ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
COMMENT	
DEPARTMENT OF PLANNING AND ENVIRONMENT	
GENERAL	
Specify the anticipated increase in student and staff numbers resulting from the proposed development.	The College is currently used as an educational establishment for boys with an overall population of **1244** students across the three (3) campus. Pursuant to the EIS, the student population and enrolment of **1244** students is currently broken down into the following: ▪ Junior Campus: **321 students**; and ▪ Senior and Main Campus: **923 students**. Student numbers can vary term to term, and year to year, ordinarily attributed to annual fluctuation for Educational Establishments given growing population. Fluctuations in enrolments can be due to changes in population and parental preference. Consequently, staff numbers may also fluctuate at schools depending on student numbers and specialist learning needs of the school. It is noted by the College that Junior Campus numbers have fluctuated between 330 and in 2011 and 328 in 2018, with a minimum of 320 in 2013 and 2017, and a maximum of 330 in 2011. The fluctuation arises from different rates to accommodate available positions from year to year. The fluctuation since 201 is less than 2% about the mean. In terms of the Main and Senior Campus, following completion of the Dalton Hall addition in 2010, and as a result of the additional class room space resulting from the work, senior school numbers increase over 2011 to 2013 from 878 to 924 students. The numbers have stabilised at this level, with very small year-to-year fluctuations since 2013. As aforementioned, the Senior School Numbers are currently at 926. Year-to-year fluctuation has been less than 0.5% about the mean. The College's brief requires a general learning "home room" for each of the six (6) streams, through years 7-12. Years 11 and 12 are accommodated in the Senior Campus, and years 7-10 are accommodated in the Main Campus, within the proposed courtyard infill works. The design for the Main Campus therefore provides for six (6) general

<table>
<tr><th>ISSUES RAISED BY AGENCIES AND ORGANISATIONS</th><th>PROPONENT'S RESPONSE</th></tr>
<tr><td></td><td>learning spaces which serve as home room for each of Years 7-10. As such the proposal provides the adequate learning and teaching facilities to accommodate the relevant student and staff population.

Notwithstanding the above, the SSDA currently under consideration by the Department of Planning and Environment, has no intention for a material increase in students. Therefore, it is considered the above information provides further certainty there will be no material increase in student number, only that attributed to annual minor fluctuation.

The design for the Main Campus therefore provides for six (6) general learning spaces which serve as home room for each of Years 7-10. These are indicated on drawings DAU125 and DAU126.

The six (6) stream structure matches the current enrolment and structure, and is not designed to accommodate additional student enrolments.

The spaces provided are appropriate for a typical number of students per class, and are in line with education facility norms. Specialist spaces, including science and art, are in addition to the general learning areas and are provided to meet the curriculum needs of the school in relation to NESA requirements and the academic focus of the College.

Therefore, the proposed design addresses the College's brief requirement for contemporary learning environments, and is not based on any future increase in enrolment numbers.</td></tr>
<tr><td>Detail the existing and proposed gross floor area at each campus, including a breakdown of the categories of use (i.e. administration, circulation and shared space, and dedicated teaching and learning areas).</td><td>The existing and proposed gross floor area of each campus has been prepared by PMDL and accompanies this application as Appendix C and Appendix D.

A breakdown of existing and proposed areas of the Main Campus (Upper Pitt Street) and Senior Campus (Wyalla) is provided below:

<table>
<tr><th>Campus</th><th colspan="2">Main (Upper Pitt Street)</th><th colspan="2">Senior (Wyalla)</th></tr>
<tr><th></th><th>Existing</th><th>Proposed</th><th>Existing</th><th>Proposed</th></tr>
<tr><td>Teaching/Learning Space</td><td>3,284m^2</td><td>3,520m^2</td><td>1,116m^2</td><td>1,163m^2</td></tr>
<tr><td>Circulation/Shared Space</td><td>5,019m^2</td><td>6,032m^2</td><td>709m^2</td><td>832m^2</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>ISSUES RAISED BY AGENCIES AND ORGANISATIONS</th><th>PROPONENT'S RESPONSE</th></tr>
<tr><td></td><td>
<table>
<tr><td>Staff/Admin Space</td><td>1,591m^2</td><td>1,718m^2</td><td>51m^2</td><td>75m^2</td></tr>
<tr><td>Support Space</td><td>652m^2</td><td>863m^2</td><td>80m^2</td><td>47m^2</td></tr>
</table>
</td></tr>
<tr><td>A detailed assessment of the proposal against Schedule 4 Design Principles of the State Environmental Planning Policy (Educational Establishment and Child Care Facilities) 2017 (SEPP Education) must be included. This is to consider the Design Guide for Schools prepared by the Office of the Government Architect NSW.</td><td>PMDL has provided an assessment against Schedule 4 of the State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP as part of their response at Appendix D.

The principles in 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. Refer to Appendix D and Section 2.2 of the RTS Report.</td></tr>
<tr><td>Provide details of how the redeveloped school facilities are proposed to be shared with the community, including how this might vary from the existing arrangements, and the likely impacts due to such sharing in accordance with Clause 35(6) of the SEPP Education.</td><td>In accordance with Clause 35(6)(b) of the Education SEPP, the following community uses, and activities take place across the school campuses:

▪ The basketball court in the Senior School and Junior School are used by North Sydney Basketball Association.
▪ The Australian Electoral Commission and the NSW Electoral Commission use both the Senior School and Junior School for election day activities including their use as polling stations.
▪ A community men's choir use the music facilities at the College for weekly rehearsals.
▪ Parishioners of the Anglican Parish of The Church by the Bridge in Kirribilli use the Junior School Campus each week.
▪ Students from Loreto Kirribilli utilise the College swimming pool for core educational purposes.
▪ Members of a local body corporate use facilities for meetings as required.

A Schedule of Uses for the proposed rooftop terrace accompanies this application as Appendix P. Primarily the rooftop terrace will accommodate school related activities. Similar to that of the current use of the quadrangle, a public address system will be used when required. The acoustic impact is considered to result in an improved outcome, compared to that at present, through the implementation of the 2.4m high acoustic barrier.</td></tr>
<tr><td>The EIS and supporting report must be updated to correct any inconsistent information.</td><td>The relevant documentation has been updated to rectify any inconsistencies with the proposed information and have been resubmitted as part of this Response to Submissions.</td></tr>
</table>

<table>
<tr><th>ISSUES RAISED BY AGENCIES AND ORGANISATIONS</th><th>PROPONENT'S RESPONSE</th></tr>
<tr><td colspan="2">TRAFFIC AND TRANSPORT</td></tr>
<tr><td>The Transport and Accessibility Impact Assessment (TAIA) must be updated to:
Consider the anticipated growth in student and staff numbers as a result of the proposal;</td><td>An update Transport and Accessibility Impact Assessment has been prepared by Positive Traffic and accompanies this application as Appendix F.</td></tr>
<tr><td>Include a detailed assessment of the proposal against the relevant parking requirements of the North Sydney Development Control Plan 2013 (NSDCP), including any floorspace-based requirement; and</td><td>The existing on-site parking provision for each Campus is clarified below:

<table><tr><th>Campus</th><th>Parking Provision</th></tr><tr><td>Main Campus</td><td>▪ The Main Campus does not contain any parking but does include a loading dock facility;</td></tr><tr><td>Senior Campus</td><td>▪ The Site contains:
Fourteen (14) car parking spaces;
Two (2) Motorbike Parking Spaces;
Ten (10) bicycle parking spaces.</td></tr><tr><td>Junior Campus</td><td>▪ Ten (10) car parking spaces are located on Site.</td></tr><tr><td>Star of the Sea Catholic Church</td><td>▪ In addition to the on-site parking, an existing arrangement allow the use by the College of the 17 car spaces within the Star of the Sea Catholic Church, on Willoughby Street, Kirribilli.</td></tr></table>
Applying the North Sydney Development Control Plan 2013 car parking rate of 1 parking space per 6 staff, the College as a whole would require 30 car parking spaces. As per the addendum Traffic Impact Assessment (Appendix F) this calculation is based on the following Equivalent Full Time (EFT) staff population by type, as provided by the College:
Senior School:
Teaching: 93.6 EFT;
Non-Teaching: 44.3 EFT
Junior School:
Teaching: 21.2 EFT;</td></tr>
</table>

