



KT/JBu
16205
25 August 2016

Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally

**LORETO KIRIBILLI
REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS**

We are writing on behalf of Loreto Kirribilli, the proponents for the staged redevelopment of Loreto School at 85 Carabella Street, Kirribilli.

As the proposed development comprises an educational establishment and has a Capital Investment Value (CIV) in excess of \$30 million it would be State Significant Development (SSD) for the purposes of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

In accordance with Clause 3 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) the purpose of this letter is therefore to request the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the proposed development. To support the request for the SEARs this letter provides an overview of the proposed development, sets out the statutory context, and identifies the key likely environmental and planning issues associated with the proposal.

1.0 BACKGROUND AND HISTORY OF THE SITE

Established in Sydney in 1907, Loreto Kirribilli is an independent, non-selective, Catholic school for girls from Kindergarten to Year 12. The School is administered by a School Board and the Institute of the Blessed Virgin Mary (Loreto Sisters). The Kirribilli site contains the junior and senior school campuses.

Loreto Kirribilli is in need of redevelopment to remove inefficient and out-dated teaching spaces and replace them with modern learning spaces that reflect new models of teaching. The School also needs to update existing access arrangements to bring them into line with current accessibility standards. The staged redevelopment will provide new facilities across five separate precincts (campus core, north, east, south and west) and will comprise a new Innovation Centre, Junior School and Performing Arts Centre, as well as a series of vertical connection pods across the campus. It is anticipated that the development will be delivered in three main separate stages, over a period of up to 50 years.

In addition to seeking approval for building envelopes, the development application will seek consent for the detailed design of the new Innovation Centre (western precinct), vertical circulation connections across all precincts and landscape works within the campus core.

It should be noted that the focus of the School's strategic masterplan is not to increase student numbers, but rather to update the current facilities to meet current and future teaching and learning requirements.

The proposal is described further below.

2.0 THE SITE

2.1 Site Location and Description

Loreto Kirribilli is located within the neighbourhood of Kirribilli on Sydney's North Shore. Kirribilli covers a small, steep peninsula and features iconic views across to Central Sydney, Circular Quay, the Harbour and Opera House. The Sydney Harbour Bridge and highway separates Kirribilli from the North Sydney CBD.

The School is located between Elamang Avenue and Carabella Street, and is surrounded by a mix of low, medium and high density residential development. The site is located approximately 500m east of the Milsons Point shops and train station.

An aerial photo of the site is provided at **Figure 1**.



 The Site

Figure 1 – Aerial photo
Source: Nearmap and JBA

The School campus is legally described as Lot 200 in DP 1166282, and has an area of approximately 1.82 hectares. The land is owned by the Trustees of the Loreto Property Association. The site is predominantly zoned SP2 Educational Establishment under *North Sydney Local Environmental Plan 2013* (LEP 2013), however also comprises land zoned R2 Low Density Residential and R4 High Density Residential.

The School slopes down from south to north, and comprises a series of existing buildings that range in height and age. Due to the lack of available open space, most buildings feature rooftop recreation and landscape areas. The site is accessible via three driveways from Carabella Street and two from Elamang Avenue. The main pedestrian entrances are from Carabella Street.

An oblique aerial view of the site, showing the topography and scale of existing buildings, is provided at **Figure 2**.



Figure 2 – Oblique aerial view
Source: FJMT

3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

An overview of the proposed development is provided below. Preliminary concept plans prepared by FJMT are attached. As noted above, the works have been divided across five precincts, however the majority of the works are focussed in the east and west precincts.

Concept approval will be sought for development in the south and east precincts, with detailed consent to be sought for works in the western precinct, as well as the vertical connectors across the campus. It is noted that the only development proposed in the north precinct is a new vertical connector, which will form part of the detailed development application. Similarly, development in the campus core is limited to landscaping works associated with the accessible link to the northern connector, detailed consent will also be sought for these works.

The five precincts, and the existing development within them, is shown at **Figure 3**.

