

17 August 2017

15456

Mr Anthony Witherdin
Director, Modification Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Witherdin,

Response to Submissions SSD 7372 – Modification 2 - O'Connell Street Public School

On 17th July 2017, The Department of Planning and Environment (DPE) invited public authorities to provide comments on Modification 2 of SSD 7373 for the O'Connell Street Primary School.

In total four agency submissions were received. Neither City of Parramatta (Council), nor any of the agencies objected to the proposed photovoltaic panels located on the new hall. However objections were raised regarding the proposed extension of the plant platform and mechanical plant facilities located on Building B in terms of visual, heritage and noise impacts.

This response should be read in conjunction with the following attached documentation:

- Response to Submissions Table prepared by Ethos Urban (**Attachment A**);
- Response to Heritage Division of Office and Environment and Heritage's (OEH) Submission prepared by TZG (**Attachment B**); and
- Response to Environmental Protection Agency's (EPA) Submission prepared by Acoustic Studio (**Attachment C**).

1.0 Matters to be Addressed

A response to each of the matters to be addressed is provided below.

1.1 Visual and Heritage Impact of the Mechanical Plant Facilities

Both Council and OEH raised objection to the visual and heritage impact of the proposed extension to the platform and mechanical plant facilities.

Council notes that the enlarged footprint and width increases the bulk and therefore increases the visibility of the structure when viewed from the north, east and west.

OEH outlined that the proposal is not supported as there is a conflict with policy 21.1 of the 1994 Conservation Management Plan, which states that the addition to the main school building is of high heritage significance and the original exterior should be recovered by the removal of intrusive elements such as the mechanical service elements on the roof.

OEH recommended that further options be considered by the proponent with the aim of removing the mechanical services from the roof entirely and a revised proposal be prepared.

TZG has prepared a response which supports the proposal in its current form as detailed below, also refer to **Attachment B**.

TZG explains that adaptive reuse of the Old Kings School site as a primary school requires spaces within Buildings A, B and C to be air conditioned, therefore additional mechanical plant and equipment including additional condensers is needed.

The location of the new condensers adjacent to the existing equipment on the roof of Building B has enabled potential impact to significant internal spaces to be minimised, as existing services reticulation paths can be generally followed and extended where necessary. The significant urban context of the site and its setting will be retained.

TGZ state that it is not possible to remove the plant platform from the roof entirely and its impact has been minimised by the following measures:

- The size of the extended roof platform has been kept to a minimum and detailed in a contemporary yet complementary manner to integrate with the existing platform. The impact of the extension has been minimised by designing it as a light, steel framed secondary element that is obviously contemporary, removable in the future, and respectful of the heritage significance of the place.
- The new powder coated louvre screens proposed will enclose the platform, unify the composition and ensure that the visual impact of the addition is reduced.
- The location of the extended mechanical plant platform ensures that impacts on significant fabric are minimized, sitting below the ridgeline and not prominent from most viewpoints, and screened entirely from the south, the key view, and the west.
- Existing service reticulation lines can be utilised wherever possible, so that visual impacts internally are kept to a minimum.

It is considered that the proposed works will have minimal impact on the heritage significance of the site as a whole or on the significant elements within it, and the upgrade and adaptive re-use of the buildings will ensure their continued use and conservation for future generations.

1.2 Noise Impact of the Mechanical Plant Facilities

The EPA noted that the modification does not appear to address noise emissions from mechanical plant impacting nearby noise sensitive land uses, including the presbytery associated with St Patricks Cathedral. It also stated that some buildings will be air conditioned but a detailed noise impact assessment has not been carried out.

The EPA requested that the proponent be required to ensure plant and equipment does not generate noise that exceeds 5dBA above the night time background noise level measured at the northern boundary of the development site, and exhibits tonal or other annoying characteristics

In response to the EPA comments, Acoustic Studio prepared a reply as outlined below, also refer to **Attachment C**.

The noise impacts have been predicted at the most sensitive boundary positions, taking into account distance attenuation, building reflections and directivity. These calculations show that all the relevant noise emission criteria will be met at all times.

In addition, the source noise data for the proposed plant have been reviewed in octave bands to establish if there are any tonal characteristics, or other characteristics which require the application of modifying factors in accordance with the requirements of the NSW INP. The plant has been found to have no tonal or other characteristics requiring application of the modifying factors.

On the basis of this assessment, it is anticipated that the operation of the proposed mechanical plant will have no adverse noise impact at the nearest noise-sensitive receivers – including the presbytery associated with St Patricks Cathedral, therefore the proposal in its current form is considered acceptable.

2.0 Conclusion

The proponent and project team have considered all submissions made from the public authorities. A considered and detailed response to all submissions has been provided within this letter and the accompanying documentation.

We trust that the responses provided above will enable the Department to finalise their assessment of the Modification application. Given the environmental planning merits (and the ability to suitably manage and mitigate any potential impacts) and significant public benefits proposed, it is requested that the application be approved.

Yours sincerely,



Belinda Thomas

Senior Urbanist

9409 4936

bthomas@ethosurban.com