Sydney Water when further information on these applications has been received.	
Registered Aboriginal Parties (RAPs)	
Consultation with Aboriginal people has been carried out in accordance with *Aboriginal Cultural Heritage Consultation Requirements for Proponents (*Dep*artment of Environment, Climate Change and Water, 2010).* Detailed consultation process and outcome is documented in the ACHAR attached at Appendix K. A final copy of the ACHAR has been provided to all project RAPs on 26 October 2021. Ongoing consultation with RAPs should occur as the project progresses. This will ensure ongoing communication about the project and key milestones and ensure that the consultation process does not lapse, particularly with regard to consultation should the Chance Find Procedure be enacted.	

9.3. COMMUNITY VIEWS

The following actions were taken to inform the community regarding the project and seek feedback regarding the proposal:

- Community update - letterbox to nearby residents

- In August 2021, an A4 notification was distributed to approx. 2,200 properties surrounding SCEGGS school campus. Due to COVID-19 restrictions no supporting door knock was undertaken.

- Project email address and hotline
  - Project specific contact details, email address and phone number, were communicated to community and stakeholders.
  - As of 26 August 2021, two emails were received and one call was received – excluding any emails and calls related to registrations for the online sessions.
- Community and stakeholder sessions
  - A community information and feedback session were held on 18 August 5.30pm-6.30pm for owners in the Horizon building, located directly opposite Wilkinson House.
  - A separate community information and feedback session was held on Thursday 19 August 5.30pm-6.30pm. Key stakeholder groups who had previously had a high level of interest in the earlier proposal for Wilkinson House were offered to attend. The Thomson Street residents' group and East Sydney Neighbours Association (**ESNA)** also attended this session.

A detailed community engagement outcome report is provided as Appendix X**,** which details the way in which these issues have been addressed in the Design Report, the EIS and the accompanied consultants 'reports.

The key issues raised by the community are summarised in the table below.

Table 13 Community Views

Issue	**Response**
Design	
Strong support for proposed alteration and addition to Wilkinson House design from all community members who shared their thoughts. - better outcome than the previously proposed scheme.	Noted.
Would like to see the lift tower design reviewed, especially the use of material and colour.	The project team has since explored and tested materials such as bricks and copper cladding. In testing these materials, it became apparent that the material needed to be more recessive and secondary to Wilkinson House. The lift addition has progressed to a glass structure that delicately sits within the streetscape. The use of material is recessive and will not distract the heritage value of Wilkinson House. Material and colour testing is further discussed in Section 10.1 of the EIS.
Lighting impact on neighbours	A Lighting Strategy has been developed by ADP and is attached at Appendix G. The lighting design for the proposal aims to achieve an elegant and discreet solution that will enhance the aesthetic qualities of the building, whilst avoiding impact to neighbours by recommending lighting design solution to comply with Australian Standards.
Heritage	

Issue	Response
Very supportive and appreciative of the preservation of historic character.	Noted.
Heritage significance of internal structures	The Conservation Management Plan for Wilkinson House grades the various elements of the interiors in terms of their contribution and demonstration of the place's overall significance. The entrance lobby and lounge hall are recognised as being of high significance and will be retained. The existing staircase and its associated vestibules are graded as being of Moderate significance. However, as the existing staircase poses a major limitation for the buildings in terms of fire risks and accessibility, it is proposed to be removed and a new central staircase is proposed with materiality that reference the former. The original balconies and former layout of the original flat buildings are proposed to be removed; however, interpretative strategies are proposed to ensure that the story of the early history of the building can continue to be told through floor and ceiling inlays. The location of the balcony openings is retained with new glazing, to ensure these spaces continue to be read as balcony openings from the exterior. While it is proposed to remove original fabric from the interiors, it is considered appropriate that the building is adaptively reused to serve the evolving needs of SCEGGS, particularly in consideration that a major part of the place's significance is vested in its association with SCEGGS Darlinghurst. Consultation has also been undertaken with the City of Sydney Heritage team to gather their feedback on the CMP, which has in turn guided the design approach for Wilkinson House's adaptive reuse.
Construction management	
Construction traffic management will be important to maintain local on-street parking and ensure safety and traffic flow	A preliminary Construction Traffic Management Plan (**CTMP**) prepared by Traffix is included Appendix O, which details construction traffic management measures. Including construction vehicle routes, work zone, pedestrian management etc. A final CTMP will be prepared and submitted to the relevant authority in response to any conditions of consent.
On street parking by construction workers.	Given the inner city site constraint and limited onsite parking, no onsite parking will be made available for construction workers. During induction, workers will be encouraged to

Issue	Response
	carpool and utilities public transport in the close vicinity of the site, to reduce the impact of off street parking. Temporary bicycle parking and end of tip facilities can be provided onsite to encourage cycling. Details of construction parking management will be provided in the final CTMP prepared by the appointed contractor.
Traffic and access	
it was noted that the proposal for Wilkinson House would have no impact on current school operational traffic. There is ongoing interest in improving current operational traffic flows around the school with some respondents suggesting the removal of bollards at the end of Forbes Street to allow traffic flow between St Peters Lane / Premier Lane and Forbes Street.	The school noted that blocking access to St Peters Lane was at the discretion of Council who control the local roads. The school is not opposed to reopening the road but will need to consult with Council.

10. ENVIRONMENTAL IMPACT ASSESSMENT

This section describes the way in which the key issues identified in the SEARs have been assessed. It provides a comprehensive description of the specialist technical studies undertaken regarding the potential impacts of the proposed development and recommended mitigation, minimisation and management measures to avoid unacceptable impacts. Further detailed information is appended to the EIS, including:

- SEARs compliance table identifying where the SEARs have been addressed in the EIS (Section 4).
- Statutory compliance assessment identifying where the relevant statutory requirements have been addressed (Section 8).
- Community engagement table identifying where the issues raised by the community during engagement have been addressed (Section 9).
- Proposed mitigation measures for the project which are additional to the measures built into the physical layout and design of the project (Section 10.15).

The detailed technical reports and plans prepared by specialists and appended to the EIS are individually referenced within the following sections.

10.1. BUILT FORM AND URBAN DESIGN

The proposal has been designed to respond to the following key heritage, design principles, educational and functional requirements:

- Retain and restore the significant heritage features of Wilkinson House. This is achieved through retaining the external façades of the building, propose restoring works and retaining the existing internal entrance foyer and lounge hall. The proposed conservation works specifically celebrate the heritage significance of the building.
- Propose heritage sensitive additions to allow for the adaptive reuse of the building. This is achieved through a light touch of external additions and alterations of the building. Including:
  - The reconstruction of the roof is in the same form as the original, using the material of copper to create vertical ribs and standing seams, taking inspiration from Sodersten's original elevational drawings, and includes angled blades and high level operable windows.
  - Propose a new lift and linking structure to the south, which will provide a lift access into Wilkinson House and improve equitable access across the wider school campus. This lift addition is setback from Forbes Street and is distinct with the heritage fabric of Wilkinson House. The proposed lift is clad with glass, creating a recessive new addition.
- Greatly improve equitable access within the secondary school. This is achieved by providing a new lift, which will provide equitable access to Wilkinson House, as well as connecting Wilkinson House with Joan Freeman building and the Centenary Sports Hall. Reconstruct the internal circulation stair, which is wider, straight, and more streamlined, making it easier, efficient, safe, and pleasant for students and staff to navigate within the building.
- Create large, flexible and well-lit learning spaces that can accommodate the school's evolving teaching ambitions for the next twenty-plus years. This is achieved by providing two to three generously-proportioned General Learning Areas (GLA's) of approximately 60sqm in each floor level, with associated student breakout spaces, amenities, staff areas, and meeting spaces.
- Ensure excellent amenity is provided and sustainability goals are achieved. The proposal has been designed to exceed a 4 Star rating or Australian Best Practice Sustainability. The design has been benchmarked to incorporate design principals of an Australian Excellence (5 Star) rating.
- Opportunity for heritage interpretation strategy of remembering and referencing the original planning of the building, including the original internal staircase and room layout.

Further detailed aspects of the built form are outlined within the following sections and detailed in the Design Report attached at Appendix C.

The design evolution of the lift addition

Following the pre-lodgement consultation with the community and GANSW/SDRP, Smart Design Studio considered the consultation feedback and tested the materiality and form of the new lift addition. The design development work Smart Design have undertaken is detailed in Figure 11 below.

In the first design iteration,

- the form of the lift shaft was curved to reduce visual bulk and create a softer look.
- Materials were also investigated, including palette of brick or copper to visually connect Wilkinson House with the new extension.
- The design also tested multiple ways to construct and lay the bricks to create interest and detail.

However, due to the layers required with brick construction, the overall thickness of the wall build up clashed with the roof of Wilkinson House, disrupting its form.

In the second design iteration:

- Moving away from bricks, the use of copper was tested, as copper ties in nicely with the proposed copper roof.

However, the curved form with copper looks utilitarian and detracts from the streetscape.

In the final design iteration:

- The extension progressed to a more simplified rectilinear form, introducing glazing.
- The final design for the new extension link is a steel framed structure with glass cladding. This enforces the light touch approach and reduces the visual impact from the street.

In summary, the proposed form and materiality are contemporary, and is distinct with the heritage fabric of Wilkinson House. The use of glazing is light, is recessive in form and distinct from the heritage fabric of Wilkinson House, whilst activating the eastern façade and Forbes Street.

Figure 11 Lift addition design evolution

Source: Smart Design Studio

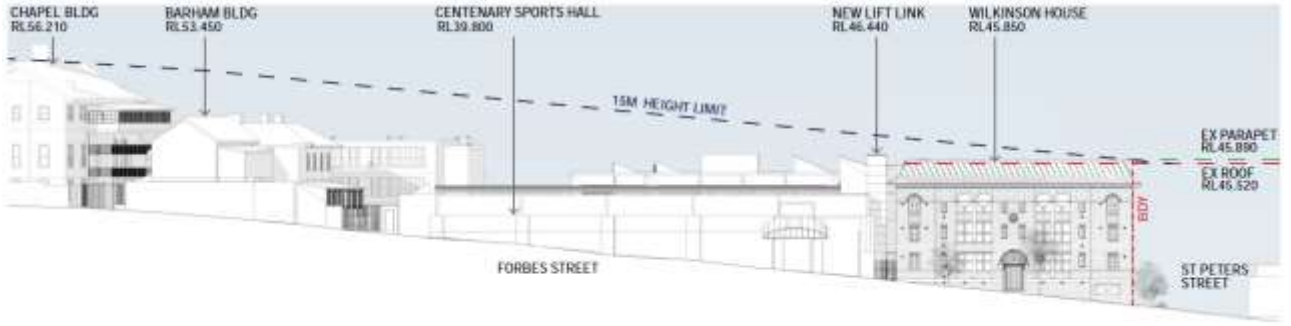
Streetscape Presentation and Character

Forbes Street

The proposal is sympathetic to the streetscape character and the heritage presentation of Wilkinson House along Forbes Street:

- The proposed copper roof has a maximum RL of 45.85, which is below the existing parapet height (RL45.85) of building to the west, however, is 330mm higher than the existing roof height. The proposed roof maintains the existing roof form and the increase in height is very minimal that it will not be noticeable from Forbes Street. The copper material is also sympathetic to the surrounding architectural context.
- The new lift extension to the south of Wilkinson House is setback approximately 4m from Forbes Street, constructed with a dark bronze colour steel frame and cladded in glass. The setback and use of material create a recessive in-fill building element, that will not distract from the heritage significance of Wilkinson House and will blend within the streetscape.
- The use of glass also creates a light and fluid building element, while activating the eastern façade along Forbes Street, to create visual interest.
- The lift overrun has a maximum RL of 46.44, which is slightly above the roof form but is below the 15m height limit and is similar in height to existing structures on other school building, such as the parapet of the sports hall and building to the southwest. The height of the lift structure remains well below the height of other SCEGGS buildings such as Baraham and the Chapel buildings and is consistent with the scale and character of the street.
- The existing balconies of Wilkinson House create a rhythm of solid and void to the streetscape. To create functional learning spaces, these balconies are proposed to be infilled with new steel windows. These windows are retained in location with further setback, to maintain the façade rhythm of light and void. This setback naturally provides sun shading to the glazing and gives an opportunity to integrate concealed external blinds for further protection from heat load.

Figure 12 Forbes Street Streetscape



Source: Smart Design Studio

St Peters Street

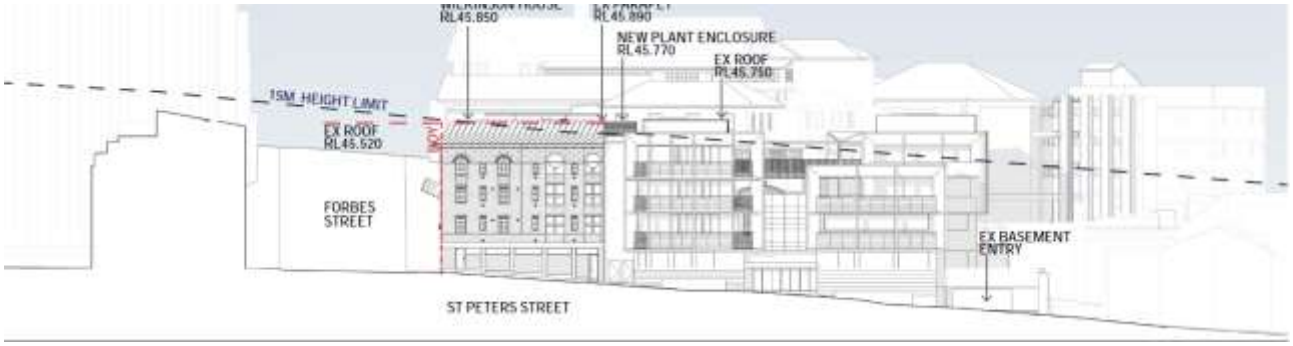
It is important to note that St Peters Street has a sloping topog**rap**hy dropping significantly toward the west. As a result existing campus buildings exceed the 15m height limit, including the existing Wilkinson House and the adjacent Joan Freeman Building.

The proposal is sympathetic to the streetscape character along St Peters Street :

- Similar to the existing roof form, the new copper roof also exceeds the 15m height limit but is below the existing parapet height of Wilkinson House. The slight increase in height by 33mm is immaterial and the new roof form does not have a significant impact on bulk and scale, and is consistent with the scale of the buildings along St Peters Street.
- The proposed new roof plant enclosure on top of the Joan Freeman building has the same RL as the existing carpark exhaust enclosure on Joan Freeman Building, to maintain a consistent building height along St Peters Street. The enclosure will be screened with acoustic louvers to minimise visual impact (refer to Figure 14).
- Similar to the Forbes Street frontage, the existing balconies along St Peters Street are infilled with steel windows that are setback, retaining the existing rhythm of light and void.

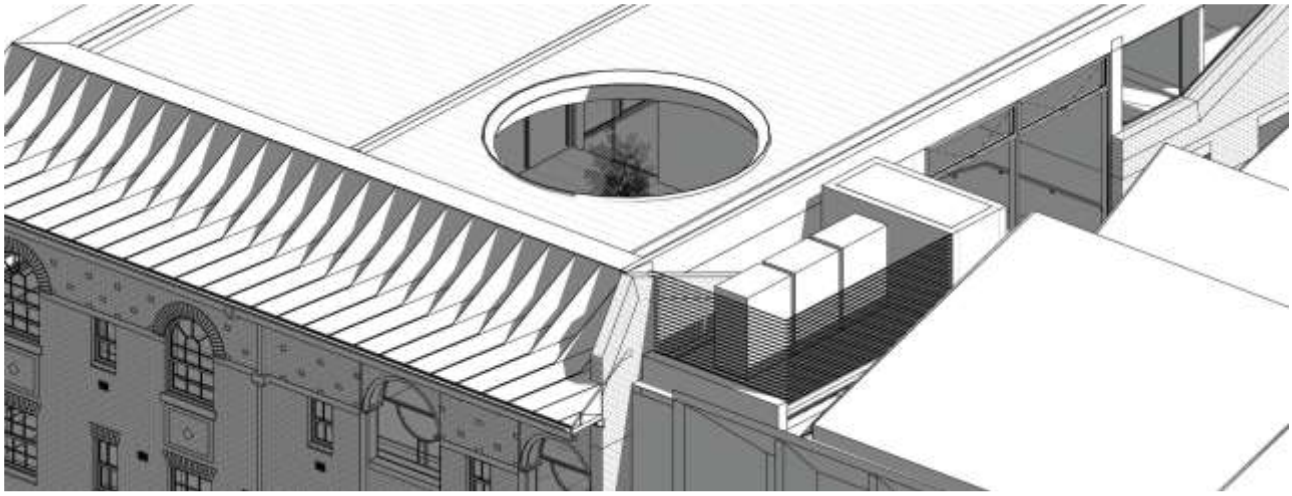
- Glass bricks are proposed for the lower ground level of St Peters Street frontage. It is of a semi-transparent finish, which provides void to the facade, representing the location of garages that once served the building previously.

