

Loreto School

Concept Proposal and Stage 1 Development Application

Response to Submissions – SSD 7919

Part 1 - Response to Agency Submissions

Issues Raised by Agencies and Organisations	Proponent's Response
Department of Planning and Environment	
General	
<p>The EIS does not include an assessment against Schedule 4 Design Principles of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (SEPP Education)</p>	<p>FJMT has provided an assessment against Schedule 4 of <i>State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017</i> (Education SEPP) as part of their response at Appendix C. The principles at Schedule 4 relate to context, built form and landscape, sustainability, accessibility and inclusivity, health and safety, amenity, flexibility and adaptability and aesthetics. The proposal has been designed to achieve these principles. In summary:</p> <ul style="list-style-type: none"> • The Campus Masterplan has been developed with a consideration of the urban context. The new development sites have considered views from the surrounding context, street alignments and materiality. Due to the steeply sloping site, the site has been developed into three major zones which are consistent with the current development on the site. • In consideration of the sloping site and the views from neighbouring properties, the school has elected to excavate deep into the site rather than increase the overall height of the new development envelopes at the site boundaries. • Landscape is very important to Loreto and this is one of the design principles of

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	<p>the campus and also a form driver. To align with the pedagogical requirements, Loreto has a new emphasis on outdoor learning which is to be incorporated into the landscape wherever possible.</p> <ul style="list-style-type: none"> • One of the main drivers for the Masterplan is improving the amenity of the current campus with a focus on accessibility. The provision of the new connectors provides, at the completion of the Masterplan, access to all levels of all buildings. • A key principle of the Masterplan is the Future Focussed Learning approach. A key focus of this approach is to provide buildings which are adaptable and flexible, acknowledging that the changes in pedagogy will continue over time. The focus on improving access and circulation provides a solid framework for new buildings to be developed, or existing buildings to be refurbished.
<p>The application does not address Clause 35(6) of SEPP Education by indicating how the school facilities are shared with community and the likely impacts of such sharing.</p>	<p>In accordance with Clause 35(6)(b) of the Education SEPP, the following community uses and activities take place on the school campus:</p> <ul style="list-style-type: none"> • External orchestral group rehearsals; • External sports training; • Weddings; • Annual Orff Music conference; • Occasional photographic shoots (for backdrops / facilities); • Italian language program for adults; • Parking is provided for Yacht Squadron members and patrons on weekends; • Professional in-services / meetings out of school hours; • Code camp for local primary students during the holidays; and • Provision of meeting facilities for another school. <p>All of these uses occur outside of school hours and outside of school pick-up and drop-off times. As such, there would be no adverse impact on traffic associated with the ongoing use of the site by the community.</p>
<p>The EIS does not include details of the use of the roof terrace located above the learning hub on the western precinct. An assessment of the acoustic impacts related to such usable has also not be undertaken.</p>	<p>The original intent of the roof top terrace was to provide a landscaped outdoor learning area and horizontal connection between the Learning Hub and adjacent Marian Centre Building. This was in alignment with the project specific design principles and Principle 1 of the Education SEPP. Following the community consultation, design</p>

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	<p>and operational changes were investigated to improve the visual amenity and acoustic impacts of the rooftop terrace for the adjacent neighbours.</p> <p>In order to reduce the acoustic impact, address privacy concerns and improve the outlook for the adjacent neighbours, the outdoor learning area was removed and replaced by an extended roof garden. The intended use of the rooftop terrace has been limited to enable connectivity between the Learning Hub and the Marian Centre and to allow intermittent staff and student access to the rooftop garden for maintenance. The roof garden may occasionally be used as a supervised recreation space.</p> <p>Further to the above changes, the plant equipment was reduced in size and redistributed to alternative locations, maximising the area of the roof garden. The remaining plant equipment was relocated to the least visible location when viewed from 111 Carabella Street.</p> <p>The circulation path providing the connection between the two buildings has been set back as far as possible from the boundary (15.5m) and a planter has been integrated into the western facade to provide a landscaped buffer between the adjoining properties. Improving accessibility and way finding, and the integration of the landscape, are key components to the identified design principles of the Masterplan. The above amendments have enabled the achievement of these principles whilst minimising the acoustic impacts and improving the outlook for the adjacent residents.</p>
<p>The EIS does not specify whether student numbers are proposed to be increased in Stage 1 of the proposal.</p>	<p>The student numbers are proposed to increase over the life of the Masterplan, however it is likely that the majority of the additional students will be enrolled during Stage 1.</p>
Height and View Loss	
<p>The proposed seven storey Learning Hub exceeds the permissible height limit and has adverse impacts on the views currently enjoyed by the residents of the east facing units at No. 111 Carabella Street. The height exceedance is primarily due to the lift overrun and the fire stair well which provide access to the roof top terrace. Insufficient information has been provided regarding the need for the terrace or the details of its usage.</p> <p>Given this, it is considered that the roof top terrace should be deleted and the height of the fire stairs / lift overrun reduced to avoid height non-compliances</p>	<p>A detailed response to these issues is provided in the covering letter.</p> <p>The only parts of the proposed Learning Hub which protrude above the LEP height limit are the lift overrun, stair and plant. As noted above, the roof top access is a key component of the proposal.</p> <p>The greatest impact with regard to the LEP height exceedance is to unit 9/111. However, the non-complying elements do not contribute to the loss of harbour views from this apartment – they have a small impact on the loss of sky views only. Therefore</p>

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<p>wherever possible. Further design changes should also be undertaken to improve the views and solar access to the affected units.</p>	<p>removing these elements to avoid height non-compliances would have a negligible impact in improving view loss from this particular apartment.</p> <p>If the harbour view was to be retained to unit 9/111 Carabella Street, the building would need to be reduced to match the height of the existing B-Block, which is approximately 3m below the 12m allowed under the LEP. This would significantly impact the viability of the proposed development and the educational outcome provided. It would not be in the broader public interest to significantly limit the educational outcome provided in order to preserve partial harbour views (which are viewed across a side boundary) to unit 9 / 111 Carabella Street.</p> <p>Following community consultation, a number of changes were made to the design of the Learning Hub to minimise the visual impact of the building (refer to Figures 1 and 2). The following changes were made:</p> <ul style="list-style-type: none"> • Removal of the roof top louvred roof structure to improve sky loss and visibility across the rooftop terrace. • Redistribution of plant to reduce the size of the roof top plant. • Relocation of the reduced roof top plant to the least visible location when viewed from 111 Carabella St. • Revised materiality of the roof top elements to improve transparency, including the introduction of a glass lift. • Western rooftop parapet wall was replaced with a reduced height integrated planter creating a landscaped buffer to 111 Carabella St • Maximisation of a roof top garden to improve the outlook for 111 Carabella St. • Change of Use - The usable floor area of the rooftop has been limited, with the outdoor learning area being removed and replaced with a rooftop garden for intermittent staff and student access for learning and maintenance, and occasional use as a supervised recreation space. • The path and bridge connection to the Marian Centre will be used for circulation purposes only, to enable connectivity between buildings.


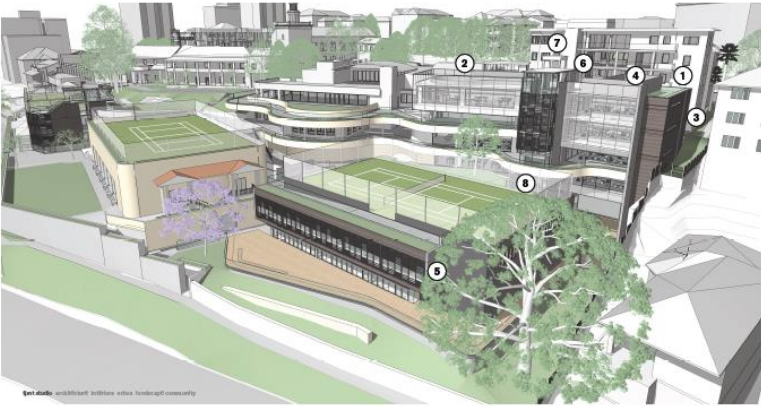
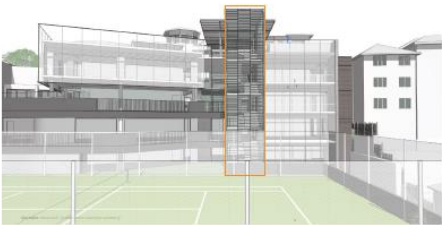
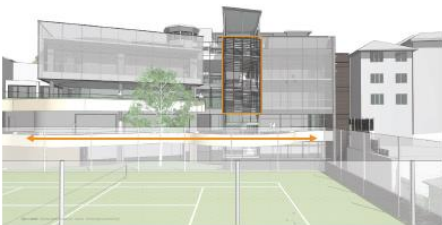
Issues Raised by Agencies and Organisations		Proponent's Response	
Original Community Consultation Scheme		SSD Revised Scheme	
		Summary of Changes <ul style="list-style-type: none">1 Parapet reduced in height and introduction of an integrated planter creating a landscaped buffer to 111 Carabella Street.2 Increased roof garden3 Western boundary facade articulation; through high level windows and brick detailing4 Relocated and reduced footprint of mechanical plant - Acoustically treated5 Building setback to improve access to light and air - 22 Elamang6 Louvred roof removed7 Glazed Lift8 Reduced bulk and scale of connector form	
			
8 Original Community Consultation Scheme 		8 SSD Revised Scheme Reduced bulk and scale of connector form 	

Figure 1 – Summary of design amendments made following community consultation

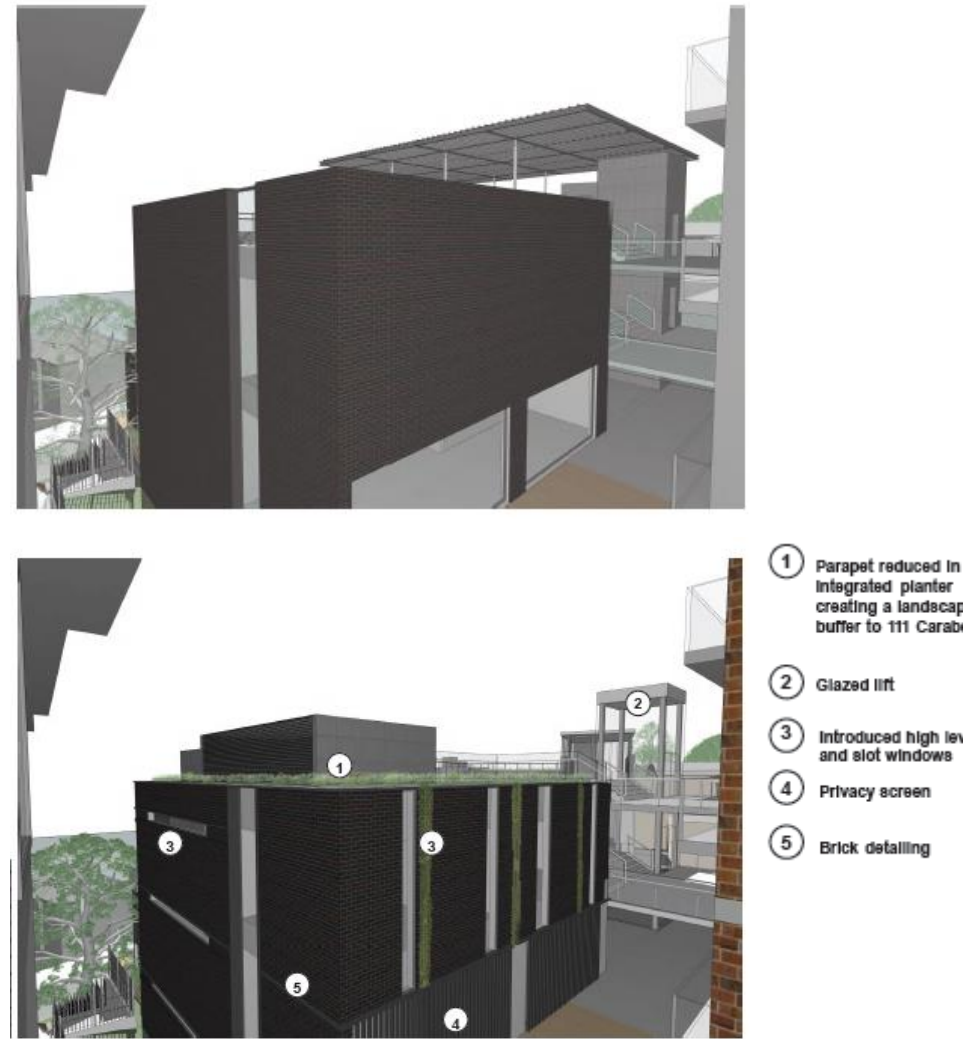
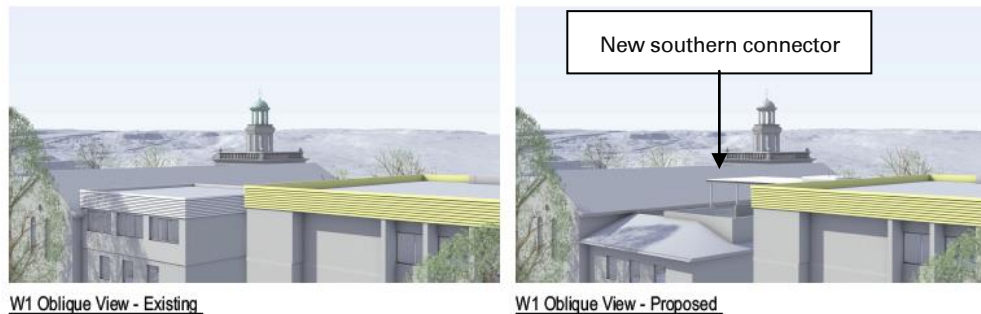
Issues Raised by Agencies and Organisations	Proponent's Response
 <p>The image shows two architectural renderings of the western facade of the Learning Hub. The top rendering shows a side view of the building with a dark, textured facade. The bottom rendering shows a front view of the building with several callouts (1-5) indicating design amendments. Callout 1 points to the roofline, callout 2 points to a glazed lift, callout 3 points to high level windows and slot windows, callout 4 points to a privacy screen, and callout 5 points to brick detailing.</p>	<ul style="list-style-type: none">1 Parapet reduced in height integrated planter creating a landscape buffer to 111 Carabella St2 Glazed lift3 Introduced high level windows and slot windows4 Privacy screen5 Brick detailing

Figure 2 – Summary of design amendments made to the western façade of the Learning Hub following community consultation

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<p>The concept building envelope within the eastern precinct is proposed to exceed the permissible height limit of 8.5m and would negatively impact on the views currently enjoyed by the residents on the southern side of Carabella Street and adjoining the eastern boundary of the site. The existing building only exceeds the permissible building height at two locations whereas the entire building footprint of the proposed concept envelope would exceed the permissible height limit. Insufficient information has been provided to justify the height exceedance. It is considered that the height of this concept envelope should be reduced to comply with the permissible height limit of 8.5m or be consistent with the height of the existing building.</p>	<p>Noted. In response to the issues raised, the development envelope in the Eastern Precinct has been reduced to be consistent with existing height of the Mary Ward at RL 29.940. Revised plans for which approval is now sought are provided at Appendix B.</p>
<p>The submitted View Impact Analysis report does not include the details of the impact of the connector within the southern precinct on the views from No. 46 Carabella Street.</p>	<p>The View Impact Analysis has been updated to address the visual impact of the Southern Precinct connector on 46 Carabella Street. The additional visual analysis at Appendix C and Figure 3 demonstrates that the connector will sit below the ridgeline of the Chapel, and will not result in any additional view impacts.</p> <div data-bbox="1108 794 2110 1109">  <p data-bbox="1108 1085 1310 1109"><u>W1 Oblique View - Existing</u></p> <p data-bbox="1612 1085 1825 1109"><u>W1 Oblique View - Proposed</u></p> </div> <p>Figure 3 – Additional view impact analysis for 46 Carabella Street</p>
<p>Parking</p> <p>Whilst the site includes parking in accordance with the requirements of North Sydney Council, it is noted that 90% of the staff currently use their car as the principal mode of transport. In this regard, the application should include a Workplace Travel Plan (WTP) that encourages a modal shift away from private motor vehicles to more sustainable travel modes. The WTP is required to incorporate site-specific measures that will be implemented to promote and</p>	<p>A Workplace Travel Plan (WTP) has been prepared by McLaren Traffic to address these requirements, and is provided at Appendix D. The WTP includes a number of provisions which could potentially be implemented to improve non-car travel modes, including:</p> <ul style="list-style-type: none"> Preparing a Transport Access Guide (TAG) for the site;