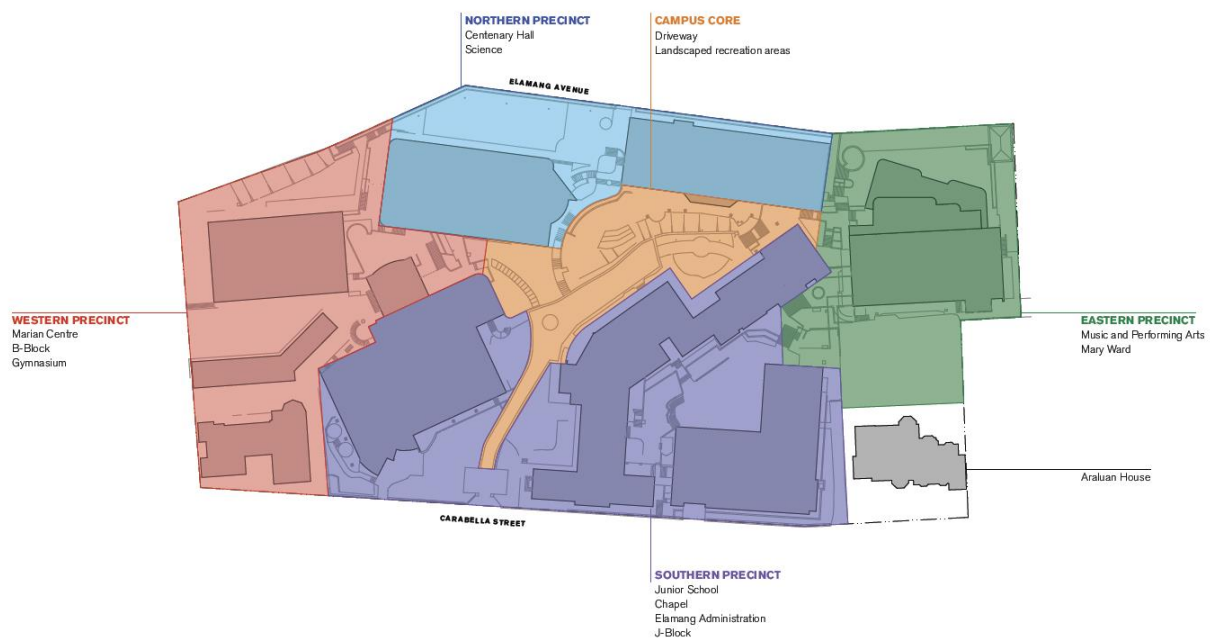


Figure 2 – Existing campus with future development precincts identified
 Source: FJMT

3.1 Campus Core

Detailed consent will be sought for the following work in the campus core:

- Landscaped recreation areas, including landscape works associated with the vertical connection pod in the north precinct.

3.2 West Precinct

Detailed consent will be sought for the following work in the west precinct:

- Demolition of the existing B-Block and associated excavation;
- Construction of a new five story Innovation Centre plus roof terrace, including an integrated connector pod, and extension of the existing Gymnasium;
- New landscaping and external play areas over the existing tennis court; and
- Construction of external covered landscape walkways for improved accessible connectivity, and construction of a new Junior School play terrace.

3.3 North Precinct

Detailed consent will be sought for the following work in the north precinct:

- Construction of a new six storey vertical connection pod, including partial demolition of external stairs and planters between the Science and Centenary Hall buildings, and lower ground excavation to provide accessible access to the north precinct.

3.4 South Precinct

Detailed consent will be sought for the following work in the south precinct:

- Construction of a new five storey vertical connection pod, including partial demolition of existing external stairs, landings and walkways and lower ground excavation.

Concept approval will be sought for the following work in the south precinct:

- Demolition of existing buildings, site excavation and construction of a new learning facility.

3.5 East Precinct

Detailed consent will be sought for the following work in the east precinct:

- Construction of an interim ramp to provide access between the existing Science and Performing Arts buildings.