Figure 13 St Peters Street Streetscape



Source: Smart Design Studio

Figure 14 Plant enclosure



Source: Smart Design Studio

Proposed Gross Floor Area

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

The proposal generally retains the original building envelope of Wilkinson House and the proposed additions contributes to 521.7sqm of additional GFA. Following the consolidation of all lots comprising the SCEGGS campus, the GFA proposed and the total campus GFA comply with the overall FSR controls for the SCEGGS site. As such, the proposed building areas are consistent with the scale of development anticipated to occur on the site under the local environmental plan.

In the circumstances of this development, there is no real relationship between density and traffic generation. That is, the additional GFA does not generate high levels of traffic as existing student and staff populations will not change. As such, the proposed minor increase in gross floor area (3% increase above the total approved GFA for the site) will not result in a greater 'intensity' of development on the site.

10.2. LANDSCAPING

The detailed landscape design for Wilkinson House is largely consistent with the Landscape Masterplan approved under the Concept SSD.

As illustrated at Appendix F, the proposed landscaping includes public domain treatment to Forbes Street and St Peters Street, including the retention of the existing street tree. The street planting will improve public domain and pedestrian experience while strengthening the existing Wilkinson House entry.

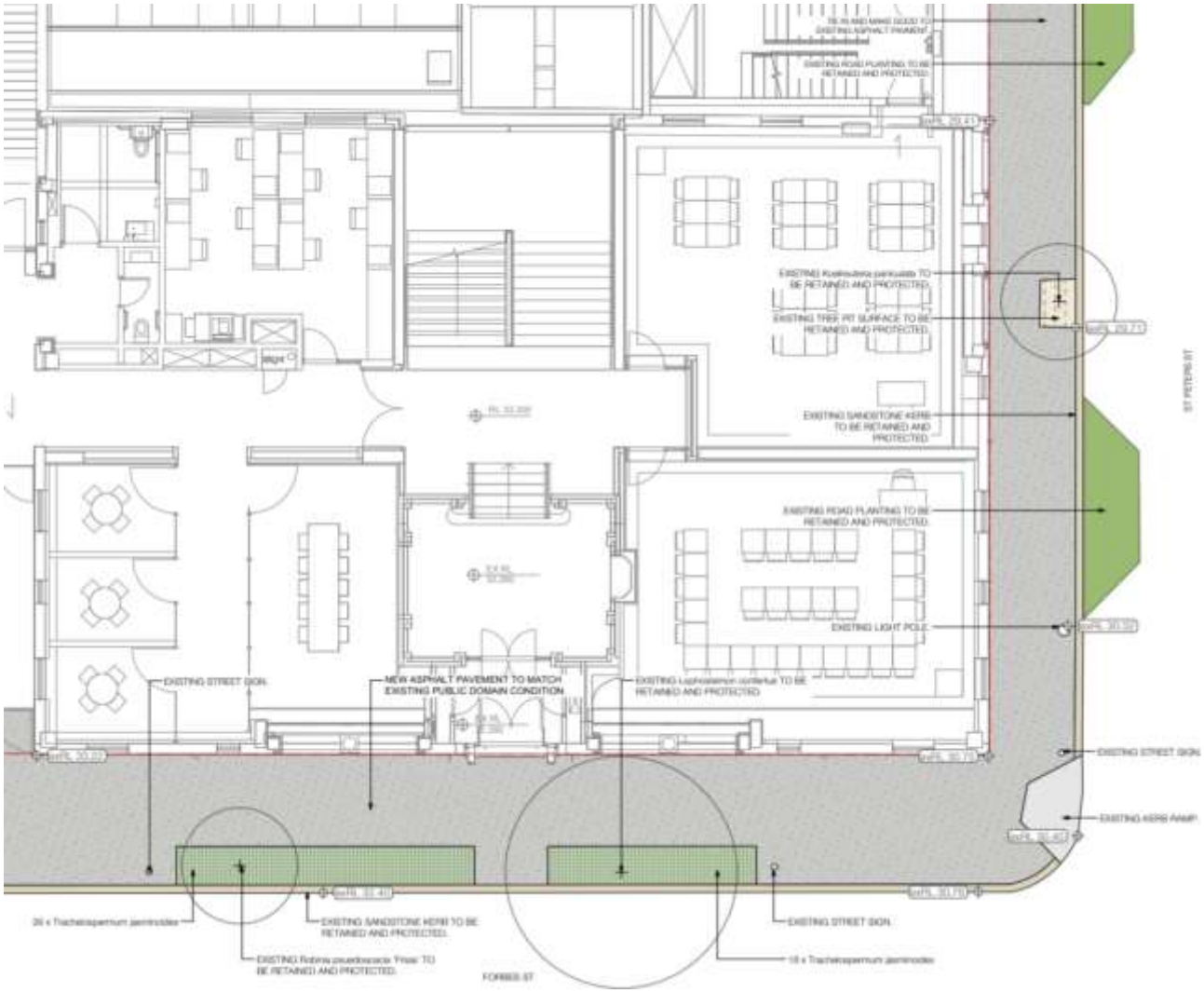
The viability and performance of the light well planting proposed as part of the Landscape Masterplan has been investigated and it was found that this location is not the most optimal for landscaping. It is therefore proposed to remove this element from the Landscape Masterplan approved under the Concept SSD. Modification to the Landscape Masterplan has been included as part of the concurrent Section 4.55 (1a) Modification to the Concept DA.

Additional landscaping is proposed on the rooftop terrace, which is a more suitable location where improved landscape performance can be achieved as it receives better solar access. The rooftop terrace is proposed to feature a Snow in Summer tree, which is a locally native understorey planting. More importantly, this tree species was selected in consultation with SCEGGS Indigenous Student Liaison Officer. The tree is recognised for its Aboriginal cultural significance and traditional medical uses, and will be a great cultural educational tool for students.

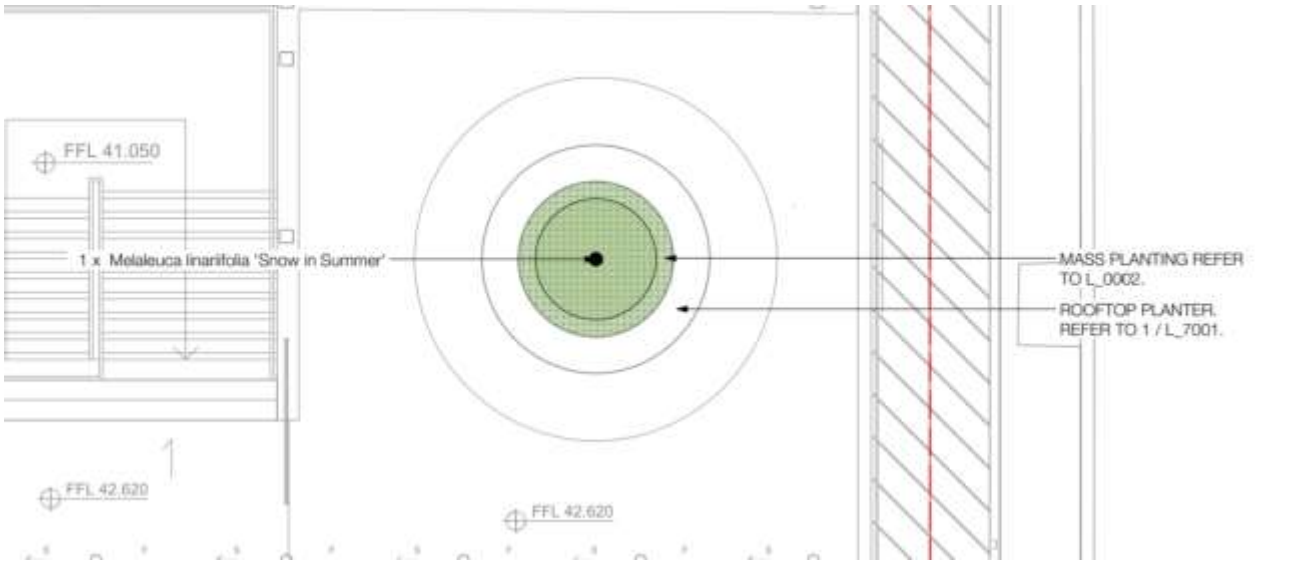
The limited exposed condition of the rooftop Oculus will naturally restrict the tree's mature height. The tree will also be regularly pruned to approximately 2m tall, to ensure view lines are not obstructed for surrounding residents.

The proposed Landscape Plan for Wilkinson House is illustrated in Figure 15 below:

Figure 15 Landscape Plan



Ground Floor



Level 3

Source: Context

10.2.1. Tree Protection

No trees are required to be removed as part of the proposal for Wilkinson House. The existing trees along the street frontages will be retained. Tree protection zones for the retention of street trees (tree ref no. 28C, 28b and 28a) is detailed within the Arboricultural Report prepared for the Concept SSD DA, and will be implemented during construction.

10.3. ENVIRONMENTAL AMENITY

10.3.1. Solar Amenity

Analysis on the potential overshadowing impacts resulting from the proposed addition to Wilkinson House has been prepared by Smart Design Studio at Appendix C. Shadow diagrams have been provided for 9:00am, 12:00pm and 3:00pm on the spring, summer, autumn and winter solstices.

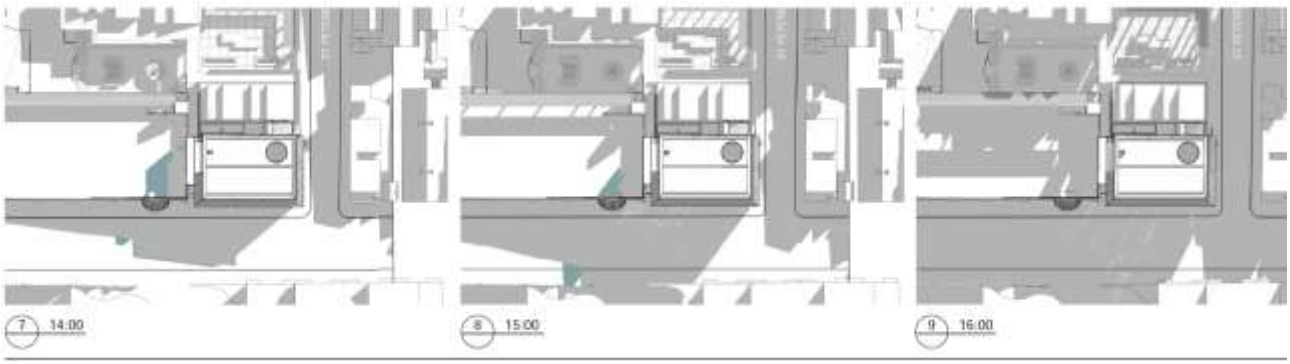
It is important to note that the existing Wilkinson House built form is wholly retained, therefore the majority of the overshadow is from the existing Wilkinson House building.

The proposed lift addition and new roof form is not anticipated to have any adverse shadow impacts compared to the existing built form. Marginal additional shadow from the proposed building additions falls within the School campus, basketball court and onto Forbes Street across the day.

Additional overshadowing will not impact adjacent properties (refer to Figure 16). At 12pm and 3pm, additional shadow falls within the setback of the eastern side of Forbes Street. However, the proposal does not overshadow communal or private open space of the adjacent developments.

Overall, the proposal is not anticipated to have any adverse shadow impacts compared to the existing built form onsite.

Figure 16 Shadow Diagrams



Source: Smart Design Studio

10.3.2. View Analysis

The proposed detailed design of Wilkinson House, including the minor roof height increase of 330mm and the lift addition has been developed with sensitive consideration on potential view impacts to the Sydney skyline and local character views from the public domain and private residential dwellings.

Massing images of the proposed detailed design have been prepared by Virtual Ideas and are attached at Appendix E. The following section provides an assessment of the potential view impacts identified to surrounding properties. The massing images and comparison analysis of view impacts has been determined on a selection of the most likely impacted existing dwellings and are indicative of the visual and view impacts resulting from the proposed building.

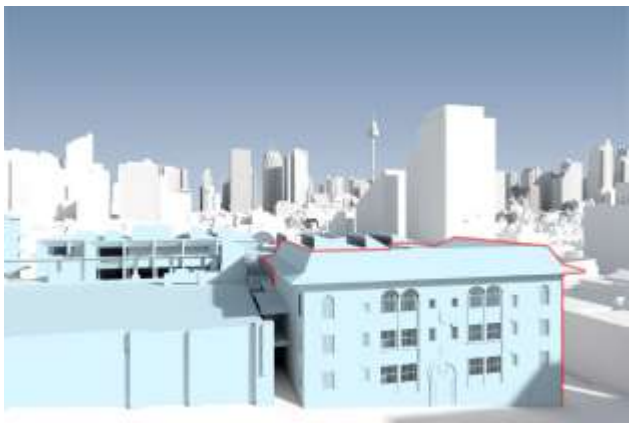
Horizon Apartments

The image below provides a comparison of the existing and proposed building massing of Wilkinson House as viewed from RL 42.5 and RL 48.5m of the Horizon Apartments.

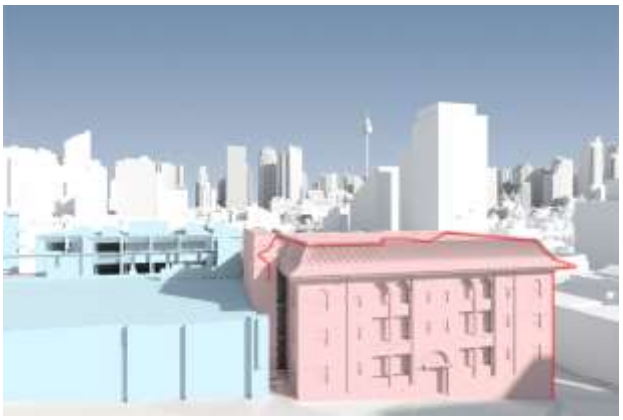
Figure 17 Comparison of proposed massing of Wilkinson House – from Horizon Apartment

Existing view from RL 42.5

Proposed view from RL 42.5



Existing view from RL 48.5
Source: Virtual Idea



Proposed view from RL 48.5

As demonstrated in the images above, at Level 2 vantage point (RL 42.5) iconic views towards Centre Point Tower are not impacted. Minor impact is associated with views towards non-iconic, regional views of the eastern CBD due to additional lift addition. Visual impact can be summarised as low. Given the low impact is a result of a building element that is compliant with the building height control, this impact is considered reasonable.

At Level 3 (RL 48.5), views towards the immediate non-iconic, regional views of the eastern CBD are improved slightly with the new roof form. Due to additional lift infill to the south, minor impact is associated with views towards non-iconic, regional views of the eastern CBD. On balance and overall, the proposal does not obstruct the important views of the Sydney skyline or any iconic buildings. View impact is summarised as low.

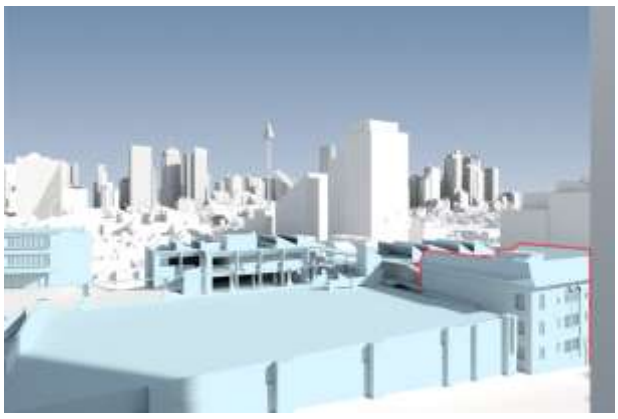
As demonstrated above, the proposal will not have a significant impact on views from Horizon Apartments towards the Sydney CBD with iconic Sydney city skyline views maintained.

186 Forbes Street, Darlinghurst

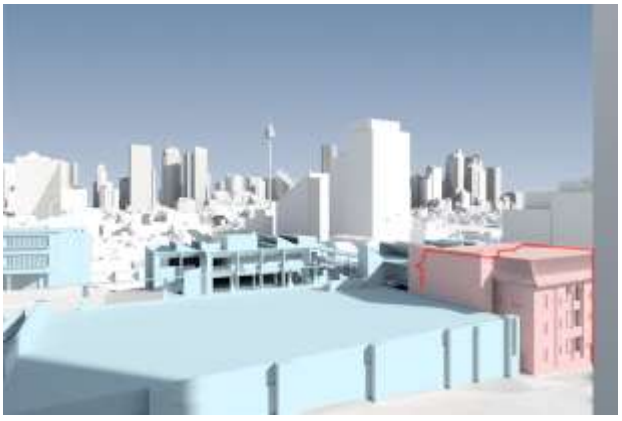
Views towards the Sydney CBD skyline to the northwest of residential apartment buildings on Forbes Street are illustrated below.

Additional height of the proposed roof and southern addition slightly impacts non-iconic, regional views of the eastern CBD. View impact can be summarised as low. Given the low impact is a result of a building element that is compliant with the building height control, this impact is considered reasonable.