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	▪ Non-Teaching: 16.1 EFT **TOTAL: 176 EFT Staff** In light of the above, the College currently has a combined total of 43 parking spaces across the three campuses; 41 general vehicle and 2 motorcycle. Therefore, it is considered the College as a whole has an excess of 13 parking spaces. In summary of the above, the proposal provides adequate on-site parking to accommodate the generated demand by the existing educational establishment.
▪ Include a draft Green Travel Plan (GTP) as specified in the Secretary's Environmental Assessment Requirements (SEARs).	A Green Travel Plan has been prepared by High Range Analytics and accompanies this application as an annexure to the Addendum Traffic Impact Assessment (**Appendix F**).
▪ Respond to Independent Traffic Assessment prepared by Bitzios Consulting	A formal response to the Independent Traffic Assessment prepared by Bitzios Consulting has been prepared by Positive Traffic and forms part of the accompanying addendum Traffic Impact Assessment (**Appendix F**).
AMENITY, VIEW LOSS, PRIVACY AND NOISE	
The Visual Impact Assessment (VIA) of the proposed development on the Main Campus must be updated to include: ▪ An overall map depicting the properties that may experience view loss as a result of the proposal; ▪ A detailed rationale justifying the selection of the detailed view analyses included in the assessment; and ▪ Additional view analyses from windows of habitable rooms in lower level apartments at No. 48 Upper Pitt Street and apartments at No. 49 Upper Pitt Street.	An overall map has been prepared illustrating the potential impacts on harbour view of adjacent residential apartments. A selection of vantage points has been justified in details and depicted in an aerial image (**Figure 1**). Roberts Day has carefully studied 19 views to identify any potential impact on existing iconic views to the Opera House and Harbour Bridge from both private and public points. **Figure 1** below, extracted from the VIA prepared by Roberts Day (**Appendix E**) identifies the properties where the VIA was taken. As depicted in the accompanying VIA, there is no detrimental view loss as a consequence of the proposed development.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	 **Figure 1 | Aerial of View Analysis Properties** Additional view analyses from windows of habitable rooms in lower level apartments at No. 48 and 49 Upper Pitt Street, 88 Kirribilli Avenue have been prepared (refer to **Appendix E**). The visual impact for the views are assessed as moderate which is the combination of high sensitivity and low magnitude.
Provide contextual sections running north-south through the development depicting the proposed development in context of the existing buildings on Upper Pitt Street.	PMDL have prepared contextual sections running north-south through the development depicting the proposed development in context of the existing buildings on Upper Pitt Street. These are depicted in **DAU302** and **DAU303**.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
Provide more detailed northern and eastern elevations of the proposed development on the Main Campus. These should be more clearly detailed: ▪ The height of the proposed building (and associated permanent structures such as plant enclosures) in the context of the height of the existing building; and ▪ The treatment of the building facades, including the various building elements, materials to be used, the level of opacity of proposed screens, and whether fixed or openable glazing/screens are to be used.	Detailed northern and eastern elevations have been prepared by PMDL (refer to drawings **DAU302** and **DAU303**). In addition, **DA202** (revision E) clearly indicates the existing building height, in comparison to the proposed built from fronting Upper Pitt Street.
Confirmation must be provided that the VIA and Solar Impact Analysis (SIA) have had regard to the proposed landscaping of the rooftop terrace (including tree heights at maturity) and any opaque structural elements required to support the 2.4 metre high acoustic barrier around, and the protruding glazed lift shaft protruding above, the proposed roof terrace.	The accompanying Visual Impact Assessment (**Appendix E**) and Solar Impact Analysis (**Appendix N**) have carefully studied the potential impacts of the proposed rooftop terrace landscaping and glazed barriers/ lift shaft. The landscaping proposed for the rooftop terrace (maximum 3.5m from the floor) and glazed barriers will not be visible from apartment units on the 2nd and 3rd floor of 48 Upper Pitt Street. The rooftop glazed barriers are frameless with low iron glass resulting in a minimal visual impact, and will serve as a mitigation measure to reduce noise impact.
Provide a lighting plan for the rooftop terrace which details the location and type of lighting proposed, along with details of the proposed operational hours and management arrangements.	A Lighting Concept has been prepared by Umow Lai and accompanies this application as **Appendix J**. Due to the context of the Site, the future lighting of the rooftop terrace would need to give consideration to light spill to neighbouring properties, light pollution (glow sky), discomfort glare, and the visibility of lighting from harbour view. A desktop review of the neighbouring properties in relation to the proposed development has been undertaken to identify potential light sensitivity receptors. Consideration has been taken to avoid unnecessary light spill and to serve main purpose of lighting design for Roof Terrace. A suitable condition of consent may be imposed to facilitate the implementation of the details and recommendations of the light spill assessment (**Appendix J**).

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
Provide justification for the location of the BBQ area, ping pong table and trees along the eastern edge of the proposed rooftop terrace, having regard to any potential impacts as a result of noise, overshadowing and view loss.	The location of the BBQ area, ping pong table and trees have been positioned to minimise undue impacts on the amenity of the neighbouring properties while providing a function and amenable recreational space. As stated in the Noise Impact Assessment prepared by SLR, the relocation of the recreational area from the ground floor courtyard to the rooftop terrace has in fact improved the overall noise impact on the surrounding developments. In addition, as indicated in the VIA, the proposed development will not result in undue impacts on view loss. The parapet height of the redeveloped north-east wing has been dropped by **270mm** to be in line with the existing parapet height. The rooftop terrace and proposed structures will sit below the parapet of the north-east wing, and will not be visible from properties to the north.
Provide further information in relation to: ▪ Any proposed public address system to be installed on the rooftop terrace; and ▪ Proposed uses of the roof terrace, including hours and frequency of school-related extracurricular activities and other activities (refer to Clause 35(6) of the SEPP Education).	Classes for students occur between 8.20am and 3.10pm each school day over the course of a calendar year. There are additional co-curricular activities available for students prior to school and following its conclusion each day. Most of the use of the proposed Roof Terrace will be consistent with the use of the current internal Quadrangle on the Upper Pitt Street Campus. Namely, it will be used as a recreation space for students during recess and lunch each school day. The Quadrangle is supervised from 7.30am each school day as students arrive at school and await the commencement of classes. • <u>Other School Activities</u> The proposed roof terrace will be used for the following activities, consistent with the College's current use of the Chapel Terrace and the Quadrangle within the Upper Pitt Street Campus: ▪ Class Reunions usually held on a Friday or Saturday night. ▪ A College event held on New Year's Eve. ▪ A number of College staff-based events – staff social events and a Christmas party - these are normally held during daylight hours. ▪ There are a number of current parent events that are currently held on the Chapel Terrace and Quadrangle that would be held on the proposed roof terrace.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	▪ Father and Son BBQ • <u>Non-School Activities</u> The proposed roof terrace will be used for the following activities, consistent with the College's current use of the Chapel Terrace within the Upper Pitt Street Campus: ▪ From time-to-time, the College has allowed its roof space to be used for filming of events or advertisements that are considered of national significance. These have included a commercial for the Australian Tourism Commission and the ABC TV annual coverage of the Sydney NYE Fireworks. We propose to continue support such events as requested by the Government and other associated entities. ▪ There are some events hosted by the Society of Jesuits – the proprietors of the College – that would continue to be offered on the proposed rood terrace. ▪ The College, from time-to-time, chooses to provide its facilities for external groups under a venue hire agreement. The College would propose to provide this opportunity on the proposed roof terrace. It is noted, when required a public address system will be utilised on the rooftop terrace, similar to the current operations in the quadrangle.
Provide information in relation to the nature and frequency of non-school related activities currently held within the quadrangle as referenced in the Noise Impact Assessment (NIA).	There are currently no non-school related activities that take place within the quadrangle. A comprehensive analysis of existing and proposed future uses, and the like, accompany this application as **Appendix P**.
The NIA must be updated to: ▪ Confirm that the assessment has considered the proposed hard surface materials on the rooftop terrace as set out in the Landscape Plan submitted with the EIS; ▪ Include conclusions in relation to mechanical plant emissions; and ▪ Address the updated Noise Policy for Industry 2017.	SLR have prepared an addendum Noise Impact Assessment which accompanies this application as **Appendix I**. Under **Section 5.1.1.2** of the Noise Impact Assessment submitted with the EIS, the noise model took into account hard surfaces and highly reflective materials on the rooftop terraces, as set out in the Landscape Plan submitted with the EIS. The complete surface of the rooftop terrace was modelled as hard ground, as a worst-case scenario. Any future proposed soft-landscaping will only have a positive impact by further lowering noise emissions, than those modelled. The original acoustic assessment predicted noise levels at the affected residential receivers for the existing operational scenario. It was concluded the relocation of quadrangle functional area, to the rooftop terrace would in

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	fact improve the noise impact on adjoining residents, as any noise produced would be elevated. The reduction in noise generated would also be assisted with the erection of a 2.4m acoustic barrier. With the implementation of an acoustic barrier of 2.4m (noise models taken from 2.1m), around the perimeter of the proposed rooftop terrace of the infill building on the main campus, the proposed changes will in fact reduce the current school noise impacts on the most highly sensitive receivers. In addition, SLR Consulting have completed an assessment against the updated Noise Policy for Industry 2017. The *Noise Policy Industry* (NPfI) (EPA, 2017) outlines the procedures for assessing noise emissions from industrial noise sources, such as mechanical plant and equipment. The process involves determining project noise trigger levels at existing noise-sensitive receivers surrounding a proposed development, predicting whether emissions from the development are likely to exceed the established levels and results in potential noise impact, and reducing the predicted levels through feasible and reasonable mitigation strategies. The assessment against NPfi is included in **Appendix I**.
TREE PROTECTION	
Work must be undertaken to confirm the extent of root spread of tree No. 60 in proximity to the Main Campus and the overall resultant impact of the proposal on the tree. Where required, changes to the design must be considered.	An Aboricultural Impact Assessment (AIA) was prepared by ArborSafe, dated 11 March 2018, and submitted with the original EIS. The assessment included five (5) trees located within or adjacent to the Main Campus, including the tree located on Craiglea House, being *Liquidambar styraciflua* (Liquidambar). The identified tree, Tree 60, has good to fair health and good to fair structure, and a Useful Life Expectancy (ULE) of more than 15 years. Although the tree is located on the adjacent property, it is close enough to the boundary that the proposed development would be within its estimated TPZ. The adjoining tree would be retained with the implementation of specific protection measures during the development. The TPZ for the identified Tree is 7.8m measured at a radial distance from the centre trunk taken from the estimated DBH. Notwithstanding, the AIA considered that the TPZ criteria should be considered void as the solid bedrock and the rock boundary wall appears to have formed an effective barrier for any significant structural roots. This assumption was based on the size, weight, components, age, construction and general appearance of excellent stability of the stone boundary wall. The full encroachment will be determined when verification of roots within the Main Campus has occurred.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	Further, the identified tree was identified to require some targeted reduction pruning of several lower lateral branches during the installation of the vertical garden and/or the new landscape plantings. It is anticipated that minor pruning only will be required of less than 10% of the trees total canopy cover. It is considered excavation adjacent to the identified tree will be carried out only under Arborist supervision. Any roots discovered will be treated with care. In order to provide certainty, root investigations have been completed by ArborSafe and an addendum report was prepared and accompanies this application as **Appendix R**. Exploratory trench work was undertaken on 9 October 2018 by means of a third party contractor utilising a Hydro-Vac truck to limit any potential root impact. Three (3) roots were identified within the trench as being large enough, generally over 40mm in diameter to warrant further consideration. Two of the roots were identified as originating from the stump of a previously removed tree, so has no bearing on the assessment, while the remaining root was identified as originating from the subject tree. The root penetrated through a weep hole within the base of the wall, 3.2m to the northwest of the subject tree's trunk alignment. The root was 60mm in diameter, measured 150mm out from the wall, with the diameter being smaller where it penetrated the weep hole. No displacement of any kind was observed within the stones of the wall. AborSafe has concluded at a distance of 3.2m from the truck alignment the root would likely be outside the theoretical Structural Root Zone (SRZ) of the subject tree. Combined with the roots relatively small size and the stability of the wall itself against the remaining root system and associated soil volume, it is considered that serving the root would have minimal to no structural bearing on Tree 60. Overall, it is considered the removal of the garden bed within the courtyard of the St Aloysius College Main Campus, as part of the proposed development, would have minimal effect on the health and structure of the subject tree, Tree 60.
BIODIVERSITY	
In accordance with the Biodiversity Conservation Act 2016, State Significant Development must be accompanied by a Biodiversity Assessment Report (BDAR). This report must form part of the application and should be provided as part of the EIS.	An assessment has been carried out by Cumberland Ecology, and accompanies this application as **Appendix M**, to consider the need for formal biodiversity assessments to support future development applications for the re-development of St Aloysius' College. The assessment considered the entire land area covered by College, including the Main Campus. Senior Campus and Junior Campus. Based on the assessment of the biodiversity of St Aloysius' College, it is considered the requirement for a Biodiversity Development Assessment Report would be waived.