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<p>maximise the use of more sustainable travel modes and should include:</p> <ul style="list-style-type: none"> Objectives and targets (i.e. site-specific, measurable, achievable and timeframes for implementation) to define the direction and purpose of the WTP; Actions to help achieve the objectives, including incentives for using sustainable transport modes; Measures to promote and support the implementation of the plan; and A process for monitoring and review that allows for the effectiveness of the WTP to be measured. 	<ul style="list-style-type: none"> Implementing incentive schemes to encourage employees to walk to work; Taking part in 'National Walk to Work Day'; Providing sufficient bicycle parking to meet peak needs; and Setting up a carpooling database. <p>The WTP also includes details of the process for monitoring and reviewing the effectiveness of the WTP.</p>
<p>The Stage 1 works should accommodate bicycle parking provisions within the site to encourage alternate modes of transport.</p>	<p>End of trip facilities are provided at Lower Ground Level 4 of the new Learning Hub (refer to Figure 4).</p> <p>Bicycle parking spaces are able to be provided in the existing sports storage area on the Lower Ground Level of Centenary Hall, with the end of trip facilities within the adjacent Learning Hub. Access is able to be provided directly off Elamang Avenue via a stair ramp on the existing stairs.</p>

Issues Raised by Agencies and Organisations

Proponent's Response

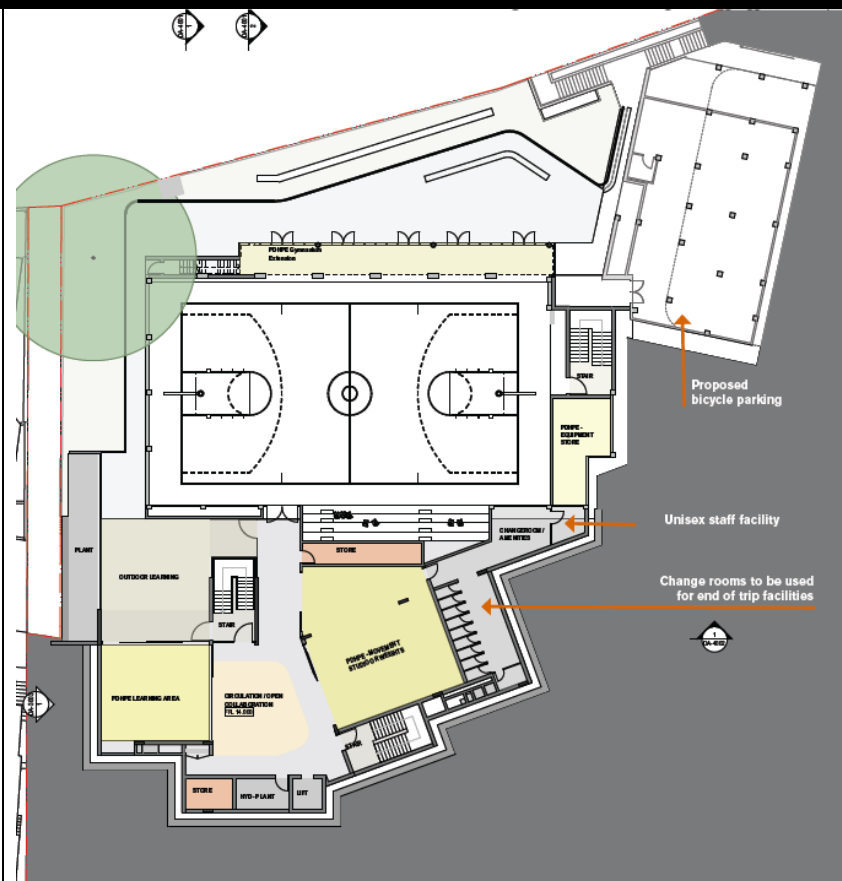


Figure 4 – Plan of Lower Ground Level 4 showing proposed end of trip facilities

The EIS indicates that the future six storey building envelope on the eastern side would include a two-storey car park. You are requested to provide the approximate location and capacity of this future car park.

The EIS states that there will be no change to existing parking arrangements as part of the Concept Proposal or Stage 1 works. Any reference to a car park (in the EIS or on the Architectural Drawings) is referring to the current car park beneath the existing Science Block and Music and Performing Arts Centre.

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<p>Swept Path</p> <p>The Stage 1 works include a loading area that would accommodate a 5.2m long vehicle and the Construction Management Plan indicates that 19.5m long 'truck and dog' style vehicles would access the site. In this regard, swept paths are required to be provided to identify the turning areas for each of the above vehicles within the site and methods of access.</p>	<p>McLaren Traffic Engineering has prepared a series of Swept Path diagrams for various truck sizes (refer to Appendix D). In summary:</p> <ul style="list-style-type: none"> • Vehicles up to 8.8m in length (MRV) can access the site with no traffic control necessary; • Vehicles up to 12.5m in length (HRV) can access the site with only some temporary removal of car parking; and • Vehicles up to 19m in length (AV) will require some temporary removal of car parking, use of traffic control in two locations, probable use of an escort vehicle and the removal of a physical median (likely required to be reinstated after construction concluded). <p>Any removal of car parking will require consent of Council as part of an updated Construction Traffic Management Plan, and with the use of traffic control, an escort vehicle and the modification of any roads. These matters can be managed as part of the preparation of a detailed Construction Management Plan prior to the issue of a Construction Certificate, in consultation with Council's Traffic Committee.</p>
<p>Construction Scheduling</p> <p>Details of scheduling of construction vehicles during the day should be provided with the expected maximum number of vehicles accessing the site during each of the scheduled periods. The construction schedule must ensure minimisation of conflict between construction vehicles and local traffic on Carabella Street and the surrounding road network.</p>	<p>As outlined in the submitted Preliminary Construction Management Plan, the excavation will generate approximately 750 truck movements in total (15 – 20 per day approximately) for excavation works associated with the first stage being predominantly truck and dog. The larger trucks minimise the potential disruption to the site and minimise the total number of truck movements thus mitigating project risks and impacts on the local road network.</p> <p>In response to the concerns raised, the scheduling of construction trucks has been revised to avoid potential conflicts with school drop off times. The revised times are reflected in the updated Preliminary Construction Management Plan at Appendix F.</p> <p>It will be in the best interests of the school, the community and the contractor, to avoid bringing trucks in at peak drop-off and pick-up times. As such, the estimated times for</p>

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	<p>trucks entering and exiting the site are as follows:</p> <ul style="list-style-type: none"> • First round of trucks between 7:00am – 7.45am (estimate 4 truck movements); • Second round of trucks between 10:00am – 11:00am (estimate 8 trucks movements); and • Third round of trucks between 1:00pm – 2:00pm (estimate 8 trucks movements). <p>Each truck would be onsite for approximately 8 – 10 minutes and would have a designated marshalling area. The trucks would be called to site as required to prevent any trucks blocking local roads. Work Zones on Carabella Street would be required for this marshalling process. A zone of approximately 20 metres to the west of the site entry and a zone of 10 metres on the eastern side of the site entry would be required. These matters can be managed as part of the preparation of a detailed Construction Traffic Management Plan, post determination.</p>
After Hours' Construction Works	
<p>The submitted EIS does not clearly indicate whether approval is sought for the after hours' construction works. Details of any such works of where such works may be required and any associated impacts, must be provided to enable as assessment as part of this proposal.</p>	<p>In accordance with Section 7.10.1 of the submitted EIS, the proposed hours of construction are:</p> <ul style="list-style-type: none"> • Monday to Friday: 7:00am to 6:00pm; • Saturday: 8:00am to 1:00pm; and • No work on Sundays and NSW public holidays. <p>These construction hours have been assessed as part of the Stage 1 (Western Precinct) DA Operation and Construction Noise and Vibration Assessment prepared by Renzo Tonin and Associates submitted at Appendix F of the EIS.</p>
Government Architect NSW	
<p>In general we support the proposal for the Concept Plan and Stage 1 Development and commend the approaches adopted to support improved accessibility and wayfinding throughout the site.</p>	<p>Noted.</p>

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<p>Prior to approval we recommend that the proponent is asked to provide the following additional information and to consider the changes noted below:</p> <ul style="list-style-type: none"> Remove the impact on view and amenity to the neighbouring apartments where the view loss is a result of proposed heights over the LEP/ DCP maximum heights. <ul style="list-style-type: none"> Seek to reduce the impact on view and amenity where the proposed buildings are within the limitations of the LEP/DCP height maximums. 	<p>Refer to response above. The only parts of the proposed Learning Hub which protrude above the LEP height limit are the plant, lift overrun and stair. The greatest impact with regard to the LEP height exceedance is to unit 9/111, Carabella Street. The plant, lift overrun and stair do not contribute to the loss of harbour views from this apartment, however have a small impact on the loss of sky views. Therefore removing these elements to avoid height non-compliances would have a minor impact in improving view loss from this particular apartment.</p> <p>If the harbour view was to be retained to unit 9/111 Carabella Street, the new building would need to be reduced to match the height of the existing B-Block, which is approximately 3m below the 12m allowed under the LEP. This would significantly impact the viability of the proposed development and the educational outcome provided. It would not be in the broader public interest to significantly limit the educational outcome provided in order to preserve partial harbour views (which are viewed across a side boundary) to unit 9 / 111 Carabella Street.</p> <p>The visual impacts on apartments at the front (northern side) of 111 Carabella Street have been considered throughout this response. The visual impacts from these apartments are the result of non-compliances with the DCP height plane. It is noted that State Significant Development Applications are not required to comply with DCPs. Notwithstanding this, the view impacts resulting from the DCP non-compliances are generally minor when the total view is considered.</p> <p>As noted above, the encroachment above the 12m LEP height limit is limited to the plant, lift overrun and stair. This exceedance results in a small loss of sky views from unit 9/111 Carabella Street. Removal of these elements would not result in harbour views being retained.</p> <p>From 9 / 111 Carabella Street, where there are encroachments into the DCP height plane, an LEP compliant envelope would still result in view loss behind. From the north facing apartments, view impacts resulting from the DCP non-compliances are generally minor when the total view is considered.</p>

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	<p>As detailed above, and as shown in Figures 1 and 2, a number of design changes have been made throughout the design process to improve the design, reduce the visual impact and improve the amenity of the neighbouring apartments. These include:</p> <ul style="list-style-type: none"> • Removal of the roof top louvred roof structure to improve sky loss and visibility across the rooftop terrace. • Redistribution of plant to reduce the size of the roof top plant. • Relocation of the reduced roof top plant to the least visible location when viewed from 111 Carabella St. • Revised materiality of the roof top elements to improve transparency, including the introduction of a glass lift. • Western rooftop parapet wall was replaced with a reduced height integrated planter creating a landscaped buffer to 111 Carabella St • Maximisation of a roof top garden to improve the outlook for 111 Carabella St. • Change of Use - The usable floor area of the rooftop has been limited, with the outdoor learning area being removed and replaced with a rooftop garden for intermittent staff and student access for learning and maintenance, and occasional use as a supervised recreation space. • The path and bridge connection to the Marian Centre will be used for circulation purposes only, to enable connectivity between buildings. <p>Further, shadow diagrams have demonstrated that the proposed development, including the proposed non-compliances, will not result in any additional overshadowing of the east facing apartments when compared to a complying built form.</p> <p>Based on the above, it is considered that the visual impacts proposed are acceptable, and are consistent with the principles established by Senior Commissioner Roseth of the Land and Environment Court of NSW in the judgement in <i>Tenacity Consulting v Warringah [2004] NSWLEC 140</i>.</p>
<ul style="list-style-type: none"> • Demonstrate the response to the Education SEPP Design Quality Principles with reference to the GANSW Design Guide for Schools document. • In particular, provide information on the strategy for sharing of facilities with 	<p>Refer to response above and Appendix C.</p> <p>Refer to response above. The site is used for a number of community uses outside of</p>

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the community. (Design Quality Principle 3)	school hours.
<ul style="list-style-type: none"> Demonstrate the ability to replace significant trees. The proposal has a negative impact on the available deep soil on the site. Satisfactorily provide natural light and air to all learning spaces including the PDHPE classrooms in Lower Ground 3 and 4 of the Learning Hub. Address potential privacy issues from the accessible roof spaces to the adjacent apartments. 	<p>Given the scale of the Masterplan development, the extent of tree removal proposed is quite limited. The ability to provide deep soil planting on the site is restricted. Notwithstanding this, it is still possible to provide significant trees in the soil depth proposed. The proposal includes approximately 27 replacement trees of varying species and sizes. The replacement planting includes 10 which are capable of growing to a height of 8m.</p> <p>The quality and amenity of the teaching and learning spaces has been a key consideration throughout the design process. The PDHPE learning area has been setback from the existing Gymnasium providing an area 7.5m deep and 11m wide open to the sky, enabling the provision of natural light and air to access the lower ground levels of the Learning Hub.</p> <p>As demonstrated in the additional shadow studies prepared by FJMT (refer to Appendix C) the PDHPE space will receive solar access between 9am and 11am on the winter solstice. As the space will receive full or partial solar access, and this represents the worst case scenario, the level of solar access achieved is considered acceptable.</p> <p>With respect to air, the Learning Hub will be serviced by a mix mode ventilation and air conditioning system.</p> <p>As detailed above, the use of the roof top terrace was amended following community consultation. Whilst it was originally intended as an outdoor learning area, the roof top will now be used as an extended roof garden. Access to the rooftop terrace will be limited to enable connectivity between the Learning Hub and the Marian Centre and to allow intermittent staff and student access to the rooftop garden for maintenance. The roof garden may occasionally be used as a supervised recreation space.</p> <p>In addition, the circulation path which provides the connection between the buildings has been set back as much as possible from the boundary (15.5 m) and a planter has been integrated into the western facade providing a landscaped buffer between the adjoining properties to prevent opportunities for direct overlooking.</p> <p>As a result, there is unlikely to be any adverse privacy impacts as a result of the use of</p>

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	the space.
Consider the replacement of dark bricks and finishes with lighter coloured material in response to issues of heat gain and sustainability, increase the possibility of light reflection to overshadowed or below ground areas and to respond sensitively to the heritage buildings on site which appear to be sandstone and light coloured render.	<p>FJMT has undertaken additional analysis of the proposed materials and finishes. The materiality is considered appropriate in the context of the site and surrounding built form. The suitability of the proposed finish is confirmed by Council's comments, as follows:</p> <p><i>The use of dark toned brickwork is supported to be consistent with the palette of materials used in the nearby conservation area and to allow the lighter rendered Chapel and Elamang buildings to be more visually dominant.</i></p> <p>The design intent is to use a selection of materials which responds very sympathetically to the surrounding heritage context of Kirribilli. The intention is to incorporate elements of sandstone into the landscaping, ideally from the site, however this will need to be ascertained as to the quality of the stone during excavation. The new building is a combination of lighter rendered low walls with light painted soffits (to the large external circulation and recreation areas), white and light grey off form concrete, face brickwork and veil like metallic screens. The colour selected for the face brickwork is intended to align with the surrounding single dwellings and apartment buildings – these range from a lighter red / brown brick to a darker brown brick. The face brick walls to the east and west are intended to be recessive so that the focus is on the curved circulation pathways and the open learning studios and their associated verandahs.</p>
The proposal is over the maximum height and significantly impacts the views, light and amenity of a number of adjacent apartments. This impact is deemed unacceptable and the height is not supported for the Learning Hub building.	Refer to responses above. The proposed height, including associated view impacts, is considered acceptable.
The height exceedance of the northern precinct connector building is acceptable to the minimal impact on surrounding views and amenity.	Noted.
The proposal includes ESD elements sufficient to achieve a 6 star Green Star As Built rating. This is commended.	Noted.
No bicycle parking is provided. The transport and traffic survey showed that no students or staff arrive at school by bicycle, and that the school is very well serviced by public transport. However due to the density of the surrounding residential area street parking is in high demand and therefore all car trips and parking to the school should be discouraged. Bicycle parking and end of trip facilities should be provided.	Refer to response above. Bicycle parking and end of trip facilities are provided as part of the proposal.