Figure 18 Comparison of proposed massing of Wilkinson House – from 186 Forbes Street North



Existing view from RL 51.6
Source: Virtual Idea



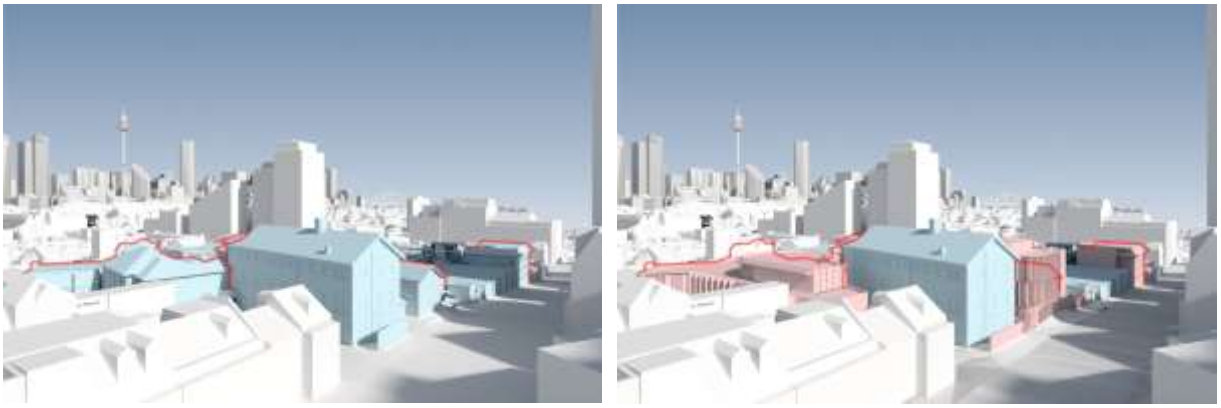
Proposed view from RL 51.6

200 Forbes Street, Darlinghurst

Properties at 200 Forbes Street currently benefit from north-western views towards the Sydney CBD including the centre-point tower and towards the Sydney harbour and portions of the Sydney Harbour Bridge.

These views towards iconic elements and the broader Sydney city skyline are retained as illustrated within the following image.

Figure 19 Comparison of proposed massing of Wilkinson House – from 200 Forbes Street



Existing view from RL 65 Proposed view from RL 65
Source: Virtual Idea

In summary, the potential view impacts associated with the proposed detailed design of Wilkinson House have varying degrees of impact, from nil and negligible. When compared to the existing Wilkinson House, the view from neighbouring properties is largely retained, including the protection of significant views to the Sydney skyline and iconic elements.

10.3.3. Visual Privacy

The proposal has been appropriately designed to prevent adverse privacy impacts on surrounding residents, and students and staff as:

- The school will continue to generally operate during standard school hours, when most residents are at work. This will ensure privacy is maintained during the early morning, evenings and at night.
- The new lift addition incorporates tinted and reflective glass to provide for the required level of privacy and security.
- The new roof form incorporates vertical ribs, derived from original elevation drawings, which will shelter classrooms and roof top terraces, and prevents overlooking whilst providing framed views out to the city beyond.
- Glass bricks have been selected for the lower ground sports facility façade fronting St Peters Street, to protect the visual privacy of students and neighbours and ensure natural light can still enter into these lower spaces.

Accordingly, the proposal is appropriate in terms of visual privacy and no additional mitigation measures are required.

10.3.4. Lighting

A Lighting Strategy has been developed by ADP and is attached at Appendix G. The lighting design for the proposal aims to achieve an elegant and discreet solution that will enhance the aesthetic qualities of the building, whilst avoiding impact to neighbours by ensuring deign compliance with the following Australian Standards:

- Building Code of Australia NCC 2019 Amdt 1
- AS4282 – Control of the Obtrusive Effects of Outdoor Lighting
- AS1680 – Safe Movement and Interior Lighting
- AS2560 – Sports Lighting

The objectives of the lighting strategy are to:

- Provide an environment that is condu**civ**e for learning and collaboration.

- Facilitate indoor recreational activities.
- Facilitate mixed use space for student and community events.
- Provide a discrete and elegant lighting solution that will preserve the aesthetic qualities and enhance the heritage character of the Wilkinson House.
- Provide a sustainable lighting solution that is adaptable and responds to site conditions as required

Sensitive receivers were identified in the locality immediately to the west of the campus boundary, which consists of medium to high rise residential and mixed-use buildings, including the Horizon Apartments.

The lighting strategy identifies three key areas that may generate light spill to neighbouring sensitive receivers, including:

- The indoor recreational facility
- The Southern extension
- The Rooftop Courtyard

Light assessment and mitigation measures for each of these areas are discussed in the table below.

Other areas such as entrance, lift lobby and circulation areas, internal staff rooms and classrooms have also been considered by the report, with appropriate lighting strategy proposed.

Table 14 Lighting Strategy proposed to sensitive areas

Building element	**Proposed Lighting Strategy**
The indoor recreational facility	The recreational facility is indoor and in the basement level. The external façade consists of brickwork and portions of glass brickwork to allow for natural light to penetrate the space. It is noted that the use of glass brick treatment is specific to the St Peters Street façade. Any light spill onto St Peters Street from the artificial lighting is anticipated to be minimal. The following lighting strategy is proposed to minimise potential light spill: ▪ Lighting design will consist of fitting selection and placement that allows for reduced glare to spectators within the building and reduced light spill in the direction of the St Peters Street Façade. ▪ The selection of light fittings in this space should also be impact resistance due to low ceiling heights. ▪ Additional treatment may be required in the form of motorised blinds or louvers installed internally and to the portions of the St Peters Street Building façade. ▪ Timer clock set to the school's operating hours and motion detectors. ▪ Manual Switch to allow for various lighting scenes
The Lift addition	The southern lift extension faces into the wider school campus, which is not considered to be a sensitive receiver. The lift well is not expected to be artificially illuminated and the lift car is expected to have occupancy lighting. The following lighting strategy is proposed to minimise potential light spill:

Building element	Proposed Lighting Strategy
	▪ Lighting design will consist of fitting selection and placement in compliance with AS4282. ▪ Lighting control is proposed to have a timer clock set to the school's operating hours and Motion Detectors.
The Rooftop Courtyard	The rooftop Oculus is partially open to the sky and is unlikely to create light spill. The following mitigation measures are proposed to minimise any light spill to nearby high rise residential building: ▪ Lighting design will consist of fitting selection and placement to reduce glare and light spill in compliance with AS4282. ▪ Timer clock set to the school's operating hours and motion detectors. ▪ Manual Switch to allow for various lighting scenes

The following lux levels to spaces as per Australian Standards AS 1680.are recommended and should be considered when selecting light source for each building elements.

Table 3 Recommended Lighting Levels as per AS1680

Room description	Recommended Lux Levels
Entrance, Lobbies and Foyers	80 lux
Circulation areas incl. ramps	40 lux
Stairwells and Lifts	80 lux
Amenities	80 lux
Staff Rooms	240-320 lux
General Learning Areas	240-320 lux
Meeting Rooms and Break-Out Rooms	240-320 lux
Level 3 Rooftop Courtyard	80 lux
Gymnasium Multipurpose Court	240-320 lux

Source: ***ADP***

Overall, the proposed lighting strategy will reduce potential light spill and glare from the building to nearby sensitive receivers.

10.4. TRANSPORT AND TRAFFIC

10.4.1. Traffic generation

A Transport and Accessibility Report has been prepared by Traffix and is attached at Appendix L.

Given the proposal does not seek to increase student or staff numbers beyond the existing capacity and the capacity that was assessed under the Concept SSDA, the proposed detailed development for Wilkinson House will not generate any additional vehicle trips. Traffic generation is expected to remain the same as previously assessed under the Concept SSDA.

While the development dose not generate external impacts, the existing traffic conditions have been assessed based on the 'pre Covid' travel mode survey and intersection volume surveys. SIDRA intersection modelling was conducted at two nearby intersections. The modelling concluded that during the AM and PM peak hour periods, the Liverpool Street/Bourke Street intersection operates at LoS of 'B – good with acceptable delays and space capacity'.

As such, no road upgrades are required or anticipated to be required for the proposed Wilkinson House.

Green Travel Plan

The proposal does however present an opportunity to the School to change travel behaviour through the implementation of an updated Green Travel Plan Included in Section 11 of the Traffic Impact Study, to encourage students, staff, parents and visitors to use the available public transport and active forms of transport available surrounding the site.

The GTP sets the following 5 years travel mode targets for staff and students from Year 4 to Year 12:

The Green Travel Plan details strategies to reduce private car based travel modes through travel demand measures, such as for the promotion of car sharing schemes, transport access guide, onsite staff parking and management, student transport scheme, cycling and bicycle parking, parent education programme.

The Transport and Accessibility Report therefore concludes that the detailed design is supportable on transport planning grounds.

10.4.2. Construciton Traffic Management

A preliminary Construction Traffic Management Plan (**CTMP**) prepared by Traffix is included in Appendix O, which details construction traffic management measures. A final CTMP will be prepared and submitted to the relevant authority in response to any conditions of consent.

Working Hours

As stated previously, the construction program will be based on a 5.5 day working week and construction hours in accordance with the City of Sydney regulations, which state:

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

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

Traffic Control Plans

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

Construction Vehicles

The anticipated truck frequencies range between two (2) trucks per day (2 in, 2 out) to a maximum of 16 trucks per day (16 in, 16 out), which will only occur on major concrete pour days.

The maximum sized vehicle is expected to be an 8.8 metre Medium Rigid Vehicle, with a payload of 12 tonnes. Figure 20 below illustrates the truck routes to be utilised to and from the site for all trucks to access and egress the site in a forward direction.

Truck movements will be restricted to outside the school's morning and afternoon pick up and drop off periods.

A swept path analysis has been undertaken of the proposed truck routs and the proposed MRV vehicle (attached at Appendix C of the CTMP). The analysis confirms that satisfactory access to the site can be achieved in accordance with AS2890.29 (2018).

Figure 20 Construction Truck Routes

Inbound

Outbound

Source: Traffix

Work zone

A construction work zone may be required for the duration of construction, and may be established around the perimeter of the Wilkinson House site (Forbes Street and/or St Peters Street). The appointed contractor will make an application to Council's Traffic Works Coordinator for the approval of a work zone. The work zone will apply during the construction hours, excluding school's drop off and pick up period.

Cumulative construction traffic impact

As discussed in Section 5.8, the proposed development is not located close to any large development sites that have been approved in the last three years. Therefore, the construction activities of neighbouring development are not expected to conflict with the construction works of the proposed development. If nearby construction is to overlap, the appointed builder should liaise with neighbouring developers to ensure critical construction activities such as concert pours etc would not overlap with other construction in the area.

Construction parking

Given the inner city site constraint and limited onsite parking, no onsite parking will be made available for construction workers. During induction workers will be encouraged to carpool and utilise public transport in the close vicinity of the site, to reduce the impact of off street parking.

Temporary bicycle parking and end of tip facilities can be provided onsite to encourage cycling.

Details of construction parking management will be included in the final CTMP prepared by the appointed contractor.

Pedestrian management

The following measures are proposed to ensure pedestrian safety during construction:

- It is expected that B Class hoarding and associated access gates will be installed around the perimeter of Wilkinson House Street frontages, to manage pedestrian safety.
- In the event that pedestrian footpaths is required to be closed during construction, pedestrian control measures, such as detours or traffic controllers' assistance will be required.
- No crane works will be permitted over pedestrian footpaths without footpath closure or hoarding.
- Pedestrian access to neighbouring properties shall be maintained at all times and no building materials shall be placed or dumped on the footpath.
- Traffic controllers will also be positioned at any vehicle access point to manage vehicle movement and to ensure pedestrian safety.

10.5. ECOLOGICALLY SUSTAINABLE DEVELOPMENT (ESD)

A Sustainable Development (**ESD**) report has been prepared by Northrop and is attached at Appendix P. The proposal will include the following key ESD initiatives (details of how these initiatives are achieved are included in the ESD report).

> *A strong commitment to energy efficiency with the project design to demonstrate a significant energy reduction over a standard construction building of its type.*
>
> *A highly efficient façade system that leverages the constraints of the existing heritage fabrics to both manage heat gains while promoting the entry of daylight into classroom spaces.*
>
> *Low impact materials selections with the project maximising the reuse of onsite materials and minimise the upfront carbon emissions associated with the project.*
>
> *The use of highly efficient water fixtures and fittings, alongside a water*less *heat rejection system and connection to the adjacent Joan Freeman Centre's non potable water supply.*
>
> *Integration of educational signage, wayfinding, and monitoring systems across the project.*
>
> *An optimised ventilation system to provide good provision of outside air while maintaining thermal comfort in the classroom areas.*

The proposal will be developed and constructed to a standard that exceeds a 4 Star rating or Australian Best Practice Sustainability. SCEGGS has set a design benchmark to incorporate the design principals of an Australian Excellence (5 Star) rating.

Due to the limitation of heritage facade and restriction on roof type, a green roof area is not possible for Wilkinson House. Despite this, vegetation has been incorporated within the roof design at the north-western corner of the roof (also known as the Oculus). Further, solar panels are proposed on the roof, which will

provide ESD benefits. Through the inclusion of the sustainability initiative outlined within the ESD report, the schools have demonstrated an overarching commitment to incorporating a strong focus on sustainability within the projects design, construction and operation phases.

10.6. HERITAGE

A Heritage Impact Statement (**HIS**) has been prepared by Urbis Heritage and is attached at Appendix H.

Conservation Management Plans for SCEGGS Darlinghurst main campus was endorsed by Planning Secretary on 8 December 2021. The Conservation Management Plan for Wilkinson House had also been prepared as per Conditions B4A of SSD-8993. The HIS utilising information prepared as part of these documents and responds to specific conservation policies as they relate to the proposed adaptive reuse of Wilkinson House.

This HIS has been prepared to determine the potential heritage impact of the proposed works on Wilkinson House, the SCEGGS Darlinghurst campus, the East Sydney HCA and the heritage items located in close proximity to the site (refer to Figure 21).

Figure 21 Existing heritage listings under the Sydney LEP 2012 and the State Heritage Register with Wilkinson House outlined in blue

The HIS concludes that the proposed adaptive reuse of Wilkinson House is considered to respect the heritage significance of the building, the SCEGGS Darlinghurst campus and the East Sydney HCA for the following reasons:

- Section 6.2 of the HIS assesses the proposal's consistency with the policies within the Site Wide CMP and Wilkinson House CMP. Key assessment is summarised below:

- Generally, all fabric graded as being of high significance is proposed to be retained and conserved. The approach to the adaptive reuse of Wilkinson House has been to contained to intervention in areas of lower significance.
- The approach to the adaptive reuse of the place has been one that balances the significance of the place as it relates to Emil Sodersten's design, as well as the places associative significance and ongoing use by SCEGGS Darlinghurst.
- The main element of high significance that is proposed to be altered is the western portion of the south elevation. This is considered to be acceptable, given this portion of the façade has undergone the most amount of change previously and is largely obscured from public view, due to the proximity to the Centenary Sports Hall. Limiting change to this portion of the façade will also ensure that the eastern most portion of the south façade, which is most visible, is retained and conserved.
- It is proposed to remove and replace the entire roof to facilitate the addition of one floor within the existing ridge height of the building. The new roof will conform with the original exterior half-hipped roof form, however the internal form will be a flat roof. The new boarded eaves and vent panels will be designed to match the existing.
- It is proposed to be remove all balconies within Wilkinson House. It is proposed to infill the balcony openings with new glazing that is setback behind the columns of the balconies to maintain the impression of the original balconies. The proposed new steel windows to be inserted reference the original Emil Sodersten design. The existing French doors to all balconies are recommended to be salvaged, however it has not been identified at this stage if they can be reused on site.
- The original staircase is proposed to be removed and reinterpreted. It is proposed to salvage and reuse the existing balustrade as part of an art piece. To further aid in the stair's interpretation, terrazzo flooring is proposed through the common areas and the location of the staircase is proposed to be interpreted in bronze floor inlays.
- The original entrance lobby and lounge hall are to be maintained and conserved. As it is proposed to remove the majority of the interiors of Wilkinson House, it is proposed to incorporate ceiling and floor inlays to interpret the original division of spaces throughout the building.

- The primary goal of the project is to both conserve the significance of Wilkinson House while also providing a building for SCEGGS that delivers a high-quality learning facility that delivers large, flexible learning spaces to accommodate the Schools ambitions over the next 20 years and beyond. The design strategy demonstrates a sensitive adaptive reuse proposal that will secure the future of Wilkinson House as an environmentally sustainable place of learning that continues to be joyful and inspiring to students and staff.
- Externally the proposed design retains the north, and east facades, while proposing some minor intervention to the south façade to provide links between Wilkinson House and the new lift structure. These are primarily contained to areas that have previously been altered and to two balcony brick balustrades that are proposed to be removed. The overall change this façade is considered to be appropriate given this portion of the façade has been altered previously and is minimally visible from the public domain. The existing brick infill at the basement level north facade is proposed to be replaced with glass brick and high-level windows. This change is considered to be a positive, and will still retain the understanding of the original function of this portion of the elevation. Modifications to the west façade for the incorporation of new windows and the introduction of the interpreted lightwell to the new internal staircase respect the moderate significance of these elements.
- The proposed modifications to the roof including a new material finish in cooper with angled blades and clerestory operable windows respects the original form and design by Emil Sodersten. The overall outer roof form will be maintained ensuring that the architectural character of Wilkinson House is maintained.
- While the proposals seeks to remove the majority of internal fabric (excluding the entrance lobby and lounge hall which was to be retained) emphasis had been placed on interpreting elements that are to be removed. This includes interpretative elements such as: floor and ceiling inlays for understanding of the original layout of the building; interpretation of the lightwell location with new circulatory and staircase space; use of terrazzo flooring through the common areas, and interpretation of the original staircase in a new art piece.
- While a new floor structure and floor levels are proposed, the new floor structure will not interrupt any of the existing openings of the building. The roof top addition was also be located within the existing ridge

height of the western parapet wall. The removal of the majority of the internal fabric has resulted in a concept that effectively utilises the floor plates and allows for large and useable GLAs that could be used for a variety of purposes by the School. Given this, the proposed interpretation devices were considered to be an appropriate compensation for the removal of original internal fabric.