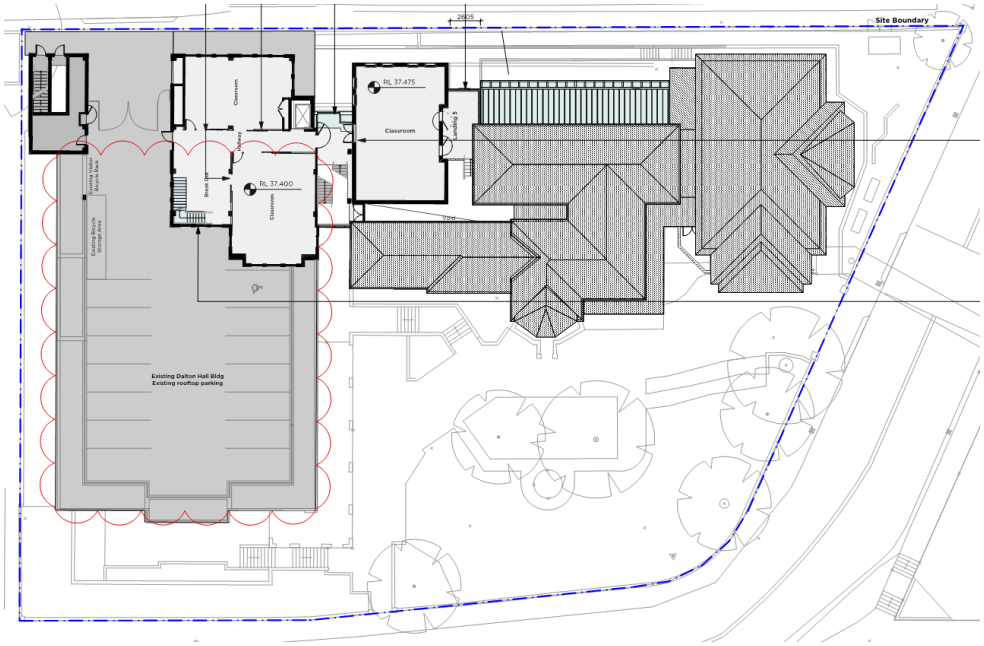
ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	A request for a waiver for the requirement for the preparation of a Biodiversity Development Assessment Report (BDAR) was issued to DoPE and Office of Environment & Heritage on 4 September 2018. Accordingly, the Department reviewed the application of the test of significance under Section 1.5 and 7.3 of the BC Act and Clause 1.4 of the *Biodiversity Conservation Regulation 2017* and considered the information provided in the letter prepared by Cumberland Ecology dated 24 August 2018. The Department have determined that the development is not likely to have any significant impacts on biodiversity values and that SSDA 8669 does not need to be accompanied by a BDAR. A waiver under Section 7.9 was therefore granted for the proposed development. The delegated *Environment Agency Head* in the Office of Environment & Heritage have also granted a waiver. Refer to **Appendix M** and **Appendix Q**.
GOVERNMENT ARCHITECT NSW	
In general, we support the Stage 1 proposals for the Junior, Senior and Main Campus, We recommend the adoption of strategies across the three campuses to maximise amenity for school users while mitigating the impact of the development on neighbours.	Noted. The school is going to ensure the future development of the campuses, both during and following construction, will continue to maximise the amenity of the students and staff while continuing to monitor and mitigate any impact of the development on the neighbouring properties. It is the intention of the College to provide regular updates on the status of timeline of the construction to the local community. Further regular meetings will be held with representatives of the community to provide a forum of open discussion.
We recommend prior to approval; the proponent is asked to provide the following additional information and consider the changes noted below:	The comments raised by Government Architect NSW have been addressed in further detail below.
MAIN CAMPUS	
Indicate whether the north-eastern roof (shown with landscaping pp. 8, Visual Impact Assessment Report Part 1) is to be accessible for use by the school	The north-eastern roof will <u>not</u> be accessible to staff and students. The roof space will only be trafficable for maintenance purposes.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
community. If the roof is accessible, describe the impact of this access on neighbouring dwellings.	
Describe the acoustic impact on neighbouring dwellings of proposed mechanical plant and describe the proposed measures to mitigate it. Described the likely loss of privacy as a result of the proposed elevated roof terrace.	The location of the proposed mechanical plant as well as the specifications and sound power data of the equipment were provided to SLR by the project Mechanical Engineers (Umow Lai). Unow Lai have also outlined that the mechanical plant will only be operational during school hours with the exception of mechanical ventilation fans operating during the night-time period in Summer for night purge. These inputs where used in the operational noise model to predict potential industrial noise impacts at the surrounding residential receivers in accordance with the project noise trigger levels.
Clarify whether the glazed acoustic barrier and rooftop trees contribute to overshadowing of eastern neighbours.	Roberts Day has carefully studied the potential impacts of proposed rooftop terrace landscaping and glazed barriers, including the acoustic fence and lift shaft. The trees on the rooftop terrace (maximum 3.5m high from the floor, and glazed barriers will not be visible from apartment units on the 2nd and 3rd floor of 48 Upper Pitt Street, which is considered to be the most impacted. It is demonstrated the proposed development will not result in detrimental overshadowing on adjoining properties. It is noted, the acoustic barrier has been design engineered to be frameless, above the parapet, with low iron glass resulting in a minimal visual impact. Refer to the accompanying Solar Analysis Report (**Appendix N**).
Provide a physical finishes board for the proposed building façade as well as detailed façade drawings which solar gain mitigation measures.	A finishes board has been prepared by PMDL and accompanies this application.
SENIOR CAMPUS	
Indicate metal roof system type and finish.	PMDL have indicated the proposed metal roof and finish will be wide ribbed metal roof and glazed skylight for the proposed extension. The proposed colouring is colourbond surfmist to match the existing, as noted on drawing **DAW122**.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
JUNIOR CAMPUS	
Daylighting and natural-ventilation should be provided to the multi-purpose hall and associated rooms.	The quality and amenity of the teaching and learning spaces have been a key consideration throughout the design process. Detailed Design of the Multi-purpose hall and associated rooms will be designed to ensure natural daylight and ventilation are achieved.
Equitable access should be provided between the mutli-purpose hall and roof top play area.	The comment provided by GANSW is noted, and will be considered in the built form approval of the Junior Campus.
GENERAL	
Demonstrate the response to the Education SEPP Design Quality Principles with reference to the GANSW Design Guide for Schools document.	Refer to the Discussion above and **Section 2.2.2** of the accompanying Response to Submissions Report.
Provide information on the strategy for sharing of facilities with the community (Design Quality Principle 3).	Refer to the Discussion above and **Section 2.2.2** of the accompanying Response to Submissions Report.
Satisfactorily provide natural light and air to all learning spaces.	The quality and amenity of the teaching and learning spaces has been a key consideration throughout the design process. With respect to air, the built form will be serviced by a mix mode ventilation and air conditioning system. Further, **DA202** (revision E) illustrates the location of operable sashes to windows and the transparency of the screens to ensure natural light and ventilation is provided.
Provide end of trip facilities and bicycle storage facilities to encourage cycling.	Bicycle lockers are provided at Dalton Hall in accordance with the provisions of **DA-469/07** issued by North Sydney Council in relation to Dalton Hall development. In addition to the 10 lockers, there are two (2) additional rack point for securing bicycles. These provisions are indicated on the revisions to the Level 3 Senior Campus Architectural Drawings, Drawing No. **DAW123** (**Appendix C**).