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Loreto Kirribilli is a private school and so while the contribution to their own school community is very high, they have not noted any access or support to the wider community in terms of access to spaces or facilities after hours. No strategy to improve performance in this way has been included in the proposal.	Refer to response above. A range of community uses and activities take place on the school campus outside of school hours.
The amenity of the existing buildings and grounds will be protected and in some cases improved by the proposal. The amenity of a small amount of adjacent apartments is adversely affected.	<p>Noted. As detailed throughout this response, measures have been implemented to minimise amenity impacts on adjacent apartments. These measures have been developed in consultation with the neighbouring owners, and include:</p> <ul style="list-style-type: none"> • Removal of the roof top louvred roof structure to improve sky loss and visibility across the rooftop terrace. • Redistribution of plant to reduce the size of the roof top plant. • Relocation of the reduced roof top plant to the least visible location when viewed from 111 Carabella Street. • Revised materiality of the roof top elements to improve transparency, including the introduction of a glass lift. • Western rooftop parapet wall was replaced with a reduced height integrated planter creating a landscaped buffer to 111 Carabella Street. • Maximisation of a roof top garden to improve the outlook for 111 Carabella Street. • Change of Use - The usable floor area of the rooftop has been limited, with the outdoor learning area being removed and replaced with a rooftop garden for intermittent staff and student access for learning and maintenance, and occasional use as a supervised recreation space. • The path and bridge connection to the Marian Centre will be used for circulation purposes only, to improve connectivity between buildings.
The proposal will contribute positively to the aesthetics of the school within and from outside the school by providing a cleaner and more coherent built strategy and form.	Noted.
North Sydney Council	
Development Timeframe	
Council questions the applicability of staging the proposal over a potential timespan	The intent of the Concept Proposal is to provide the school and the community with

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<p>of 50 years. During a 50-year timespan, Council and State Level controls will inevitably be reviewed and amended to suit the ever changing needs of greater Sydney, North Sydney and Educational Establishments. With continual increases to the population densities in the Kirribilli area, revised development standards and controls will need to be considered and will likely involve increased building heights and densities.</p>	<p>certainty around the future built form outcome for the site.</p> <p>However, it is appreciated that changes to controls (including likely increased building heights and densities) may change over the life of the Masterplan. If required, there are mechanisms in place to enable the Concept Proposal to be modified over time.</p>
<p>With increased height and densities reflected in future Plans and Policies, it is likely the works outlined in this proposal including the concept building envelopes would be abandoned in favour of a new proposal. Council recommends that applicant revise the development schedule to meet the shorter term needs of the school and revisit the concept building envelope components of the development (Stages 2 and 3) of the development when better projection of the specific requirements of the school can be made versus controls applicable controls at the time.</p>	<p>Refer to response above. The applicant will continue to pursue the full Concept Proposal.</p>
Traffic / Pick up and Drop off	
<p>The Kirribilli suburb is identified as having one of the highest densities in Sydney. Traffic associated with the existing school and morning drop off and evening collection of students contributes to the significant shortfall in existing parking and traffic problems in the immediate locality.</p>	<p>The Traffic and Parking Impact Assessment submitted with the EIS has determined that the proposed development will not have any adverse impact on traffic and parking in the area.</p> <p>Whilst it is not possible (due to existing buildings, the site's topography and heritage constraints) to bring pick-up and drop-off onto the campus, the school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns</p> <p>In addition, a Workplace Travel Plan has been prepared to encourage more staff to utilise non-car travel modes. Over time, implementation of the Workplace Travel Plan will assist in improving the availability of on-street parking.</p>
<p>The subject proposal will enable the school to take on more enrolments and increase the school's student and staff population. There does not however appear to be consideration given to increasing parking on site or provision of in internalised pick up / drop off point both of which will assist in alleviating traffic and parking issues in the suburb.</p>	<p>Noted. The proposal seeks to increase student enrolments by 100 and staff numbers by two. As noted in Council's own submission (see page 30 of this table), staff parking is provided in excess of the DCP requirements. Given Council's comments on the subject proposal, it is considered unlikely that additional parking would be supported.</p> <p>Further, it is not feasible to accommodate additional parking or pick-up and drop-off on the campus due to the site's existing buildings, as well as its heritage and</p>

Issues Raised by Agencies and Organisations	Proponent's Response
	<p>topographical constraints.</p> <p>Finally, a Workplace Travel Plan has been provided to encourage staff to switch to non-car modes of travel in order to alleviate existing traffic and parking issues.</p>
<p>Over the proposed 50-year time span, it is anticipated that future population, traffic and parking projections for the Kirribilli area will only further exacerbate the existing problems the local roadway is experiencing. Please also refer to the specific traffic referral comments obtained from Council's Traffic Engineers detailed below.</p>	<p>Noted. Based on the findings of the Traffic and Parking Impact Assessment submitted with the EIS and the implementation of a Workplace Travel Plan to encourage non-car modes of travel, the proposed development will not result in any adverse traffic or parking impacts. Traffic and parking will be considered further as part of subsequent detailed development applications.</p>
Planning - North Sydney Local Environmental Plan 2013	
<p><i>Building Height</i></p> <ul style="list-style-type: none"> Clause 4.3(3) of NSLEP 2013 states that the maximum permitted building height on the site is 12 meters over the portion of the site which is zoned R4 High Density Residential. The works of most significance in the Stage 1 Western Precinct include the 7 story learning hub and an overall height of 14.5 metres exceeding the height limits for this zoning (12 metres). 	<p>Noted. Whilst the majority of the Learning Hub is within the 12m height limit established for this part of the site under LEP 2013, parts of the building (limited to the lift overrun, stair and plant) exceed the 12m control. The highest point of the building is the stair connection in the centre of the building, which has a height of 14.5m.</p> <p>Notwithstanding the non-compliance with LEP 2013, it is important to note that Clause 42 of the new Education SEPP was introduced to provide greater flexibility for school developments in terms of LEP compliance. Clause 42 states that '<i>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</i>'. Notwithstanding this provision, a Clause 4.6 variation has been prepared which demonstrates that compliance with height of buildings development standard would be unreasonable and unnecessary in these circumstances.</p>

Issues Raised by Agencies and Organisations

- North Sydney Council is of the view that the scale of the New Buildings particularly the new additions to the western building (Learning hub) located close to the adjoining boundary site are incompatible with the site's adjoining and opposite along Carabella Street and Elamang Avenue. Existing buildings at the eastern end of the sites are zoned R2 Low Density Residential with a maximum permissible building heights of 8.5 m.

Proponent's Response

The proposed Learning Hub has been designed to use the topography of the site in order to minimise its apparent height. The Learning Hub is entirely consistent with the surrounding built form for the following reasons:

- It is only two storeys above street level (Carabella Street) and is lower than the existing Marian Centre when viewed from Carabella Street.
- The Learning Hub is well within the height of the School Chapel, which sits at approximately 24.7m.
- The land immediately to the west of the campus (at the interface with the Learning Hub) is zoned R4 High Density Residential. The proposed Learning Hub is consistent with the scale of the apartment building immediately to the west at 111 Carabella Street (refer to the Section at **Figure 5**).

In response to the issues raised, the envelope in the Eastern Precinct has been reduced in height to align with the height of the existing Mary Ward.

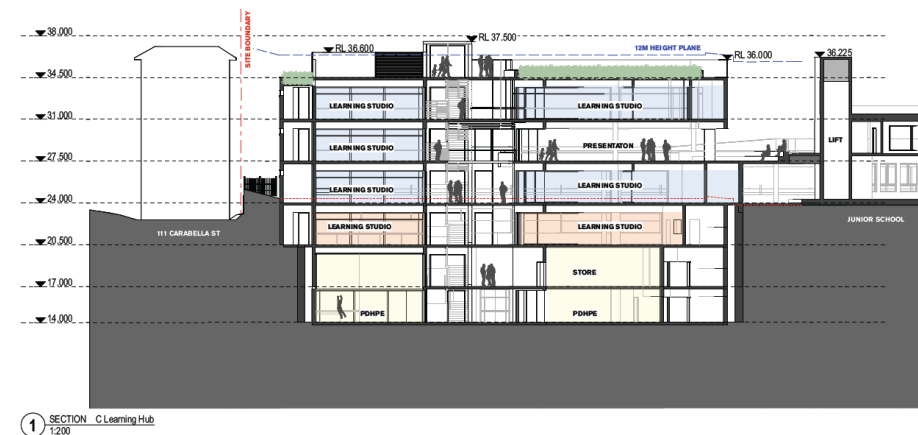


Figure 5 – Relationship between 111 Carabella Street and the proposed Learning Hub

Issues Raised by Agencies and Organisations	Proponent's Response
<ul style="list-style-type: none"> The non-compliances with the building height control for this building is contrary to the Aim of Plan 1.2(2)(b)(i) and building height objectives 4.3(1)(c), (e) and (f) of NSLEP 2013 The height and depth of the building is such that the new Learning Hub building will significantly impact upon the eastern outlook currently afforded from 111 Carabella Street residential dwellings. 	<p>The proposed development, including the non-compliances with the height of building development standard, is considered to be consistent with the aims of the plan and the building height objectives for the following reasons:</p> <ul style="list-style-type: none"> The proposed Learning Hub is generally consistent with the LEP height control, with point exceedances for the lift overrun, stair and plant. Further, the proposal is generally consistent with the scale of surrounding development on the school campus and the Kirribilli peninsular more broadly. It is therefore considered to be consistent with the bulk, scale and appearance of the area, in accordance with Clause 1.2(2)(b)(i) of LEP 2013. With respect to the height of building objectives at Clauses 4.3(1)(c), (e) and (f) of NSLEP 2013, the proposal: <ul style="list-style-type: none"> Will not result in significant overshadowing of any existing dwellings, public reserves or streets, nor compromise solar access for future development. As noted elsewhere in this response, the proposed non-compliance will not result in any additional overshadowing of 111 Carabella Street when compared to a complying built form. The proposed development will be compatible with the scale of development at the site boundaries, including the scale of 111 Carabella Street (see Figure 5 above) The proposed building is of a scale and density that is consistent with the character of the area, and existing development on the School site. <p>Refer to responses above with respect to view loss. The proposed LEP exceedance results in a small loss of sky views only, and does not impact on harbour views from unit 9/111 Carabella Street. In order to retain views of the harbour from this apartment, the height would need to be reduced to approximately 9m – 3m below the LEP height limit. This would result in an unfeasible outcome. Further, the LEP non-compliance does not impact on solar access to the east facing apartments, as shown at Appendix C.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<ul style="list-style-type: none"> The new works to the new Learning hub in Stage 1 of the proposal propose a new rooftop recreation area can introduce amenity impacts such as overlooking and privacy impacts. The height, depth and proximity of the new Learning Hub to the Marian Centre will also significantly reduce solar amenity to the Marian Centre and adjoining residential properties to the west. 	<p>Refer to responses above. The roof top will now be used as an extended roof garden. Access to the rooftop terrace will be limited to enable connectivity between the Learning Hub and the Marian Centre and to allow intermittent staff and student access to the rooftop garden for maintenance. The roof garden may occasionally be used as a supervised recreation space.</p> <p>The solar amenity of the adjoining residential properties to the west has been discussed throughout this response.</p> <p>With respect to the Marian Centre, FJMT has undertaken an extensive analysis of the impact of the proposed development on solar access. The proposed Learning Hub will have a minimal impact on solar access to the existing Marian Centre (refer to Appendix C).</p>
<p><i>Inadequacy of the submitted Clause 4.6 Request for Variation to the Development Standard</i></p> <ul style="list-style-type: none"> The Statement of Environmental Effects which accompanies the application contains a Clause 4.6 Request for variation to building height however it is noted that it only makes minor reference to the height of the proposed building envelopes contained in Stages 2 and 3 of the concept proposal. Without adequate details and plans of the proposed built form for these significant buildings proposed for Stage 2 and 3, proper assessment of the acceptability of the Clause 4.6 and associated impacts cannot be made. Approval of the development in its entirety, including endorsement of future building envelopes for Stage 2 and 3 will lock in future breaches to the building height standard without proper consideration being made of the associated impacts. In conjunction with the concerns raised regarding the intended development timeframe, the proposal should be amended to either remove the concept building envelopes until such time that the designs are sufficiently advanced and can undergo proper assessment. 	<p>The Clause 4.6 variation provides an equal assessment of both the Concept Proposal and Stage 1 works.</p> <p>Concept / Stage 1 approval is sought for Stages 2 and 3. The level of detail provided is consistent with what would typically be submitted for a Concept Proposal / Stage 1 DA. The submitted EIS includes an assessment of view and solar access impacts associated with the Stage 2 and 3 building envelopes, noting that the future building would be more refined and would therefore have a lesser impact.</p> <p>Notwithstanding this, in response to the comments made, the height of the building envelope in the Eastern Precinct has been reduced in height to align with the height of the existing Mary Ward at RL 29.940. This will ensure that visual and overshadowing impacts are consistent with the existing building.</p> <p>The applicant will continue to pursue the Staged DA. The level of detail provided is sufficient to enable an assessment of the proposed envelopes.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<ul style="list-style-type: none"> Alternatively, the information associated with the development can be expanded to include all relevant information to enable proper assessment of the building height breaches and associated impacts (solar access, privacy and view loss). Should the applicant wish to alter the building height controls without the benefit of lodging all the required information associated with a full development application, the applicant could also consider a Planning Proposal to alter the current NSLEP 2013 clause 4.3 Building Height provisions. 	<p>The applicant will continue to pursue the Staged DA. The level of detail provided is sufficient to enable an assessment of the proposed envelopes.</p> <p>A Planning Proposal is not required. Clause 42 of the Education SEPP states that <i>'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'</i>. Notwithstanding this, a Clause 4.6 variation has been prepared which demonstrates that compliance with height of buildings development standard would be unreasonable and unnecessary in these circumstances.</p>
<p><i>Excavation</i></p> <ul style="list-style-type: none"> Clause 6.10 Earthworks of NSLEP 2013 requires that earthworks associated with any development should not have a detrimental impact on environmental functions and processes, neighbouring uses. A significant amount of demolition and excavation is proposed and occurring around the western end of the site to facility the construction of the new Stage 1 Learning Hub with potential excavation to 3 three storeys below existing ground level in close proximity to the adjoining western boundary. The applicant is to ensure structure stability of the ground against bulk movements during excavation and construction. The applicant is to ensure adequate measures are incorporated into the proposal to ensure ground water flows and surface drainage are not directed to adjoining properties. 	<p>Noted. Earthworks will be managed to ensure that there are not adverse impacts on environmental functions and processes, or neighbouring uses.</p> <p>Noted.</p> <p>The works will be undertaken in accordance with the recommendations of the Geotechnical and Structural Engineers to ensure structural stability.</p> <p>The stormwater system has been designed to ensure that there will be no adverse impacts on downstream properties. Properties on Elamang Avenue will be monitored during the construction process to ensure that there are no adverse impacts from groundwater or stormwater.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<p>Planning - North Sydney Development Control Plan 2013</p> <p>NOTE: DCPs are not a matter for consideration in the assessment of SSD DAs. Clause 11 of <i>State Environmental Planning Policy (State and Regional Development) 2011</i> states that:</p> <p>11. Exclusion of application of development control plans</p> <p><i>Development control plans (whether made before or after the commencement of this Policy) do not apply to:</i></p> <p>(a) <i>State significant development</i></p> <p>...</p> <p>Whilst consideration has been given to key DCP controls, in particular the setback controls, the development is not required to comply with the DCP, and so North Sydney DCP has not been addressed in detail. Notwithstanding this, consideration has been given to Council's comments below.</p>	
<p><i>Views</i></p> <ul style="list-style-type: none"> Concern is raised that there will be loss of views to high amenity water views currently afforded from the eastern outlook from 111 Carabella Street, Kirribilli. A reduction to the height and depth to the building can ameliorate the potential impact. 	<p>Refer to responses above. In order to maintain the harbour views to unit 9/111 Carabella Street, the height of the Learning Hub would be required to match the existing B-Block height at RL 33.620 which is approximately 3m below the allowable 12m LEP height. This would significantly impact the viability of the proposed development and the educational outcome that can be achieved on the site. It would not represent the economic use of the school's land, and would not be in the broader public interest of the numerous students who will have the opportunity to learn at Loreto Kirribilli over the lifetime of the building.</p>
<p><i>Solar Access</i></p> <ul style="list-style-type: none"> The proximity to the boundary of the new Learning Hub building inclusive of the overall height of the building. The depth of the building is such that shadowing to 111 Carabella Street will be expanded and extended to being to cover the north eastern elevation of the building and further reduce available solar access. 	<p>Additional shadow diagrams have been prepared by FJMT (refer to Appendix C). The shadow diagrams demonstrate that the proposed development, including the proposed non-compliances, will not result in any additional overshadowing of the east facing apartments when compared to a complying development.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<p><i>Building setbacks</i></p> <ul style="list-style-type: none"> The proposed extended Learning Hub (Stage 1) has between a minimal side setback to the western boundary of the site which is considered insufficient for a building of this scale and does not provide for adequate building separation with the existing townhouse development at No's 22 Elamang Avenue and 111 Carabella Street. A greater building setback to this western boundary should be provided with additional deep soil landscaping and minimize the visual (bulk and scale) and privacy impact of the new learning hub building to this adjoining property. 	<p>A minimum setback of 3m is provided to 111 Carabella Street, which is consistent with Part 3.3.6, Provision P5 of North Sydney DCP. Whilst the proposal seeks to vary the height plane control, as noted above, this inconsistency does not result in any additional visual or solar access impacts on the east facing apartments when compared to a complying development.</p> <p>A larger setback is provided to 22 Elamang Avenue as the vacant, separately owned strip of land provides additional separation to the Learning Hub.</p> <p>The proposed building setback is consistent with the alignment of the existing B Block. It is not possible to setback the building further to the east due to the need to connect with the existing Marian Centre, and the presence of existing buildings on the campus. As outlined above, a number of amendments were made to improve the visual (bulk and scale) and privacy impact of the new Learning Hub to the adjoining property. Openings in the facade were carefully positioned and screened so as to not allow direct lines of sight in and out of the new building, providing privacy for both the residents and the school. The western facade was reduced in height and a planter was introduced to provide a landscaped buffer between the properties.</p>
<p><i>Privacy (Visual and Acoustic)</i></p> <ul style="list-style-type: none"> Privacy concerns are raised regarding the lower levels of the new Learning Hub at the western end of the site and the view and noise corridor created as a result of the orientation of and depth below ground level of the lower levels of the hub towards the existing residential flat building at 22 Elamang Avenue, Kirribilli. Additionally, the new Learning Hub building proposes a new rooftop activity area. Any use of this area should be restricted to ensure there are no adverse noise or visual privacy impacts occurring from this new roof area. 	<p>The outdoor learning area associated with the lowest level of the new Learning Hub is set back from the boundary in accordance with the North Sydney Council DCP and is also further set back due to the additional site which lies between 22 Elamang and Loreto. As this area is excavated below the level of the adjacent boundary, visibility is either not possible (from the lower apartment) or oblique (from the upper levels).</p> <p>Refer to responses above. A number of changes have been made to the design and operation of the roof top terrace following the community consultation process. The roof top will now be used as an extended roof garden. Access to the rooftop terrace will be limited to enable connectivity between the Learning Hub and the Marian Centre and to allow intermittent staff and student access to the rooftop garden for maintenance. The roof garden may occasionally be used as a supervised recreation space.</p> <p>In addition, the circulation path which provides the connection between the buildings has been set back as much as possible from the boundary (15.5m) and a planter has</p>