- The proposed new lift core to the south has been resolved over a series of design refinements that will result in a lightweight addition to the south of Wilkinson House that will lightly attach to the buildings south façade. While overall a taller structure, the substantial setback from Forbes Street and the narrowness of the overall form and its overall transparency, ensures that the structure is read as a lightweight addition that complements the robustness of the brick of Wilkinson House.
- As the overall external character and form of Wilkinson House will only be minorly altered through the addition to the south and new roof, it is considered that there are no detrimental impacts to either the SCEGGS Darlinghurst campus, the East Sydney HCA or the surrounding heritage items.

For the reasons stated above, the proposed works are recommended for approval from a heritage perspective, subject to the proposed recommendations below.

- Prior to the issue of a Construction Certificate a Photographic Archival Recording should be undertaken of the place and must be prepared in accordance with the NSW OEH Heritage Division's Guidelines for 'Photographic Recording of Heritage Items Using Film or Digital Capture'.
- A suitably qualified heritage consultant should be engaged to provide ongoing advice throughout the design development, contract documentation and construction stages of the project.
- A Schedule of Conservation Works should be prepared by a suitably qualified and experienced heritage consultant prior to the issue of a Construction Certificate.
- A Heritage Interpretation Strategy should be prepared for the site by a suitably qualified heritage consultant as a condition of the DA consent. The Heritage Interpretation Strategy should identify significant themes and narratives for interpretation, as well as identifying locations, media, and indicative content for interpretation. Interpretation should be developed throughout detailed design and construction phases in conjunction with the project architect and other specialists as required.

Overall, the proposed adaptive reuse of Wilkinson House is considered to respect the significance of the building and will ensure that a balance is met between the tangible and intangible significance of the building while allowing for the building to be transformed into an asset for SCEGGS that will serve the educational needs of the school into the future.

10.7. HISTORICAL ARCHAEOLOGICAL IMPACT ASSESSMENT

A Historical Archaeological Impact Assessment (**HAIA**) has been prepared by Urbis and is attached at Appendix I.

This **HAIA** has been prepared specifically for the subject SSDA for Wilkinson House. However, this HAIA assesses the historical archaeological potential and significance for the whole SCEGGS campus and is intended to be adapted for future stages of development at the school.

The findings of this HAIA have been incorporated into the CMPs prepared for the SCEGGS Darlinghurst Campus (2021) and Wilkinson House (2021).

This Historical Archaeological Impact Assessment has been prepared in accordance with the following guidelines:

- NSW Heritage Manual (Heritage Division, 1996)
- the Australia ICOMOS Burra Charter (2013)
- Historical Archaeology Code of Practice (Heritage Division, 2006)
- Assessing Significance for Archaeological Sites and 'Relics' (Heritage Division, 2009)
- Assessing the Research Potential of Historic Sites (Bickford, A., and Sullivan, S., 1984)

The proposal requires excavation be taken to a depth of approximately 2.5-3 metres within the southern portion of the Wilkinson House site to accommodate a larger basement footprint than currently exists.

Historical overlays suggest that the subject area incorporated a number of buildings prior to the establishment of SCEGGS.

Despite various earlier structures having occupied the Wilkinson House site, the assessment of archaeological potential has established that the site has low archaeological potential.

Construction of Wilkinson House in 1926 involved terraced excavation to accommodate a partial basement. These works are likely to have removed or significantly dislocated evidence of the former cottage and terraces. Geotechnical investigations for the adjacent Joan Freeman building (Douglas Partners 2008) identified a subsurface profile of 1 metre fill overlying weathered sandstone and then medium strength sandstones from depths of 0.35-1 metre. Other investigations on the site encountered rock at depths less than 1 metre. Therefore, it is probable that the previous excavation works associated with the construction of Wilkinson House removed most of the shallow, archaeologically sensitive soil profile from the site.

The HAIA concluded that there is low potential for the proposal to impact on archaeological resources associated with the early 19th century stone cottage and late 19th century terraces within the Wilkinson House site.

In the unlikely event that evidence of these earlier structures, or associated occupational deposits are encountered during the proposed works, these may have local heritage significance and the following recommendations should be adopted:

Recommendation 1 – Excavation Permit Exception

An application should be made for an Excavation Permit Exception under Section 139(4) of the Heritage Act 1977. In the event that potential relics are identified during the course of archaeological monitoring, mechanical excavation must immediately cease, Heritage NSW be contacted and an application be made for

an Excavation permit under Section 140 of the Heritage Act 1977.

Recommendation 2 – Archaeological Monitoring

Archaeological monitoring should be undertaken throughout any works which would disturb the ground surface.

In general, archaeological monitoring should adhere to the following:

- *Demolition should be undertaken in such a way as to minimise impacts to foundations and subsurface structures. The archaeologist should initially be consulted about the proposed demolition methodology.*

- *An archaeologist should be present at all times during the lifting of current hard surfaces, excavation and/or other activities that result in ground disturbance.*

- *Where a mechanical excavator is used, it must have a flat or mud bucket, rather than a toothed bucket, to ensure a level ground surface.*

- *All machinery should work backwards from a slab surface in order to avoid damage to any exposed archaeological relics.*

- *Fills should be removed sequentially in reverse order of deposition, starting with any imported fill and overburden, which reflect the archaeological stratig**rap**hy and as instructed by the archaeologist.*

- *If archaeological relics are identified by the monitoring archaeologist, work must stop immediately, the area be cordoned off and the find safely retained in situ. Further assessment and recording of the find will be required, following the methods outlined in Section 6.2 of this report.*

10.8. ABORIGINAL CULTURAL HERITAGE

Aboriginal Cultural Heritage Assessment (**ACHA**) (refer to Appendix K) has been undertaken by Urbis to identify any potential Aboriginal objects and other cultural heritage values within the study area. For the purpose of the ACHA, the study area comprises the entire SCEGGS main campus located at 215 Forbes Street, including the Wilkinson House site. Therefore, this ACHA assesses the potential Aboriginal Cultural Heritage values for the whole school campus site and is intended to be adapted for future stages of development at the school envisaged under the Concept Approval SSD 8993.

The **ACHA** process included:

- A comprehensive background research of all available archaeological and cultural heritage information for the subject area in context with the scope of the project.
- Analysis and interpretation of the background research.
- Archaeological field survey of the subject area.
- Consultation with the Registered Aboriginal Parties (**RAP**s).
- Virtual site survey.
- Summarising of results and providing recommendations for the proposed development in relation to Aboriginal cultural heritage and archaeological resources

The site survey was initially proposed to take place with RAPs at the end of June 2021. However, due to the resurgence of COVID-19 cases within the Greater Sydney Region, the site survey was instead undertaken virtually, with one Urbis Archaeologist (Meggan Walker) and representative of the school Keith Stevenson. This was considered appropriate and preferable to rescheduling due to the unknown duration of the COVID-19 lockdown and the lack of ground surface visibility across the subject area.

Aboriginal community consultation was undertaken for the project following the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010a)* (consultation requirements). The consultation registration process resulted in the registration of three different Registered Aboriginal Parties (**RAPs**) for the project. The virtual site survey was undertaken on the 4th of August 2021. Detailed information regarding the site survey was provided to RAPs including summary letter and a link to the recording of the site survey.

The ACHA concluded that

- A search of the Aboriginal Heritage Information Management System (**AHIMS**) database has identified no Aboriginal objects and/or Aboriginal places located within, or in close proximity to, the subject area.
- The subject area does not contain any landscape features which typically indicate Aboriginal archaeological sensitivity such as deep soils, crest or ridge landforms, or proximity to water.
- The subject area is highly disturbed resulting from historical land use and recent uses, with geotechnical investigations identifying a number of the existing buildings as extending onto sandstone bedrock.
- Virtual survey of the subject area confirmed high levels of disturbance with low ground surface visibility due to the presence of hardstand areas as well as school buildings and leaf litter in garden beds.
- The subject area has generally low-nil potential for Aboriginal objects and/or archaeological sites to occur.
- Due to the low-nil potential for Aboriginal objects and/or archaeological sites to occur, no impact is anticipated to Aboriginal archaeological resources as a result of the proposed works, and no mitigation measures are deemed necessary.
- The subject area and wider Darlinghurst region have been identified (through consultation) as having high cultural significance with intangible cultural heritage value associated with the area. Impact to these values is proposed to be mitigated through interpretation. This will facilitate ongoing connection the Country and education of students and staff on the importance of country. Therefore, the proposal will have a positive impact on the cultural heritage values at the subject area by embedding this value within the fabric and ethos of the School.

As no impact is proposed, the ACHA concluded that the proposal can proceed in accordance with the following recommendations:

Recommendation 1 – RAP consultation & Aboriginal interpretation.

A copy of the final ACHAR must be provided to all project RAPs. Ongoing consultation with RAPs should occur as the project progresses. This will ensure ongoing communication about the project and key milestones and ensure that the consultation process does not lapse, particularly with regard to consultation should the Chance Find Procedure be enacted.

Furthermore, options for Aboriginal interpretation through the use of language in signage and naming, and native garden plantings should continue to be explored and be incorporated into this development and future developments at the subject area. This will mitigate impact to the intangible cultural heritage values of the area and embed these values in the fabric and ethos of the School.

Recommendation 2 – Develop Archaeological Chance Find Procedure

Although considered highly unlikely, should any Aboriginal objects, archaeological deposits be Although considered highly unlikely, should any Aboriginal objects, archaeological deposits be uncovered during any site works, a Chance Find Procedure must be implemented.

The following steps must be carried out:

1. All works stop in the vicinity of the find. The find must not be moved 'out of the way' without assessment. The area must be cordoned-off with appropriate signage to prevent accidental impact.

*2. The archaeologist and Aboriginal representative on site examine the find, provides a preliminary assessment of significance, records the item for the AHIMS register and decides on appropriate management. Such management may require further consultation with the Aboriginal Cultural Heritage Regulation Branch of Heritage NSW within the Department of Premier and Cabinet (**DPC**), preparation of a research design and archaeological investigation/salvage methodology and decision on temporary care and control.*

3. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required, and further archaeological investigation undertaken.

4. Reporting may need to be prepared regarding the find and approved management strategies. Any such documentation should be appended to this ACHAR and revised accordingly.

5. Works in the vicinity of the find can only recommence when all management measure all implemented, and the find is removed from the activity area. Should the find be an unmovable item such as an engraving or grinding groove located on a sandstone surface, further management measures will need to be introduced to avoid harm to the find.

Recommendation 3 – Human Remains Procedure

In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

1. All works within the vicinity of the find immediately stop. The area must be cordoned-off and appropriate signage installed to avoid accidental impact. The remains must not be moved.

2. Site supervisor or other nominated manager must notify the NSW Police and DPC.

3. The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.

4. Management recommendations are to be formulated by the Police, DPC and site representatives.

5. Works are not to recommence until the find has been appropriately managed.

Recommendation 4 – Aboriginal Cultural Heritage Induction

It is recommended that induction materials be prepared for inclusion in the construction management plan and site inductions for any contractors working at the subject area. The induction material should include an overview of the types of sites and artefacts to be aware of (i.e. stone tools, concentrations of shells that could be middens and rock engravings and grinding grooves), under the NPW Act, and the requirements of an 'archaeological chance find procedure' (refer below). This should be prepared for the project and included in any site management plans.

The induction material may be paper based, included in any hard copy site management documents; or electronic, such as "PowerPoint" for any face to face site inductions.

10.9. SOCIAL IMPACTS

A Social Impact Assessment has been prepared by Urbis and is attached at Appendix BB. Based on the assessment in this report, the key social impacts of the proposal is summarised below.

Sensitive retention of heritage item

Through sensitive design decisions and extensive heritage advice, the alterations and additions to Wilkinson House will retain the heritage significance of the building for SCEGGS and wider community. The new lift structure located to the south has been designed to be sympathetic and recessive to Wilkinson House, and will not distract from the heritage characteristics of its façade. Wilkinson House will continue to make a significant contribution to the streetscape.

The implementation of management measures already identified, including the adoption of a CMP, will ensure ongoing good practice management and conservation of the site long term. The sensitive retention of Wilkinson House will likely have a high positive impact on the community.

Engagement with Aboriginal culture and heritage

The inclusion of Aboriginal interpretation through landscaping will assist in creating a welcoming and inclusive environment for students, staff, and visitors to the school. The positioning of the Indigenous support office in Wilkinson House will also enhance student, family, and staff engagement with and awareness of local Aboriginal culture.

This aligns with GANSW's Designing with Country framework and Designing Guide for Schools, which suggested strategies to continue learning from Country in an educational environment. Engagement with Aboriginal culture and heritage is likely to have a high positive impact on the community.

Improved and functional internal layout

The redevelopment of Wilkinson House will provide an improved and more functional internal layout that will enhance usability for staff and students. A new lift will provide equitable access to each floor level. Classrooms will be of contemporary standard and provide flexibility to suit various education purposes. Improved circulation across each level will enhance natural light and ventilation to learning spaces. By removing the existing roof structure, an additional level with more space for classrooms and staff areas can be provided.

The improved and functional internal layout is likely to have a high positive impact on SCEGGS staff, students and visitors.

Temporary loss of outdoor space during construction

The temporary loss of the existing sports court during construciton. will have a short term negative impact on the SCEGGS students and staff, and the community groups that use this space.

To reduce impacts, it is recommended SCEGGS establish an operational plan for students, to ensure efficient use of other areas of open space across the Campus, or access to open space off Campus where possible.

Disruption to way of life during construction

SCEGGS students and staff, local Darlinghurst residents and local businesses may experience disruption to their way of life during construction, which is likely to have a short term medium negative impact.

Impacts will be reduced through the implementation of the proposed construciton management measures.

Recommendations are provided below to help further manage and improve the potential impacts arising from the proposal.

Recommendations

The following recommendations are provided to further manage the potential impacts from the proposal:

- Adopt all recommendations provided by the HIS.
- Adopt all recommendations provided by the ACHA.
- Implement recommendations provided in the CPTED assessment prepared by Urbis.
- Consider community use of the sporting facility outside school hours.
- Establish an operational plan for SCEGGS open spaces, or off-site access to open space, where possible during the construction period.
- Implement recommendations in the Noise Impact Assessment around careful selection of plant and construction equipment.
- Implement recommendations and procedures in the CTPMP and the Preliminary Construction Management Plan.

Overall the proposal will create a positive impact on the community, SCEGGS students, staff and visitors.

10.10. NOISE AND VIBRATION

An Acoustic Report has been prepared by ADP Consulting and is attached at Appendix R. The Report addresses the following key considerations:

- Construction Noise and Vibration; and
- Operational Noise.

The site is surrounded by mixed use and residential apartments. Residential receivers surrounding the site that may be affected by construction and operational noise have been identified in Figure 22.

Unattended logger measurements presented in the previous 2018 Wilkinson Murray's report that accompanied the Concept SSDA are referenced in this assessment. These measurements are representative of the current noise environment, as they were taken in the last 5 years and no major changes to the area and its environment have been made since these measurements. Additionally, due to lockdown restrictions in the current noise environment, additional measurements would not represent the noise environment as accurately as those outlined in the 2018 Noise Report.

Noise monitoring devices were installed for:

- Location L1 – on the northern end of Thornton Street
- Location L2 – at the back of 184 Forbes Street

The sound levels in Figure 23 have been used to determine the acoustic criteria.

Figure 22 Acoustic Sensitive receivers and site surrounds


William St
William St
Mixed-use
St Peters Church -
SCEGGS Campus
L2
Wilkinson House
Development Site
Bourke St
Forbes St
Bourke St
Residences
L1
Forbes St
Residences
SCEGGS Main
Campus
Thomson St
Thomson St
Residences

Source: ADP

Figure 23 Unattended noise measurements at locations L1 and L2, dB(A)

Noise Measurement	Daytime (07:00-18:00)	Evening (18:00-22:00)	Night-time (22:00-07:00)
L1 – Thomson Street			
Repeatable – L_{Aeq}	56	52	49
Rating Background Level (RBL) – L_{A90}	47	45	44
L2 – Forbes Street			
Repeatable – L_{Aeq}	55	55	53
Rating Background Level (RBL) – L_{A90}	50	49	47

Source: ADP

Key assessment considerations, as well as proposed mitigation measures have been outlined below.

10.10.1. Construction Noise

Noise modelling has been conducted for the construction scenarios outlined in the Construction Management Plan, indicative general construction equipment and the following assumptions:

- The use of handheld demolition saws is required intermittently, and typically only run for 2 minutes at a time during the excavation and mostly internally during construction phases. These activities are limited in use over relatively short durations and hence recommend that the methodology regarding time intervals is used.
- The tower crane and single hoist are used intermittently and only for approximately 5 minutes intervals in a 15-minute period.
- The use of the 5 hammer and saw attachments will be also restricted to intermittent 2 minute periods
- General delivery trucks will access the site from St Peters Street and are not to idle their engines outside the site
- The internal noise levels have been determined as being through a fully enclosed façade, resulting in a conservative transmission loss of approximately 22dB.

