

15 June 2015

Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Karen Jones and Peter McManus

Dear Karen and Peter,

Review of Environmental Impact Statement against SEARs - SCECGS Redlands School Senior Campus (SSD 6454)

We act on behalf of SCECGS Redlands Ltd, owner of the above site and applicant of the above State Significant Development Application (SSDA). This submission responds to the NSW Department of Planning and Environment's (DPE) letter dated 22 May 2015 requesting clarification on six matters prior to exhibition of the SSDA. The six matters relate to:

- Envelope study and justification of the proposed scale and layout of buildings
- Stage 2 Environmental Site Assessment (ESA) and Remediation Action Plan (RAP)
- Assessment against the principles of Ecological Sustainable Development (ESD) as defined under clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000
- Details of the proposed out of hours activities
- Detailed capital Invest Value (CIV) Report
- Design resolution of the Belgrave/Gerard Street frontage

We will respond to the above matters in the following table and refer to the relevant sections of the EIS.

TABLE 1 – RESPONSE TO REVIEW OF EIS AGAINST SEARS

SEAR	MATTER	COMMENT	REFER TO
Urban Form and Urban Design	Provide envelope study and justification of the proposed scale and layout of buildings	Tanner Kibble Denton Architects Pty Ltd (TKD Architects) has undertaken an envelope study and considered the parameters of the site and the development. The layout of the proposed buildings is such that it is almost a consolidated built form, which has enabled a larger consolidated area of open space to be achieved. The scale of buildings	Section 3.2.1 of EIS and Appendix F

SEAR	MATTER	COMMENT	REFER TO
		is consistent with the scale of existing buildings on site and development generally along Military and Waters Road and Winnie and Gerard Streets. Development in the area is up to eight storeys in height. Setbacks are provided to adjoining residences to ensure an appropriate interface and ensure there are no significant adverse impacts on amenity.	
Statutory and Strategic Context	Prepare Stage 2 Environmental Site Assessment and Remediation Action Plan (RAP)	The majority of the site is currently occupied by buildings and structures. Undertaking a Stage 2 ESA prior to demolition is not possible. Samples would need to be taken from a minimum of 15 additional locations to meet the requirements of a Stage 2 ESA. As agreed with DPE, Stage 2 ESA should be undertaken following demolition of the existing buildings and can be included as a condition of development consent.	Section 6.3 of EIS and Appendix P
Ecologically Sustainable Development	Provide an assessment against the principles of Ecological Sustainable Development (ESD)	The proposal has been assessed against the principles of ESD under clause 7(4) of Schedule 2 of <i>Environmental Planning and Assessment Regulation 2000</i>. The proposal will not cause serious or irreversible damage to the environment. Mitigation measures have been recommended where a potential risk has been identified. The proposal maintains and enhances the education use for future generations. The site will not	Section 8.6 of EIS and Appendix J

SEAR	MATTER	COMMENT	REFER TO
		impact on threatened species or ecological communities. New plant species proposed will contribute to ecological diversity. The proposal incorporates a number of measures that contribute to an ecologically sustainable development.	
Other	Details of the proposed out of hours activities	The School operates a number of activities outside the standard education curriculum, including swimming, sport, art, drama and school community events. These activities vary from term to term and year to year. Details of activities and hours are provided in the EIS.	Section 4.6 of EIS
General requirement	Provide detailed CIV Report	Detailed CIV Report provided.	Appendix B
Other	Design resolution of the Belgrave/Gerard Street frontage	A key design objective of the proposal is to shift the primary public frontage of the school from the Military Road frontage to the quieter Gerard Street side of the site. The design provides an appropriate setting for the School with an open landscaped area, clear visibility of the primary education buildings, in particular the new Learning Hub, and a significant consolidated landscaped forecourt. The podium is undulating to reflect the changing form of buildings along Gerard and Belgrave Streets. The entry to the car park is located on Gerard Street as the project's Traffic and Parking consultant advised that a	Section 5.9 of EIS

SEAR	MATTER	COMMENT	REFER TO
		driveway entry via 6 Winnie St is prohibited by the relevant governing standards and therefore unsupportable.	

We trust this information satisfies the DPEs request for clarification on the identified matters and the SSDA can be exhibited. If you have any questions or require anything further please do not hesitate to contact me on 8233 9927 or Tim Blythe on 8233 9959.

Yours sincerely,



Alaine Roff
Senior Planning Consultant

URBIS SERVICES

GPO Box 5278 Sydney 2001
Tower 2, Level 23, Darling Park
201 Sussex Street
Sydney NSW 2000 Australia

t 02 8233 9900 f 02 8233 9966 e info@urbis.com.au w urbis.com.au Urbis Services Pty Ltd ABN 24 105 273 505