

29 May 2017

Ms Carolyn McNally
Secretary
Department of Planning and Environment

Attention: Karen Harragon

Dear Ms Harragon

REQUEST FOR GRANTING OF SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS FOR ALTERATIONS TO WAITARA PUBLIC SCHOOL AT 48 -58 MYRA STREET, WAHROONGA

Think Planners on behalf of TSA Management, who are acting for the Department of Education, are seeking approval for alterations and additions to the existing Waitara Public School.

As the proposed development comprises an educational establishment and has a Capital Investment Value (CIV) in excess of \$30 million it is categorised as 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.

SITE

The site is legally known as Lot 1 DP 333142 and Lots 11 -13 DP 17375 and Lot A DP 309739, but commonly known as 48 -58 Myra Street, Wahroonga. The site is a regular shaped corner allotment that has frontage to both Edgeworth David Avenue and Myra Street. The site also has a limited frontage to Highlands Avenue, Wahroonga.

The site is owned by the NSW Department of Education and is located within the Hornsby Council local government area.

Figure 1: Cadastre (Source: Sixmaps 2017).



The following aerial photograph illustrates existing development in the vicinity of the site that predominantly comprises of dwellings in a suburban setting.

Figure 2: Aerial Photograph (Source: Googlemaps 2017).



EXISTING APPROVALS

The school was established on the site in 1927 and has been progressively developed since then. Recent development applications submitted to Hornsby Council for the site include development applications for addition portable buildings.

PROPOSAL

The proposal is for the removal of 13 demountable spaces and 11 Modular Design Range buildings and construction of 37 permanent teaching spaces/ homebases. Core facilities including the hall, canteen and library are also to be provided to cater for future growth of the school up to 1000 students.

The school has an existing equivalent student population of 760 and after the 13 additional classrooms will have teaching equivalent space for 874 students. (An increase of 114)

Three new buildings comprising a four-storey building on the corner of Myra Street and Edgeworth David Avenue and two x three storeys buildings along the Edgeworth David Avenue are proposed to be constructed.

Concept plans for the school that have been prepared by GHD Woodhead, accompany this letter.

PROJECT JUSTIFICATION

Hornsby Council's 2010 Housing Strategy identified a target of 11,000 new dwellings for the council area. A portion of these have been delivered in the area around Waitara station in proximity to the school. The Plan for Growing Sydney also identifies Hornsby as a Strategic Centre. Finally, the Draft North District Plan prepared by the Sydney Commission indicates that the population of the Hornsby local government area will increase by 28,350 by 2036. These documents have resulted in the need in increased demand for pupil places and is anticipated that

The eleven existing primary schools in the Department of Education's cluster do not currently have capacity to meet the projected demand over the next 15 years. There is a need for additional teaching spaces and expansion of core facilities across the cluster to meet the projected demand.

STATUTORY CONTROLS

Hornsby LEP 2013

As shown on the zoning map extract at Figure 3, the site is zoned R2 Low Density Residential

Educational Establishments are permissible with consent and the proposal is consistent with the definition contained within this SEPP:

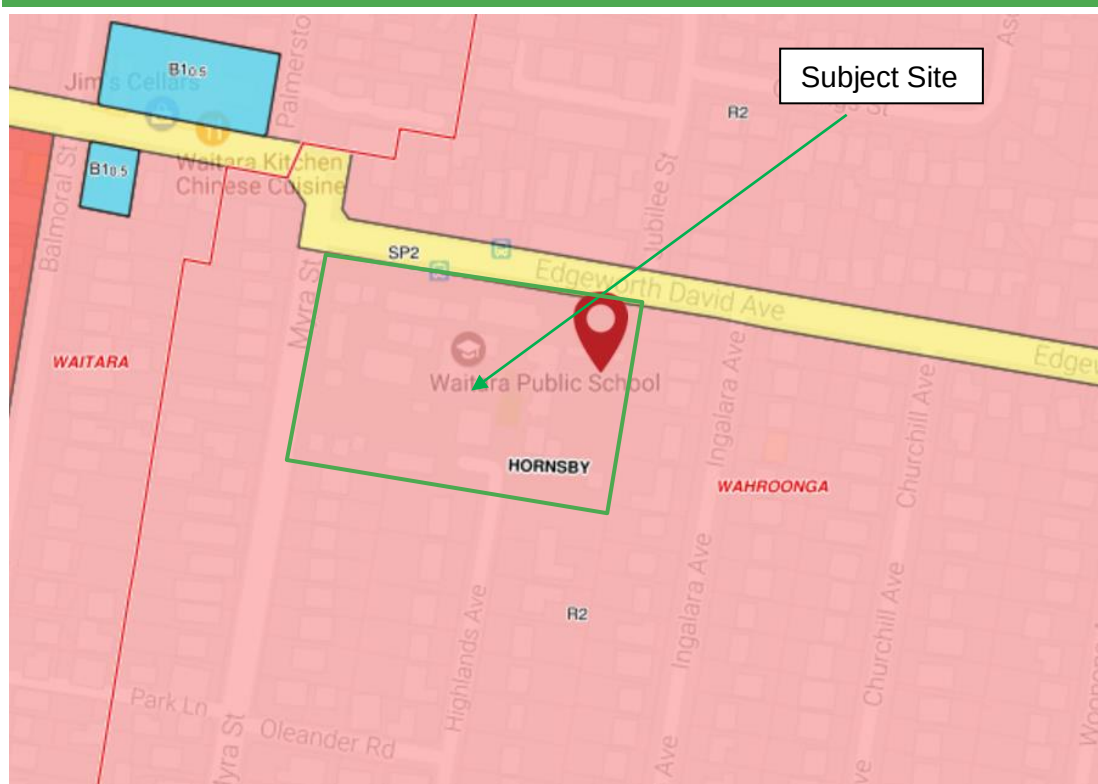
educational establishment means a building or place used for education (including teaching), being:

(a) a school, or

(b) a tertiary institution, including a university or a TAFE establishment, that provides formal education and is constituted by or under an Act

It is also noted that clause 28 of the Infrastructure SEPP also permits the construction of an educational facility on R2 zoned land.