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
HERITAGE COUNCIL OF NEW SOUTH WALES	
The EIS has not identified any buildings within the campuses that are of State Heritage Significance and finds that the proposed Concept Master Plan to be generally acceptable.	Noted.
The Archaeological Impact Assessment (AIA), prepared by Casey and Lowe, finds that all three campuses are unlikely to result in any impacts to significant archaeological remains or relics and recommends an Unexpected Finds Procedure should be developed and implemented prior to the commencement of works.	Noted.
The unexpected finds condition is considered appropriate and should be implemented as a condition of any approval issued by the Department of Planning & Environment.	St Aloysius' College would be willing to accept a condition of consent requiring an 'unexpected finds condition'.
NSW ENVIRONMENTAL PROTECTION AUTHORITY (EPA)	
EPA has previously provided advice in a letter dated 17 August 2017 (EPA reference DOC17/405332) which stated that the proposal does not constitute a Schedule Activity under Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act). The EPA does not consider that the proposal will require an Environment Protection Licence (EPL) under the POEO Act. The EPA does not consider that the proposal will require an Environment Protection Licence (EPL) under the POEO Act. The EPA understands that the proposal is not being undertaken by or on behalf of a public	No further comment required.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
authority for the proposal and has no further interest in the proposal.	
TRANSPORT FOR NSW	
TfNSW has reviewed the exhibited Environmental Impact Statement (EIS) supporting the proposed development and detailed comments provided as follows:	Noted.
ACTIVE TRANSPORT	
Advise to develop construction management plans which also specify how pedestrian and bicycle rider movements along footways and cycle ways will be managed at all times during construction activities. Should the development require the closure to either type of facility, the construction management plans should also include adequate safety and diversion measures to put into place to limit time delay and detour distances.	The comment provided by Transport for NSW is noted and will be incorporated into the final Construction Management Plan.
BICYCLE PARKING	
The architectural plans should be revised to include increased provision of bicycle storage facilities to address the outcomes sought by *Sydney's Cycling Future 2013*, the *Future Transport 2056 Strategy* and to support students and staff using sustainable forms of transport including cycling. Bicycle storage facilities should be designed in accordance with AS 2890.3: Parking Facilities For Bicycle Parking (2015) and Austroads Guidelines. The can be	Bicycle lockers are provided at Dalton Hall in accordance with the provisions of **DA-469/07** issued to North Sydney Council in relation to Dalton Hall development. In addition to the ten (10) lockers, there are two (2) additional rack points for securing bicycles. These are indicated on the revisions to the Level 3 Senior Campus Architectural Drawings, **DAW123** (**Appendix C**).

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
achieved by locating bicycle parking and end of trip facilities in secure, convenient, accessible areas which are close to main entrances and away from vehicle access, incorporating adequate lighting and passive surveillance.	 **Figure 2 | Proposed End of Trip Facilities**
BUS OPERATION	
Construction traffic must not impede bus operations. It is advised that Carabella St and Kirribilli Avenue must continue to remain open with adequate width to enable the 'normal' operation of buses between approximately 8:30m and 5:30pm, Monday to Friday.	A draft Construction Management Plan and Traffic Impact Assessment accompanied the original EIS submission. An addendum Preliminary Construction Traffic & Pedestrian Traffic Management Plan has been prepared by TBH and accompanies this application as **Appendix G**. A detailed Construction Management Plan will be issued prior to CC, which will address the continued operations of the local bus network.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
RECOMMENDED CONDITIONS	
ROAD SAFETY EVALUATION	
A Road Safety Evaluation (RSE, refer to NSW Centre for Road Safety Guidelines for Road Safety Audit Practices and Austroads Guide to Road Safety Part 6: Road Safety Audit) shall be conducted on all relevant sections of road utilised for bus and private vehicle pick-up and drop-off. Appropriate road safety measures and/or traffic management measures shall be implemented based on the outcomes of the RSE.	Noted. No further comments are required.
GREEN TRAVEL PLAN	
As part of the ongoing operation of the school, a detailed Green Travel Plan (GTP), which includes target mode shares for both staff and student to reduce the reliance on private vehicles, shall be prepared. The GTP must be implemented accordingly and updated annually.	A Green Travel Plan has been prepared by High Range Analytics and accompanies this application as an attachment to the revised Traffic Impact Assessment (**Appendix F**).
TRAFFIC AND PARKING MANAGEMENT PLAN	
The Applicant shall prepare a Traffic and Parking Management Plan, which details the measures to safely manage the daily transport to/from the school. Traffic management measures that need to be addressed include: ▪ Kerbside vehicle pick-up/drop-off management and orderly vehicle queuing; ▪ Maintaining bus accessibility and student waiting areas;	Noted. No further comments are required. St Aloysius' College would be willing to accept a condition of consent requiring the preparation of a Traffic and Parking Management Plan.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
▪ Safe parent and student behaviour during pick-up/drop-off; and ▪ Safe pedestrian movements to the school entrances, minimising vehicle-pedestrian conflicts. The plan shall also detail the responsibilities of various personnel executing the plan and include measures to monitor, review the performance and make improvements to the plan. This plan should be implemented as part of the ongoing operation of the redeveloped school.	
CONSTRUCTION PEDESTRIAN TRAFFIC MANAGEMENT	
The Applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with North Sydney Council. The CPTMP needs to specify, but not to be limited to, the following: ▪ Location of the proposed works; ▪ Haulage routes; ▪ Construction vehicle access arrangements; ▪ Proposed construction hours; ▪ Estimated number of construction vehicle movements; ▪ Construction program; ▪ Consultation strategy for liaison with surrounding stakeholders; ▪ Any potential impacts to general traffic, cyclists, pedestrians and bus services within	Noted. No further comments are required. St Aloysius' College would be willing to accept a condition of consent requiring the preparation of a Final Construction Pedestrian and Traffic Management Plan (CPTMP).

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
the vicinity of the site from construction vehicles during the construction of the proposed works; ▪ Cumulative construction impacts of other developments. Existing CPTMPs for developments within or around the development site should be referenced in the CPTMP to ensure that coordination of work activities are managed to minimise impacts on the road network; ▪ Proposed mitigation measures. Should any impacts be identified, the duration of the impacts and measures proposed to mitigate any associated general traffic, public transport, pedestrian and cyclist impacts should be clearly identified and included in the CPTMP.	
ROADS & MARITIME SERVICES	
Roads and Maritime has reviewed the submitted application and notes that the proposed redevelopment of the St Aloysius College will not include any increase in either staff or student population servicing any of the three (3) campuses. As such, the traffic generation will not change. Furthermore, the proposal is unlikely to have significant traffic impact on the classified road network. Therefore, Roads and Maritime raises no objections to the proposal subject to the following conditions being included in any determination issued by the department:	Noted. No further comment is required.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
1. The subject property is within a broad area currently under investigation for the proposed Western Harbour Tunnel and Beaches Link motorway. The actual alignment for the proposal has not yet been determined and at present Roads and Maritime advises that the subject property remains within an area of investigation. The design will be finalised following feedback and development of an environmental impact statement. Once Roads and Maritime has more certainty on the properties impacted by the final road design, it will directly advise the owners of those properties. Further information about this project is available by contacting 1800 789 297 or motorwaydevelopment@rms.nsw.gov.au or by visiting the project website at http://www.rms.nsw.gov.au/projects/sydney-north/western-harbour-tunnel-beacheslink/index.html However, Roads and Maritime has no approved proposal that requires any part of the subject property for road purposes.	Noted. No further comments are required.
2. A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be	Noted. No further comments are required.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
submitted to Council for approval prior to the issue of a Construction Certificate.	
3. A Road Occupancy Licence should be obtained from Transport Management Centre for any works that may impact on traffic flows at nearby traffic signal sites during construction activities.	Noted. No further comments are required.
4. All works / regulatory signage associated with the proposed development are to be at no cost to Roads and Maritime.	Noted. No further comments are required.
AUSGRID	
Ausgrid notes the correspondence the proponent has had with Ausgrid to date and has no further submission to make.	No further comment required.
OFFICE OF ENVIRONMENT & HERITAGE	
BIODIVERSITY	
Key Issue (17) of the Reissued SEARs requires the biodiversity impacts related to the proposal to be addressed in accordance with the requirements of the Biodiversity Conservation Act 2018 (BC Act). Section 7.9(2) of the BC Act requires SSD applications to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values. The EIS does not include a BDAR	An assessment has been carried out by Cumberland Ecology, and accompanies this application as **Appendix M**, to consider the need for formal biodiversity assessments to support future development applications for the re-development of St Aloysius' College. The assessment considered the entire land area covered by the Main Campus. Senior Campus and Junior Campus. Based on the assessment of the biodiversity of St Aloysius' College, it is considered the requirement for a Biodiversity Development Assessment Report would be waived. A request for a waiver for the requirement for the preparation of a Biodiversity Development Assessment Report (BDAR) was issued to Department of Planning & Environment and Office of Environment & Heritage on 4 September 2018 (**Appendix Q**).

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
and OEH records indicate that a BDAR waiver request has not been received for this project. In the absence of a BDAR or waiver request OEH is unable to comment on biodiversity related issues for this proposal and recommends Key Issue (17) of the Reissued SEARs is addressed.	Accordingly, the Department reviewed the application of the test of significance under Section 1.5 and 7.3 of the BC Act and Clause 1.4 of the *Biodiversity Conservation Regulation 2017* and considered the information provided in the letter prepared by Cumberland Ecology dated 24 August 2018. The Department have determined that the development is not likely to have any significant impacts on biodiversity values and that SSDA 8669 does not need to be accompanied by a BDAR. A waiver under Section 7.9 was therefore granted for the proposed development. The delegated *Environment Agency Head* in the Office of Environment & Heritage have also granted a waiver. It was noted in OEH response, the Biodiversity Assessment noted two (2) trees, located on the Junior Campus that have a risk of being impacted as a result of the proposed development. The intention is retain all trees where possible and appropriate mitigation measures will be in place during the detailed design of the Junior Campus to ensure all trees can be retained where possible. It is noted the two trees identified are native to NSW, not locally endemic. Refer to **Appendix M** and **Appendix Q**.
The EIS indicates the Concept Plan for the Main Campus includes a rooftop terrace (page 39) which includes a mixture of green roof and hard paved surfaces (page 56). OEH supports the development incorporating a Green Roof and/or a Cool Roof into the design. The benefits of Green Roofs and Cool Roofs are outlined in the OEH (2015) Urban Green Cover in NSW Technical Guidelines. Green roofs are roof surfaces that are partially or fully vegetated. Cool roofs use reflective material to reflect and emit more solar energy than dark coloured roofs. Green roofs and cool roofs can have a strong regulating effect on the temperature of roofs and building interiors, reducing the energy needed for cooling and the impact	The Office of Environment & Heritage are in support of the proposed Rooftop Terrace, as it would increase habitat and biodiversity across the Site. No further comment is required.

