

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

19 October 2020

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

Dear Mr Betts,

SSD MODIFICATION MOD 4 OF SSD 6454 - 272 MILITARY ROAD, CREMORNE REDLANDS SENIOR CAMPUS CONCEPT PROPOSAL & STAGE 1 WORKS

1. INTRODUCTION

This Environmental Impact Statement (EIS) has been prepared on behalf of SCECGS Redlands (the Proponent) to accompany a section 4.55(1a) modification of State Significant Development Approval SSD 6454 (the Approval).

The proposal is to modify Condition A4 of the Concept Approval and Condition A2 of the Stage 1 Approval to amend the approved plans, pursuant to section 4.55(1a) of the act. The proposed modification includes replacement of inadequate parapet cladding material at John Roberts Centre fronting Gerard Street at the north of the site.

The proposed modification is minor in nature and does not result in any change to the function of the site as approved under SSD 6454. The proposed modification is also of minimal environmental impact subject to the implementation of the recommended mitigation measures. The modification, therefore, can be dealt with under section 4.55(1a) of the *Environmental Planning & Assessment Act 1979* (the Act).

2. SITE AND SURROUNDING CONTEXT

The SCECGS Redlands School Senior Campus (the site) is located at 272 Military Road, Cremorne on Sydney's lower north shore. The site is legally described as the following:

Lot 11 DP 877844, Lot 1 DP 80618, Lot 11 DP 877879, Lot 1 DP 343811, Lot 2 DP 783664, Lot 3-4 DP 783993, Lot 1 DP 783663, SP 13814, Lot 6 DP 19382, SP 15886, SP 10384, Lot 1 DP 90591, Lot 21 DP 88932, Lot 1 DP 783664, Lot A DP 107138, Lot 2 DP 222013, Lot 1 DP 713405, Lot 21A DP 83152, Lot 224 DP 152693, Lot 21 DP 783663, Lot 1 DP 81061, Lot 1 DP 83047

The school campus comprises a main school on the northern side of Military Road and the Adams Centre directly opposite the main school on the southern side of Military Road.

3. PROJECT BACKGROUND

The Approval (SSD 6454), issued on 28 April 2016 granted development consent to a staged development application including a Concept Proposal and Stage 1 works for the SCECGS Redlands School Senior Campus.

On 24 October 2017, development consent was granted to SSD 6454 MOD 1, which amended the plans as follows:

- Relocation of mechanical plant previously located on the eastern side of the podium garden to the eastern edge of the podium;
- Modification of the extent, profile and depth and of the roof overhang to the west elevation of the New Learning Hub;
- Replacement of glazing to the west elevation of the Interim Music Hub at the basement level with solid wall;
- Minor increase (100mm) in the height of the window sill at basement level to the north elevation of the Interim Music Hub;
- Minor modifications to the entry forecourt including changes to the ramp

On 28 April 2016, development consent was granted to SSD 6454 MOD 2, which amended the plans as follows:

- Modification to the layout of stair 05 and 06;
- Demolition of existing staff rooms and link structure and construction of new replacement staff rooms and link structure;
- Southern NLH awning changed from curved to straight shape
- Southern external wall to NLH on Level 1 modification to glazing to solid ratio;
- Reduction in the extent of external terracotta fin elements by 15%.

On 21 August 2019, development consent was granted to SSD 6454 MOD 3, which amended a small error in the legal description of the site.

All the concrete structure/parapet for Stage 1 was completed in 2017. Stage 1 is 95% complete and will be fully complete following determination of this modification.

4. PROPOSED MODIFICATIONS

4.1. DESIGN CHANGES

The proposed modification to SSD 6454 is for the addition of fibre cement cladding to the external façade of the parapet on the north, west and east elevations of the John Roberts Centre (Interim Music Hub). The reason for the modification is that the current concrete cladding is of low construction quality and does not meet the required standard for the finish. This has resulted in poor presentation to the street and at the entrance to the school campus. The modified drawings are attached at Appendix A and shown in Figure 1 on the following page. A comparison of the approved and proposed Stage 1 development is shown in Figures 2 and 3.