Issues Raised by Agencies and Organisations	Proponent's Response
	<p>been integrated into the western facade providing a landscaped buffer between the adjoining properties to prevent opportunities for direct overlooking.</p> <p>As a result, there is unlikely to be any adverse privacy impacts as a result of the use of the space.</p>
<p><i>Site Coverage and Landscaped Area</i></p> <ul style="list-style-type: none"> North Sydney Council's Development Control Plan 2013 (NSDCP 2013) specifies maximum site coverage (45%) and minimum landscaped area (40%) controls. The proposal remains significantly non-compliant with the maximum site coverage control in NSDCP 2013. The amended proposal should incorporate greater deep soil landscaping across the site to improve the landscape buffer with adjoining properties and the public domain and to maximize the absorption of the surface drainage water across the site. 	<p>It is noted that development control plans are not a matter for consideration in the assessment of SSD DAs per Clause 11 of SEPP SRD, which states that "<i>Development control plans... do not apply to... State significant development.</i>" As such, the DCP site coverage requirements are not applicable to the development.</p> <p>Notwithstanding this, the site is heavily constrained and there is limited opportunity for additional deep soil planting without significantly compromising the educational facilities accommodated on the site. Whilst it is not feasible to provide additional deep soil planting, the landscaping proposal has been designed to accommodate a number of mature trees.</p>
Heritage and Landscaping (Including Tree Removal)	
<p><i>Block B</i></p> <ul style="list-style-type: none"> No objection is raised to its demolition as it has no heritage significance. The replacement Learning Hub seven-storey building is considered to be satisfactory subject to the application of the conditions regarding materials and finishes. The proposed walkway on the north-eastern side of the Learning Hub will have acceptable impacts, although close to Elamang subject to the provision of adequate soft landscaping. No objection is raised to the proposed extensions to the Gymnasium. The removal of the existing Jacaranda tree is a negative heritage impact however, as it is prominent feature tree and is assessed as having high landscape significance by the arborist. A mature replacement planting is recommended. 	<p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>Noted, however it is not possible to retain the Jacaranda without significantly compromising the educational facilities accommodated on the site. The landscape proposal includes a number of mature replacement trees to compensate for the loss of the Jacaranda tree.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<p><i>Northern Precinct Stage 1 Works</i></p> <ul style="list-style-type: none"> No objection to the demolition works associated with the Science Building and the Centennial Hall as these elements have no heritage significance. No objection is raised to the proposed Connector Pod works as they will have only low impact upon the nearby heritage-significant buildings and the view loss of the harbour from Elamang is considered to be low. 	<p>Noted.</p> <p>Noted.</p>
<p><i>Eastern Precinct Stage 1 Works and Concept Master Plan</i></p> <ul style="list-style-type: none"> No objection is raised to the demolition of the Music and Performing Arts Building as it has little heritage significance. Concern is raised to the proposed demolition of the Mary Ward building as it has been identified as having moderate heritage significance by the heritage consultant. This is contrary to clause 5.10 of NSLEP 2013 and Part B Section 13.8 of NSDCP 2013. The interior of the Mary Ward Building has not been assessed in terms of its heritage significance. Further information is required regarding its structural integral. Should the demolition of the Mary Ward building be proven to be acceptable, then no objection is raised to the proposed development envelope for the proposed six/seven storey new building in the Concept Master Plan subject to resolution of harbour view loss from the heritage items at 69 and 71 Carabella St. The sandstone wall to the south of the Mary Ward building is to be retained. 	<p>Noted.</p> <p>GML has undertaken a revised assessment of the significance of the Mary Ward Building (refer to Appendix H). The revised assessment concludes that the building is of little significance to the overall heritage significance of Loreto Kirribilli, due to the substantially compromised exterior and interior of the building. As such, it is considered that demolition of the Mary Ward Building will have little impact on the heritage significance of the school.</p> <p>Refer to response above. The height of the envelope in the Eastern Precinct has been reduced in height to align with the existing Mary Ward. This will remove any potential view impacts on 69 and 71 Carabella Street.</p> <p>As per the documentation submitted with the DA, the sandstone wall is proposed to be retained.</p>
<p><i>Southern Precinct Stage 1 Works and Concept Master Plan</i></p> <ul style="list-style-type: none"> The proposed demolition of the eastern Chapel wing and reconstruction of the east Chapel wing to its original single-storey profile is highly supported and will have a positive heritage impact. No objection is raised to the proposed connector pod between the Chapel and J-Block as it will be set behind the Chapel's southern wing and lower than the Chapel belfry. The landscape solution to the space between the J-Block and Chapel requires 	<p>Noted.</p> <p>Noted.</p> <p>Refer to responses below, and the revised Landscape Plans at Appendix G.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<p>further resolution as does the Courtyard to the south of Elamang.</p> <ul style="list-style-type: none"> The proposed works to Levels E, F and H of the Chapel building will have minimal impact as these areas are of low heritage significance however, details are requested of the proposed new openings to ensure that they are sympathetically detailed. The removal of the original staircase from the Chapel building's southern wing will have a moderate heritage impact however, it is understood that disabled access is required and an archival recording is recommended prior to its demolition. No objection is raised to the proposed changes to J-Block as it will result in little heritage impact. The demolition of the Junior School is acceptable as the building has no heritage significance. No objection is raised to the proposed new replacement building as it will sit neutrally in the Carabella streetscape and will have negligible additional impacts to the Chapel and Elamang buildings. 	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
<p><i>Heritage Conclusions</i></p> <ul style="list-style-type: none"> Structural report for the Mary Ward Building as its demolition has not been satisfactorily justified on the basis of being structurally unsound. This is a requirement of clause 5.10 NSLEP 2013 and Part B Section 13.8 of NSDCP 2018 A thorough heritage assessment of the Mary Ward Building including its interior, as the heritage consultant has assessed it as having moderate heritage significance despite its first level addition and the architect's anonymity. Demolition cannot be supported without this assessment. This should also inform whether demolition is acceptable or not. New walls on Levels F and H of the Chapel to be located on the original location that was previously demolished and nib walls to be retained as per heritage consultant's recommendation on Pages 104-105 Section 7.3.5. 	<p>Refer to response above and Appendix H. GML has reassessed the significance of the building and has concluded that due to the substantially compromised exterior and interior of the building, the demolition of the Mary Ward Building will have little impact on the heritage significance of the school.</p> <p>Refer to response above and Appendix H. GML has reassessed the significance of the building and has concluded that due to the substantially compromised exterior and interior of the building, the demolition of the Mary Ward Building will have little impact on the heritage significance of the school.</p> <p>Noted. This is in accordance with GML's recommendation.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<ul style="list-style-type: none"> Details of the proposed new openings to the external openings on the NW elevation and NE elevation of the northern wing of the Chapel wing are to be provided as per the heritage consultant's recommendation on Pages 104-105 Section 7.3.5. Infill of windows on Level H of Chapel's southern wing to be completed as blind windows so that the location and size of the original windows remains legible as per heritage consultant's recommendation on page 105 Section 7.3.5. The St Aloysius verandah on the original Chapel is to be retained and to be documented on the drawings. Non-original elements may be replaced such as the roof sheeting. Archival recording of the staircase proposed to be demolished in the Chapel's southern wing. (Can be a condition of consent) Exterior Finishes and Colour Schedule. The use of dark toned brickwork is supported to be consistent with the palette of materials used in the nearby conservation area and to allow the lighter rendered Chapel and Elamang buildings to be more visually dominant, Resolution of the harbour view loss from the heritage items located at 69 (Fairhaven) and 71 (Araluen House) Carabella St resulting from the proposed new building on the north-east corner of the campus in the location of the existing Mary Ward building as well as the harbour view loss from residences on the opposite side of the road at 54, 56 and 58 Carabella from the additional height of the proposed new Junior School building. Landscape Plans with further refinement as the exact species location and the plant pot sizes. Replacement trees should be 200L (minimum) where planted into natural ground where possible. Additional canopy trees should be provided on the site to ameliorate the impacts of the additional paved areas and built 	<p>Noted. This is in accordance with GML's recommendation.</p> <p>Noted. This is in accordance with GML's recommendation.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>In response to the issues raised, the development envelope in the Eastern Precinct has been reduced to be consistent with existing height of the Mary Ward at RL 29.940. The impact of the proposal on views from properties at 54, 56 and 58 Carabella Street were included in the VIA. The analysis shows that existing views are generally obstructed by vegetation and existing buildings on the school campus. The Junior School building will not have a significant impact on views from these properties.</p> <p>The Landscape Plans have been amended to show species / pot sizes, 200L acceptable for trees. Refer Drawing 501 at Appendix G.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
structures.	
<ul style="list-style-type: none"> Landscape Plan for the proposed landscape works between the Chapel and J - Block. The removal of the three mature Brush Box trees (identified as significant by the arborist) will result in significant canopy loss and replenishment canopy trees are required. The hardened solution does not support the heritage significance of the Chapel building. Additional canopy trees should be provided along the Elamang St frontage as replenishment trees. Landscape Plan required for the courtyard to the south of the Elamang building and it should have a soft landscape solution to support the heritage significance of Elamang. The fully paved solution is not supported. Landscape Plan required for the proposed amphitheatre adjacent to the Chapel, including sections. It currently appears to detract from the significance of the Chapel building due to the hardened surfaces. Sandstone blocks from the demolished walls located between the B-Block and Marian Centre are to be salvaged for re-use on site and incorporated into the Landscape Plan. Sandstone 'log' retaining walls as shown on drawing LH – 601 Issue D by Site Image are not understood. Timber log walls are not acceptable, and sandstone blocks should be re-used on site. Archival photographic recording to be made of the demolished sandstone walls. (This may be a condition of consent). Proposed new location of the heritage significant St Michael's statue to be provided as it requires removal due to the proposed amphitheatre works. Archaeological investigations and recording should be made as per the recommendations at Section 9.4.1 in the heritage consultant's report. 	<p>The Landscape Plans have been updated to include additional tree planting to the courtyard and a revised paving pattern to visually break up the space.</p> <p>The hardscape solution is necessary for year round circulation and gathering within the space. GML has advised that existing trees are of little heritage significance.</p> <p>The Landscape Plans have been amended to show additional tree planting to Elamang Avenue.</p> <p>The landscape proposal is to retain existing soft-scape with supplementary planting, as necessary.</p> <p>The amphitheatre plan is shown on Drawing 108 (refer to Appendix G). Based on advice provided by GML, planting has been added to the base of the Chapel tower.</p> <p>The sandstone logs are to be used for retaining in front of the gym are a solid sawn sandstone product 500 x 500 x 2000mm proposed as an informal retaining wall amongst embankment planting. Existing sandstone blocks can be incorporated wherever possible as quantity and staging of works allows.</p> <p>Noted.</p> <p>The amphitheatre is proposed to the north of the sculpture location. The sculpture location is shown on updated plan (refer to Appendix G).</p> <p>Noted.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
Traffic, Parking and Transport	
<p><i>Traffic Generation</i></p> <ul style="list-style-type: none"> The proposed alterations include increasing student number by 100 to 1200 and staff numbers by 2. While SIDRA Intersection Modelling indicates a satisfactory level of service with low average delays and queue lengths, the modelling software has limited capability to reflect traffic conditions in a high turnover and pedestrian dominant environment such as around schools. Inspections by Council staff found that the existing traffic during school pick-up and drop-off times is already at saturation. As the school does not have an onsite pick-up and drop-off facility, vehicles queue significantly along Carabella Street during the afternoon pick-up causing congestion and traffic safety issues. The report states that the additional 100 students would generate additional 73 trips in the morning period and 43 trips in the afternoon period. The additional traffic generation will exacerbate the already problematic traffic situation. The school pick-up and drop-off operation should be reviewed as part of the proposed development and plans should include a reconfiguration of the drop-off and pick-up facility to ensure that all queuing occurs on site. 	<p>Noted. In the absence of an alternative tool, SIDRA modelling is the most suitable method for assessing traffic impacts.</p> <p>Whilst it is not possible to bring pick-up and drop-off into the school site, the school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns</p> <p>Further, it is proposed to implement the Workplace Travel Plan at the commencement of the use, to encourage more staff to use non-car travel modes to access the site.</p> <p>Due to the existing site constraints (including existing buildings, heritage items, landscape features, topography and the need to retain existing on-site parking) it is not possible to bring pick-up and drop-off into the school site. Notwithstanding this, the school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns</p>
<p><i>Car Parking – Supply</i></p> <ul style="list-style-type: none"> The school currently has 180 staff and proposes to increase additional 2 staff. The report indicates that approximately 90% of staff travel to and from the site by car. This is a high proportion of staff particularly for a site with excellent access to public transport. The development proposes to retain the existing 80 underground parking spaces within the school and 20 off-street parking in the nearby Sailing Club (via agreement) for a total of 100. The existing parking provisions significantly exceed the maximum requirements set out in the North 	<p>It is acknowledged that the existing parking provision exceeds Council's current parking rates.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<p>Sydney of 31 spaces. This is 323 % of what is permitted under the DCP.</p> <ul style="list-style-type: none"> Council has developed this section of the DCP in accordance with its policies on traffic minimization. Further, Council's adopted Community Strategic Plan aims to minimize the impact of the private motor vehicle. By restricting the supply of parking, employees are encouraged to consider other forms of transportation which in turn reduces congestion which benefits all road users, particularly pedestrians, cyclists and public transport users. Permitting any development to increase their parking spaces by 3 times the DCP would entirely undermine the intent and purpose of Council's DCP. North Sydney Council has recognized that increased traffic flow, congestion and parking demand can lead to a loss in residential amenity. Further, congestion leads to reduced levels of service for public transport, through longer journey times and loss of fleet efficiency. For pedestrians and cyclists increased traffic means more difficulty in walking and increased noise levels on roads. This can result in roads that are intimidating environments for pedestrians and cyclists. It is strongly recommended that the car parking provision be reduced to comply with the limits set out in North Sydney DCP and offset the space for an on-site pick-up and drop-off bay as mentioned above. 	<p>A Workplace Travel Plan has been prepared to encourage more staff to use public transport to access the site. A copy of the Workplace Travel Plan is provided at Appendix D.</p> <p>The proposal does not seek to make any changes to the existing car park or parking supply. Noting that Council's DCP does not apply to this SSDA, it would be unreasonable for the existing parking provision to be reduced, particularly given the concerns raised by the community with respect to the demand for on-street parking. Notwithstanding this, it is proposed to implement the Workplace Travel Plan at the commencement of the use, to encourage more staff to use non-car travel modes to access the site.</p>
<p><i>Traffic Recommendations</i></p> <ol style="list-style-type: none"> That the existing parking provisions be reduced to comply with current North Sydney DCP requirements with provision of a Green Travel Plan to place more emphasis on alternatives to driving. That the School be required to review the operation of the existing drop-off and pick-up facility and include a reconfiguration of the drop-off and pick-up facility to ensure that all queuing occurs within the School site and not onto the public road, as part of the proposed development. That a Demolition and Construction Traffic Management Program be prepared and submitted to Council for approval by the North Sydney Traffic Committee 	<p>As detailed above, it is not reasonable to reduce the existing parking supply on the site. A Workplace Travel Plan has been prepared to encourage more staff to use non-car travel modes to access the site. A copy of the Workplace Travel Plan is provided at Appendix D.</p> <p>Due to the existing site constraints (including existing buildings, heritage items, landscape features, topography and the need to retain existing on-site parking) it is not possible to bring pick-up and drop-off into the school site. Notwithstanding this, the school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns.</p> <p>Noted. A detailed Demolition and Construction Traffic Management Plan will be</p>