The noise levels from use of indicative construction plant and equipment have been predicted at the nearest noise sensitive receivers. The predicted noise levels indicate that there may be exceedances of the Interim Construction Noise Guideline (**ICNG**) noise management levels for residences nearest to the development. The exceedances range between 1 dB and 12 dB. However, they are all below the highly affected noise level for residences.

Based on these findings, the adoption of reasonable and feasible noise management and mitigation will be required during construction. In-principal mitigation measures are detailed below.

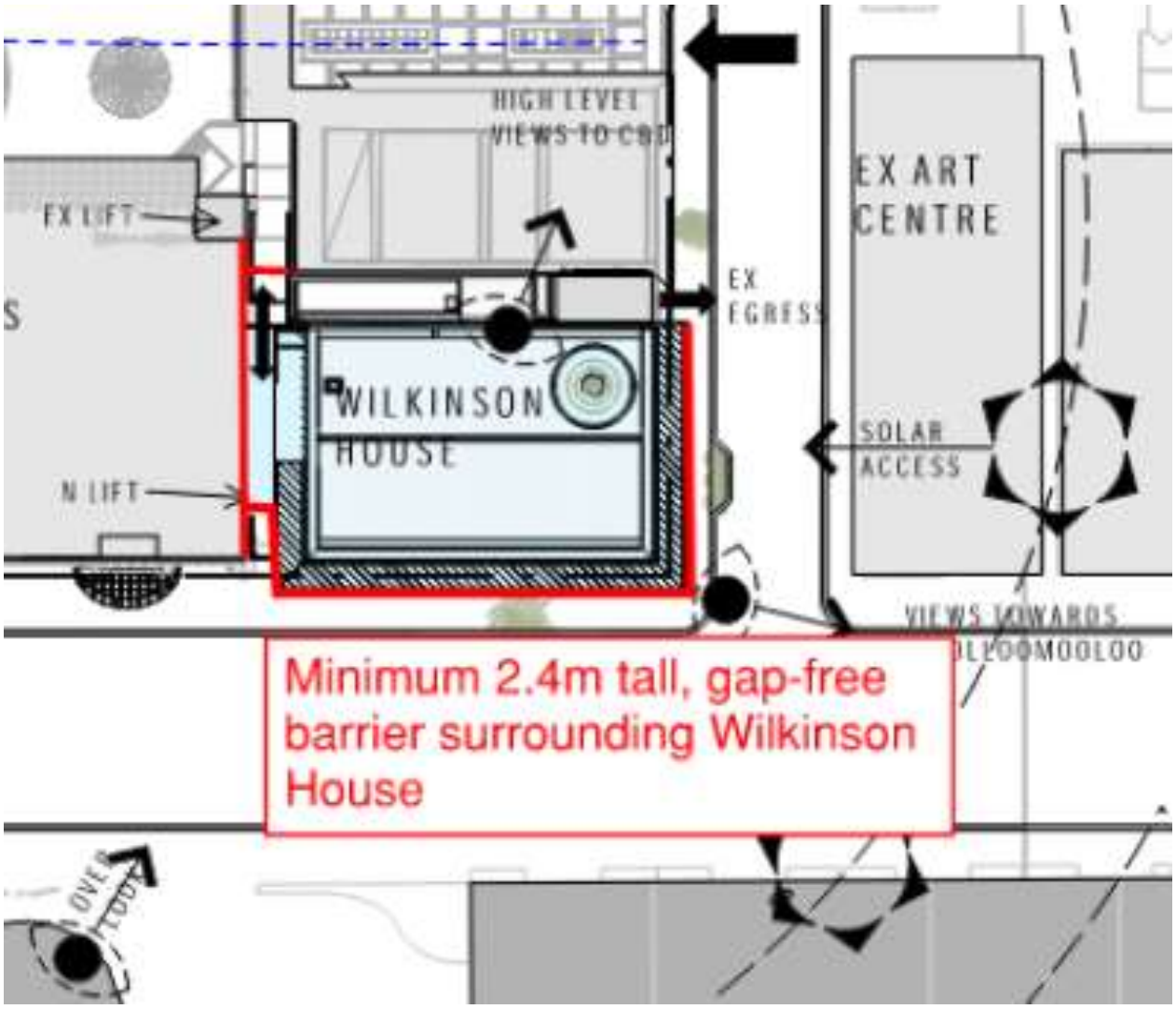
Mitigation measures:

Where it is expected that an exceedance of the Noise Affected NML will occur at noise-sensitive receivers, the following measures have been identified to assist in managing the noise impact of such activities:

- Community notification of nearby sensitive receivers before any work begins.
- Plant operation - For activities with marginal exceedances of the NMLs (i.e. up to 5dB(A)), careful selection and maintenance of plant equipment will ensure that disruptions to adjacent receivers are minimised.
- Worker conduct programme
- Measures on complaint handling

- The preliminary construction management plan states that a 2.4m plywood barrier will be installed around the perimeter to reduce the noise emission of equipment on site. Using this technique, the following reductions can be expected:
  - > 0-15 dB reduction: This may be achieved with the use of a barrier or hoarding strategically placed around noisy equipment, such as hand-held pneumatic jackhammers and hand-held demolition saws or around the site perimeter. Note that construction materials of barriers or hoardings achieve different results based on material used height and relative distances between barrier and noise source or sensitive receiver.
  - The noise impact assessment conservatively estimated the performance of the plywood barrier to lead to a 7dB reduction. The figure below presents the required locations of the barrier to effectively reduce noise levels at nearby receivers.

Figure 24 recommended noise barrier



Source: ***ADP***

10.10.2. Construction vibration mitigation measures

The amount of vibration in a building is difficult to estimate due to the large number of factors involved in vibration transmission and at this stage, the equipment for construction have not been finalised. Notwithstanding, the following measures have been identified to meet vibration criteria.

- A buffer distance can be used to indicate safe distances of activities from adjacent buildings. Indicative best-practice buffer distances are presented in below. The buffer distances are intended as a guide for the appointed builder subject to the final construction equipment.

Criterion	Descriptor		Handheld jack-hammer	Rock-breaker			Rotary cutter
				Light (300kg)	Medium (900kg)	Heavy (1600kg)	
Tactile vibration – residential	VDV & rms	Continuous	10m	25m	35m	55m	5m
		Impulsive	< 1m	1m	5m	20m	< 1m
Tactile vibration – commercial	VDV & rms	Continuous	5m	10m	20m	40m	2m
		Impulsive	< 1m	< 1m	5m	15m	< 1m
Cosmetic damage	Peak particle velocity		< 1m	2m	7m	22m	< 1m

Source: ADP

- Dilapidation reports be prepared on the adjacent and surrounding buildings.
- In the event that heavy equipment exceeds the Vibration Criteria, in these instances, it is recommended that vibration monitoring equipment be used to ensure that the vibration limits are not exceeded (particularly during excavation and piling works). It is recommended that vibration loggers be installed on each side of Wilkinson House at the base of the building to monitor vibration to the retained façade and to other SCEGGS buildings. These monitoring locations and methodology may be revised, subject to the structural engineers review during construction, particularly for the retention of the Wilkinson House Façade.
- It is also recommended that, where practicable, alternative methods to reduce the impacts of demolition / construction, i.e. using saws instead of jackhammers near adjacent structures where vibrations are easily transferable, such as in bedrock.
- Monitoring equipment should be configured in such a way so that alarms are triggered at a level below the values of 2mm/s for heritage buildings and 5mm/s for non-heritage.

10.10.3. Operational Noise

Operational noise from the proposed Wilkinson House building will be from school activities within Wilkinson House, as well as mechanical plant located predominantly on the roof of the adjacent Joan Freeman Building.

The Noise emission criteria (**NPfI**) requires that trigger levels be calculated from the intrusiveness and amenity criteria. The NPfI also includes the application of modifying factors for undesirable noise characteristics, up to a maximum of 10dB. The project noise trigger level represents the level that, if exceeded, may indicate a potential noise impact upon a community. The amenity and intrusiveness noise levels to nearby sensitive receivers and resulting project trigger levels is shown in Figure 25 below. The Sleep Disturbance Trigger Levels from out of our school activities are shown in Figure 26 below.

It should be noted that the cumulative noise emission from the operations of the entire SCEGGS campus are to also meet the project trigger levels presented below.

Figure 25 Noise emission criteria – Residential

Time of operation	Site specific noise limits				
	Intrusive, $L_{Aeq,15min}$	Recommended amenity, $L_{Aeq, Period}$	Project amenity, $L_{Aeq, Period}$	Project amenity, $L_{Aeq, 15min}$	Project trigger levels, $L_{Aeq, 15min}$
Residential – Thomson St and Bourke St					
Day (7am to 6pm)	52	60	55	58	**52**
Evening (6pm to 10pm)	50	50	45	48	**48**
Night (10pm to 7am)	49	45	40	43	**43**
Residential – Forbes St and St Peters St					
Day (7am to 6pm)	55	60	55	58	**55**
Evening (6pm to 10pm)	54	50	45	48	**48**
Night (10pm to 7am)	52	45	40	43	**43**

Source: ***ADP***

Figure 26 Transient noise events – sleep disturbance

Activity	Noise Descriptor	Noise criterion dB(A)
Out of hours school activities	$L_{Aeq, 15min}$	49
	L_{Amax}	59

Source: ADP

School activities noise emission

The basement gym / sports centre, the internal classrooms, the roof terrace and the announcement system have been identified as potential sources of noise. The major sensitive receiver that may be affected by school activity noises are the residences at 184 Forbes Street.

Noise emission from school activities have been assessed during standard school hours from 8.20am to 6.00pm, as well as after hour school activities, such as sports training and parents teacher evening that may occur from 6:00pm to 9:00pm. In addition, the assessment is based on the following assumptions:

- Wilkinson Classrooms - operation will take place internally with the option for doors open
- Sports Centre typical operation - events will take place internally with doors closed.
- Roof terrace typical operation - Roof terrace is mostly covered and offers some degree of shielding. It will not play amplified music. A maximum of 30 people will be in attendance during after hour (5:00pm and 9:30pm).

The resulting noise levels at each receiver for different times are presented below:

Receiver location	Time of day	Receiver noise levels, dB(A)	Criteria, dB(A)	Compliance
Residences - Forbes St	Day	47	55	Yes
	Evening	43	48	Yes
	Night (6:45am to 7:00am)	29	43	Yes
Residences - 152 Bourke St	Day	44	52	Yes
	Evening	42	48	Yes
	Night (6:45am to 7:00am)	23	43	Yes
Commercial - 165 William St	When in use	43	63	Yes
St Peter's Church – internal	When in use	35	38	Yes
L2 Classroom - internal	When in use	29	38	Yes

Source: ADP

The predicted noise levels indicate compliance will be achieved with the site-specific noise criteria.

Mechanical plant and equipment emission

Preliminary plant and equipment specifications have been provided by the mechanical engineer for the proposed 3 condenser units proposed on the north-western roof of the Joan Freeman science, art and technology building.

The assessment is based on the following assumptions:

- Each outdoor condenser is to have a maximum sound power level of 84 dB(A).
- Classrooms will be mechanically ventilated and not require open windows for ventilation.
- Condenser units will be operating under the following operating conditions:
  - Day and Evening: 100% of units in operation
  - Night: if operating, operate in night-time mode (-6dB correction)

The resulting noise levels at each receiver for different times are presented below:

Receiver location	Time of day	Receiver noise levels, dB(A)	Criteria, dB(A)	Compliance
Residences - Forbes St Apartments	Day	45	55	Yes
	Evening	45	48	Yes
	Night	39	43	Yes
Residences - 152 Bourke St	Day	40	52	Yes
	Evening	40	48	Yes
	Night	34	43	Yes
Commercial - 165 William St	When in use	45	63	Yes
St Peter's Church	When in use	33	38	Yes
L2 Classroom - internal	When in use	35	38	Yes
Playground	When in use	48	53	Yes
Roof terrace	When in use	53	53	Yes

Source: ADP

The predicted noise levels indicate compliance will be achieved with the site-specific noise criteria.

Mitigation measures

Based on the above findings, ADP recommend the following mitigation measures to ensure the above mentioned noise criteria can be met:

- Recommended minimum glazing system performance noted in the Acoustic Report should be incorporated at detailed design stage.
- To assist in reducing noise intrusion, the wall construction will need to be made up of concrete or brick veneer with a minimum acoustic performance of Rw 50.
- To assist in reducing noise intrusion and structure borne noise between levels, the floor construction will need to have a minimum airborne acoustic performance of Rw 50 and impact noise performance of Lnw62.
- School bells and announcement system recommendations noted in the Acoustic Report should be incorporated.
- The noise generated by the lift operation is to be 5dB(A) below the lower levels presented. Noise levels inside the lift car are not to exceed 55dB(A) under the following circumstances:
  - Door opening and closing
  - Accelerating and decelerating
  - Noise levels inside the lift car are not to exceed 50dB(A) when running at constant speed
  - Lift guide alignment should be accurate enough such as to not give rise to increased levels of noise during operation
- It is anticipated that provision has been included in the current scheme to incorporate standard acoustic treatment, such as silencers, barriers, acoustically lined ductwork, acoustic louvres, etc. to meet the noise emission requirements.
- The assumptions regarding operation conditions noted in the acoustic assessment should be complied with.

10.11. UTILITIES

A Utilities Report has been prepared by ADP (Appendix CC), which outlines the existing infrastructure, detailing information on the existing capacity and any augmentation to the services required for the proposed development. The report also details records of consultation with Sydney Water and Ausgrid.

Electrical services

Based on information provided from Ausgrid, Wilkinson House is fed from an above ground supply pole on St Peters Street (Pole number SY22365). The supply pole is fed from a Chamber substation (Substation No. S000830) located within a high-rise residential development on Forbes Street.

The point of attachment at the premises is located on the northern face of the building. The point of attachment is connected to the supply pole via. an overhead LV cable. This type of connection can support a maximum supply of 200A 3 Phase.

As part of the proposed works to Wilkinson House, the following is proposed for electricity connection:

- Relocation of existing meter and meter panel
- Relocation of existing Main Switchboard
- New Electrical Cupboard for existing Main Switchboard
- Modification of existing Main Switchboard as required.

A preliminary estimate of the sites maximum demand is estimated at less than 200 Amps 3 Phase which is within the limits of the existing supply. Therefore, ADP anticipates no issues with re-use of the existing supply for the redevelopment. The existing connection, and meter panel are expected to be retained and re-used, and a new main switchboard maybe required subject to confirmation at detailed design stage.

ADP have provided the Supply Authority, Ausgrid with a preliminary estimate of the anticipated demand via an ‘Alteration to Existing Connection Application. A copy of the application is attached at Appendix A of the service report. At the time of writing this EIS, confirmation has not been received, the project team will continue to liaise with Sydney Water post lodgement.

Telecommunication

SCEGGS school is currently utilising Voice Over IP (VOIP) telephony. There is an existing communications rack located in a comms cupboard in the ground floor foyer area of Wilkinson House adjacent to the existing electrical cupboard. The fibre cable to the communications rack comes from the main campus distributor located in the administration building. The rack appears to be in poor condition and is proposed to be replaced as part of the proposed works to Wilkinson House.

Hydraulic service

There is an existing connection to the water main at Forbes Street that serves the Wilkinson House potable water demands. This connection is to be capped off and made redundant with the water meter within Wilkinson House proposed to be removed.

The existing connection on St Peters Street that is currently servicing the Joan Freeman Science and Technology building is proposed to be used to service the redeveloped Wilkinson House. The connection to Wilkinson house is to be extended from the pump sets located in the Joan Freeman carpark.

A Pressure and Flow application has been submitted to Sydney Water Corporation, which shows the existing connections to the water main are adequate to service the new development. A new private meter for Wilkinson House can be installed should there be a requirement to monitor water usage within Wilkinson House.

Water Services Coordinator (**WSC**) has been engaged, and a Feasibility Assessment application has been lodged with Sydney Water (attached at Appendix B of the service report). At the time of writing this EIS, confirmation has not been received, the project team will continue to liaise with Sydney Water post lodgement.

Natural gas

There is an existing connection to the gas main in Forbes Street which services multiple buildings on SCEGGS campus, including Wilkinson House. All gas pipework to Wilkinson House will be made redundant, but the gas meter and regulator are to be retained to serve existing fixtures within the site.

Overall, the Infrastructure Report concludes that there appears to be sufficient capacity in the surrounding water, gas, sewer, and electrical infrastructure to continue support the ongoing operation of Wilkinson House, without the need for major augmentation or diversion of the surrounding supplies available to the main school campus.

10.12. STORMWATER MANAGEMENT AND FLOODING

A Stormwater Management and Civil Report has been prepared by Northrop and is enclosed at Appendix W. This report assessed flood study, stormwater drainage and detention, stormwater quality and sediment and erosion control.

10.12.1. Stormwater

The stormwater strategy for the SCEGGS Darlinghurst Wilkinson Building development has been developed in accordance with City of Sydney DCP and Water Sensitive Urban Design guidelines.