Figure 1 - Elevations

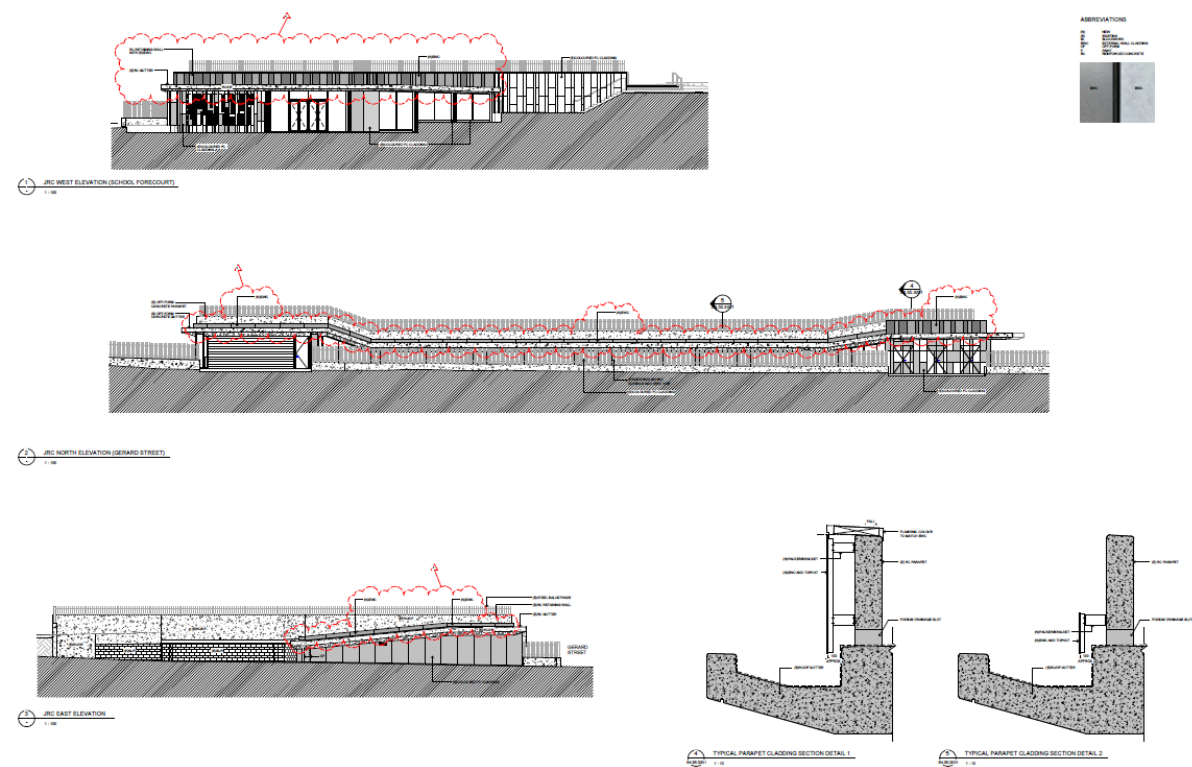