Figure 3: Zoning Map Extract.



The following table outlines the primary planning controls within the Hornsby LEP 2013.

Hornsby Local Environmental Plan 2013			
Clause	Controls	Comment	Complies
Land Use	R2 Low Density Residential	An educational establishment is permissible with Council consent on the site	YES

**Table
(Zoning)**

Part 2 Permitted or Prohibited Development			
2.3	Zone Objectives and Land Use Table	The proposal is consistent with the zone objectives of the R2 Low Density Residential zone.	YES
Part 4 Principal Development Standards			
4.3	Height of Buildings: 8.5m	The 3 and 4 storey cluster will exceed this control and is proposed to have a height of approximately 17.4m. As the development will result in this control being varied a clause 4.6 departure will accompany the EIS to address this.	Variation
4.4	Floor Space Ratio:	The site is not subject to an FSR control.	N/A
4.6	Exceptions to development standards	As the development will result in the height control being varied a clause 4.6 departure will accompany the EIS to address this.	Variation
Part 5 Miscellaneous Provisions			
5.9	Preservation of Trees or Vegetation	The site contains some trees that will need to be removed to facilitate the development. An arborist report will accompany the EIS to address vegetation removal.	YES
5.10	Heritage Conservation	The school and some surrounding properties are heritage listed with adjoining properties to the south and east located in the Wahroonga North Conservation Area. The implication of	YES

this listing and the impact on the adjoining items will need to be carefully considered. A heritage impact statement will accompany the EIS.

State Environmental Planning Policy – (Infrastructure) 2007

Clause 32 of the ISEPP requires a consent authority to consider the following state government publications:

(a) *School Facilities Standards—Landscape Standard—Version 22 (March 2002)*,

(b) *Schools Facilities Standards—Design Standard (Version 1/09/2006)*,

(c) *Schools Facilities Standards—Specification Standard (Version 01/11/2008)*

It is important to note that clause 32(3) states: *If there is an inconsistency between a standard referred to in subclause (2) and a provision of a development control plan, the standard prevails to the extent of the inconsistency.*

Hornsby Development Control Plan 2013

The DCP contains specific controls for Education Facilities in section 7.1 and requires consideration to height, landscaping, setbacks, open space provision, privacy, bus servicing and acoustics.

Given that this proposal is for an expansion of rather than the construction of a new facility, some of these controls are of less relevance.

The following table predominantly outlines the DCP controls that are proposed to be varied.

Hornsby Development Control Plan 2013			
Clause	Controls	Comment	Complies
1C.2.1	Transport and parking 1 space per fulltime teacher and 1 space per 2 students of driving age	The development will result in this control being varied and a traffic and	Variation

	2-3% of total spaces to be accessible	parking report will accompany the EIS to address this.	
7.1.2	Scale		
	The maximum floor space ratio shall be in accordance with the HLEP Floor Space Ratio Map:	The site is not identified as having an FSR by HLEP 2013.	YES
	The maximum building height shall be in accordance with the HLEP Height of Buildings Map.	The maximum building height for the site is identified at 8.5m. The 3 and 4 storey clusters will exceed this control and is proposed to have a height of approximately 17.4m. As the development will result in this control being varied a clause 4.6 departure will accompany the EIS to address this.	Variation
	The scale of buildings should be in accordance with Table 7.1.2(a) that indicates: Apply height and site coverage controls for dwelling houses in Section 3.1 of the DCP		
	2 storeys plus attic height limit	The proposed buildings are up to 4 storeys in height. The development will result in this control being varied and the EIS will address this.	Variation
7.1.5	Open Space		
	Recreation space should be provided on-site at a minimum rate of 20m ² per student	The development provides approximately 15,934m ² of open space. The expanded school will have the capacity to cater for 874 students	Variation

which leads to a requirement for 17,480m² of open space.

The development will result in this control being varied and the EIS will address this.

7.1.7 Vehicle Access and parking

Driveways should incorporate a set down/ pick up area for students.

The driveways to the school do not incorporate a set down/pick up area. The development will result in this control being varied and a traffic and parking report will accompany the EIS to address this.

Variation

PRELIMINARY RISK ASSESSMENT

Traffic and Parking

As there will an increase in traffic volumes and parking demand in the locality. A traffic and parking study will accompany the EIS to address these matters

Contamination

Although the site has been used for educational purposes since 1927, there is some potential for the site to be contaminated. A contamination report will accompany the EIS.

Heritage

As the site contains European heritage including significant vegetation and adjoins sites containing European Heritage a Heritage Impact Statement and arborist report will accompany the EIS.

CONSULTATION

Formal consultation has not been undertaken with external agencies or organisations at present.



It is anticipated that the SEAR's process will outline agencies that consultation is to occur with.

CONCLUSION

The CIV of the project is over \$30 million and in excess of the SSD threshold of \$30 million for educational establishment projects. A Quantity Surveyors Statement prepared by Rider Levett Bucknall is attached that confirms this.

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*. The Department of Education and Communities 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.

Should you require any further information, I can be contacted on 02 9687 8899 or brad@thinkplanners.com.au.

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Enclosed:
QS CIV report
Preliminary architectural plans