Sydney Water on-site detention requirements state that developments do not require on-site stormwater detention in the case that an existing building is being refurbished, and the existing drainage system is to be maintained. The proposal is for the upgrade of an existing building, due to the relatively small discharge volume, stormwater quantity management can be achieved by connecting the roof drainage system to the existing OSD tank located within the existing school car park to the west.

The stormwater drainage system will consist of a roof catchment only, and the run-off from the roof catchments will be collected in a series of gutters and down pipes, which will be delivered to the existing OSD tank. From here it will discharge to an existing stormwater drainage system that runs along St Peters Street as shown in Figure 27.

The stormwater quality management aims to reduce the pollutant load of stormwater runoff using a series of treatment devices prior to discharge into receiving waters. The targets for stormwater quality are outlined in Section 3.7.3 of Sydney DCP:

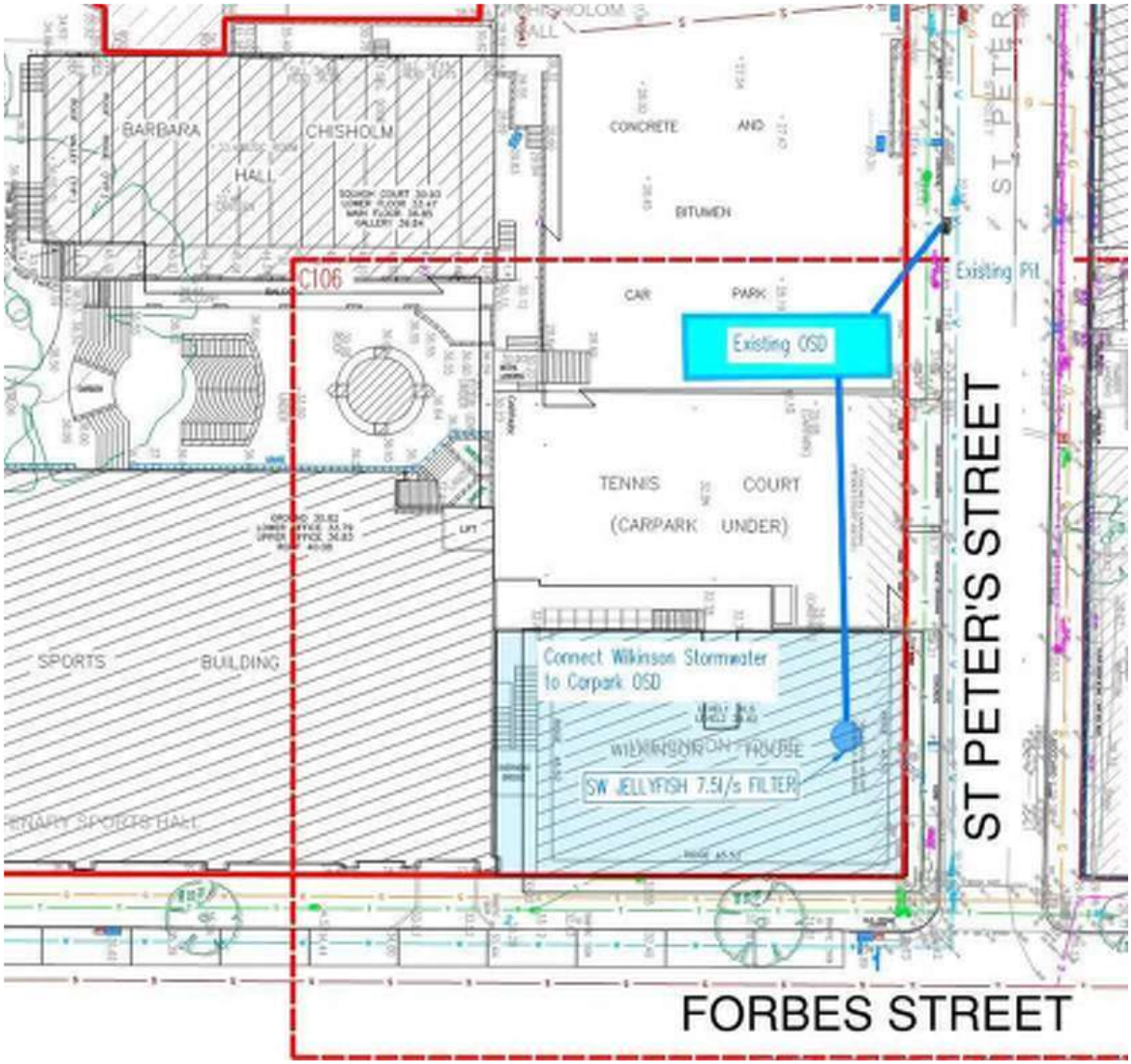
- Gross Pollutants 90%
- Total Suspended Solids (**TSS**) 85%
- Total Phosphorous (**TP**) 65%
- Total Nitrogen (**TN**) 45%
- % = % Reduction Post-Development Average Annual Load Reduction

The proposed water quality treatment consists of a proprietary OceanProtect StormFilter precast pit of size 1200 x 1200 (1.4m2) and 3 x 690 Psorb Stormfilter cartridges prior to entering the detention tank and discharging to the street drainage on St Peters Street .

Stormwater quantity and quality management measures have been modelled using MUSIC software. The MUSIC model results show that the pollutant reduction targets recommended by Council can be achieved through the implementation of the above measure:

- Gross Pollutants 100%
- Total Suspended Solids (**TSS**) 87.6%
- Total Phosphorous (**TP**) 79.4%
- Total Nitrogen (**TN**) 52.9%

Figure 27 Connection to existing OSD and stormwater infrastructure



Source: Northrop

10.12.2. Flooding

The site is located within the Woolloomooloo floodplain and is located towards the top of the catchment with only minor levels of flooding during the 100-year ARI flood event. The site will be minimally impacted by overland flows from storm events. Predicted flood levels in the vicinity of the site has been presented in Figure 28 and summarised below:

Figure 28 Peak Depth of the 100-year **ARI** flood event

Source: Northrop

Table 15 Flood Levels and Depths across site

Location	1% AEP Peak Flood Depth (m)	PMF Peak Flood Depth (m)
A – St Peters Street	< 0.1 m	0.1 – 0.2 m
B – Corner of Forbes Street and St Peters Street	0.1 – 0.2 m	0.1 – 0.2 m
C – Forbes Street	< 0.1 m	0.1 – 0.2 m

According to Sydney LEP 2012 the flood planning level is defined as the 1 in 100 ARI flood level plus 0.5 m freeboard. The ponding in front of Wilkinson House is less than 100mm in the 100-year ARI event and will be sufficiently contained within the kerb and gutter system along the Forbes Street frontage.

The flood planning level for the Wilkinson House is taken as the invert of the kerb on Forbes Street plus 0.5m. The invert level of the kerb in front of the existing Forbes Street entrance is approximately 31.78m AHD. This results in a Flood Planning Level of RL32.38m AHD at the entrance along Forbes Street. The existing entrance lobby is retained and has an existing finished floor level of 32.28AHD. The proposed ground floor of the Wilkinson Building has a finished floor level of RL 33.30m AHD, which is compliant with the flood planning level.

The building additionally has a proposed lower ground floor with a single egress door to St Peters Street at the north-western corner of the building. There is no overland flow path identified on the southern side of St Peters Street. The invert of gutter opposite this door is 28.62 AHD. This results in a flood planning of 29.22 AHD. The proposed basement floor level is at RL 29.68m AHD, which is also compliant with the flood planning level.

The overland flow study conducted under the previous study shows that the 100-year ARI flood event will result in flood depths on Thomas Street of up to 1m in depth, which will flow through the school property and into Bourke Street to the southwest of Wilkinson House. This does not impact the Wilkinson House site.

Overall, the building has been designed to comply with flood planning level. The following flood protection requirements should also be implemented:

- Finished floor levels set at or above the flood planning level (as defined above).
- No hazardous materials are to be stored in areas below the 100-year ARI flood level.
- All critical services and associated infrastructure and equipment (including electrical equipment) is to be set above the 100-year ARI flood level.
- Depth velocity values across the site are to be no greater than that specified in the Australian Rainfall & Runoff guidelines.

10.12.3. Sediment, Erosion and Dust Controls

Prior to any earthworks commencing on site, sediment and erosion control measure shall be implemented generally in accordance with the Construction Certificate drawings and the “Blue Book”.

Preliminary sedimentation and erosion control measure have been identified within the sediment and erosion control plans preliminary sketches attached in Appendix U. These measures will include:

- A temporary site security/safety fence is to be constructed around the site.
- Sediment fencing provided downstream of disturbed areas, including any topsoil stockpiles.
- Dust control measures including covering stockpiles, installing fence hessian and watering exposed areas.
- Placement of mesh and gravel inlet filters around and along proposed catch drains and around stormwater inlets pits.
- Stabilised site access at the construction vehicle entry/exits.

The measures shown on the drawings are intended to be a minimum treatment only. The appointed builder will be required to modify and stage the erosion and sedimentation control measures to suit the construction program, sequencing and techniques.

10.13. WASTE

10.13.1. Operational Waste

An Operational Waste Management Plan (**OWMP**) has been prepared by Foresight Environmental and is attached at Appendix V.

Based on the information provided and the benchmark data from similar developments, the primary waste streams expected to be generated in the ongoing operation of Wilkinson House would be:

- Food waste (where appropriate)
- Cardboard/paper
- Mixed recycling (plastics, glass, aluminium, steel)
- Landfill

In addition to the above, the following streams are likely to be generated in a more ad hoc manner:

- E-waste
- Battery recycling
- Toner cartridge recycling
- Lamps and globes

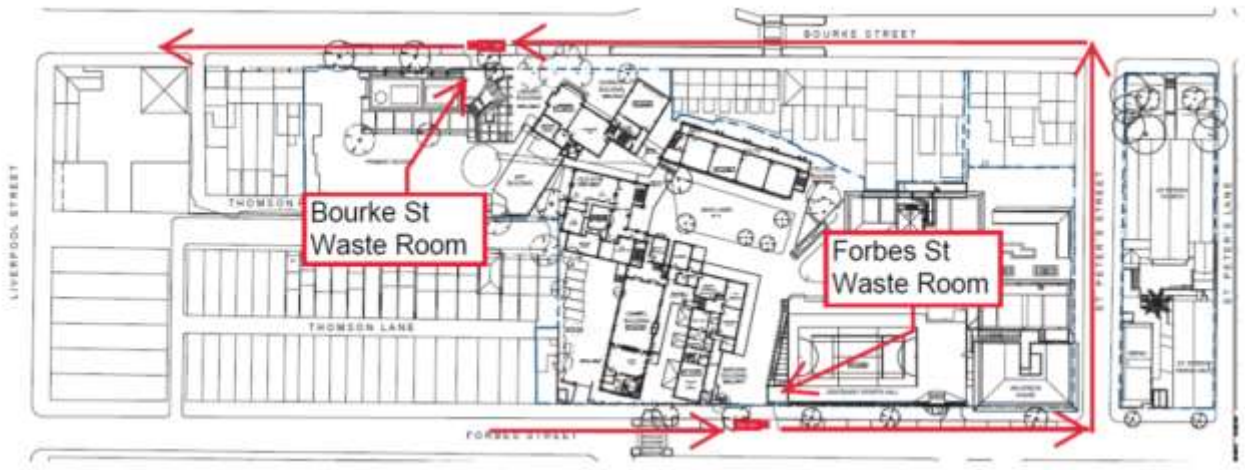
Given there is no change to overall school population, there is no requirement to accommodate additional waste storage. The following table shows the recommended bin systems for the management of the estimated waste profile within Wilkinson House (using the existing student population in Wilkinson House, which is not proposed to be increased). Waste from Wilkinson House will be taken to the existing waste storage area on Forbes Street, located next to the Centenary Sports Hall.

Waste Stream	Bin Type	Bin Size	No. of bins	Weekly Clearance Frequency	Weekly capacity (L)	Estimated volume/ Week (L)	Footprint per bin m^2	Total footprint m^2
Paper/cardboard	MGB	660L	1	1	660	1,579	1.05	1.05
Mixed Recycling	MGB	660L	1	1	660	451	1.05	1.05
Organics	MGB	120L	3	3	1,080	677	0.27	0.81
General Waste	MGB	1100L	1	2	2,200	1,805	1.69	1.69
Total								**4.59**
Including 50% additional space around bins for manoeuvring								**6.9**

Source: Foresight Environmental

Waste collections will remain as per the School's current waste collection location and procedure as shown in Figure 29

Figure 29 Waste contractor collection procedure



Source: Foresight Environmental

General waste and recycling bins are also recommended to be placed in learning spaces and staff areas.

10.13.2. Construction Waste

A Construction and Demolition Waste Management Plan (**CWMP**) has been prepared by Foresight Environmental and is attached at Appendix V.

The quantity of waste materials to be generated onsite are estimated based on the proposal and construction methodologies known to date. Approximately 869m^3 of demolition waste and 590m^3 of construction waste is estimated, which is subject to confirmation at the construction stage. The waste

strategy proposed therefore incorporate flexibility to allow for variation in the total quantities generated at construction stage.

The aim of CWMP is to ensure that all waste resulting from construction and demolition activities is managed in an effective and environmentally aware manner. Specifically,

- To maximise the reuse and recycling of demolition materials
- To reduce the volume of materials going to landfill
- To maximise waste material avoidance and reuse on site
- To ensure that where practicable, an efficient recycling procedure is applied to waste materials
- To ensure efficient storage and collection of waste

To achieve the objectives outlined above, the CWMP contains strategies for:

- Detailed onsite and offsite waste management system. Specifying whether the waste is to be:
  - Re-used on site,
  - Re-used or recycled off site, or
  - Disposed off-site (landfill)
- Site waste control and management
- Management of hazardous waste
- Implementation responsibility
- Training and education

The CWMP will be refined post approval and the appointed builder working on the site will be required to adhere to this CWMP.

10.14. BCA AND ACCESSIBILITY

10.14.1. BCA

BCA Logic has undertaken an assessment of the proposal against the Deemed-to-Satisfy (**DTS**) provisions of the relevant sections of the Building Code of Australia (**BCA**) and applicable Building Regulations (Appendix Z).

The assessment identifies a number of matters which are considered "'Matters for Further Consideration' that require further information or consideration and/or assessment as Performance Solutions. Any Performance Solution will need to be detailed in a separate report and must clearly indicate methodologies for achieving compliance with the relevant BCA Performance Requirements.

Overall, the detailed design is capable of complying with the relevant requirements of the EP&A Act, the Regulation and the BCA, through a combination of deemed-to-satisfy provisions and performance-based solutions.

It is important to note that the proposed internal layout of Wilkinson House greatly improves BCA compliance for an educational establishment when compared to the existing outdated and non-compliant layout. Key elements of the building that will become BCA compliant as a result of the proposed works include:

- All rooms and corridors comply exceeds room heights of 2.4m. Ceilings to the GLA's are maximised in height (2.6m-2.7m) to maximise natural ventilation and light.
- The proposed central open grand stairway is 5.4m wide and has 2.5m wide flights, and is able to accommodate maximum population of 120. The new stair will also be fire safety compliant.
- Wider external links with 1:20 gradients, allowing a gentle connection of existing levels of wider campus and eliminating bottle neck pedestrian traffic.
- New accessible WC facilities for both staff and students.

- Reconstructed floors in concrete for fire safety and durability

10.14.2. Accessibility

Urban Health Access & Heritage Consultants has assessed the proposal with regards to accessibility objectives under the BCA, Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards), and the relevant Australian Standards as they relate to access to premises and the intent of the Disability Discrimination Act 1992 (Cth) (**DDA**) (Refer to Appendix Y).

The report outlined a number of existing non-compliances, including:

Existing Access to Wilkinson House

Due to the steep natural terrain, equitable access within the campus and to the rear of Wilkinson House is challenging. For this reason, the school has prepared a master plan for realising disability access by progressively linking buildings via walkways, ramps and lifts with each successive building upgrade.

Each new link and building upgrade have compounding networking benefits, providing choice ease of access and opportunities for people with access needs.

Existing access within Wilkinson House

The existing heritage building was built under the 1917 Local Government Act building regulations and was not required to be accessible. Due to the current fire regulations and geometric limitations, standard complying accessways cannot be upgraded within the existing building, without the substantial rebuilding.

The need for wheelchair access and access for regular school-aged children, teachers and visitors is inadequate.

Existing stairs

The existing internal stairs are inadequate and need replacing. Passage, stairway widths and stair amenity are less than NCC/ BCA requirements.

A second handrail is now required for ascending and descending traffic. The total width of the stairway cannot accommodate a second handrail and is already too narrow which results in gridlock during classroom changeovers.

The assessment provides advice and strategies to provide equitable access for people with disabilities and to ensure Wilkinson House can achieves DDA compliance.

The new lift provides equitable access to all levels within Wilkinson House. The new walkway on level 2 is 2m wide with a 1:20 gradient, providing a handrail free gentle connection within the campus (refer to Figure 30).

More importantly, as the result of the proposal, the greatest accessibility improvement is that equitable access from St Peters Street to Wilkinson House and equitable connection to existing school facilities have been provided. Pedestrian route is illustrated in Figure 31 and described below.