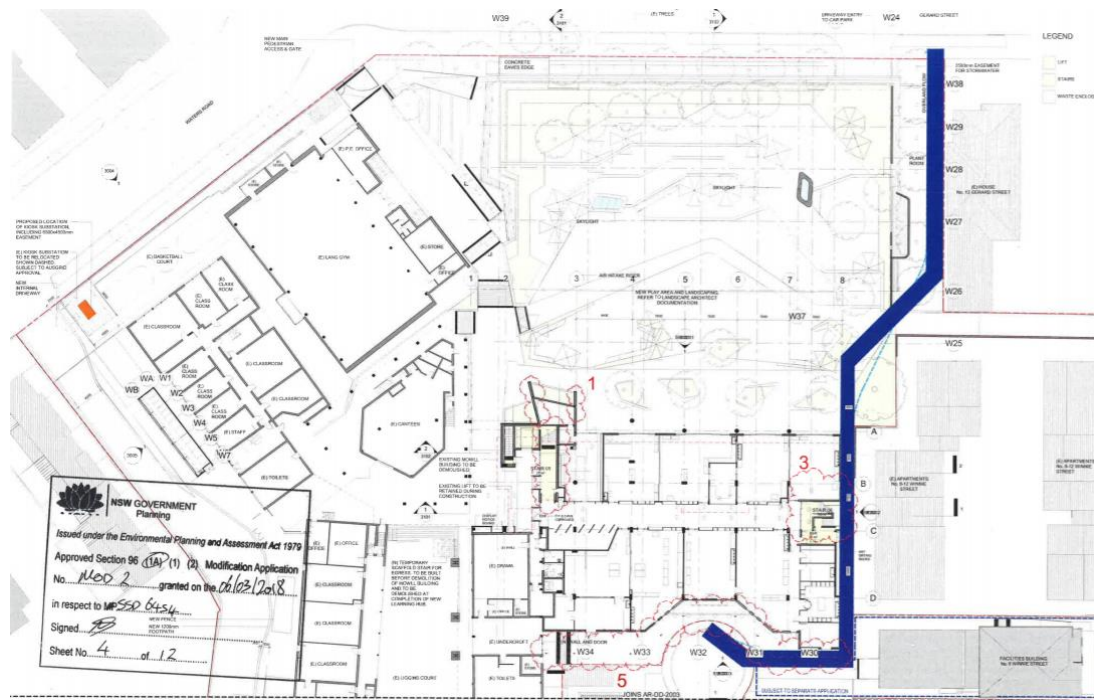
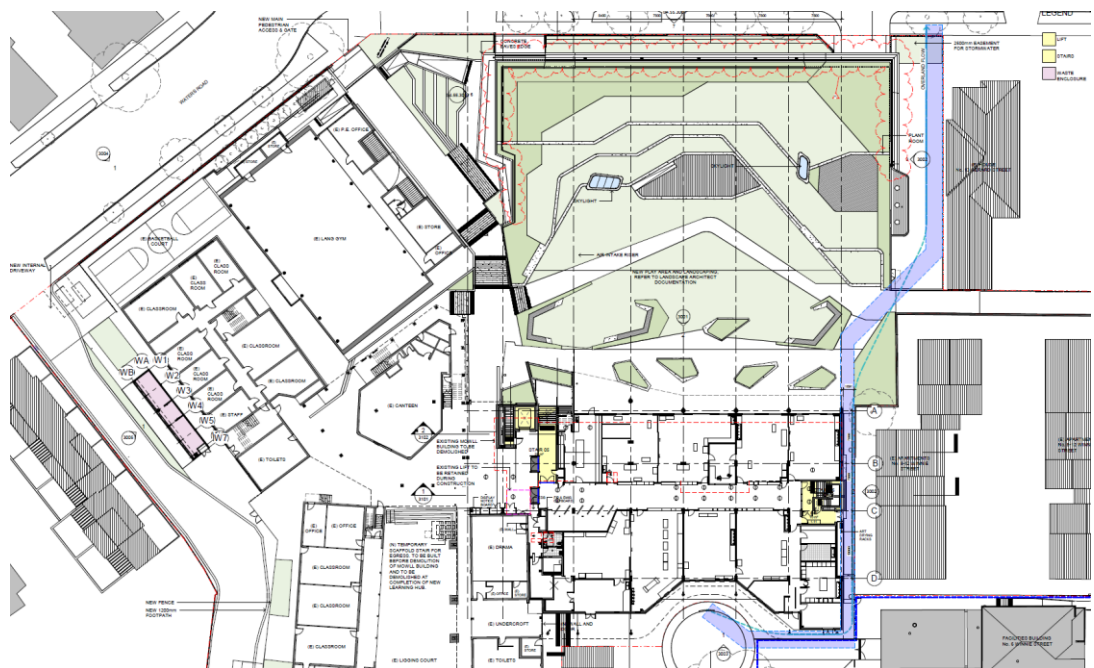