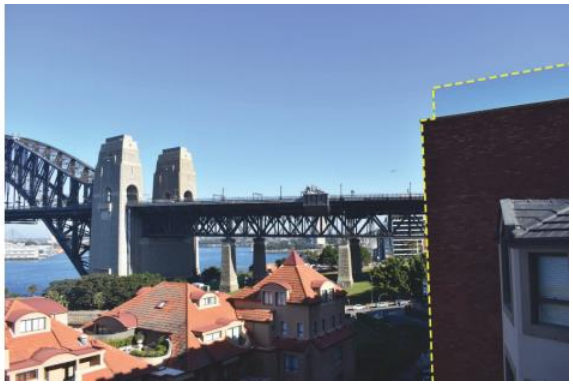
ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
of the Urban Heat Island effect. The provision of an Intensive Green roof would increase habitat and biodiversity at the site, particularly if local native plant species are used from the relevant native vegetation community.	
FLOOD	
The flood information for the site in the Stormwater Management Plans is acceptable for the three sites. Council does not have a Flood Planning Area for the area but the sites are subjected to minimal depths (0-0.15m) in the 1% AEP and in the PMF% on the street and no flooding within the lots. Therefore, the presented information and consideration to the flood risks are acceptable.	Noted.
OBEJCTION	
NORTH SYDNEY COUNCIL	
TRAFFIC/ PICK-UP AND DROP-OFF	
Traffic associated with the existing school and morning drop off and evening collection of students	The College, as a whole, has been provided by Council two (2) areas of pick-up/drop-off. 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 accommodate additional pick-up and drop-off locations across the three (3) campuses. However, the College is committed to ensuring that student drop-off and pick-up continues to be well managed.
Potential impacts to local traffic and no additional parking spaces and functional a pickup/drop off zone	As previously re-iterated, the College, as a whole, has been provided by Council two (2) areas of pick-up/drop-off. There is no increase in student numbers and therefore the proposal does not seek to change the current drop off system that currently applies to the Site.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
Proposal will increase the potential for the school to take on more enrolments and increase the school's student and staff population	The proposal does not include additional student and staff numbers, nor is its intention to increase student numbers as part of this application. Refer to discussions above.
Consideration of concurrent State Significant application for the nearby Loreto School	The College has met with Loreto Kirribilli on a number of occasions over the course of the last two (2) years and have held fruitful conversations regarding the State Significant Developments being submitted by both schools. Discussions to date have been centred on how the two schools are able to work together to ensure that any approved works are conducted in a manner that is least disruptive to the local community. Both schools are very conscious of the need to ensure close co-ordination of construction schedules and planning in partnership with local groups and authorities. In addition to multiple discussions about the projects, Loreto and the College have met to specifically discuss the coordination of high level programming and construction traffic across both projects. The combined project programme review noted the most intensive times of construction across both projects **would not overlap**. The major construction phase for the College (Phase 2) would occur after Loreto's planned demolition and bulk excavation. In terms of traffic management for construction, vehicles for each school would enter Kirribilli from different points. The only area of concurrent activity would occur at Carabella Street, which would be effectively managed through localised CTMP's for each project.
USE OF PUBLIC OPEN SPACE	
Consolidates development on school sites by building over the already limited existing private open space. New rooftop does not alleviate the existing impact the school has on the public open space in the locality	The College is located in an urban, medium to high density community. The subject SSDA 8669 is contained within the existing boundaries of the college campuses. The use of Bradfield Park has no association with the subject application and no further comment is provided.
Additional students would exacerbate the current school practice of using Bradfield Park south as defacto school grounds. "Wear and tear" on the grass coverage - the school contributes nothing to that upkeep	As outlined above and in the submitted EIS, the focus of the College's Masterplan is to not increase student and staff number. The use of Bradfield Park has no association with the subject application and no further comment will be provided.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
The sheer number of private school students using that space alienates any other active or passive usage by the general public during those times of use	As stated above, the use of Bradfield Park has no association to the subject application and no further comment will be provided.
Current and likely increased usage amounts to the local rate paying residents subsidizing a private school usage of a community open space.	As stated above, the use of Bradfield Park has no association with the subject application and no further comment will be provided.
Inappropriate Building Character and Context to the Kirribilli Locality	The Character Assessment (**Appendix J**), as prepared by Roberts Day, concludes the proposal *genuinely respects and responds to the Kirribilli local character and community values, the 4 sub character interfaces and that the interface between the proposed built form and adjoining character is considered appropriate.* The proposals appropriate response to the surrounding character is further reinforced in that the proposal will not change the existing streetscapes and setbacks which are compatible with the Kirribilli Neighbourhood Local Character. Overall, it is considered, the College remains as an iconic institute of learning in the Kirribilli Neighbourhood local area and does not compromise the scenic values of Kirribilli.
Middle Campus is an incongruous built form within the Kirribilli locality with nil street setbacks and no tangible landscaped area	
Middle Campus - Proposed infilled section is inconsistent with the desired built form for educational establishments prescribed under the Part C Section 8.2.3 Desired Built Form of the character statement for Kirribilli Neighbourhood of NSDCP 2013 which states: P2 Educational establishments are to reflect the scale and massing of development on adjoining properties at its interface with the adjoining property.	
State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 – What about Schedule 4 Design Quality Principles for Schools.	Refer to discussions above.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
NORTH SYDNEY LOCAL ENVIRONMENTAL PLAN 2013	
BUILDING HEIGHT	
▪ Difficult to gauge the full extent of existing breaches to the Building Height control and impacts associated with new elements in breach of the control ▪ New infill building located close to the eastern boundary site are incompatible with density of the locality ▪ The building as existing already displays densities far above that typical of the immediate locality	Refer to discussions above.
EXCAVATION	
▪ A significant amount of demolition and excavation is proposed. ▪ The applicant is to ensure structure stability of the ground against bulk movements during excavation and construction and ensure adequate measures are incorporated into the proposal to ensure ground water flows and surface drainage are not directed towards adjoining properties	There is no bulk excavation planned for Phase 1 and 2. Only detailed excavation is required for Phase 1 (Senior School) and Phase 2 (Middle school) including service/infrastructure works. The Junior Campus design will include bulk excavation and would be subject to a future development application. Any future detailed submission would include full design detail, covering all aspects around ground water management, geotechnical stability and civil and structural obligations.
NORTH SYDNEY DEVELOPMENT CONTROL PLAN 2013	
SOLAR ACCESS	
▪ Solar amenity to the occupants of 88 Kirribilli Avenue, Kirribilli (also known as "Craiglea").	An hour by hour breakdown between 9.00am to 3.00pm on June 21 was prepared by Roberts Day and submitted with the original EIS as **Appendix 11**. The Solar Analysis has been resubmitted with this RTS as **Appendix M**. The Solar Analysis also provided 3D sun eye view shadow diagrams.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
▪ An hour by hour breakdown (from between 9.00am to 3.00pm June 21) ▪ Three dimensional sun eye view shadow diagrams should also be provided on an hour by hour basis ▪ Shading devices on the rooftop area	Overall, the solar analysis of the proposal revealed that shadows are predominately existing in the morning. The afternoon overshadowing caused by the proposed additional elements is minimal, and the affected windows in the residential building on 88 Kirribilli Avenue remain compliant with the Apartment Design Guide (ADG) direct sunlight requirement. Glazed Canopies are located on the north-western corner of the rooftop terrace. They will sit below the existing parapet and will not have undue impacts on the solar access to adjoining properties.
PRIVACY (VISUAL AND ACOUSTIC)	
▪ Rooftop outdoor area at the eastern end of the site with the view and noise corridor created at 88 Kirribilli Avenue ▪ Any use of this area should be restricted (preferably in the form of a separate management plan).	The operation of the Rooftop Terrace and its subsequent use will be influenced through the preparation of a Plan of Management, prepared by St Aloysius' College. Notwithstanding, a preliminary Schedule of Uses, and the like has been prepared and accompanies this application as **Appendix P**, to give an indication of the proposed use and frequency of the rooftop terrace.
VIEWS	
▪ Loss of outlook and views to high amenity bridge and water views currently afforded from lower levels of 88 Kirribilli Avenue, Kirribilli. ▪ Expand upon the view analysis to detail impact to these areas. ▪ Glazed barrier - specify whether there are to be frameless panels or whether they require structural support i.e. metal brackets ▪ Confirm if Shading devices are to be employed to the rooftop area which may impact upon the view analysis.	The proposal would see no change to the current views afforded to lower levels of Kirribilli Avenue (refer to **Appendix E** and **Figure 3** below) .