Issues Raised by Agencies and Organisations	Proponent's Response
prior to the issue of a Construction Certificate. Any use of Council property shall require appropriate separate permits/ approvals.	prepared in consultation with Council prior to the commencement of works.
Office of Environment and Heritage	
After reviewing the relevant documents, OEH's Greater Sydney Planning Team has concluded that the matter does not contain biodiversity, natural hazards or Aboriginal cultural heritage issues that require a formal OEH response. We have no further need to be involved in the assessment of this project.	Noted.
Heritage Council	
Loreto School is not listed on the State Heritage Register (SHR) nor is it in the immediate vicinity of any SHR items. Consequently, no specific comments are offered for built or landscape heritage.	Noted.
<p>The following archaeological Conditions are recommended to be included in any approval of the proposal:</p> <ol style="list-style-type: none"> 1. Before excavation that may disturb archaeological 'relics', the Proponent must nominate a suitably qualified Excavation Director who complies with the Heritage Council of NSW's Criteria for Assessment of Excavation Directors (July 2011) to oversee and advise on matters associated with historic archaeology and advise the Department and OEH. The Excavation Director must be present to oversee the excavation and advise on archaeological issues. The Excavation Director must be given the authority to advise on the duration and extent of oversight required to ensure that archaeological 'relics' are recorded to an adequate standard. 2. Before excavation Research Design and Excavation Methodology is also to be prepared to guide any proposed excavations. This is to be provided to the Department and to the Heritage Council of NSW to confirm adequacy of the proposed methods. 3. A final archaeological report must be submitted to the Heritage Council of NSW within one year of the completion of archaeological excavation on the project. 4. The Proponent must ensure that if substantial intact archaeological deposits and/or State significant relics not identified in the Archaeological Assessment prepared for the project are discovered, work must cease in the affected 	<p>Loreto Kirribilli would be willing to accept a condition of consent requiring these measures to be implemented during the construction phase.</p> <p>Loreto Kirribilli would be willing to accept a condition of consent requiring these measures to be implemented during the construction phase.</p> <p>Loreto Kirribilli would be willing to accept a condition of consent requiring the final archaeological report to be submitted to the Heritage Council of NSW within one year of the completion of archaeological excavation on the project.</p> <p>Loreto Kirribilli would be willing to accept a condition of consent requiring these measures to be implemented during the construction phase.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<p>area(s) and the Heritage Council of NSW must be notified in accordance with s.146 of the Heritage Act 1977. Additional assessment and approval from DPE may be required prior to works continuing in the affected area(s) based on the nature of the discovery.</p>	
NSW EPA	
<p>The EPA has reviewed the supporting documentation and notes that the Stage 1 Operational and Construction Noise and Vibration Assessment prepared by Renzo Tonin and Associates Pty Ltd indicates that noise levels from the operation of plant and equipment are predicted to exceed the established noise criteria.</p> <p>A proactive and preventive approach to noise mitigation measures should be taken based on the findings of the quantitative acoustic modelling and data. This includes feasible and reasonable noise mitigation and management measures to minimise noise impacts from construction on surrounding receivers, as detailed in the acoustic assessment.</p>	Noted.
Transport for NSW	
<p>The proposed additional growth over the proposed masterplan period would not have a major impact on traffic and transport. Nevertheless, there is an opportunity to implement measures to help manage the growth.</p>	Noted.
<p>The school is located close to Milsons Point Railway Station, which is serviced by both rail and bus services. There is scope to influence commuting patterns of staff and reduce staff reliance on on-street parking through the provision of a Green Travel Plan.</p>	Noted. A Workplace Travel Plan has been prepared to encourage more staff to use non-car travel modes to access the site. A copy of the Workplace Travel Plan is provided at Appendix D .
<p>The Stage 1 works should include provisions for bicycle parking and end-of-trip facilities for staff, which would encourage the use of sustainable transport modes and reduce the traffic and on-street parking impacts within the local road network.</p>	<p>Refer to response above. End of trip facilities are provided at Lower Ground Level 4 of the new Learning Hub.</p> <p>Bicycle parking spaces are able to be provided in the existing sports storage area on the Lower Ground Level of Centenary Hall, with the end of trip facilities within the adjacent Learning Hub. Access is able to be provided directly off Elamang Avenue via a stair ramp on the existing stairs.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
RMS	
<p>Roads and Maritime raises no objections to the proposed development subject to the following condition:</p> <p>1. A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval prior to the issue of a Construction Certificate.</p>	<p>A detailed Construction Traffic Management Plan will be prepared by the contractor prior to the commencement of works.</p>
Sydney Water	
<p>A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water prior to development commencement. It is recommended that Council includes this term as a condition of the DA approval.</p>	<p>Noted.</p>
<p>The development must have the building plans stamped and approved by Sydney Water before any construction is commenced. Approval is needed because construction / building works may affect Sydney Water's assets) e.g. water, sewer and stormwater mains).</p>	<p>Noted.</p>
Strata Plan 6699 – 67 Carabella Street, Kirribilli	
<p>Our primary concern is the additional adverse effect the increased traffic will generate from the additional students the report refers to being accepted by the school, to assist in paying for the new buildings. The situation is that while students are either being dropped off from school in the morning or picked up in the afternoon the traffic on both Carabella Streets and Elamang Avenue becomes gridlocked, making access and egress to our apartment block extremely difficult and often a painfully stow process. On irregular dates and times this chaos is revisited upon Carabella Street when large buses collect and return students from excursions.</p>	<p>Noted. The school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns.</p> <p>A Workplace Travel Plan has been prepared to assist in alleviating traffic and parking concerns. The Workplace Travel plan will encourage more staff to use public non-car travel modes to access the site.</p>
<p>We note with some alarm that the scheme alludes to an increase in the number of students but makes no mention of how many there will be. We believe that if the school is serious about their future planning they ought to have gone some way to address the issue of students being dropped at and fetched from the school within their grounds. This could be done by carving out an area on the Elamang Avenue side of the school to facilitate both dropping off and fetching of students.</p>	<p>The EIS makes it clear that there will be 100 additional students on the campus, representing a 10% increase to existing student numbers.</p> <p>Due to the existing site constraints (including existing buildings, heritage items, landscape features, topography and the need to retain existing on site parking) it is unfeasible to 'carve out' an area on Elamang Avenue to accommodate pick-up and</p>

Issues Raised by Agencies and Organisations	Proponent's Response
	drop-off on site.
We note that the submission has been taken as the value of a supposed 50 year plan in order to make the amount for the work sufficient for the proposal to be submitted as a development of State significance. This appears to be a contrivance used to circumvent the power of the North Sydney Council in the decision making process and to allow for it to be lodged directly to the State Government.	This statement is incorrect. The value of the Stage 1 works is well in excess of the \$20 million State Significant Development threshold. With a Capital Investment Value of approximately \$33 million, the Stage 1 works would qualify as State Significant Development in their own right.
Milson Precinct	
<p><i>Scale and Bulk</i></p> <ul style="list-style-type: none"> This will be the biggest mass of buildings in Kirribilli, on a scale equivalent to a 40 storey building, without necessary separation. It is unjustified for this scale of building and linkages from building to building to be based on the need for disabled access. Some lifts and ramps, as has been progressively added to buildings over past refurbishments, would suffice. Breaching North Sydney Council's LEP, DCP and BHP is not acceptable to the community. The community and NSC has fought this on all previous DA's. Should not be allowed now, when those buildings are to be 're-built' - Junior School and Music Block. 	<p>The Kirribilli peninsular is a high density area. The new Learning Hub has a height of 7 storeys (2 storeys above ground – Carabella Street).</p> <p>There is currently no equitable access across the campus. The proposed vertical connectors are the minimum height required to achieve the necessary connections and levels of accessibility.</p> <p>Noted. The proposed variations to the LEP and DCP controls are addressed throughout this response.</p>
<p><i>Loss of Landscaping</i></p> <ul style="list-style-type: none"> Loss of significant trees, including Jacaranda (see photo attached) to allow for the building of Stage 1. Fear of damage to the root structure of a very significant Morton Bay Fig tree adjacent to the gym building on Elamang. No allowance has been made for any deep planting for mature trees to grow within. Loss of general medium and large scale landscaping to provide shade into the future, or to soften the urban built form and ameliorate the scale of the built environment on the site. 	<p>Refer to responses above. It is not possible to retain the Jacaranda without significantly compromising the educational facilities accommodated on the site. Similarly, whilst the existing site constraints mean that it is not possible to accommodate additional deep soil planting, the landscape proposal includes a number of mature replacement trees to compensate for the loss of the existing trees and to ensure that adequate shade is provided.</p> <p>The proposal has been designed to ensure that there will be no adverse impacts on the Morton Bay Fig in the north-western corner of the campus.</p>

Issues Raised by Agencies and Organisations	Proponent's Response
<p><i>50 Year Context</i></p> <ul style="list-style-type: none"> The 50 year timeline for this masterplan seems bogus, as you could not be planning now for the educational needs for 20-30 years hence. The community was advised that the building would only take place after the necessary fundraising - hence the long time frame. If funds come in more quickly, and all buildings are built within 15 - 20 years, is the community assured that the school will then STOP any further development on the site? 	<p>It is appreciated that educational needs are likely to evolve over the next 50 years, which is why envelopes are proposed which provide flexibility for the future built form, layout etc.</p> <p>Whilst there is nothing to prevent the school from submitting another development application at the completion of the Masterplan, the school does not have any plans for further development beyond what is presented in Concept Proposal.</p>
<p><i>Increased Student Numbers</i></p> <ul style="list-style-type: none"> The community was assured by the Principal that the numbers were staying as they currently are - 1097 students. But the Application is for an additional 100 students to 1200 students, along with 2 additional teachers to 182. 	<p>As outlined in the EIS, whilst the focus of the school's Masterplan is not to increase student or staff numbers, the School's enrolments are currently at capacity, and it is widely acknowledged that there is growing pressure on existing schools to meet the demands of population growth, particularly in areas like Sydney's North Shore.</p> <p>The school proposes to introduce an additional 100 students (10% addition on existing approval) and two staff to the site over the life of the masterplan (50 years), resulting in a total of 1,200 students and 182 staff.</p>
<p><i>Traffic Management</i></p> <ul style="list-style-type: none"> Traffic management for the local streets is currently inadequate for the local community to bear, with both Loreto and St. Aloysius junior schools within blocks of each other, for the drop off and pick up on school days. Add to that all the additional parents who help at the school during the day, the ancillary teachers - like music instrument teachers, who can't fit into the limited 105 parking places, all vying for parks on our streets, along with the senior students who drive. Then the construction phase starts and the majority of the heavy truck movements for demolition need to occur during school holiday times. Increased student numbers will only increase the already compromised road use and traffic for Kirribilli. 	<p>It is not possible to pick-up and drop-off into the school site. However, the school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns</p> <p>Further, it is proposed to implement the Workplace Travel Plan at the commencement of the use, to encourage more staff to use non-car travel modes to access the site.</p> <p>A detailed Construction Management Plan will be prepared by the contractor prior to the commencement of construction to ensure that heavy vehicle movements are managed appropriately.</p>

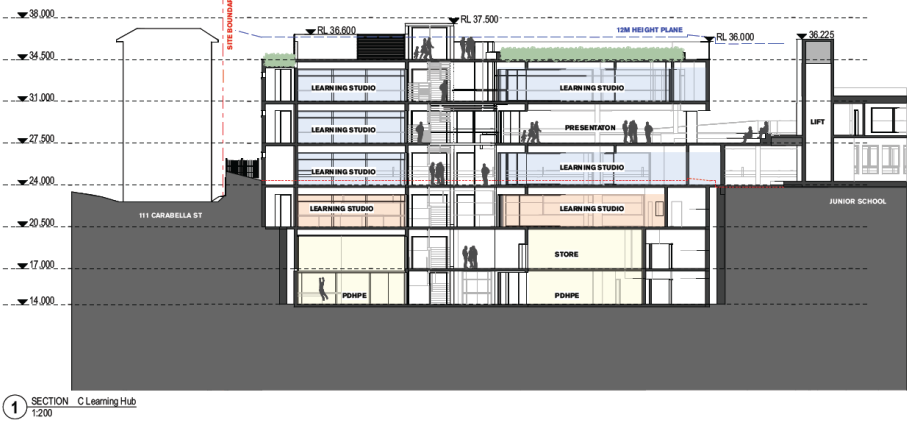
Issues Raised by Agencies and Organisations	Proponent's Response
<p><i>Liver Coloured Bricks</i></p> <ul style="list-style-type: none"> The community is extremely concerned at the introduction of yet another material, which is not seen within the context of the school or neighbouring streets. We would wish to have the existing light finish be applied to all new structures, as opposed to any 'Liver' coloured bricks, as explained to the residents by the architect at our meeting. 	<p>FJMT has undertaken additional analysis of the proposed materials and finishes. The materiality is considered appropriate in the context of the site and surrounding built form. The suitability of the proposed finish is confirmed by Council's comments, as follows:</p> <p><i>The use of dark toned brickwork is supported to be consistent with the palette of materials used in the nearby conservation area and to allow the lighter rendered Chapel and Elamang buildings to be more visually dominant.</i></p>
<p><i>Heritage</i></p> <ul style="list-style-type: none"> Elamang House, the original house for James Milson, should not have its views to the harbour restricted by the proposed buildings. It should have clear view from Milson Park across Careening Cove, to the main harbour. 	<p>The minor loss of harbour views is considered to be acceptable. This is supported by Council's submission, which notes that:</p> <p><i>No objection is raised to the proposed Connector Pod works as they will have only low impact upon the nearby heritage-significant buildings and the view loss of the harbour from Elamang is considered to be low.</i></p>