Figure 2 - Level 1 Floor Plan



Picture 1 Approved (MOD 2)



Picture 2 Proposed (MOD 4)

Figure 3 - North Elevation



Picture 3 Approved (MOD 2)



Picture 4 Proposed (MOD 4)

4.2. PROPOSED MODIFICATION TO CONCEPT APPROVAL

Text to be deleted is shown with strike through and text to be added is shown in red.

Development in Accordance with Plans and Documents

A4. The Applicant shall carry out the development generally in accordance with the:

- a) *Environmental Impact Statement Concept Proposal and Stage 1 Development Application SCECGS Redlands Cremorne, prepared by Urbis dated June 2015, as amended by the Response to Submissions to EIS - SSD 6454 prepared by Urbis dated November 2015; and the ~~S96 Environmental Impact Statement prepared by Urbis dated 6 December 2015;~~ and any subsequent modifications; and*
- b) *following drawings, except for:*
 - i) *any modifications which are 'Exempt' or 'Complying Development'; and*
 - ii) *otherwise provided by the conditions of this consent.*

Redlands Senior Campus Masterplan Prepared by TKD Architects			
Drawing No.	Rev.	Name of Plan	Date
AR-MP-1104	E	Envelope Diagrams	05/02/16
AR-MP-1105	E	Envelope Elevations	05/02/16
AR-MP-1106	E	Envelope Sections	05/02/16
AR-MP-1107	E	Proposed Location Plan	05/02/16
AR-MP-1108	E	Proposed Site Plan	05/02/16
AR-MP-1109	E	Staging Diagrams 1	05/02/16
AR-MP-1110	E	Staging Diagrams 2	05/02/16
AR-MP-2001	G	Proposed Masterplan - Basement and Level 1 Plans	27/10/2017
AR-MP-2002	G	Proposed Masterplan - Level 2 and Level 3 Plans	27/10/2017
AR-MP-2003	G	Proposed Masterplan - Level 4 and Level 5 Plans	27/10/2017
AR-MP-2004	E	Proposed Masterplan – Roof Level Plan	05/02/16
AR-MP-3001	G H	Elevations	27/10/2017 25/09/2020
AR-MP-3002	E G	Street Elevations	05/02/2016 25/09/2020
AR-MP-3101	E	Sections	05/02/16
Landscape Plans prepared by Silk Consulting Landscape Architects			
Drawing no.	Rev.	Name of Plan	Date
MP-100	D	Masterplan Initiative Landscape Masterplan	08/10/15
MP-200	D	Masterplan Initiative Landscape Sections	08/10/15

4.3. PROPOSED MODIFICATION TO STAGE 1 APPROVAL

Text to be deleted is shown with strike through and text to be added is shown in red.

PART A ADMINISTRATIVE CONDITIONS

Development Description

A1. Consent is granted to the 'Stage 1 works' as described in Schedule 1 and the Environmental Impact Statement, as amended by the Response to Submissions, the S96 Environmental Impact Statements, prepared by Urbis dated 31 August 2017, 6 December 2017 and 25 January 2018 and the conditions contained in this development consent.

Development in Accordance with Plans and Documents

A2. The Applicant shall carry out the development generally in accordance with the:

- a) Environmental Impact Statement Concept Proposal and Stage 1 Development Application SCECGS Redlands Cremorne, prepared by Urbis dated June 2015, as amended by the Response to Submissions, prepared by Urbis dated November 2015; ~~the S96 Environmental Impact Statements, prepared by Urbis dated 31 August 2017, 6 December 2017 and 25 January 2018;~~ **and any subsequent modifications;** and
- b) following drawings, except for:
 - i) any modifications which are 'Exempt' or 'Complying Development'; and
 - ii) otherwise provided by the conditions of this consent.

Architectural Design Drawings Titled Prepared by TKD Architects			
Drawing No.	Rev.	Name of Plan	Date
AR.DA.0000	E G	Cover Sheet and Site Plan	31/08/2017 25/09/2020
AR.DA.1001	E	Level 1 Demolition Plan North	05/02/16
AR.DA.1002	E	Level 1 Demolition Plan South	05/02/16
AR.DA.1003	E	Level 2 Demolition Plan North	05/02/16
AR.DA.1004	E	Level 2 Demolition Plan South	05/02/16
AR.DA.1005	E	Roof Demolition Plan	05/02/16
AR.DA.1101	E	Stage 1 Sub Staging Diagrams 1	05/02/16
AR.DA.1102	E	Stage 1 Sub Staging Diagrams 2	05/02/16