Concept approval will be sought for the following work in the east precinct:

- Partial demolition of external stairs, landings, walkways and planters in between the existing Science, Elamang, Performing Arts and Mary Ward buildings;
- Demolition of the existing Performing Arts and Mary Ward buildings;
- Excavation to the area at the rear of Araluen House to the carpark on Elamang Avenue; and
- Construction of a new four storey learning facility, including an integrated connector pod, and two storey carpark within the proposed development envelope.

4.0 PLANNING CONTEXT

4.1 Environmental Planning and Assessment Act 1979

The EP&A Act establishes the assessment framework for SSD. Under Section 89D of the EP&A Act the Minister for Planning and Environment is the consent authority for SSD. Section 78A(8A) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the Regulations.

4.2 4.2 State Environmental Planning Policy (Infrastructure) 2007

Under Clause 32 of *State Environmental Planning Policy (Infrastructure) 2007*, proposals for new School buildings need to address the School Facilities Standards State Government publications, including:

- a) *School Facilities Standards—Landscape Standard—Version 22* (March 2002);
- b) *Schools Facilities Standards—Design Standard* (Version 1/09/2006); and
- c) *Schools Facilities Standards—Specification Standard* (Version 01/11/2008).

These standards provide a guide for the development of new schools, new facilities at existing schools and the refurbishment of existing facilities to ensure the creation of an environment which is conducive to learning whilst being safe and robust in a school environment.

These standards will be considered in the detailed design of the development.

4.3 State Environmental Planning Policy (State and Regional Development) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* identifies development which is declared to be State Significant. Clause 14 of Schedule 1 of the policy provides that the proposed development as described herein is SSD, as follows:

Development for the purpose of educational establishments (including associated research facilities) that has a capital investment value of more than \$30 million.

As the proposal is for the purposes of an educational establishment and has a total estimated CIV of over \$30 million, it would be considered SSD.

4.4 State Environmental Planning Policy No. 55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Land aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment.

SEPP 55 will be addressed as part of the EIS.

4.5 Current Zoning and Development Controls

North Sydney Local Environmental Plan 2013

North Sydney Local Environmental Plan 2013 (LEP 2013) is the applicable local planning instrument for the proposed development and establishes the relevant land uses and other development standards for the site. Specifically:

- The proposed School redevelopment is permissible in the SP2 Educational Establishment, R2 Low Density Residential and R4 High Density Residential zones either in its own right, or by virtue of Clause 28(1) of *State Environmental Planning Policy (Infrastructure) 2007*.
- The proposal is consistent with the zone objectives for each of the land use zones.
- The whole of the campus has a height limit of 8.5m with the exception of the western portion of the site which is zoned R4 High Density and has a maximum height limit of 12m. From Carabella Street the maximum height of the proposed development is approximately 10.5m (lift overrun of the south precinct connection pod), however as the site slopes steeply from Carabella Street to Elamang Avenue, a number of both the existing and new buildings are above the 8.5m height plane in various locations. At Elamang Avenue, the maximum height of the proposal is approximately 15.5m (the top of the connection pod in the north precinct). A request will be made to vary the height development standard in accordance with Clause 4.6 of LEP 2013.
- There is no maximum FSR applying to the site.
- The majority of the campus is identified as a local heritage item, and is surrounded by a number of heritage items. However, the site is not located in a heritage conservation area, and there are no State heritage listings on the campus.

North Sydney Development Control Plan 2013

North Sydney Development Control Plan 2013 (DCP 2013) contains detailed built form and other development controls. Whilst there are no objectives or other controls in DCP 2013 specifically relating to schools, the proposal will have regard to the requirements applying to permitted development in the R2 and R4 zones.

Whilst it is proposed that the project will have regard to the key DCP controls outlined above, it is noted that DCP 2013 (along with any other DCP) will carry no weight in the assessment due to the status of the application as a SSD DA.