Wheelchair/disability access to Wilkinson House from the St Peters Street is via the existing route starting at the campus entry through the Joan Freeman Building entrance foyer. The existing complying accessway will be augmented by the new lift addition, linking all levels of Wilkinson House to Joan Freeman. This provides an equitable pedestrian connection from the main street entry to Joan Freeman, the basement car park via lifts and ramps walkways and landings.

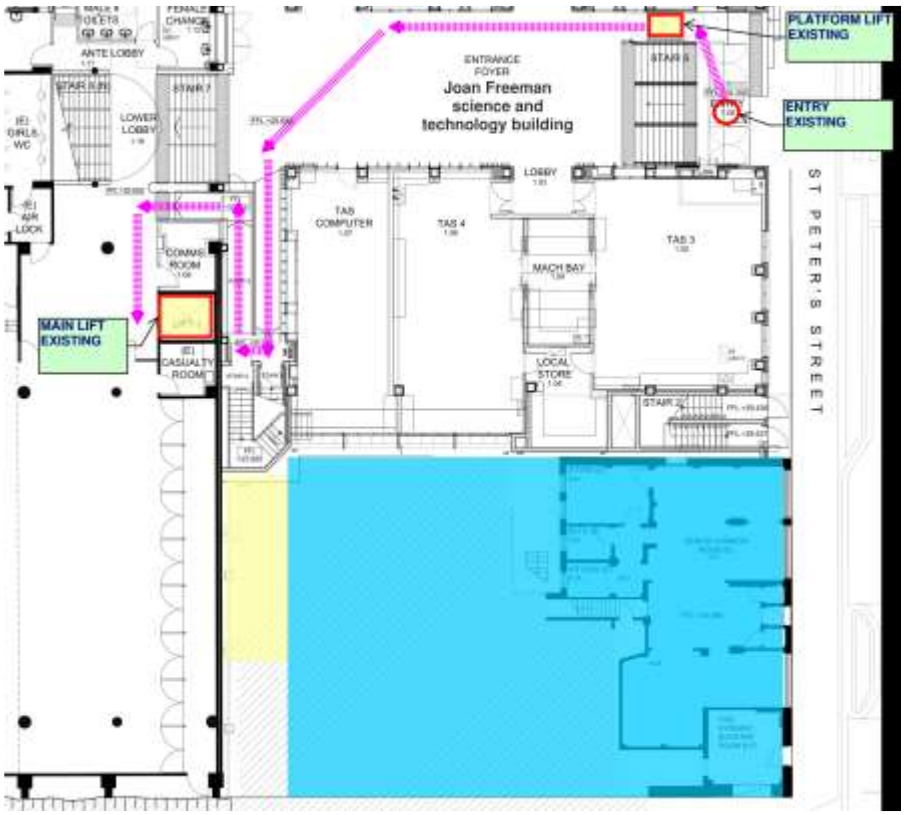
An existing lift node at Centenary Sports Hall, the John Freeman Building and Wilkinson House provides and will continue to provide complying vertical transfer between the three buildings. In addition, the proposed lift in the void between Wilkinson House and Centenary Sports Hall will augment the existing lift and extend equitable access from the levels of Sports Hall to new levels in the Wilkinson House.

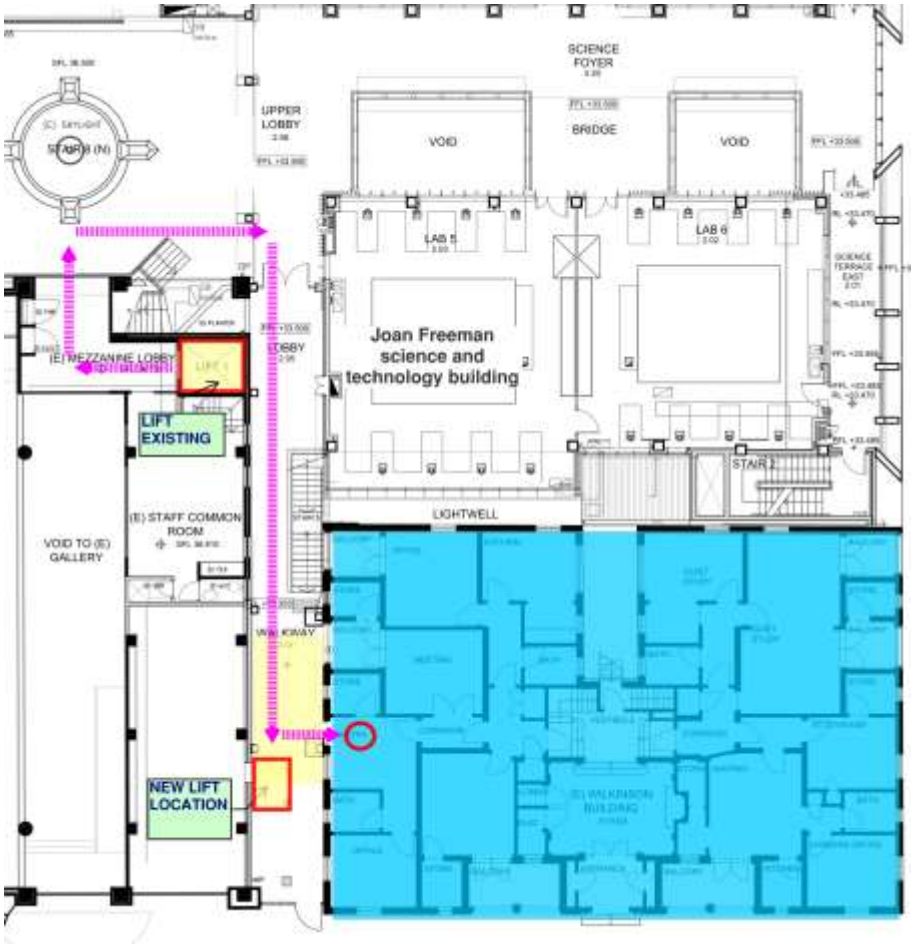
Overall, as the result of the lift addition and the location of Wilkinson House, extended equitable access is able to be provided that connects Joan Freeman, Wilkinson House and Sports Hall.

Figure 30 Equitable access within Wilkinson House

Source: Smart Design Studio

Figure 31 Equitable access route from within the SCEGGS campus to Wilkinson House





Source: Urban Health Access & Heritage Consultants

A Performance Solution is proposed to permit a lift car internal width dimension that vary to the BCA E3.6. A larger 1200 x 2000 mm stretcher lift car is proposed in lieu of a 1400 x 1600 mm lift car. The select lift is a European (EC) complying lift certified by a 'Notified Body' for person with limited mobility. A performance solution design brief is to prepare prior to construction, and to be assessed using the BCA assessment methods.

In conclusion, the proposal will be capable of complying with the applicable accessibility requirements of the DDA Access to Premises Standards 2010, relevant Australian Standards and requirements of the BCA pertaining to building access, common area access and sanitary facilities.

Further detailed resolution of the design during the construction stages is required to ensure the built solution meets the current BCA and conditions of consent for disability access, health, and amenity.

10.15. MITIGATION MEASURES

The measures identified to mitigate the potential environmental impacts of the proposed development are described in detail within Section 10 of the EIS and summarised in the table below.

Table 16 Proposed Mitigation Measures

Issue	Potential Impact	Approach	Residual Impact
View and Visual Impact	Adverse view impacts to surrounding developments	Compliance with the Concept DA building envelope (as amended). The limited exposed condition of the rooftop Oculus will naturally restrict the rooftop's tree's mature height. The tree will also be regularly pruned to approximately 2m tall, to ensure view lines are not obstructed for surrounding residents.	N/A
Privacy	Adverse impact on visual privacy of surrounding residential properties	Maintain proposed building orientation and floor layout, including privacy treatments and window locations.	N/A
Traffic and Transport	Increased traffic on local roads (Operational).	Implementation of a Green Travel Plan prepared by Traffix.	N/A
Pedestrian Management	Conflict with pedestrian and cycle/vehicle operations (Operational).	Implementation of an Operational Transport and Access Management Plan prepared by Traffix to manage and mitigate traffic movements from and to the site.	N/A
Environmental Performance / ESD	Irreversible increase in energy usage.	Adhere to ESD measures within the ESD Report prepared by Northrop.	N/A
Contamination	Exposure of contamination or hazardous materials during construction and operation.	Adopt the recommendations of the Detailed Site Investigation prepared by Douglas Partners 2021. The exceedances in the fill can be mitigated during construction through either: ▪ Remove all fill from the building footprint; or ▪ Retain the fill beneath the building footprint with the ground level and / or basement floors (existing and proposed) acting as a cap and hence removing the potential complete source - pathway - receptor linkages.	N/A

Issue	Potential Impact	Approach	Residual Impact
		This option will require the implementation of a long-term environmental management plan (**LTEMP**) for the building footprint. Additionally, the following is recommended prior to or following demolition of existing structures (excluding the areas to be retained such as the external façade and existing foyer): ▪ Hazardous Building Materials Survey: Given the age and potential renovations which may have taken place in Wilkinson House, it is considered likely to contain hazardous building materials. A hazardous material building survey and subsequent appropriate removal of any identified hazardous materials in accordance with relevant legislation and guidelines is to be undertaken prior to demolition; ▪ Waste classification: Confirmation of the waste classification of the soils requiring offsite disposal should be undertaken to inform the lawful disposal of excess spoil. The waste classification must be undertaken in accordance with the POEO Act (1997) and EPA (2014); and ▪ Unexpected finds protocol: An unexpected finds protocol is prepared and implemented during site works to address any potentially impacted fill (e.g., asbestos contamination) encountered during the works.	
Heritage	Advise impact to the heritage significance of Wilkinson House and SCEGGS campus.	1. Prior to the issue of a Construction Certificate a Photographic Archival Recording should be undertaken of the place and must be prepared in accordance with the NSW OEH Heritage Division's Guidelines for 'Photographic Recording of Heritage Items Using Film or Digital Capture'. 2. A suitably qualified heritage consultant should be engaged to provide ongoing advice throughout the design development, contract documentation and construction stages of the project.	N/A

Issue	Potential Impact	Approach	Residual Impact
		3. A Schedule of Conservation Works should be prepared by a suitably qualified and experienced heritage consultant prior to the issue of a Construction Certificate. 4. A Heritage Interpretation Strategy should be prepared for the site by a suitably qualified heritage consultant as a condition of the DA consent. The Heritage Interpretation Strategy should identify significant themes and narratives for interpretation, as well as identifying locations, media, and indicative content for interpretation. Interpretation should be developed throughout detailed design and construction phases in conjunction with the project architect and other specialists as required.	
Aboriginal Heritage	Disturbance of previously unidentified items of aboriginal heritage.	**Recommendation 1 – RAP consultation & Aboriginal interpretation.** A copy of the final ACHAR must be provided to all project RAPs. Ongoing consultation with RAPs should occur as the project progresses. This will ensure ongoing communication about the project and key milestones and ensure that the consultation process does not lapse, particularly with regard to consultation should the Chance Find Procedure be enacted. Furthermore, options for Aboriginal interpretation through the use of language in signage and naming, and native garden plantings should continue to be explored and be incorporated into this development and future developments at the subject area. This will mitigate impact to the intangible cultural heritage values of the area and embed these values in the fabric and ethos of the School. **Recommendation 2 – Develop Archaeological Chance Find Procedure** Although considered highly unlikely, should any Aboriginal objects, archaeological deposits be Although considered highly unlikely, should any Aboriginal objects, archaeological deposits be uncovered during any site works, a Chance Find Procedure must be implemented.	N/A

Issue	Potential Impact	Approach	Residual Impact
		The following steps must be carried out: 1. All works stop in the vicinity of the find. The find must not be moved 'out of the way' without assessment. The area must be cordoned-off with appropriate signage to prevent accidental impact. 2. The archaeologist and Aboriginal representative on site examine the find, provides a preliminary assessment of significance, records the item for the AHIMS register and decides on appropriate management. Such management may require further consultation with the Aboriginal Cultural Heritage Regulation Branch of Heritage NSW within the Department of Premier and Cabinet (**DPC**), preparation of a research design and archaeological investigation/salvage methodology and decision on temporary care and control. 3. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required, and further archaeological investigation undertaken. 4. Reporting may need to be prepared regarding the find and approved management strategies. Any such documentation should be appended to this ACHAR and revised accordingly. 5. Works in the vicinity of the find can only recommence when all management measure all implemented, and the find is removed from the activity area. Should the find be an unmovable item such as an engraving or grinding groove located on a sandstone surface, further management measures will need to be introduced to avoid harm to the find. **Recommendation 3 – Human Remains Procedure** In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:	

Issue	Potential Impact	Approach	Residual Impact
		1. All works within the vicinity of the find immediately stop. The area must be cordoned-off and appropriate signage installed to avoid accidental impact. The remains must not be moved. 2. Site supervisor or other nominated manager must notify the NSW Police and DPC. 3. The find must be assessed by the NSW Police and may include the assistance of a qualified forensic anthropologist. 4. Management recommendations are to be formulated by the Police, DPC and site representatives. 5. Works are not to recommence until the find has been appropriately managed. **Recommendation 4 – Aboriginal Cultural Heritage Induction** It is recommended that induction materials be prepared for inclusion in the Construction Management Plan and site inductions for any contractors working at the subject area. The induction material should include an overview of the types of sites and artefacts to be aware of (i.e. stone tools, concentrations of shells that could be middens and rock engravings and grinding grooves), under the NPW Act, and the requirements of an 'archaeological chance find procedure' (refer below). This should be prepared for the project and included in any site management plans. The induction material may be paper based, included in any hard copy site management documents; or electronic, such as "PowerPoint" for any face to face site inductions.	
Archaeological Heritage	Found or disturbance of previously unidentified earlier structures, or associated	**Recommendation 1 – Excavation Permit Exception** An application should be made for an Excavation Permit Exception under Section 139(4) of the Heritage Act 1977. In the event that potential relics are	N/A

Issue	Potential Impact	Approach	Residual Impact
	occupational deposits that are of Archaeological significance.	identified during the course of archaeological monitoring, mechanical excavation must immediately cease, Heritage NSW be contacted and an application be made for an Excavation permit under Section 140 of the Heritage Act 1977. **Recommendation 2 – Archaeological Monitoring** Archaeological monitoring should be undertaken throughout any works which would disturb the ground surface. In general, archaeological monitoring should adhere to the following: ▪ Demolition should be undertaken in such a way as to minimise impacts to foundations and subsurface structures. The archaeologist should initially be consulted about the proposed demolition methodology. ▪ An archaeologist should be present at all times during the lifting of current hard surfaces, excavation and/or other activities that result in ground disturbance. ▪ Where a mechanical excavator is used, it must have a flat or mud bucket, rather than a toothed bucket, to ensure a level ground surface. ▪ All machinery should work backwards from a slab surface in order to avoid damage to any exposed archaeological relics. ▪ Fills should be removed sequentially in reverse order of deposition, starting with any imported fill and overburden, which reflect the archaeological stratigraphy and as instructed by the archaeologist. ▪ If archaeological relics are identified by the monitoring archaeologist, work must stop immediately, the area be cordoned off and the find safely retained in situ. Further assessment and recording of the find will be	

Issue	Potential Impact	Approach	Residual Impact
		required, following the methods outlined in Section 6.2 of the Archaeological Impact Assessment prepared by Urbis 2021.	
Waste	Excessive waste generation.	**Construction waste** The successful construction contractor will be responsible for finalising the detailed construction Waste Management Plan. **Operation waste** ▪ Implementation of the Operational Waste Management Plan. ▪ Waste management within Wilkinson House will follow the existing waste management system at SCEGGS ▪ General waste and recycling bins are also recommended to be placed in learning spaces and staff areas.	N/A
Stormwater	Adverse impact on the quality of stormwater runoff (Operation).	The run-off from the roof catchments will be collected in a series of gutters and down pipes, which will be delivered to the existing OSD tank in the existing car park to the west of the Wilkinson Building. Incorporate a proprietary OceanProtect StormFilter precast pit of size 1200 x 1200 (1.4m2) and 3 x 690 Psorb Stormfilter cartridges prior to entering the detention tank and discharging to the street drainage on St Peters Street.	N/A
Flooding	Potential flooding to the Wilkinson House building	Finished floor levels set at or above the flood planning level: ▪ Flood Planning Level of RL32.38m AHD for this entrance along Forbes Street ▪ Flood Planning Level of 29.22 AHD along St Peters Street. No hazardous materials are to be stored in areas below the 100-year ARI flood level.	N/A

Issue	Potential Impact	Approach	Residual Impact
		All critical services and associated infrastructure and equipment (including electrical equipment) is to be set above the 100-year ARI flood level. Depth velocity values across the site are to be no greater than that specified in the Australian Rainfall & Runoff guidelines.	
Acoustic and Vibration	Noise generation during the construction and on-going operation of Wilkinson House.	Implementation of the recommendations contained within the Noise Impact Report prepared by ADP Consulting dated October 2021.	N/A
Social Impact	General disruption to community associated with construction.	▪ Adopt all recommendations provided by the HIS. ▪ Adopt all recommendations provided by the ACHA. ▪ Implement recommendations provided in the CPTED assessment prepared by Urbis. ▪ Consider community use of the sporting facility outside school hours. ▪ Establish an operational plan for SCEGGS open spaces, or off-site access to open space, where possible during the construction period. ▪ Implement recommendations in the Noise Impact Assessment around careful selection of plant and construction equipment. ▪ Implement recommendations and procedures in the CTPMP and the Preliminary Construction Management Plan.	N/A
	Antisocial and criminal behaviour	Adoption of the recommendations of the CPTED assessment, including: ▪ Ensure all entrances, stairwells, elevators, communal areas, and walkways are well lit in accordance with Australian Standards.	N/A

Issue	Potential Impact	Approach	Residual Impact
		▪ Use balanced lighting and appropriate glazing between internal and external spaces to avoid a mirroring effect at night and allow for a continuation of sightlines from and into the building. ▪ Install clear and legible universally legible wayfinding signage consistent with the wider campus. ▪ Ensure the Melaleuca tree and understory planting proposed for the rooftop courtyard are maintained to protect sightlines from excess plant growth. ▪ Install security hardware on all back of house areas, storage rooms and plant rooms to restrict unauthorised access by students and non-staff members. ▪ Maintain all access points, including fire exits and stairs, to ensure they remain in good working order and are inaccessible from the outside. Magnetic door locking systems linked to fire sprinkler alarms can ensure that fire exits are used for emergencies only. Fire exits and stairs can often be targets for offenders. ▪ When access is provided between Forbes Street and Wilkinson House during special functions, ensure organised surveillance is provided by the stationing of a staff member within clear sight of the entrance. ▪ Use clear signage and lighting to create legible and inviting entrances to Wilkinson House both from within the Campus and from Forbes Street, when in use. ▪ Natural guardianship of the space and surrounding streets could potentially be provided through scheduled activities outside normal operational hours, such as evenings and weekends.	