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	  **Figure 3 | Existing and Proposed View, Unit 501, 88 Kirribilli Avenue** The VIA prepared by Roberts Day concluded that high sensitivity, combined within a negligible magnitude will result in a NEGLIGIBLE visual impact. There are no shade devices proposed for the rooftop terrace other than the structures and vegetation indicated on the accompanying Architectural Drawings, and they sit within the building envelope of the existing building so as not to create additional impacts on views. The glass elevator shaft extending to the Chapel Roof Terrace, to improve accessibility, has minor impacts on select views, but this is lesser impact than the improvement offered by the removal of the existing fire stair and lift.
ARTIFICIAL ILLUMINATION	
▪ A detailed external lighting plan should be submitted (if proposed for newly created outdoor areas which details the proposals compliance with AS4282 Control the Obtrusive Effects of Outdoor Lighting.	A detailed lighting plan has been prepared by Umow Lai as accompanies this application as **Appendix L**.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
REFLECTIVITY	
▪ The types of glazing and their reflectivity levels should be specified to ensure the extensive rooftop barrier screening and new or refurbished windows will not result in excessive glare to surrounding properties.	The proposed glazing to the acoustic barrier of the roof terrace will have characteristics similar to the following: ▪ Laminated safety glazing system using low iron, high clarity glass. The proposed re-glazing of the Main Campus windows, and new glazed openings, will have characteristics similar to the following: ▪ Viridian Comfort Plus – Neutral.
SITE COVERAGE AND LANDSCAPED AREAS	
▪ North Sydney Council's Development Control Plan 2013 (NSDCP 2013) specifies maximum site coverage (45%) and minimum landscaped area (40%) controls. ▪ The proposal (particularly the Middle Campus) is significantly non-compliant with the maximum site coverage control in NSDCP 2013. ▪ The amended proposal should incorporate greater deep soil landscaping across the site or in site where landscaping cannot be provided, management strategies put in place to enable student access to bona fide landscape area across the range of St Aloysius campuses in Sydney.	The College is located within the dense peninsula suburb of Kirribilli. As a long established part of the local community, the College aims for its facilities to be integrated within the local context, whilst providing first class educational establishments for its students. The Main Campus has an existing non-compliance with North Sydney's Development Control Plan 2013, in relation to site coverage and minimum landscaped area controls. The existing main campus features minimal landscaped elements whereas, the proposal includes significant and carefully considered landscaped space at the roof terrace level, improving amenity for both the students and staff, as well as the neighbouring residents. Overall, the proposed outcome is considered an improved design outcome for the existing landscape design.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
INTERNAL REFERRAL COMMENTS	
TRAFFIC, PARKING AND TRANSPORT	
▪ As the school does not have any off-street pick-up/drop off facilities and rely on on-street pick-up/ drop off zones, any increase of the school population will have significant impact on the traffic flow and on-street packing supply in the surrounding road network and may have implications on road safety.	Based on the information provided to date and within the accompanying documentation, combined with the on-going assurance that no increase in student/ staff population would occur, it is noted that there would be no foreseeable unacceptable traffic implications in terms of road network capacity.
▪ The proposed development will not have unacceptable traffic implications in terms of road network capacity provided that there is no increase of school populations and a Green Travel Plan be submitted as part of this application or a condition of consent prior to the issue of Construction Certificate/Occupation Certificate.	The need for a Green Travel Plan is contrary to the statement provided by the independent reviewer for the Department of Planning & Environment. Notwithstanding, a Green Travel Plan has been prepared and accompanies that application as an annexure to **Appendix F**.
CAR PARKING – SUPPLY	
▪ The traffic report - unclear how some results were derived. ▪ The traffic report - It is questionable how numbers were calculated and over what time period these parking opportunities are expected to be available. ▪ Any increase of parking demand by the school will have significant impact on the surrounding road network.	As noted in the original traffic report, the College as a whole has been provided by Council, two (2) areas of parallel parking 'No Parking' zones which operate during the morning and afternoon, during school peak period drop-offs. Each zone provides for five (5) parking spaces and are located in Upper Pitt Street for the Main Campus, and Burton Street for the Junior Campus. The Traffic Impact Assessment (dated March 2018), assumed a maximum of two (2) minute stay for each of the five (5) parking spaces, located adjacent to each campus. This length of stay is in accordance with the Australian Road Rules 2009 which states a maximum 2-minute length of stay where the time limit with a 'No Parking' zone is not specified.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	This provides for a potential 150 vehicles to turn over within each section of five (5) parking spaces. Having regard to the estimate parking demands generated by the College as a whole through parking surveys evidence provided in the original traffic report, the existing provision is sufficient to cater for the drop off/pick up demands. Applying the *North Sydney Development Control Plan 2013* car parking rate of 1 parking space per 6 staff, the College as a whole would require 30 car parking spaces. As per the addendum Traffic Impact Assessment (Appendix F) this calculation is based on the following Equivalent Full Time (EFT) staff population by type, as provided by the College: **Senior School:** ▪ Teaching: 93.6 EFT; ▪ Non-Teaching: 44.3 EFT **Junior School:** ▪ Teaching: 21.2 EFT; ▪ Non-Teaching: 16.1 EFT **TOTAL: 176 EFT Staff** In light of the above, the College currently has a combined total of 43 parking spaces across the three campuses; 41 general vehicle and 2 motorcycle. Therefore, it is considered the College as a whole has an excess of 13 parking spaces. In summary of the above, the proposal provides adequate on-site parking to accommodate the generated demand by the existing educational establishment. Refer to **Appendix F** for further detail.
CONSTRUCTION TRAFFIC MANAGEMENT PLAN	
▪ The proposed Construction Traffic Management Plan can be accommodated except for the proposed Works Zone locations in Upper Pitt Streets that are replacing the existing Kiss & Drop zones. Relocation of any	The College understands and notes the comments by NSC regarding the draft work zones and any changes to any existing Kiss and Drop zones as part of the future CTMP and understands that consultation will be required with North Sydney Council post SSD approval.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
Kiss & Drop zones will require community consultation and approval by the Traffic Committee. ▪ Additionally, there is no feasible location on the northern side of Upper Pitt Street to implement any additional Kiss & Drop zone. Should Works Zones be required at these locations, alternative Kiss & Drop Zone must be determined prior to the issue of Construction Certificate. ▪ It should also be noted that the supposed Works Zone in Kirribilli Avenue is not considered ideal as it requires construction vehicles to travel in a longer route through residential areas. ▪ Furthermore, there is a proposed redevelopment of Loreto Kirribilli pursuant to DA371II 7 currently with Council. It is unknown at this stage the extent of construction activities will involve for the Loreto redevelopment and the cumulative impacts of the redevelopments of both school sites in such close proximity. ▪ A combined CTMP should be required to coordinate construction activities of both sites if occurring at the same time. ▪ It recommended that, additional traffic study detailing the impacts of the proposed redevelopment and the cumulative impacts of both schools be provided.	The College and Loreto project teams have consulted/coordinated and communicated over the last 2 years. As a result, it is clear the two projects have minimal cross over regarding key construction timing, minimal impact regarding construction traffic movements and substantially different construction works and durations. Given the above, the College and Loreto strongly request both projects table individual CTMP's for approval that include a cumulative project understanding and acknowledgement. If required by North Sydney Council, the College are happy to participate in a combined traffic study.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
ACCESSIBILITY	
▪ Access Considerations taking into account Australian Standards: AS 1428.1, 1428.2, 1428.4 and 1428.5 should account for: o A new pedestrian entrance to the school including the installation of an automatic sliding entrance door o enhancing the paths of travel in the redeveloped to include improved access to all areas of the school including buildings, rooms and facilities o improved access to all areas by installing lifts as designated within the Upper Pitt Street Campus and a new one suggested for the Wyalla Building. o recalibrating the Wyalla building so as to ensure compliance with the standards and improved access ways o Incorporating accessible WCs into the Wyalla Building.	An automatic door will be considered in the detailed design. Paths of travel in the proposed development of the Main Campus, especially accessible paths, are significantly enhanced in the proposal. The heritage nature of Wyalla, and earlier interventions, have resulted in there being many changes of level which all cannot be reasonably addressed, as reflected in the access consultants' reports, accompanying the original EIS submission.
NORTH SHORE HISTORICAL SOCIETY	
Unsympathetic additions have already been made to the south side of the building. To this point in time, the eastern side of this historic building has remained intact. The removal of wall masonry, and, particularly, the removal of the eight double hung timber windows on the ground floor, would destroy the historical integrity of the eastern side of the structure and would diminish the	NBRS have prepared a letter of response to the comments made by the North Shore Historical Society, which accompanies this application as **Appendix H**. It is acknowledged that the proposed works include the removal of windows from the eastern elevation, that would have an adverse impact on the original building fabric. As part of the earliest Site visit, the issue of the extent of the demolition to the eastern side of the building was discussed. At the time, NBRS advised there was risk involved

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
heritage value of the entire building. Any such substantial alterations would be irreversible. The relationship of these ground floor windows to the matching eight windows on the first floor is an integral part of the heritage building. Urges reconsideration of any such alterations to this historic buildings, which will unavoidably damage the present and future heritage value of Wyalla, both to the school and to the surrounding community.	in removing the wall, and associated openings, however, the requirement for the additional space resulted in moving forward with the proposal and identifying any mitigating measures that could be made. The Mitigation measures and appropriate approach identified include the following: 1. The rear of the building is not generally visible from the public domain, and as such does not alter the understanding of the early building and particularly the primary elevation and its open corner setting; 2. The opening would be limited to the outer edges of the outermost windows and be limited to the same height as the existing intel; and 3. The new structure would read as clearly contemporary allowing the overall form of the building and the upper windows to the eastern elevation to be retained. It is noted, NBRS Architecture provided further heritage advice in relation to minimising openings in internal walls, specifically to limit internal works, and where possible, to the removal of non-significant internal stud walls. This strategy has generally been adopted to reduce physical impacts on internal fabric of Wyalla, and to retain the volume of significant spaces. NBRS Architecture have been commissioned by the College to provide ongoing heritage advice during the design development process, at Masterplan Stage through design development and consent phases of the project.
BODY CORPORATE – 31B FITZROY STREET, KIRRIBILLI (MELBA, ACT)	
The proposed rooftop playground over 4 buildings and entertainment terrace are going to create noise and disturbance to the residents of all the surrounding buildings - ours included. In a worst-case scenario, we insist that this rooftop space ONLY be used in school hours (Monday to Friday 9 - 3pm. No before school. No after school and no weekends, and that new and	The operation of the Rooftop Terrace and its subsequent use will be influenced through the preparation of a Plan of Management, prepared by St Aloysius' College. Notwithstanding, a preliminary Schedule of Uses has been prepared and accompanies this RTS as **Appendix P**. The proposed uses of the rooftop terrace are generally consistent with that of the current quadrangle. It is noted Cadets <u>will not</u> occur on the rooftop terrace.