Architectural Design Drawings Titled Prepared by TKD Architects			
Drawing No.	Rev.	Name of Plan	Date
AR.DA.2001	F	Basement Level Plan	31/08/2017
AR.DA.S4.55.2002	G H	Level I Floor Plan North	27/10/2017 25/09/2020
AR.DA.2003	E	Level 1 Floor Plan South	05/02/16
AR.DA. S96 .2004	G	Level 2 Floor Plan	27/10/2017
AR.DA. S96 .2005	G	Level 3 Floor Plan	27/10/2017
AR.DA. S96 .2006	G	Level 4 Floor Plan	27/10/2017
AR.DA. S96 .2007	G	Accessible Roof Plan	27/10/2017
AR.DA.2008	F	Roof Level Plan	31/08/2017
AR.DA.2031	E	Existing & demolition in 7 & 8 Monford Place	05/02/16
AR.DA.2032	E	Interim works in 7 & 8 Monford Place	05/02/16
AR.DA.2041	E	Temporary Classrooms – Stage 1a to 1b	05/02/16
AR.DA.2042	F	Temporary Classrooms – Stage 1C	31/08/2017
AR.DA.2051	F	Basement level Plan – Interim Music Stage 1B	31/08/2017
AR.DA.S4.55.3001	G H	Elevations sheet 01	27/10/2017 25/09/2020
AR.DA.S4.55.3002	G H	Elevations sheet 02	27/10/2017 25/09/2020
AR.DA. S96 .3003	G	Elevations sheet 03	27/10/2017
AR.DA.S4.55.3004	F G	Elevations sheet 04	31/08/2017 25/09/2020
AR.DA.3005	E	Elevations sheet 05	05/02/16
AR.DA.3031	E	Elevations sheet 06 - 7 & B Monford Place	05/02/16
AR.DA.3101	E	Sections Sheet 01	05/02/16
AR.DA.3102	E	Sections Sheet 02	05/02/16
4R.D4.3131	E	Sections Sheet 03-T & 8 Monford Place	05/02/16

Architectural Design Drawings Titled Prepared by TKD Architects			
Drawing No.	Rev.	Name of Plan	Date
Landscape Plans Prepared by Silk Consulting Landscape Architects			
Drawing No.	Rev.	Name of Plan	Date
DA.L100	E	Stage 1 Overall Plan	29/08/2017
DA.L101	E	Stage 1 Main Open Space indicative Plan	29/08/2017
DA.L102	E	Stage 1 Hub Building Roof indicative Plan	29/08/2017
DA.L200	D	Stage 1 indicative Landscape Sections	08/10/15
DA.L400	E	Stage 1 indicative Planting	29/08/2017

5. SECTION 4.55(1A) ASSESSMENT

5.1. MINIMAL ENVIRONMENTAL IMPACT

The proposed modification is for minor changes to the Concept Proposal and Stage 1 works which do not alter the context, scale, or built form of the approved development. The works are façade works that improve the quality and adequacy of the parapet cladding material of the John Roberts Centre. The proposed modification will have no additional environmental impacts.

5.2. SUBSTANTIALLY THE SAME DEVELOPMENT

The proposed development, as modified, will be substantially the same development as that which was originally approved in SSD 6454. This is because there are no changes to:

- Approved use or operational parameters of the school, such as staff/student numbers, school opening hours or other management processes is proposed;
- Approved site layout, building envelopes, or gross floor area;
- Parking numbers, vehicular circulation and access remain the unchanged; or
- The level of environmental impact.

6. SECTION 4.15 EVALUATION

The following environmental assessment addresses the relevant matters pursuant to Section 4.15 of the Act.

6.1. STATE ENVIRONMENTAL PLANNING POLICY NO. 55 REMEDIATION

The requirements of *State Planning Policy No. 55 – Remediation of Land* (SEPP55) apply to the subject site. SEPP55 requires the consent authority to consider whether the land is contaminated.

A Preliminary Stage 1 and a Detailed Stage 2 Environmental Site Assessment were prepared in relation to the site as part of SSD 6454. A Remediation Action Plan has also been developed and associated remediation works are underway. The proposed modification does not materially change the findings of the ESAs or require amendment of the RAP / validation plan. The proposal as modified will continue to satisfy the requirements of SEPP 55 subject to compliance with the existing conditions of consent.

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

State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 applies to this modification. The proposal has been designed with consideration of the design principles in Schedule 4 of the SEPP:

- There is no change to the context, built form and landscaping;
- The proposal does not alter the health and safety outcomes of the development;
- The proposal does not alter the flexibility and adaptability of the development;
- The proposal replaces the cladding material of the parapets at the John Roberts Centre, improving the quality of the building façade.