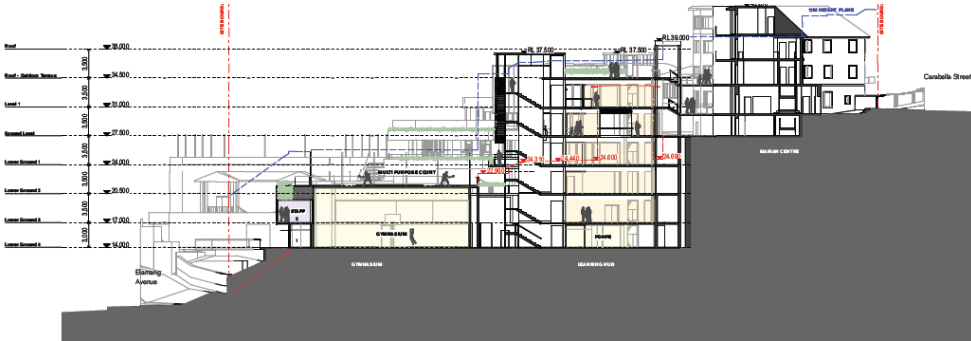
Part 2 - Response to Public Submissions

Issues Raised by the Public	Proponent's Response
Access, Traffic and Parking	
All access roads to the school are full to capacity with regard to traffic flow. Broughton, Carabella and Willoughby Streets have all become one-lane roads due to increased parking, increased bus routes and the size of vehicles (particularly those used in demolition and construction) attempting to negotiate these streets. Traffic is frequently banked up at intersections and parking which is at a premium for local residents is commandeered by the building industry.	<p>The SIDRA modelling undertaken to support the proposal indicates that the surrounding intersections will continue to operate at a satisfactory level of service at the completion of the proposed development.</p> <p>A detailed Demolition and Construction Traffic Management Plan will be prepared and approved prior to the commencement of works to minimise the impacts of heavy vehicles on the local road network.</p>
Traffic is unsafe in Kirribilli. Children are often being dropped off at no standing areas (Carabella St) on busy corners etc., often cars double park to drop off and pick up Loreto students. It is now unsafe to walk on the streets.	Noted. Whilst it is not possible (due to existing buildings, the site's topography and heritage constraints) to bring pick-up and drop-off onto the campus, the school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns
Please have consideration for the local community, avoid fatal accidents and maintain current limits on numbers of students at Loreto, also have a better and safer traffic plan.	<p>Refer to responses above. The modelling carried out as part of the proposed development has demonstrated that the increase in students and staff will not adversely impact traffic surrounding the campus.</p> <p>Notwithstanding this, the school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns.</p>
Students should use public transport and walk the short distance to the school as we are very lucky to have public trains, buses and ferries available.	Noted. The school will continue to encourage students and staff to use public transport to access the site. A Workplace Travel Plan has been prepared for the proposal which details measures to encourage more staff to use non-car travel modes as an alternative to private cars.
The traffic in the area is already at its limits and more so during school events. Approval for any increase in student numbers will make the situation worse.	Refer to responses above.
The current development proposal does not include any provision for any additional off street parking, or off street student pickup area.	Noted. Refer to response above and below.
The EIS estimates that 90% of school staff drive to work and park in or around the campus, corresponding to a total demand of 162 parking spaces. With 100 spaces	As noted elsewhere, it is not feasible to accommodate additional parking on the campus due to the existing site constraints, including existing buildings, heritage items,

Issues Raised by the Public	Proponent's Response
available for school staff (80 of which are located on-site, and 20 of which are provided off-site in the nearby Royal Sydney Yacht Squadron). This results in a total actual shortfall of 62 staff vehicles which has to be accommodated by the surrounding streets.	landscape features and topography. Further, staff parking is provided in excess of the DCP requirements and additional parking is unlikely to be supported by Council given their comments on the subject proposal. Finally, a Workplace Travel Plan has been provided to encourage staff to switch to non-car modes of travel.
The school proposes to introduce an additional 100 students, or a total of 1,200 students and 182 staff. This will result in significant increase to traffic congestion and safety issues for drop-offs/pick-up around the local area and exacerbate the existing traffic / parking problem, particularly during peak morning/afternoon periods.	Refer to responses above.
A great deal of attention should be given to the traffic congestion in the area that already blocks the roads and footpaths during school drop-off and pick-up times.	Refer to responses above.
The effect of the school on the neighbourhood streets is truly significant. This was very much underplayed by this report and the small sample period was either uncharacteristic of the true volume and stress caused by school traffic or perhaps poorly measured.	<p>Turning movement counts were undertaken from 7:00 am - 10:00 am and 2:00 pm - 5:00pm on a Wednesday during term time. Traffic tube surveys were also undertaken for a week-long period in February 2017 to determine the characteristics of the local traffic environment, including during key pick and drop off periods.</p> <p>In addition, a travel survey was undertaken to determine exactly how students and staff travel to school to ensure that accurate results were obtained.</p> <p>Based on the above, the SIDRA modelling undertaken to support the proposal indicates that the surrounding intersections will continue to operate at a satisfactory level of service at the completion of the proposed development.</p>
The McLaren report understates the effect of the school traffic in a number of ways by not mentioning the number of senior school students who drive to school each day or the large number of visitors and contractors who do likewise.	The number of senior school students who drive to school was captured in the surveys undertaken by McLaren Traffic Engineering.
The most serious and dangerous issue is the parents who currently double park outside the school on Carabella Street, Peel Street and Elamang Ave waiting for a parking or pick up spot for their child. This effectively stops the traffic flow in one direction and since the queue can be over 50 meters there is no exit once you are in it. The McLaren report is quite remiss in this area and can I suggest that the Department engages its own consultant to investigate this very regular problem.	Noted. The school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns.
School functions, parent meetings, sports training and sports events seemed to be glossed over by the McLaren report which are very regular and natural events in any school.	Refer to response above. The duration of the traffic surveys has ensured that the full range of school activities was captured in the data that was collected.

Issues Raised by the Public	Proponent's Response
<p>The biggest pinch point for traffic flow is at the school pick up in the afternoons between 3-15 pm and 4pm. Unfortunately once again this is not discussed in the McLaren report. For in the mornings parents arrive at different times from say 7am to 8-30am and whilst disruptive it is nowhere near as disruptive as the afternoons when most of the junior girls leave at the same time and their parents or minders are waiting to pick them up by double parking until their daughters are available for collection. The school teachers are careful and conscious of the children's safety and are carefully making sure that the girls are only picked up in a designated area but unfortunately thereby creating a problem for all the surrounding traffic as the carers wait in a long double parked queue.</p>	<p>Turning movement counts were undertaken from 7:00 am - 10:00 am and 2:00 pm - 5:00pm on a Wednesday during term time. Traffic tube surveys were also undertaken for a week-long period in February 2017 to determine the characteristics of the local traffic environment, including during key pick and drop off periods.</p> <p>The school is committed to ensuring that student pick-up and drop-off is well managed. The school will continue to work with local residents to try and alleviate these concerns.</p>
<p>Further I believe that Loreto should include parking and traffic flow solutions to as an amendment to this or to any new application.</p>	<p>Refer to responses above.</p>
Height, Bulk, Scale and Design	
<p>The proposed building to be fitted between the gymnasium and the Marian Centre is to be built up to the property boundary. It extends along the boundary for some 25 m. Despite a good deal of the building being below ground level it will still loom over us. The open space we currently see is replaced by a large dark building. However it is my understanding that the area immediately behind the gymnasium will be of open plan outdoor educational space. The bulk of the building is behind our rear boundary to the east and south of 22 Elamang Avenue.</p> <p>Despite the size of the proposed new construction and its looming presence, with proper design and appropriate landscaping the proposed building should have a minimal impact on the amenity of 22 Elamang Avenue.</p>	<p>Noted. The proposal will have a minimal impact on 22 Elamang Avenue.</p>
<p>The significant non-compliance with the building height standard demonstrates the unreasonable bulk/scale, and means that the resulting bulk/scale is highly incompatible with the context of the locality and will result in unreasonable amenity impacts on the adjacent residential properties (particularly 111 Carabella Street).</p>	<p>The majority of the Learning Hub sits within the 12m height limit. The only parts of the building to extend above the height limit are the lift overrun, staircase and plant. The Kirribilli peninsular contains buildings of varying scales, including a number of high rise, high density buildings. The Learning Hub is consistent with the context of the broader Kirribilli peninsular, as well as the immediate context of the school campus. The Learning Hub is lower than many existing buildings on the campus, including the Marian Centre which sits directly to the south. Further, as shown at Figure 6, the Learning Hub is directly comparable with the height of 111 Carabella Street.</p>

Issues Raised by the Public	Proponent's Response
	 <p>Figure 6 – Section showing the relationship between 111 Carabella Street and the proposed Learning Hub</p>
<p>The proposed height of the development is considered to be incompatible with 111 Carabella Street. The building height needs to be lowered and setback further to provide a building that is more compatible with adjoining residential building.</p>	<p>Refer to response above. The proposed Learning Hub is consistent with the height of the residential building at 111 Carabella Street, and is therefore considered compatible in terms of height and scale.</p> <p>Further, as demonstrated above, the proposal is also considered acceptable in terms of visual and solar access impacts. Therefore, the proposal is considered compatible with the adjoining residential building.</p>
<p>Given the absence of a FSR control for the site, it is even more critical that the development must comply with the sole principal development standard (building height) that regulate building envelope.</p>	<p>Refer to responses above. The proposal is considered to be consistent with the objectives of the building height standard.</p>

Issues Raised by the Public	Proponent's Response
<p>Common design practice dictates that developments should step down and respond to topography. Despite the steep sloping nature of the site, the development has not been stepped down to adequately respond to the topography of the land. The subsequent non-compliances and amenity impacts on adjacent residential properties suggest that a redesign is required.</p>	<p>A key strategy of the proposed design is to utilise the topography of the site to minimise the height of the building as far as possible. As shown in the architectural Sections submitted with the EIS, the Learning Hub steps to the north with the topography of the site (refer to Figure 7).</p>  <p>Figure 7 – Section showing the stepping of the Learning Hub with the topography of the site</p>
<p>The development also does not achieve the objectives of Clause 4.3 of NSLEP 2013, and therefore the variation to the development standard under Clause 4.6 should not be supported as it is unreasonable and unnecessary in the circumstances of this site.</p>	<p>As outlined above and as demonstrated in the Clause 4.6 variation submitted with the EIS, the proposal (including the height variation) is considered to be consistent with the objectives of Clause 4.3 of LEP 2013.</p>
<p>The EIS report also cited Clause 42 of <i>State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017</i> which states that:</p> <p><i>'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'.</i></p> <p>Firstly, it is considered that the wording of Clause 42 is intended for new schools, instead of alterations/additions to an existing school, and therefore it is not applicable to this DA. Secondly, the Education SEPP only came into force on 1 September 2017 and is still in its infancy, and therefore will have "teething problems". If the application of Clause 42 is indeed intended for all schools-related</p>	<p>The Education SEPP was introduced in an effort to make it easier for childcare providers, schools, TAFEs and universities to build new facilities and improve existing facilities. The new SEPP streamlines approvals processes recognising the need for additional educational infrastructure.</p> <p>The rationale for Clause 42 is outlined in the Explanation of Intended Effects (EIE) which accompanied the exhibition of the draft SEPP. The EIE states that <i>'to provide flexibility to accommodate the built form requirements of schools, the proposed SEPP will enable the consent authority to grant development consent even if a development does not comply with development standards such as height and floor space ratios contained in local environmental plans.'</i></p> <p>The provision applies equally to new schools, and works to existing schools.</p>

Issues Raised by the Public	Proponent's Response
DAs (new and/or existing), the “capture-all” wording of this provision without any checks and balances is considered highly problematic and will likely lead to significant conflicts with residential uses.	Notwithstanding this, the applicant is required to justify that there are sufficient environmental planning grounds to support the contravention. This justification has been provided in the Clause 4.6 variation.
The proposed Learning Hub is poorly designed (evident by failure to satisfy planning controls and objectives) without regard to its position and context relative to the neighbours.	The Learning Hub has been designed to respond to the site and its surroundings. The scale and positioning of the Learning Hub is largely driven by the height of the existing Marian Centre to which it connects. The connections to the Marian Centre are central to the success of the proposed development.
Changes to LEP standards can be anticipated, but there is a reasonable expectation that developments will comply with planning controls to mitigate adverse impact to neighbours, particularly in this context of this site/locality.	As detailed throughout this response, it is considered that the impacts on 111 Carabella Street are acceptable, even with the proposed exceedance of the LEP standard. The variations to the LEP height standard do not result in the loss of water views of solar access when compared to a LEP-compliant scheme.
The new extended building is not sympathetic to the traditional heritage style of Kirribilli. The colour of the proposed building is dark and obtrusive. This proposal pays no homage to the beauty or history of the area.	<p>FJMT has undertaken additional analysis of the proposed materials and finishes. The materiality is considered appropriate in the context of the site and surrounding built form. The suitability of the proposed finish is confirmed by Council's comments, as follows:</p> <p><i>The use of dark toned brickwork is supported to be consistent with the palette of materials used in the nearby conservation area and to allow the lighter rendered Chapel and Elamang buildings to be more visually dominant</i></p>
The buildings should be toned in to the more established theme of cream coloured, rendered buildings. If needed, extra levels can be achieved by excavation.	Refer to response above.
The question of whether the Stage 1 Building is finished in liver coloured bricks should be left to the architect FJMT.	Noted. Refer to response above.
The 6 storey (including car park) building proposed in the East Precinct as part of Stage 2 looks to be too bulky and dominant for the area or compared with other buildings. Without precise dimensions and location it is impossible to be definitive but it is liable in the afternoon to shade parts of 11 Elamang Avenue?	<p>The EIS states that there will be no change to existing parking arrangements as part of the Concept Proposal or Stage 1 works. Any reference to a car park (in the EIS or on the Architectural Drawings) is referring to the current car park beneath the existing Science Block and Music and Performing Arts Centre.</p> <p>In response to the issues raised, the development envelope in the Eastern Precinct has been reduced to be consistent with existing height of the Mary Ward at RL 29.940.</p>
The 6 storey vertical connection pod proposed for the north precinct seems unnecessarily high by comparison with the buildings nearby - 2 storey above a 1 story carpark - and which it is proposed to connect. Is the pod a forerunner of an	The height of the vertical connector is dictated by the floor levels of the existing / proposed buildings and the need to accommodate a lift and lift overrun. The connectors

Issues Raised by the Public	Proponent's Response
application to increase the height of those buildings?	are not a precursor to further development.
<p>The non-compliances are evidence that the proposal is unreasonable and poorly designed with maximum regard to private commercial interests (e.g. the applicant is indicating that no Section 94 contributions / VPA are payable/applicable to a State Significant Project with a CIV of \$97,697,500) and minimal regard to neighbours and the interests of the public and contrary to Section 79C(1)(e) of the <i>Environmental Planning & Assessment Act</i>.</p>	<p>Noted. It is generally accepted that it is not appropriate for school developments to pay section 94 contributions. This is because schools generally provide their own sport and open space facilities within their campuses (or have arrangements in place to share facilities with other schools in the locality), and the developments usually further enhance the provision of sporting facilities. In the case of this development, the proposal will not put any additional demand on Council's infrastructure, and so it is considered reasonable that a dispensation be given.</p> <p>As detailed as Section 7.19 of the submitted EIS, the proposal is in the public interest for a number of reasons. It:</p> <ul style="list-style-type: none"> • Will provide disabled access to all parts of the school site for the first time; • Will create additional jobs during construction and operation, and represents an investment in the local economy; • Has been designed to limit visual impacts when viewed from Carabella Street, and will improve the presentation of the Chapel to Carabella Street; • Will modernise outdated educational facilities for future generations; • It is of a high architectural standard, and the built form is compatible with the site's surrounding buildings; and • Retains and respects the site's heritage significance whilst developing new facilities which are in-keeping with the heritage built form.
<p>The proposed Gymnasium Extension is an improvement on the first draft. It could be amended to produce a better outcome in line with the professed Loreto values. A solution which the owners of 22 Elamang Avenue would be happy with, includes:</p> <ul style="list-style-type: none"> • To move the extent of the ground floor cloister back to the second column from the West as shown on the plan marked Western Precinct Plan level A, and to remove the cantilever towards the West from the mezzanine floor. This would allow the stairwell to be moved towards the east, these minimal changes would significantly preserve the feeling of space and access to the prevailing breezes that we currently enjoy. • The stairwell wall and wall of the cantilevered section that we would see are 	<p>The School has worked closely with the owners of 22 Elamang Avenue to achieve a design that is acceptable for both parties.</p> <p>Notwithstanding this, in response to the concerns raised, the School would be willing to continue to work with the owners of 22 Elamang Avenue regarding the colour of the Gymnasium Wall.</p>