Issue	Potential Impact	Approach	Residual Impact
		▪ Implement safety procedures for workers and contractors accessing the site, including working with children checks and a sign in/out requirement at the entry to the site. ▪ Ensure all fixtures and surfaces are repaired promptly. Routine maintenance is a strong indicator of area control and safety. ▪ Continue to provide spaces within the Campus for other user groups outside school hours.	
Construction	Impacts associated with public safety, visual amenity, noise, waste and traffic management in the locality during construction.	Finalisation and implementation of the draft Construction Environmental Management Plan.	N/A
Soil and Water	Impact on water table	Adhere to erosion and sediment control measures attached at Appendix U.	N/A
Infrastructure provision	Adequate connection to infrastructure and utilities and adequate infrastructure capacity.	Adhere to the required augmentation details outlined in the Utilities Infrastructure Report at Appendix CC.	N/A
Lighting impact	Potential light spill from the proposed building on public domain, pedestrians and surrounding residents.	Implement the lighting strategy attached at Appendix G.	N/A
Building Standards	Adequate access for people with disability. Adherence to Building Code of Australia.	Ensure detailed design adherence to BCA, accessibility objectives under the BCA, Disability (Access to Premises – Buildings) Standards 2010 (Premises Standards), and the relevant Australian Standards as they relate to access to premises and the intent of the Disability Discrimination Act 1992 (Cth) (DDA).	N/A

Issue	Potential Impact	Approach	Residual Impact
		Ensure detailed design adherence to Building Code of Australia.	
Cumulative Impacts	Cumulative impacts (traffic, noise, dust, etc.) associated with concurrent construction of other development in the area.	Implementation and finalisation of the Construction Pedestrian and Traffic Management Plan and the Construction Environmental Management Plan. A detailed Construction Management Plan be prepared at CC stage, which should detail any surrounding construciton, and how cumulative construction impact can be managed to ensure public safety and amenity.	N/A
	Cumulative impacts (traffic, noise emissions, etc.) during operation of Wilkinson House and other school buildings.	Continue to implement the school's codes of conduct and Plan of Management for school operation. Implementation of an Operational Transport and Access Management Plan prepared by Traffix to manage pedestrian access and mitigate traffic conflict.	N/A

11. EVALUATION OF PROJECT

This section of the report provides a comprehensive evaluation of the project having regard to its economic, environmental and social impacts, including the principles of ecologically sustainable development.

It assesses the potential benefits and impacts of the proposed development, considering the interaction between the findings in the detailed assessments and the compliance of the proposal within the relevant controls and policies.

1.1. PROJECT DESIGN

Balancing the heritage significance of the building and contemporary educational needs, the proposed design has been underpinned by the policies outlined in the Wilkinson House CMP.

The overall design strategy is to retain and restore all external facades and incorporate modest and recessive exterior additions, to retain the visual prominence of the Wilkinson House from the streetscape and maintain legibility of the heritage building.

The entrance lobby and lounge hall are retained. While the internal layout of the building is proposed to be reconstructed to accommodate larger classrooms with high quality amenities. Opportunities for heritage interpretation strategy have been explored and incorporated in the design.

The proposal has been designed taking into consideration of heritage conservation as well as other environmental impacts, such as minimising view, noise and visual impact to the public domain and surrounding developments.

1.2. STRATEGIC CONTEXT

Strategic context and policy have been assessed in Section 6 of this EIS.

11.1. ENVIRONMENTAL PLANNING INSTRUMENTS

State and Local Environmental Planning Instruments have been assessed in Section 8 of this EIS.

11.2. DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

Draft Environmental Planning Instruments are addressed in Section 8 of this EIS.

11.3. DEVELOPMENT CONTROL PLAN

Sydney Development Control Plan 2012 (the DCP) provides detailed planning controls which are relevant to the site and surrounding locality. However, clause 11 of the SRD SEPP states that DCPs do not apply to State significant development.

Where relevant, the DCP controls have been addressed on a merit basis in Section 8.13 of the EIS so the proposed development is compatible and consistent with the existing, approved and likely future development in the locality, including relevant technical requirements (e.g. public domain, stormwater, etc)

11.4. PLANNING AGREEMENT

No planning agreements are relevant to this proposal.

11.5. REGULATIONS

This application has been prepared in accordance with the relevant provisions of the EP&A Regulation.

11.6. LIKELY IMPACTS OF THE PROPOSAL

The proposed development has been assessed considering the potential environmental, economic and social impacts as outlined below:

- Natural Environment: the proposal addresses the principles of ecologically sustainable development (**ESD**) in accordance with the requirements of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and as outlined below:
  - Precautionary principle: through the implementation of environmental management and building maintainability, the proposal will apply industry best practice ESD initiatives, implement climate change adaptation principles, and include vegetation planting.
  - Intergenerational equity: through the inclusion of zero ozone depleting refrigerants, best practice PVC and low impact paints, sealants and adhesives, the proposal demonstrates a strong commitment to the preservation of environmental health, diversity and productivity of the local area.
  - Conservation of biological diversity and ecological integrity: through the planting of native vegetation, improvement of stormwater runoff and use of integrated landscaping, including roof landscaping, the proposal will improve, conserve and support the local biological diversity and integrity.
  - Improved valuation, pricing and incentive mechanisms: the proposal has involved significant input from the Quantity Surveyor, who will be involved throughout the entire design process to ensure the project remains on budget and effectively considers environmental factors in the valuation of assets and services. Furthermore, the project has considered the economic cost benefits that will stem from the project both short and long term. Extensive cost modelling has been completed to consider both capital and operational costs over the expected lifetime of the project.
- Built Environment: The proposal has been designed to respond to the heritage, design principles, and consistency with the streetscape and existing school building. The proposal is sympathetic to the streetscape character and the heritage presentation of Wilkinson House along Forbes Street and St Peters Street .
- Social: The proposal continues the educational use of the site. The proposed Wilkinson House will provide improved teaching facility, therefore contributing to long term positive social impact.
- Economic: The proposal will generate 50 full-time construction jobs, therefore contributing to the employment opportunities.

The potential impacts can be mitigated, minimised or managed through the measures discussed in detail within Section 10 of the EIS.

11.7. SUITABILITY OF THE SITE

The site is entirely suitable for the development of the proposal as it continues the use of the site as an educational establishment as identified within Schedule 1 of the SRD SEPP.

It is acknowledged that the site is listed as a local heritage item and is located within a heritage conservation area under the relevant local environmental plan. The development of the CMP for Wilkinson House will therefore be the guiding document for the future adaptive reuse of the building and facilitating its ongoing conservation and use.

The significance of Wilkinson House is not just vested in its tangible fabric, namely those elements which reflect the original building as designed by Emil Sodersten, but also in the intangible aspects as they relate to the association and ongoing educational use by SCEGGS Darlinghurst since 1960. Including the adaptation of the building from boarding house to classrooms since 2001.

The proposed adaptive reuse of Wilkinson House accommodates the school's changing educational needs, represents its ongoing association with SCEGGS Darlinghurst, which allows the building to continue to play a role in the School's future plans and therefore maintain the ongoing presence of the building within the SCEGGS campus.

Furthermore, the site is highly accessible and can be accessed by students, staff and visitors by walking, cycling, and buses, and trains. The site is located within a walking and public transport catchment for many residents of inner-city suburbs.

This EIS has also outlined why the proposal is suitable given:

- Wilkinson House has been used for 20 years by SCEGGS for teaching purposes, including general learning areas, staff rooms, study and student rooms. The School has therefore adaptively reused the

original residential flat building for over 61 years, with all efforts made to adaptively reuse the building for learning and teaching facilities specifically for the past 20 years.

- Wilkinson House is not suited for administration functions, and recognising the better alternative of co-locating administration functions in the central zone of the SCEGGS campus adjacent to the School's main entrance and address;
- The benefits associated with improving secondary school general learning facilities for the functional requirements of staff and students;
- The limited environmental impacts and sensitive receivers located near the site; and
- The significant benefits it provides in regard to accessible internal building connections and pathways connecting adjacent buildings.

11.8. SUBMISSIONS

It is acknowledged that submissions arising from the public exhibition of this application will need to be addressed as part of the Response to Submission phase.

11.9. PUBLIC INTEREST

The proposed development is considered to be in the public interest for the following reasons:

- The proposal has been prepared having regard to Council's planning policies and generally complies with the aims and objectives of the controls for the site.
- Subject to the various mitigation measures recommended by the specialist consultants as summarised in Section 10.15 of this EIS, the proposal does not have any unreasonable environmental or social impacts on adjoining properties or the public domain.
- The site is well serviced by public transport and various walking and cycling routes and does not change the consolidated drop-off/pick-up zone at Bourke Street.
- The proposal will result in the development of a high-quality educational environment for staff and students that:
  - Provides flexible working environments that can accommodate full classroom sizes;
  - Supports a fulfilling and diverse extra-curricular experience;
  - Provides an inclusive, supportive and secure pastoral environment for both primary and secondary school students; and
  - Provides efficient and environmentally sustainable facilities.
- The proposal has been designed to make a positive contribution to the overall built form of the site, having regard to topography and the heritage significance. The proposal is sympathetic to the character of the surrounding neighbourhood and respects visual privacy and significant views from neighbouring residential dwellings.
- The proposal will contribute positively to energy efficiency and environmental sustainability. The design has incorporated many ESD features to reduce energy consumption during the life of the proposed development.

12. SUMMARY AND CONCLUSION

The Environmental Impact Statement (**EIS**) has been prepared on behalf of SCEGGS Darlinghurst Limited (the applicant) in support of a State Significant Development Application (**SSDA**) for the adaptive re-use of Wilkinson House (the Site), located on the existing main SCEGGS school ground at 215 Forbes Street, Darlinghurst, legally described as Lot 200 DP1255617.

The EIS has addressed the issues identified in the SEARs and has been prepared in accordance with Schedule 2 of the EP&A Regulation.

Having regard for the biophysical, economic and social considerations, including the principles of ecologically sustainable development, the proposed development is justified for the following reasons:

- The land is zoned 'R1 General Residential' under the Sydney LEP, which is a prescribed zone for the purposes of the Education SEPP. The proposed development is permissible with consent and consistent with the land use objectives of R1 zoning.
- Minor alterations and additions are proposed to the approved Wilkinson House envelope (which is the existing building envelope). A concurrent Modification to Concept Approval SSD 8993 has been submitted with the SSDA to amend the approved building envelope for Wilkinson House. This is to ensure this SSDA is consistent with the Concept Approval (as modified). The areas of concept approval variation are minor and relate to minor roof height increase (of 330mm), additional envelope extension to the south to accommodate the lift, and additional envelope for roof plant on the Joan Freeman Building.
- The proposal is consistent with state and local strategic planning policies.
- The proposal satisfies the applicable local and state development controls. Minor departures to the local development standard - maximum building height, is required to increase the roof height by 330mm pursuant to clause 42 of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017. Whilst technically not required, a detailed Clause 4.6 variation justification is provided. Overall, the proposal largely complies with the LEP height control. The minor encroachment (the roof and the plant enclosure) would result in negligible environmental and amenity impact, including privacy, visual amenity, overshadowing and on the surrounding heritage items.
- External alterations and additions respond to the streetscape and provide a positive built form design outcome for the site.
- The design strategy demonstrates a sensitive adaptive reuse proposal. It is considered that the proposal will not result in detrimental impacts to either the SCEGGS Darlinghurst campus, the East Sydney HCA or the surrounding heritage items. Overall, the proposed adaptive reuse of Wilkinson House is considered to respect the heritage significance of the building and will ensure that a balance is met between the tangible and intangible significance of the building.
- The proposal provides much needed high quality, collaborative, equitable, large and classrooms that meet contemporary educational standards. Overall, the proposal will create 4 additional general learning classrooms and 2 additional indoor sports areas.
- The proposal does not seek to increase student and staff number. Therefore, amenity impact including traffic and noise is minimised and is comparable to the existing condition.
- Subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unreasonable impacts on adjoining properties or the public domain in terms of construction traffic, social and environmental impacts.
- The proposal will result in the development of a high-quality educational environment for staff and students that:
  - Provide BCA, accessibility and fire compliant teaching facility.
  - Enables an excellent academic programme;
  - Supports a fulfilling and diverse extra-curricular experience;
  - Provides efficient and environmentally sustainable facilities.

- The proposal allows the building to be fully accessible by all students and provides equitable connection to adjacent facilities.
- The proposal will contribute positively to energy efficiency and environmental sustainability. The design has incorporated best practice ESD features to reduce energy consumption during the life of the proposed development.
- The proposal appropriately satisfies each item within the Secretary's Environmental Assessment Requirements.

Having considered all relevant matters, we conclude that the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

DISCLAIMER

This report is dated 27 January 2022 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of SCEGGS Darlinghurst **(Instructing Party)** for the purpose of Environmental Impact Assessment **(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).

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

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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 QUANTITY SURVEYORS COST ASSESSMENT (INCLUDING CONSTRUCTION JOB ESTIMATE)

APPENDIX B SURVEY

APPENDIX C URBAN DESIGN REPORT

APPENDIX D ARCHITECTURAL DRAWINGS (INCLUDING SCHEDULE OF MATERIALS AND FINISHES)

APPENDIX E VISUAL IMPACT ASSESSMENT

APPENDIX F LANDSCAPE PLAN AND STATEMENT

APPENDIX G LIGHTING STRATEGY

APPENDIX H STATEMENT OF HERITAGE IMPACT

APPENDIX I HISTORICAL ARCHAEOLOGICAL IMPACT ASSESSMENT

APPENDIX J WILKINSON HOUSE CMP

APPENDIX K ABORIGINAL CULTURAL HERITAGE

APPENDIX L TRAFFIC AND TRANSPORT IMPACT ASSESSMENT (INCLUDING UPDATED GREEN TRAVEL PLAN)

APPENDIX M OPERATIONAL TRANSPORT AND ACCESS MANAGEMENT PLAN

APPENDIX N ROAD SAFETY AUDIT

APPENDIX O PRELIMINARY CONSTRUCTION TRAFFIC AND PEDESTRIAN MANAGEMENT PLAN

APPENDIX P ECOLOGICALLY SUSTAINABLE DEVELOPMENT ASSESSMENT

APPENDIX Q CONTAMINATION - SITE INVESTIGATION REPORT

APPENDIX R OPERATIONAL AND CONSTRUCITON NOISE ASSESSMENT

APPENDIX S STRUCTURAL REPORT

APPENDIX T GEOTECHNICAL REPORT

APPENDIX U SEDIMENT, EROSION AND DUST CONTROL PLAN

APPENDIX V CONSTRUCITON AND OPERATIONAL WASTE MANAGEMENT PLAN

APPENDIX W CIVIL ENGINEERING REPORT - STORMWATER MANAGEMENT AND FLOOD ASSESSMENT

APPENDIX X CONSULTATION OUTCOME REPORT

APPENDIX Y ACCESSIBILITY REPORT

APPENDIX Z BCA REPORT

APPENDIX AA CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN ASSESSMENT

APPENDIX BB SOCIAL IMPACT ASSESSMENT

APPENDIX CC UTILITIES REPORT

APPENDIX DD PRELIMINARY CONSTRUCTION MANAGEMENT PLAN

APPENDIX EE GANSW MEETING MINUTES

APPENDIX FF PLANNING CERTIFICATE

APPENDIX GG BIODIVERSITY ASSESSMENT REPORT (BDAR) WAIVER APPROVAL LETTER

APPENDIX HH CLAUSE 4.6 VARIATION REQUEST – BUILDING HEIGHT

APPENDIX II ACID SULFATE SOIL

APPENDIX JJ HERITAGE RESPONSE TO CONSULTATION WITH CITY OF SYDNEY COUNCIL

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