5.0 PRELIMINARY IMPACT IDENTIFICATION AND RISK ASSESSMENT

The impacts and risks associated with the proposal are summarised below and will be addressed in detail in the EIS. Overall, the risks from the proposal are considered to be low, as development is concentrated within the existing School grounds and will not generate any environmental impacts that cannot be managed appropriately.

5.1 Built Form and Impacts on Adjoining Residents

The EIS will address the height, density, bulk and scale of the proposed development within the context of the locality. The application will demonstrate that the proposal integrates with the local environment, and that the form, layout and siting of the building achieves appropriate design and amenity outcomes for users of the site, and residents of the adjoining building.

In summary, the preliminary scheme is considered consistent with the existing development on the School campus and the character of the area for the following reasons:

- The proposed buildings, with the variation in building height, will be compatible with the scale of existing buildings on the site and surrounding residential buildings. The maximum height of

the proposed new development is 15.5m to the top of the vertical connection pod in the north precinct. Due to the topography of the site, all buildings will step down with the topography from Carabella Street towards Elamang Avenue to follow the natural gradient. The elements which protrude above the height plane will be carefully designed to minimise any impacts.

- The proposed development is of a scale and density that is consistent with the character of the area.
- The proposed development will be sited and designed to reduce any impacts on existing views from properties to the east and west.
- The proposed development will maintain privacy for residents of existing dwellings to the east and west through appropriate design measures. The proposed buildings are for an educational establishment and will therefore not house any residents.
- The proposed development will limit overshadowing on existing dwellings and streets. The adjoining residential buildings to the east and west of the site will be subject to some overshadowing, however adequate solar access will be retained.
- The development will use materials and finishes which respond to the materials of the School's existing buildings, respect the architecture of surrounding buildings, and enhance the architectural features of the new buildings.

5.2 Acoustic Impacts

Due to the nature of the proposal and the proximity of surrounding properties, there is potential for acoustic impacts to arise. The development will be designed to limit noise spill, and the application will be accompanied by a Construction and Operation Noise and Vibration Management Plan to address construction and operational noise impacts, and mitigation measures to lessen any impacts that may arise.

5.3 Heritage

The majority of the School site is identified as a local heritage item under LEP 2013. Whilst some buildings which are heritage listed will be subject to works, none of the buildings proposed for demolition are of heritage significance. The EIS will be accompanied by a Heritage Impact Statement to assess the impacts of the proposal on the site's heritage significance.

5.4 Traffic and Parking

There will be no changes to existing traffic and parking arrangements in the immediate future. However, it is acknowledged that development in the eastern precinct may alter traffic and parking arrangements. A traffic and parking study will accompany the EIS to address these matters.

5.5 Tree Removal and Landscaping

The proposal may require the removal of approximately five (5) trees of varying dimensions. It is our understanding that the trees are not identified as having heritage significance, however further detailed investigations will be undertaken during the design phase to understand the status of the trees. To compensate for any loss of trees due to the proposed development, new tree planting will be accommodated on site.

The EIS will be accompanied by an Arborist Report and a Landscape Concept Plan.

5.6 Construction and Operational Impacts

The EIS will address and consider the construction and operational impacts of, or on:

- Noise and vibration;
- Construction and operational traffic; and
- Water and air quality impacts.

6.0 CONCLUSION

The CIV of the project is over \$30 million and in excess of the requisite SSD threshold of \$30 million for educational establishment projects. A Quantity Surveyors Statement prepared by QS1 is attached for reference.

On the basis that the project falls within the requirements of Clause 15 of Schedule 1 of the SRD SEPP being *development for the purpose of educational establishments (including associated research facilities) that has a capital investment value of more than \$30 million*. Loreto Kirribilli formally requests that the Secretary issue her Environmental Assessment Requirements for the project to facilitate the preparation of the EIS to accompany the DA for the project.

Yours faithfully,



Kate Tudehope
Principal Planner

Enc:

- QS Statement prepared by QS1
- Concept Architectural Drawings prepared by FJMT