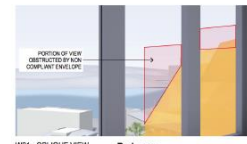

Issues Raised by the Public	Proponent's Response
<p>shown in the current plan as being solid masonry. We would suggest that a glass and steel structure such as that indicated along the northern wall of the cantilever section would be equally appropriate for the new construction we have to look at. It would certainly improve our outlook.</p> <ul style="list-style-type: none"> • The proposed balcony to the front of the gymnasium requires rethinking. Firstly it is very difficult to build given the present situation at that north-west corner and secondly there will be another high retaining wall for the occupiers of units one and two in our building to look at. • We are given to understand that it is proposed to clad the gymnasium building. The materials suggested in our informal discussions have been dark brick with perhaps sandstone surrounds for the windows. We would submit that the colour and composition of the cladding be the subject of further discussions. 	
Amenity Impacts	
<p>The proposal will obstruct daylight and sunshine into 111 Carabella Street. The non-compliant height, extension of the proposed building and lack of boundary setback will significantly block daylight and all sunshine into the eastern side of the units. This can jeopardise the health and wellbeing of the residents (e.g. clinical depression, effects of mould etc.)</p>	<p>As detailed above, the minimum 3m setback is consistent with the requirements of North Sydney DCP. Whilst the proposal does not comply with the DCP height plane, the shadow analysis has demonstrated that the non-compliances with the LEP and DCP height controls does not result in any additional overshadowing when compared to a complying development.</p>
<p>Noise from machinery and students. The staircase on the side of the proposed building will generate undue noise when used by all students. The noise from the proposed location of machinery on top of the building will also impact residents.</p>	<p>Renzo Tonin and Associates have prepared an Operation and Construction Noise and Vibration Assessment to assess the potential acoustic impacts of both the Concept Proposal and Stage 1 works on surrounding sensitive receivers.</p> <p>The report made a number of recommendations to mitigate noise impacts associated with the use of the building, and the mechanical plant and equipment. These recommendations have been incorporated into the Mitigation Measures at Section 10 of the submitted EIS.</p>
<p>Outdoor Rooftop Terrace Noise. This terrace will result in undue noise and lack of privacy to residents. This also has the potential to be used outside of school hours, and therefore the disruption to residents could be experienced day and night.</p>	<p>Refer to responses above. The roof top will now be used as an extended roof garden. Access to the rooftop terrace will be limited to enable connectivity between the Learning Hub and the Marian Centre and to allow intermittent staff and student access to the rooftop garden for maintenance. The roof garden may occasionally be</p>

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	used as a supervised recreation space.
The roof terrace on top of the Learning Hub (without showing adequate detail of the design and/or management measures) will likely result in significant loss of visual and acoustic privacy to the northern neighbours at 111 Carabella Street.	Refer to responses above.
One of the objectives of the R4 zone is “to ensure that a reasonably high level of residential amenity is achieved and maintained”, and it is clear that this land use objective is not achieved as the proposed non-complying height and failure to step down to follow the topography will unreasonably impact on residential amenity.	<p>A key strategy of the proposed design is to utilise the topography of the site to minimise the height of the building as far as possible. As shown in the architectural Sections submitted with the EIS, the building steps to the north with the topography of the site (refer to Figure 7 above).</p> <p>As detailed above, the proposal is consistent with the 3m DCP setback requirements, and the proposed exceedance of the LEP height control does not contribute to the loss of water views or solar access. Further, a number of design changes have been made to the design to improve the amenity of unit 9 / 111 Carabella Street, as detailed above.</p>
Privacy can be achieved primarily through complying with planning provisions and also considerate planning and clever design. The cumulative impact of the non-compliant bulk/scale of the building combined with the new rooftop terrace will result in significant loss of visual and acoustic privacy for the adjacent neighbours from overlooking/noise directly onto their living areas and private open spaces.	Refer to responses above.
The high-density Learning Hub, intense nature of school operations, increased student capacity and the new rooftop terrace will directly overlook the private open spaces and living areas of the neighbours.	Refer to responses above.
There is a reasonable expectation that development will comply with planning legislation and controls to ensure that the neighbour's and their internal living areas and private open space will retain as much daylight as possible. The development's non-compliant bulk/scale is poorly designed, and will result in significant loss of existing daylight for the neighbours, with the deterioration amplified towards the lower apartments.	Refer to responses above. The proposed non-compliances do not result in any additional overshadowing when compared to a complying built form. It is noted that the apartments in 111 Carabella Street do not have private open spaces / balconies.
The Acoustic Report does not assess the potential impacts from the roof terrace in any detail. There is also no Plan of Management to clearly specify measures to manage (and whose responsibility it is to manage such measures) issues such as safety/security, loitering, noise/nuisance and other anti-social behaviour.	Refer to responses above.
There would be privacy concerns if the Stage 1 J Block (St. Joseph's block) increases a floor to include an outdoor roof area bordering onto the Carabella	The Stage 1 works do not include an outdoor roof area on the J Block fronting Carabella Street.

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Street side. This alteration would raise privacy concern as it would have direct line of site into homes opposite.	
Compliance with North Sydney DCP 2013	
<p>The DA and EIS report does not adequately address North Sydney Development Control Plan 2013 (NSDCP), in particular Section 3 – Non-Residential Development in Residential Zones. The NSDCP has specific objectives / controls in place for select non-residential uses including educational establishments because it recognises that “these uses are primarily operated from large scale buildings which are often inconsistent with the scale of residential development occurring within the residential zones...and lead to additional impacts on residential amenity”.</p>	<p>DCPs are not a matter for consideration in the assessment of SSD DAs. Clause 11 of <i>State Environmental Planning Policy (State and Regional Development) 2011</i> states that:</p> <p>11. Exclusion of application of development control plans</p> <p><i>Development control plans (whether made before or after the commencement of this Policy) do not apply to:</i></p> <p><i>(b) State significant development</i></p> <p>Whilst consideration has been given to key DCP controls, in particular the setback controls, the development is not required to comply with DCP and so North Sydney DCP has not been addressed in detail. Notwithstanding this, consideration has been given to the comments raised below.</p>
<p>The Learning Hub does not comply with the side setback and building height plane (of 45 degrees inwards starting at 3.5m from NGL) DCP controls for the R4 High Density Residential zone and will have significant amenity impacts to the residents of 111 Carabella Street, Kirribilli in terms of loss of privacy, views, ventilation and daylight.</p>	<p>Noted. Whilst DCP controls do not apply to SSD, the building has a minimum side setback of 3m in accordance with Part 3.3.6, Provision P5 of North Sydney DCP. Whilst the proposal seeks to vary the height plane control, as demonstrated above, this inconsistency does not result in any additional visual or solar access impacts on the east facing apartments when compared to a complying development.</p>
<p>It is also unclear if the proposal complies with other requirements of the DCP e.g. site coverage, landscaping, excavation etc. Therefore a detailed and consolidated section in the EIS is required to confirm that the proposal comply with the provisions of the DCP.</p>	<p>Refer to response above.</p>
<p>The non-compliant building height and adverse view impact to neighbours are inconsistent with the objective of retaining residential amenity and environmental quality, and should not be acceptable to the consent authority.</p>	<p>Refer to responses above. The proposal seeks to deliver a high quality development which balances the amenity of neighbours with educational outcomes.</p>
<p>For the Learning Hub (western precinct), the majority of plant and equipment is to be located on the western side of the roof, i.e. as close as possible to the residents</p>	<p>Following the community consultation process, the plant equipment was reduced in size and redistributed to alternative locations to maximise the area of the roof garden. The</p>

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<p>at 111 Carabella Street, Kirribilli. This is inconsistent with the noise objectives of the DCP and is considered to be unacceptable notwithstanding the unoriginal measures outlined in the Acoustic Report, and it is considered that the best mitigation measure is to relocate plant / equipment as far away from these sensitive receivers as possible. It is also noted that the Acoustic Report does not assess the potential impacts from the roof terrace in any detail.</p>	<p>remaining plant equipment was relocated to the least visible location when viewed from 111 Carabella Street and will be housed within an acoustic enclosure.</p> <p>The measures proposed in the Acoustic Report, whilst perhaps 'unoriginal', are known to be successful in ensuring compliance with the relevant acoustic controls.</p>
<p>With respect to views, the locality's sloping topography and proximity to (and special views and vistas) Sydney Harbour contribute to its unique character and to the amenity of private dwellings. Council's DCP indicates that "when considering impacts on views, Council will generally not refuse a development application on the grounds that the proposed development results in the loss of views, where that development strictly complies with the building envelope controls applying to the subject site." Therefore, at the very least, the development must strictly comply with the building envelope controls.</p> <p>The proposed Learning Hub has a maximum height of 14.5m and any non-complying portion must step down with the topography to comply with the 12m limit and setback in accordance with the building height plane to protect the existing vistas and views from 111 Carabella Street to Sydney Harbour.</p>	<p>Refer to responses above. The only parts of the proposed Learning Hub which protrude above the LEP height plane are the lift overrun, stair and plant. The greatest impact with regard to the LEP height exceedance is to unit 9/111. The lift overrun, stair and plant do not contribute to the loss of harbour views from this apartment, however have a small impact on the loss of sky views. If the harbour view was to be retained to unit 9/111 Carabella Street, the building would need to be reduced to match the height of the existing B-Block, which is approximately 3m below the 12m allowed under the LEP. This would significantly impact the viability of the proposed development and the educational outcome provided.</p> <p>Further, the proposed DCP variations to the building height plane only result in additional view loss from the front (north facing) apartments. The non-compliance with the DCP height plane does not result in any additional view loss from unit 9 / 111 Carabella Street as the complying building envelope (behind) would obstruct views. In the context of the total views enjoyed from the north facing apartments, the extent of view loss is considered minor and acceptable (refer to further discussion below).</p>
<p>Council's DCP indicates that "open entertaining spaces such as terraces, patio, gardens and the like on roof tops are generally not supported."</p> <p>Therefore the proposed roof terrace should not supported, given that it is much bigger than 18m² and that there are other outdoor and indoor recreation spaces throughout the campus. Its location will significantly compromise the amenity of the residents at 111 Carabella Street given the proximity to these sensitive receivers.</p>	<p>Notwithstanding that DCP 2013 does not apply to the proposed development, the outdoor roof terrace is considered acceptable for the following reasons:</p> <ul style="list-style-type: none"> • The trafficable / usable component of the roof terrace is setback 15.5m from the site's boundary, ensuring that there are no opportunities for overlooking into adjoining apartments. • Access to the rooftop terrace will be limited to enable connectivity between the Learning Hub and the Marian Centre and to allow intermittent staff and student access to the rooftop garden for maintenance. The roof garden may occasionally be used as a supervised recreation space. • Whilst the roof terrace is greater than 18m², outdoor space is limited on the

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	<p>campus. The use of the roof top terrace for teaching and learning makes more efficient use of the school's land.</p>
Views and Visual Impacts	
<p>Views to bay will be obstructed. The proposed building height and extension toward the bay is well above the complying council limits and will remove views now seen from the units. The proposed building should not be extended to reduce views and decrease the enjoyment of residents. It also will reduce the general valuation of the units.</p>	<p>As demonstrated throughout this response, when the whole view is considered, visual impacts from the north facing (front) apartments towards the bay are minimal. Further, view loss from these apartments is the result of non-compliance with the DCP, rather than the LEP. As noted above, SSD applications are not required to comply with the relevant DCP.</p> <p>View loss associated with LEP non-compliance is limited to unit 9 / 111 Carabella Street, where the lift overrun and stair results in a small loss of sky views. From this apartment, a LEP compliant building would result in the loss of harbour / bay views.</p>
<p>Applying the principles of view sharing to 111 Carabella Street, it is considered that the existing view of the Harbour are highly desirable and what most people would describe as wonderful/scenic as the views are of Sydney Harbour with whole view i.e. interface between land and water and are therefore highly valued, and is currently available from various windows/apartments (including side-views from easterly aspect apartments).</p>	<p>Roseth SC in <i>Tenacity</i> points out that water views are valued more highly than land views, as are whole views and those containing iconic features. The views from the north of the building contain water, land-water interfaces, largely whole views and scenic items. Whilst views across the school site from apartments in the east of the building do contain water, and a small area of land-water interface, they do not comprise whole views and do not contain iconic items. What would be lost from these apartments would primarily be a foreground composed of buildings, with some partial water beyond.</p>
<p>The EIS suggests that apartments orientated towards the north-east with unencumbered views towards the Harbour and Kurraba Point will remain largely unaffected by the proposal. That statement is only true if losing up to 50% of existing views means "largely unaffected". However, it is considered that an unbiased opinion would not categorise a 50% loss as largely unaffected. Refer to Pictures and Figures below for more details.</p>	<p>FJMT has prepared a response to the letter prepared by Tranplan (refer to Appendix C).</p> <p>In regard to the views from the north facing apartments (views W21, W22 and W23), view impacts from these apartments were tested from a number of angles to assess the overall view loss. Refer to the Figures 8 – 10 and attached drawing sheets SKMP-60.1/SKMP-60.2 (Appendix C) for further details.</p> <p>Figure 8 shows view W21, taken from a worst case view point looking obliquely across the school site. However, when looking directly out of the window (the total view) there is no impact to the existing views. The same applies to W22 and W23 (Figures 9 and 10) which show that the proposal will have no, or minimal, impact on total views.</p> <p>As illustrated below, the loss of views as a result of the non-compliance (shown in red) is considered to be relatively minor when considering both the total view and the oblique</p>

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	<p>view - W21 shows a small portion of harbour view loss and W22 shows small portion of sky loss from the non-compliant envelope. From W23, the non-compliant envelope does not result in any additional view loss. It is important to note that the non-compliance relates to the DCP, rather than the LEP. As detailed above, SSD applications are not required to comply with the provisions of a DCP.</p> <p>Overall, it is considered that the view loss from these apartments (when the total views are considered) are minor and acceptable, and are generally associated a complying built form. Direct views from these dwellings to the north across the front boundary will remain unaffected by the proposed development.</p> <div data-bbox="1108 671 1601 1157"><div><div>EXISTING VIEW</div><div>W21 - OBLIQUE VIEW Bedroom</div></div><div><div>PROPOSED VIEW</div><div>W21 - OBLIQUE VIEW Bedroom</div></div><div><div>W21 - OBLIQUE VIEW Bedroom</div></div><div><div>W21 - TOTAL PROPOSED VIEW Bedroom</div></div></div> <p>Figure 8 – Oblique (worst case) and total views from W21</p>

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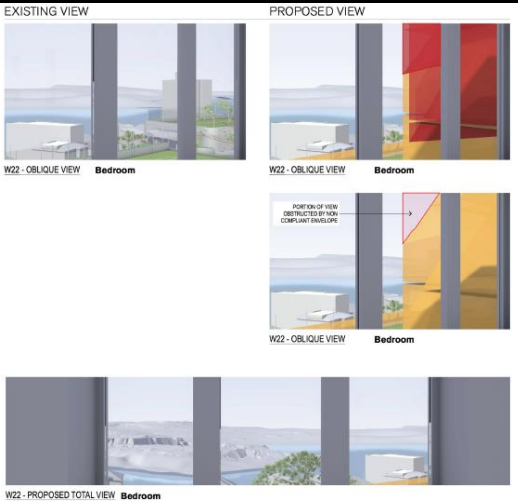


Figure 9 – Oblique (worst case) and total views from W22

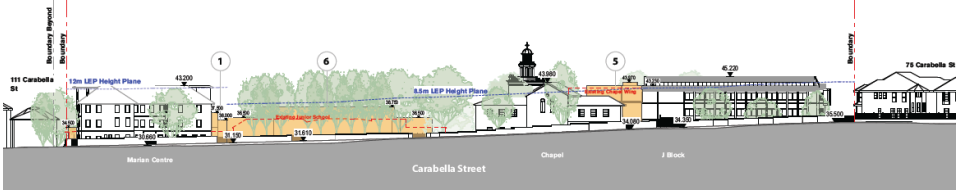



Figure 10 – Oblique (worst case) and total views from W23

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Views are available from the standing position and therefore there is a reasonable expectation that views can be retained.	<p>Noted. If the harbour view was to be retained to unit 9/111 Carabella Street, the building would need to be reduced to match the height of the existing B-Block, which is approximately 3m below the 12m allowed under the LEP. This would significantly impact the viability of the proposed development and the educational outcome provided. As noted in Roseth SC in <i>Tenacity</i>, views across side boundaries are often more difficult to protect than views from the front and rear boundaries.</p> <p>Views from the front (north-facing apartments) are addressed above.</p>
It is considered that the impact on views would be severe to devastating as view loss range from 50% to 100%. In addition to the loss of scenic views, there would also be severe loss of privacy. The application's EIS also does concede that "the extent of the view loss could be considered to be moderate to severe using the qualitative ratings recommended in <i>Tenacity</i> ".	<p>Refer to responses above with respect to views from the north-facing apartments. When the total view is considered, view loss is considered minor and acceptable.</p> <p>It is acknowledged that all of the harbour views currently available from unit 9 / 111 Carabella Street would be lost, however these views would be lost with a complying built form. In order to retain harbour views to this one apartment, the building would need to be approximately 3m lower than the LEP height control.</p>
Whilst views are over the side boundary, for some apartments, this side view is from living areas where views/amenity is most valued. For some other apartments, loss views are not side-views but from harbour front windows.	<p>Noted. Irrespective of the value of the view, and which room it is viewed from, Roseth SC in <i>Tenacity</i> points out that views across side boundaries are often more difficult to protect than views from the front and rear boundaries.</p> <p>Refer to responses above with respect to views from the north-facing apartments, where views are available from the front windows. When the total view is considered, view loss from these apartments is considered minor and acceptable.</p>
Views are considered scenic, highly valued and various ranges.	Refer to response above. Roseth SC in <i>Tenacity</i> points out that water views are valued more highly than land views, as are whole views and those containing iconic features. The views from the north of the building contain water, land-water interfaces, largely whole views and scenic items. Whilst views across the school site from apartments in the east of the building do contain water, and a small area of land-water interface, they do not comprise whole views and do not contain iconic items. What would be lost from these apartments would primarily be a foreground composed of buildings, with some partial water beyond.
In some cases, impacts are directly due to non-complying envelope e.g. views W21 & W22.	Refer to response above. View impacts from the north-facing apartments (including views W21 and W22) are the result of DCP non-compliances, and result in the loss of a small portion of harbour views and a small portion of sky views. These view impacts are largely associated with oblique (worst case) views across the school site. When the total