6.3. NORTH SYDNEY LOCAL ENVIRONMENTAL PLAN 2013

The site is located within North Sydney Local Government Area and is subject to *North Sydney Local Environmental Plan 2013* (NLEP 2013). The relevant provisions of NLEP 2013 are identified in the table below.

Provision	Proposal	Compliance
Part 2 Land Use Zone - SP2 School / R4 High Density Residential	The proposal relates to an educational establishment, which is permissible in the SP2 zone (pursuant to NLEP 2013) and the R4 zone (pursuant to the ISEPP).	Complies
Clause 4.3 Maximum Building Height - 12 metres	No change to approved building heights.	No change
Clause 5.10 Heritage Conservation - Site contains heritage items SCECGS Redlands (I0065) and Cremorne	The modification works to the Learning Hub are and will not result in any additional adverse impacts on the heritage values of the campus. Rather, the material change is an improvement on what was originally constructed. Refer to Section 6.4 of this report for further discussion.	Complies

Provision	Proposal	Compliance
Post Office / Telephone Exchange (I0064).		

6.4. ENVIRONMENTAL IMPACTS

6.4.1. Heritage

The site includes locally heritage listed items identified as:

- SCEGGS Redlands 272 Military Road
- Former Cremorne Post Office / telephone exchange 219 Military Road, Cremorne

The heritage items are shown in Figure 4 below. The site includes heritage buildings of cultural, aesthetic, historical and social significance. These items demonstrate the different phases of the school's development. The buildings that were demolished to facilitate the Stage 1 learning hub were not heritage listed. Their demolition was assessed in the original EIS for SSD 6454 and determined to be acceptable.

The location of the Stage 1 development, and the MOD 4 works, are adjacent to the Lang Building, which is itemised in the heritage listing for 272 Military Road.

The NBRS heritage Impact Statement submitted with the EIS assessed that the Stage 1 development was designed using well-modulated facades with a variety of materials including brickwork, various wall claddings, reinforced off-form concrete, horizontal sunshade elements and fixed glazed aluminium windows. The design is in keeping with that of the places of high heritage significance on the school site. The proposal is a minor cladding change that improves the materiality of the development. There will be no impacts beyond what was already assessed for the original EIS and determined to be acceptable.

Figure 4 LEP Heritage Map



Source: Urbis

6.4.2. Visual Impact

There are no environmental impacts resulting from the modification. The built form remains the same and the visual change will barely be perceptible (refer to Figures 1 and 2).

Figure 5 3D Perspective 1



Picture 5 Approved



Picture 6 Proposed

Figure 6 - 3D Perspective 2



Picture 7 Approved



Picture 8

Source: TKD Architects

6.5. SUITABILITY OF THE SITE

Site suitability was considered in detail during the assessment of SSD 6454. The proposed modification is minor and does not affect the suitability of the site to continue in its current use as an educational establishment. The site remains suited to the proposed use.

6.6. PUBLIC INTEREST

The assessment has demonstrated that the proposed modification is minor and improves the quality of the façade of the John Roberts Centre by installing parapet cladding which is of higher quality than that currently located on the site. An improvement to the construction material of the John Roberts Centre will also contribute to the Redlands Senior School's longevity as a high-quality educational establishment.

7. CONCLUSION

This section 4.55(1a) application seeks consent for modification to the Concept Plan and Stage 1 works approved in SSDA 6454. The Proposal will continue to support the delivery of essential social infrastructure within the locality with improved function and amenity outcomes arising minor design changes identified during the detailed design phase.

The proposed modification is an improvement of the parapet cladding of the John Roberts Centre and will not have any built form impacts. The works do not directly affect the heritage fabric within the Redlands Senior School campus. The works, therefore, will have negligible impact on the heritage values of the school and surrounding heritage items.

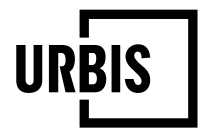
The modifications will have minimal environmental impact and the proposal should be approved.

Please do not hesitate to contact me on (02) 8233 9900 if you have any questions.

Kind regards,

A handwritten signature in blue ink, appearing to read "Alaine Roff". The signature is fluid and cursive, with the first name "Alaine" written in a larger, more prominent script than the last name "Roff".

Alaine Roff
Associate Director
+61 2 8233 9927
aroff@urbis.com.au



APPENDIX A