<table>
<tr><th>ISSUES RAISED BY AGENCIES AND ORGANISATIONS</th><th>PROPONENT'S RESPONSE</th></tr>
<tr><td>effective noise reduction measures are incorporated into the design.</td><td></td></tr>
<tr><td>The submission claims that even with no additional carparking provided that there will be no congestion impact in the streets around the school. The ugly rooftop carpark that already impacts our outlook (above the multipurpose hall) creates noise and fumes - and it only provides 19 car parks for some 339 staff and a student population of 1244. To suggest that there will be no congestion impact defies logic.</td><td>The existing on-site parking provision for each Campus is clarified below:

<table><tr><th>Campus</th><th>Parking Provision</th></tr><tr><td>Main Campus</td><td>▪ The Main Campus does not contain any parking but does include a loading dock facility;</td></tr><tr><td>Senior Campus</td><td>▪ The Site contains:
o Fourteen (14) car parking spaces;
o Two (2) Motorbike Parking Spaces;
o Ten (10) bicycle parking spaces.</td></tr><tr><td>Junior Campus</td><td>▪ Ten (10) car parking spaces are located on Site.</td></tr><tr><td>Star of the Sea Catholic Church</td><td>▪ In addition to the on-site parking, an existing arrangement allow the use by the College of the 17 car spaces within the Star of the Sea Catholic Church, on Willoughby Street, Kirribilli.</td></tr></table>
Applying the NSDCP 2013 car parking rate of 1 parking space per 6 staff, the College as a whole would require 30 car parking spaces. As per the addendum Traffic Impact Assessment (**Appendix F**) this calculation is based on the following Equivalent Full Time (EFT) staff population by type, as provided by the College:

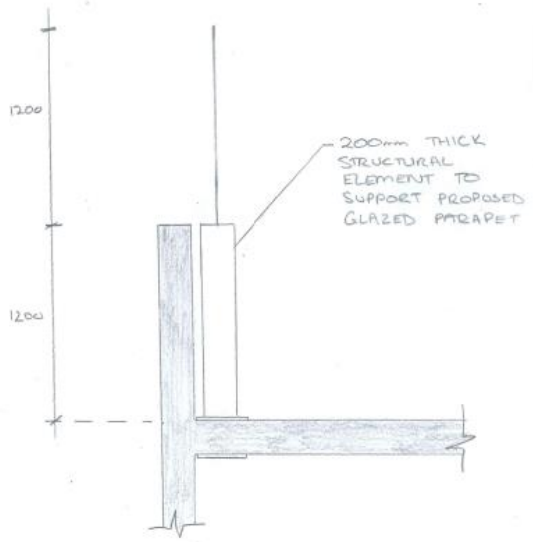
Senior School:
▪ Teaching: 93.6 EFT;
▪ Non-Teaching: 44.3 EFT

Junior School:
▪ Teaching: 21.2 EFT;
▪ Non-Teaching: 16.1 EFT</td></tr>
</table>

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	TOTAL: 176 EFT Staff Currently, the College a total parking provision of 43 parking spaces; 41 general vehicle and 2 motorcycle. Therefore, it is considered the College as a whole has an excess of 13 parking spaces based on Council's parking requirements. As previously iterated throughout this response, there is no intended increase in student or staff numbers. Therefore, the proposed development will not trigger further congestion on the surrounding road network and traffic.
A seven year timeframe for the works is utterly untenable. If reduced works are eventually approved after extensive input and agreement by residents - then we propose that building work ONLY be done in school hours. Yes this will make it inconvenient for the school population. But weekend and out of hours works is not acceptable at all to the residents and owners who call this part of Kirribilli their home.	The intent of the Concept Master Plan is to provide the school and the community with certainty around the future built form outcome for the Site. In accordance with **Section 8.11** of the submitted EIS, and reiterated in the Preliminary Construction Traffic & Pedestrian Management Plan, the proposed hours of construction are: ▪ 7:00am to 5.00pm Monday to Friday; ▪ 8:00am to 1:00pm on Saturday. The proposed construction hours are in accordance with Council's standard construction hours. Notwithstanding the above, demolition and excavation works are proposed from 8:00am to 5:00pm Monday to Friday only. No work is to be carried out on Sundays or Public Holidays unless prior approval is granted by North Sydney Council.
48 UPPER PITT STREET – SP 1036, PREPARED BY PAUL BERKEMEIER ARCHITECTS	
VIEW IMPACTS	
The View Impact Assessment takes photos from Unit 27, located on the 5th floors, however, it is considered the view impact from units on the 2nd and 3rd floors is more significant, particularly the impact of the proposed	**Figure 4** and **Figure 5**, taken from Levels 2 and 3, 48 Upper Pitt Street, illustrates the existing and proposed view. It is evident the proposed development will in fact improve the current view, with the removal of the existing stairwell. The acoustic barrier sits below the parapet of the North-East Wing and therefore will not obstruct the views from units on Levels two (2) and three (3) of 48 Upper Pitt Street.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
balustrade and screen to the south and east edges of the roof top play area.	 **Figure 4 | View from Unit 6, Level 2, 48 Upper Pitt Street**  **Figure 5 | View from Unit 13, Level 3, 48 Upper Pitt Street**
The drawings of the new East Wing on Upper Pitt Street appear to show an increase in the parapet height from the existing RL43.21 to RL43.49, an increase of 0.28m. Similarly, the new façade element above the main entrance appears to be raised from existing RL46.29 to	The parapet height of the new north-east wing has been lowered by **270mm** to reflect the existing heights, presenting an **RL 43.22**. Demonstrated in the VIA (**Appendix E**) prepared, and amended by RobertsDay, the existing views from 2nd and 3rd Floor units will be retained, if not improved, with the removal of the existing stairwell. It is noted, the units

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
RL46.96, an increase of 0.67m. Both changes appear to be quite unnecessary and would have a severe impact on views from the 2nd floor units.	located on the 2nd floor sit below the current building height, and therefore no change to the current view will occur, after the removal of the stairwell.
Unclear on the exact height of the proposed roof-top plant enclosure on the new East-Wing.	Refer to revised Architectural Drawings prepared by PMDL (**Appendix C**).
Some of the parapet heights are not entirely clear, or may contain errors. For example, Section 3 on Sheet DAU301 shows parapet to the new East Wing as RL46.64 rather than the intended RL43.40 for that part of the Section.	Refer to revised Architectural Drawings prepared by PMDL (**Appendix C**).
NOISE	
Concern over the noise from the rooftop. Any use of amplified sound, voice or music, would exacerbate this problem and should not be permitted. The hours of use should be restricted to normal school hours and be listed in the consent. Any out-of-hours use, for example New Years Eve or Australia Day, may be considered but must be listed in the Consent.	The implementation of an acoustic barrier of 2.4m (noise models taken from 2.1m), around the perimeter of the proposed rooftop terrace of the infill building on the main campus, will in fact reduce the current school noise impacts on the most highly sensitive receivers. Refer to **Appendix K**. The hours of use for rooftop terrace will be guided by a future Plan of Management, prepared by St Aloysius' College. However, it would be reasonable the school related events currently held in the quadrangle will be conducted on the rooftop terrace, other than cadets. Notwithstanding, a preliminary Schedule of Uses, and the like, has been prepared and accompanies this application as **Appendix P**.
DISTURBANCE DURING CONSTRUCTION	
Access to the site for construction traffic and materials handling is very restricted and will need careful planning and good site management to avoid the inconvenience of frequent road closures.	A Construction Management Plan will be prepared by a qualified consultant and will be required to be signed off by Council prior to the issuing of a Construction Certificate. A Preliminary Construction Traffic & Pedestrian Management Plan was submitted as part of the SSDA, and has since been revised as part of the Response to Submissions (refer to **Appendix G**).

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
The proposed crane will impact on resident views. Its location, height and duration should take this into account.	The location of the crane will be considered as part of the final Construction Management Plan, to be organised by a qualified consultant and will be required to be signed off by Council prior to the issuing of a Construction Certificate.
REQUEST FOR FURTHER INFORMATION AND MODIFICATIONS:	
The Owners of SP1036 request the Applicant provided the following:	
▪ Height frames to indicate position and height of the parapets, glass roof top canopy, new lift motor room and plant enclosures.	Height frames may be considered if requested by the determining authority.
▪ Details of proposed glass balustrade and screen to the roof-top play areas. The screen, from 1200mm to 2400mm height above finished roof-top, should be clear frameless glass, without metal posts or support frames, to minimise view loss.	The detailed design of the Balustrade has been prepared by Wood & Grieve Engineers and accompanies this application as **Appendix K** (refer to **Figure 6** below). 