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<p>In response to the applicant's contention that a reduction in height would result in a significant impact on the quality and quantity of teaching space that is proposed, it is noted that the many generations of students to come can benefit from new education space which is compliant with planning controls to minimise adverse impacts to the many generations of residents to come who will live in these apartments, and retain some reasonable level of residential amenity. Intergenerational equity is a core principle of ecological sustainable development practice.</p>	<p>view is considered, visual impacts are considered minor and reasonable.</p> <p>As detailed above, view impacts from the front (north facing) apartments are considered minor and acceptable. Reducing the height of the building would not significantly change view impacts from these apartments.</p> <p>In order to maintain the existing view of the harbour from unit 9 / 111 Carabella Street, the building would need to be reduced to match the height of the existing B-Block, which is approximately 3m below the 12m allowed under the LEP. This would represent an uneconomical use of the school's land, and would significantly impact the viability of the proposed development and the educational outcome provided.</p> <p>Given the pressure on existing school facilities in Sydney, the growing demand for student enrolments and the benefit that the proposal will provide to numerous students over many decades, it would seem unreasonable to limit the proposed development for the benefit of one single apartment, which enjoys views over the side boundary.</p>
<p>Overall, in terms of the reasonableness of the proposal, the proposal breaches the Local Environmental Plan's height control by 2.5m or 21% and does not comply with the other major DCP planning controls e.g. height plane / setback, building envelope. In our opinion, the proposal significantly and unreasonably reduces the amenity / views enjoyed by the neighbour and therefore are not consistent with the intent and controls of Planning Instruments and Council's development controls.</p>	<p>The submission does not acknowledge that the exceedances are limited to the plant, lift overrun and stair case – the majority of the building is within the 12m height limit.</p> <p>It is noted that DCPs do not apply to SSD applications. Whilst the building does not comply with the DCP height plan control, the solar and visual impact analysis demonstrates that this non-compliance does not result in additional water view loss or overshadowing to unit 9 / 111 Carabella Street.</p> <p>In order to reintroduce the harbour views to unit 9 / 111 Carabella Street, the building would need to be lowered to approximately 9m (3m below the 12m allowed under the LEP). To limit the proposed educational establishment in this way would be unreasonable and would not be in the broader public interest.</p>
<p>The neighbours at 111 Carabella Street enjoy views to the harbour / bays which carry scenic values. The proposed development does not reasonably maintain existing view corridors from the neighbouring dwelling and the view loss will be from various areas of the apartments including the living / dining rooms, which are heavily used area of the household. The proposal has made little an attempt to preserve an equitable amount of views for the surrounding properties as far as is practicable</p>	<p>Refer to responses above. The impact on total views from north facing apartments are considered minimal and acceptable.</p> <p>With respect to unit 9/111 Carabella Street, several changes were made to the design post-community consultation to improve the visual impact of the development and open up more sky views (refer to before and after images at Figure 2 above). These</p>

Issues Raised by the Public	Proponent's Response
<p>and reasonable, so that a reasonable level of views is retained for the residents of 111 Carabella Street.</p>	<p>include:</p> <ul style="list-style-type: none"> • Removal of the roof top louvred roof structure to improve sky loss and visibility across the rooftop terrace. • Redistribution of plant to reduce the size of the roof top plant. • Relocation of the reduced roof top plant to the least visible location when viewed from 111 Carabella St. • Revised materiality of the roof top elements to improve transparency, including the introduction of a glass lift. • Western rooftop parapet wall was replaced with a reduced height integrated planter creating a landscaped buffer to 111 Carabella St • Maximisation of a roof top garden to improve the outlook for 111 Carabella St. • Change of Use - The usable floor area of the rooftop has been limited, with the outdoor learning area being removed and replaced with a rooftop garden for intermittent staff and student access for learning and maintenance, and occasional use as a supervised recreation space. • The path and bridge connection to the Marian Centre will be used for circulation purposes only, to enable connectivity between buildings.
<p>The J Block (St. Joseph's Block) Master Plan proposed building envelope is outside its current build - a new section seems planned to expand over the driveway between the current J Block and Fairhaven building up to an 8.5m height, which will impact views. There is no building at this height in this section of school land currently - it is a laneway. Enabling this envelope height and length expansion, will impact or completely remove current water views for property at strata 46 Carabella Street that is opposite this building. There is no view impact assessment or detail provided for this.</p>	<p>There are no plans to redevelop the J Block as part of the proposed Masterplan. There is no intention to develop over the existing laneway between the J Block and Fairhaven.</p>
<p>The top two levels for the Eastern Precinct Stage 1/ Master Plan for the Mary Ward Building seem above the LEP 2013 heights, and will impact on views of other properties not identified in this submission. The new proposed building current top floor height seems to be a stairwell height, which is not currently a full floor with a roof - it looks to be an outdoor seating area. Increasing the building to this extra height impacts views of heritage listed properties. But it also impacts other</p>	<p>Noted. In response to the issues raised, the development envelope in the Eastern Precinct has been reduced to be consistent with existing height of the Mary Ward at RL 29.940. Please refer to the revised documentation at Appendix B.</p>

Issues Raised by the Public	Proponent's Response
<p>properties with water views such as Strata building at 46 Carabella St, for which no view impact assessment is provided (property has water views across this area through the lane way that borders between Fairhaven and J Block).</p> <p>There is ongoing impact from the Southern Precinct Master Plans for the Kirribilli area in that the plans may remove or impact remaining water views from the Carabella streetscape (due to the new sections of the building at a proposed 8.5m height envelope) and because the development might continue for up to 50 years. These plans will alter the character of the Kirribilli streetscape, in a low density area, as some of these building expansions look to be large, with new sections in spots where some of the last community water views are available on the Carabella street footpath between the stretch of Willoughby Street and Peel Street.</p>	<p>Due to the topography of the site, streetscape impacts on Carabella Street will be limited. As shown on the architectural Elevations submitted with the EIS, the proposed envelope within the Southern Precinct sits within the 8.5m LEP height limit and is generally within the extent of the existing Junior School (refer to Figure 11).</p> <p>Streetscape impacts on Carabella Street will generally be limited, and views will still be available across the site, between the existing and proposed buildings.</p>  <p>Figure 11 – Proposed Carabella Street elevation</p>
<p>There is a view from two levels of 113 Carabella Street, Kirribilli across the side boundary of Loreto. I object to any changes to the plans that would further encroach into the oblique view of Bradleys Head from my residence.</p>	<p>The proposal will not obstruct the oblique views of Bradleys Head that are currently available from 113 Carabella Street, across the tennis court. Refer to line of sight at Figure 12.</p>

Issues Raised by the Public	Proponent's Response
	 <p>Figure 12 – Line of sight from 113 Carabella Street towards Bradley's Head</p>
Construction Impacts	
<p>We assume that all of the stringent requirements for noise, dust, and pollution control will be in place. We also assume that work will be on weekdays only unless there is some absolutely compelling reason for Saturday morning work.</p>	<p>Correct. The necessary controls will be put in place prior to the commencement of construction, as part of the detailed Construction Management Plan which will be prepared by the contractor.</p> <p>Saturday morning work is proposed. Saturday works will be carried out in accordance with the NSW EPA's standard construction hours.</p>
<p>The construction of the building is expected to drill into the same rock that 111 Carabella Street sits on. This extensive process could jeopardise the stability of the unit block and surrounding structures.</p>	<p>The works will be undertaken in accordance with the recommendations of the Geotechnical and Structural Engineers to ensure structural stability.</p> <p>Notwithstanding this, dilapidation surveys will be carried out before and after construction to ensure that there are no adverse impacts on surrounding properties.</p>
<p>The construction of the building will cause further difficulties for residents in regards to parking and general travel in the area. Pedestrians including children will be at risk of danger with increased congestion and use of this area.</p>	<p>Construction traffic and pedestrian safety will be managed in accordance with a detailed Construction Traffic Management Plan which will be prepared by the</p>

Issues Raised by the Public	Proponent's Response
	contractor prior to the commencement of works.
Noise and dust from construction. The duration of such a huge and extensive building will cause severe disruption to the peaceful lifestyle and enjoyment of nearby residents.	Noted. Mitigation measures will be put in place to minimise amenity impacts on surrounding residents. These measures will be detailed in the Construction Management Plan which will be prepared by the contractor prior to the commencement of works.
Student and Staff Numbers	
<p>The school proposes to introduce an additional 100 students - a 10% increase to the existing approval) and also two additional staff to the site, resulting in a total of 1,200 students and 182 staff.</p> <p>However, little / no reference was made to the existing consent and the rationale of that consent's limitation on the current student capacity, which may have been based on existing traffic congestion and safety issues for drop-offs/pick-up around the local area and significant parking problems for residents due to the significant shortfall of parking for staff.</p>	<p>The current application is to be considered on its own merits, with new traffic surveys carried out to determine the impact of the additional students and staff on current traffic / parking conditions.</p> <p>As has been demonstrated in the submission, there will be no adverse traffic impacts as a result of the additional students on the campus.</p> <p>As noted elsewhere, staff parking is provided in excess of the DCP requirements. It is not feasible to accommodate additional parking on the campus due to the site's heritage and topographical constraints, and this is unlikely to be supported by Council given their comments on the subject proposal. Further, a Workplace Travel Plan has been provided to encourage staff to switch to non-car modes of travel.</p>
Planning Process	
Further development of the school site is inappropriate for the area the 50 year timeframe is unreasonable and alienates the community from input when further stages are actually to be developed	Each future stage will be subject to a detailed DA at the appropriate time. All future DA will be subject to separate community consultation and public exhibition processes.
There has been no prior consultation with the neighbours. This should be given top priority, and resultant changes made, before any decisions are taken.	Extensive consultation was carried out with the surrounding community, as outlined in Section 6 of the EIS.
Neither my family nor I are aware of any attempt by the school or their consultants to contact us. I would be very interested to see if they would furnish the Department and all of their neighbours a list of who in the neighbourhood they contacted and consulted and when they did so.	<p>Extensive consultation was carried out with the surrounding community, as outlined in Section 6 of the EIS.</p> <p>In addition to sending letters to surrounding residents, a newspaper advertisement was placed in the North Shore Times and Mosman Daily on Thursday 16 March 2017 ensuring that all local residents were made aware of the proposal, and the community information sessions.</p>

Issues Raised by the Public	Proponent's Response
I oppose the development because the school does not pay rates and makes no contribution to funding the costs (e.g. greater wear and tear on roads/footpaths) it imposes on the North Sydney Council.	Noted. These concerns are beyond the scope of the proposed development.
Trees and Landscaping	
The proposed removal of trees will leave the site looking like an industrial zone rather than belonging in a residential area.	11 of the existing 57 trees on the campus are required to be removed to facilitate the proposed development. The proposed tree removal will be offset by new tree plantings, ensuring the continuation of the existing landscaped character.
I oppose the development because of the destruction of established trees and the lack of re-planting of trees.	A comprehensive new landscaping scheme has been prepared for the development which identifies the locations where new trees are proposed to be planted
The Northwest corner of the Loreto school property is dominated by a massive Fig Tree. This tree is a menace. It is submitted that the Fig Tree and the surrounding banana plantation should be removed as part of this redevelopment. We understand the position of Council and others hold about the tree however they do not have to live with it, or be subject to the nuisance and risks it poses. Those of us who do have to live with it, the school and the immediate neighbours would like the tree to be documented and removed.	<p>Despite the nuisance caused by the tree, its aesthetic and heritage value is recognised by the school and the local community.</p> <p>As a result, the tree is proposed to be retained, and will be protected from damage during construction works.</p>
The removal of the tree offers the opportunity for the school to do something very creative with the north-west corner of their block and to provide proper access around the gymnasium to the new development behind. The removal of the tree offers the opportunity to provide a much improved streetscape and innovative landscaping as part of the new development.	Noted. The tree is proposed to be retained.
The land between the gymnasium and the boundary of the school property has been studiously ignored in the 10 years that we have lived here and is basically an 'out of bounds' zone. The overall ugliness was added to in the saga of the retaining wall when a large stormwater pipe was "tastefully" attached to the facade of the building. A decrepit chain wire fence, not build on the boundary, completes the tatty outlook. We would submit that the landscaping of the current 'no go zone' be subject to further discussions in order to provide the required softening of the building and the necessary visual separation.	The proposal includes modifications to the open space area between the Gymnasium and the School's Elamang Avenue boundary, however no works are proposed outside of the School site.

Issues Raised by the Public	Proponent's Response
Existing Retaining Wall	
<p>In 2011 a temporary fix was undertaken to address what was discovered to be a dangerous and failing retaining wall at the rear of the recently purchased Tremayne property. Had this wall failed the land slippage would have caused considerable damage to 22 Elamang Avenue. Approximately half of the failing wall was removed and a Batter and Vegetation Mattress was created down to the retaining walls of 22 Elamang Avenue. While addressing some of the short-term risk, the failure to follow through on various commitments given to the owners of 22 Elamang Avenue meant the creation of a very ugly space that rapidly became overgrown with noxious weeds.</p> <p>An excavation and construction of proper retention of the land is needed.</p>	<p>The new Learning Hub will be constructed in consultation with Structural Engineers to ensure that no adverse issues arise with respect to retaining structures / walls.</p> <p>The School is happy to engage further with the owners of 22 Elamang Avenue to re-landscape the existing retaining wall.</p>
Groundwater Drainage	
<p>The Geotechnical Reports attached to the DA Proposal suggest/estimate that there will be no impact to properties in Elamang Avenue below the Loreto site, resulting from excavations. This is contrary to the actual experience resulting from the 1990 Loreto development excavations, which resulted in increased groundwater seepage into properties located below the Loreto site.</p>	<p>Noted. The stormwater system has been designed to ensure that there will be no adverse impacts on downstream properties. Properties on Elamang Avenue will be monitored during the construction process to ensure that there are no adverse impacts from groundwater or stormwater.</p>
Stormwater Drainage	
<p>Stormwater from the Loreto site general flows into Sydney Harbour via Elamang Avenue and a stormwater drain located in an easement at No 15 Elamang Avenue. This drain is of 1800/1900 vintage and is inadequate for the present built up area.</p> <p>North Sydney Council's recent Flood Study showed that properties in Elamang Avenue were flood prone. Further development on the Loreto site will adversely affect this situation and should not be permitted until the stormwater drainage has been upgraded.</p>	<p>Refer to response above.</p>

Issues Raised by the Public	Proponent's Response
<p>Lot1 DP115513</p> <p>This narrow strip of land is a legacy issue from the purchase of the Tremayne property. The land measures approximately 2.65 m (front) by 35.5 m (West) by 2.8 m (rear) by 36 m (East) and is understood to be owned by The Boundary Pty Ltd. This owner is related to the previous owner of Tremayne. Somehow in the purchase of that property this title was not transferred. This land became progressively more and more overgrown and more and more unsightly.</p> <p>The owners of 22 Elamang Avenue would like to see this strip of land maintained as a green zone between us and the school. Properly managed it could be an attractive feature rather than a terrible eyesore</p> <p>If a sensible commercial arrangement cannot be arrived at with the current owners perhaps the land could be compulsorily acquired and leased to the school with a condition that it is to be preserved as green space. Alternatively it could be held in a trust with both the school and SP77406 having responsibility for the ongoing maintenance after initial landscaping.</p>	<p>This is beyond the scope of this application. Loreto appreciates the concerns regarding this vacant strip of land, however is in no position to force the current owner to sell the land, or to compulsory acquire the land.</p>