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	Figure 6 | Acoustic Barrier, Rooftop Terrace A **200mm** thick structural element will sit below the parapet height to support the proposed glazed parapet. The acoustic barrier has been engineered to ensure the screen above the 1200mm parapet is a clear frameless acoustic glass, with no metal posts or support frames, obscuring view corridors.
The Owners of SP1036 also request that the application be modified to incorporate the following:	
▪ Amended parapet heights to the new East Wing and the new main entrance façade element, to keep them at of below the existing heights in the same locations.	The parapet height of the new north-east wing has been lowered by **270mm** to reflect the existing heights, presenting an **RL 43.22**.
▪ Amended consultation strategy during construction, to include regular coordination between the college, its builder / project manager and a representative of the Strata Committee.	St Aloysius' College are willing to consider and accommodate regular co-ordination with members of the local community during the construction process.
▪ No sound amplification shall be used on the roof top play areas.	Hours of operation for the rooftop terrace will be guided by a future Plan of Management, prepared by St Aloysius' College. However, it would be reasonable the school related events currently held in the quadrangle will be conducted on the rooftop terrace, other than cadets. Similar to that of the current use of the quadrangle, a public address system will be used when required. The acoustic impact is considered to result in an improved outcome, compared to that at present, through the implementation of the 2.4m high acoustic barrier. A preliminary Schedule of Uses, and the like, has been prepared and accompanies this application as **Appendix P**.
▪ Hours of use for the roof-top play areas be restricted to normal school hours.	Hours of operation for the rooftop terrace will be guided by a future Plan of Management, prepared by St Aloysius' College. However, it would be reasonable the school related events currently held in the quadrangle will be conducted on the rooftop terrace, other than cadets. A preliminary Schedule of Uses, and the like, has been prepared and accompanies this application as **Appendix P**.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
▪ That out-of-hours use of the roof-top be restricted to New Years Eve, from 5pm on 31st December to 1:30am on 1st January, and Australia Day, 26th January, between 9am and 9pm.	Hours of operation for the rooftop terrace will be guided by a future Plan of Management, prepared by St Aloysius' College. However, it would be reasonable the school related events currently held in the quadrangle will be conducted on the rooftop terrace, other than cadets. A preliminary Schedule of Uses, and the lik,e has been prepared and accompanies this application as **Appendix P**.
▪ That roof-top shade structures and mature planting be kept below the view lines from the sitting positions in all 3rd floor units at 48 Upper Pitt St.	The view lines from the Apartments on the 3rd floor units of 48 Upper Pitt Street will not be affected by rooftop terrace landscaping and glazed barriers due to the level difference between the rooftop terrace and the front building along Upper Pitt Street. Refer to **Appendix E**.
MILSONS POINT COMMUNITY PRECINCT	
St Aloysius' College and Loreto have failed within their applications for Master Plans to address the cumulative effect of the traffic and parking within the local community. Both have failed to address their lack of open outdoor space and green space for students to have recreation areas.	The purpose of the Response to Submissions is to address the SSDA 8669 for St Aloysius' College. Comments raised by the Milsons Point Community Precinct are addressed below.
This is not a Master Plan, but a series of DA's for capital works, wanting to be approved, without detailed scrutiny by the community.	The Concept Master Plan and Stage 1 Built Form Approval has been prepared in accordance with the requirements of the EP&A Act.
Fail to consider all the land holdings of the College. Advised Willoughby was unable to be used as they are in different LGAs. The Precinct believe this to be wrong and there the application is not a Master Plan.	Noted. The College is part of the Kirribilli Peninsula Community, and the proposed development sits within the boundaries of the individual campuses and has been designed in consideration of the adjoining neighbours and developments.
Failed to look at alternative solutions and locations, considering the College has three restrained sites in Kirribilli.	The proposed development is in relation to the future development of the existing educational establishment.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
Failed to look holistically at the whole of the schools operations within the context of the Kirribilli Peninsular, with analysis of the traffic generation pedestrian movements, the require bus movements, the use of the public open space by the school boys, with no contributions by the school for the maintenance and upkeep of the infrastructure and Bradfield Park.	The Proposal is considered to be in the public's interest as its key impacts have been minimised through the amendments to the built form. Importantly, its benefits will be significant and widespread for the entire community, including: ▪ The implementation of the Green Travel Plan will encourage sustainable transportation; ▪ The proposed development is of a high quality in terms of built form, bulk and architectural treatment and responds positively to proportions of the adjoining development; ▪ New essential and supportive services and infrastructure will bring a range of social and public benefits to the local community and broader region. The proposal will provide enhanced sport and recreational facilities on the Junior Campus. At present, the College relies on off-site facilities for its sporting programmes. The introduction of the future purpose built sports facility will help relieve demand on these facilities generated by the College.
Executive Summary states that "the proposal does not have any unacceptable, long term, off-site impacts on adjoining or surrounding properties or the public domain, in terms of traffic, social and environmental impacts". The community disagrees with this statement, as the studies have failed to look at the broader community, only looking at the school community's needs. The Principal commented to community members, that it was a Classroom Master Plan; therefore this is not a true Master Plan under the SEPP.	The proposed development is identified as State Significant Development under SRD SEPP. Development for an Educational Establishment with a capital investment of more than $20 million is identified in Schedule 1 of *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP SRD) and is therefore declared to be SSD for the purpose of EP&A Act. Clause 15 and Schedule 1 of SEPP SRD 2011, identifies classes of development which are SSD, which includes the following: *Education Establishments – Development for the purpose of Educational Establishments (including associated facilities) that has a capital investment value of more than $20m.* Throughout the design process, the design team has taken into account any foreseeable cumulative impacts on the local community and adjoining properties, which have been mitigated through the ongoing community consultation and design process.
The proposal failed to work in with the other major school, Loreto, who is doing a similar Master Plan estimated to be $100 million. Both schools have failed to address how they will provide for the community in some way, with the traffic generation, not only during	The College has met with Loreto Kirribilli on a number of occasions over the course of the last two years and held very fruitful conversations regarding: 1. <u>The State Significant Development Applications being submitted by both schools:</u> These discussions have centred on how the two schools can work together to ensure that any approved works are conducted in a manner that is least disruptive to the local community. Both schools are very

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
construction, but afterwards with their ongoing school operations.	conscious of the need to ensure close coordination of construction schedules and planning in partnership with local groups and authorities; 2. <u>Shared Resources:</u> Both schools are very keen on a more collaborative approach to sharing resources given our close proximity. This includes the shared use of physical resources and the potential of shared service arrangements.
Misleading documentation – the EIS fails to mention the demolition of the four (4) storey building. The way it is written gives the impression that all works are internal works only.	As stated in the EIS, the project description is as follows: **<u>Concept Master Plan</u>** A Concept Proposal has been prepared for St Aloysius' College to guide its future redevelopment and is intended to provide a statutory framework for the long-term planning of the College. The proposal seeks consent for building envelopes and built form design controls, open space and pedestrian and circulation spaces. Future detailed built form will be subject of future Development Applications, and will continue to be consistent with the subject SSD Concept Master Plan. The Concept Master Plan will be delivered across two (2) stages, as outlined below: <u>Stage 1:</u> ▪ Concept approval is sought for the building envelopes allowing alterations and additions and new development across the Junior, Senior and Main Campus; ▪ Detailed built form approval is sought for Main and Senior Campus. For these two (2) campuses the delivery will be conducted across two (2) clear construction phases as summarised below: o **Senior Campus:** Single storey, ground floor addition to the heritage building fronting Robertson Lane, as well as internal refurbishment and upgrades of teaching and learning facilities.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	○ **Main Campus:** Demolition and rebuild of the existing four (4) storey North-East Wing fronting Upper Pitt Street, construction of new infill building in the existing quadrangle, and associated refurbishment of north-wing, south-wing, Great Hall and Chapel. Stage 2: Detailed built approval for the Junior Campus will occur as part of a future Development Application and does not form part of this submission.
The proposal fails to meet the following provisions, as outlined in the NDCP 2013: ▪ Minimum Parking Standards for Educational Establishments; ▪ Setback provisions; the proposed setbacks are zero, not 4m; and ▪ The development does not meet the minimum landscaping requirements.	With respect to compliance with the DCP setback controls, Clause 11 of *State Environmental Planning Policy (State and Regional Development) 2011* expressly states the DCPs do not apply to SSD applications. Notwithstanding this a setback of 3.05m – 4m is provided to the eastern boundary in accordance with **Part 3.3.6** of the *North Sydney Development Control Plan 2013* (NSDCP 2013). Whilst the proposal will seek a variation to the height plane control under NSDCP 2013, this non-compliance does not contribute to the loss of views or solar access from the adjoining apartments to the east. It is not feasible to setback the building further from the eastern boundary due to the need to provide the required teaching and learning space, and the presence of the existing built form. The built form retains the existing front setback to Upper Pitt Street. The College is located within a dense urban community, with limited landscaping. It is the intention of the proposed development to improve landscaping across the three (3) campus, retaining existing vegetation and providing landscaped buffer treatments to neighbouring boundaries. In light of the above, it is considered the proposal satisfies Council's landscaping requirement on merits, and will continue to satisfy the relevant objectives.
Failed to analyse the pedestrian and car movements for the sites, nor look at the need for footpath treatments to allow ease of movement of students to transport hubs, without them taking out the local residents, especially the aged and less mobile, with students walking 4-5 abreast with back packs on that make them nearly a metre deep, when they turn to talk to each other, swiping innocent people off the footpath.	The College prides itself as a member of the Kirribilli community. The College will continue to monitor the student's interaction with the community and would encourage local members to advise the school of any concerns of out of school behaviour.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
Failure to adequately communicate with the community, concerning the proposed development, with insufficient information on story boards over an afternoon. No further communication, after this initial concepts and feedback session, showing how the school has listened to the community and altered their plans accordingly. Nearest neighbours asked for a meeting, and it was refused.	This statement is considered invalid. Following two formal community information sessions, the school discussed with the residents of Craiglea on the opportunity to discuss the design progression with residents. It was agreed that the School would progress the application to a more detailed design and which, at a later date, another community session would be held. A meeting was held on 31st January to discuss with the residents of Craiglea on how the application had progressed, and included a walk around of the Site. Preliminary discussions were also held with residents of 48 Upper Pitt Street. Again, we reiterate, community consultation has been completed in accordance with the Department of Planning & Environment Consultation Guidelines, and the SEARs issued by the DOPE, revised on 22 November 2017. In line with the College's commitment to open, transparent and ongoing community engagement, a range of subsequent meetings have taken place with the local community, as per the following: ▪ Presentation to Milson Point Community Precinct – Thursday 3rd May 2018; ▪ Presentation to Craiglea Residents – Tuesday 8th May 2018; ▪ Presentation to North Sydney Council – Tuesday 19th June 2018.
The Master Plan should be rejected and sent back to the College, to start again, taking into consideration all of the matters raised here.	The preparation of the Response to Submissions has taken into account the comments raised by the DoPE, North Sydney Council, government agencies, and local community.
If not rejected in its current form, then the community requests an extension of time, for submission.	The SSDA is currently within a defined statutory process, including a public exhibition period of 30 days.
Request that site poles with tape be erected on all three sites, showing the extent of the height and bulk of the proposed buildings, so that all residents can appreciate the three dimensional elements of the 2D plans, as no models were made available for consideration.	Height frames may be considered if requested by the determining authority.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
Request that the trees that are to be removed, be identified with a bright thick ribbon, to assess the impact on the sites. Any trees located on neighbouring properties, that are nominated to be pruned, should identify the extent of pruning, so an independent arborist can be engaged to confirm the proposed would not destabilise the tree and its root structure.	The intention of the proposal is to minimise the removal of the existing vegetation across the College campuses. Trees located within the Junior Campus are proposed to be retained. An Aboricultural Impact Assessment (AIA) was prepared by ArborSafe, dated 11 March, 2018, and submitted with the original EIS, in relation to the development of the Main Campus. The assessment included five (5) trees located within or adjacent to the Main Campus, included the tree located on Craiglea House. The identified tree, Tree 60, has good to fair health and good to fair structure, and a Useful Life Expectancy (ULE) of more than 15 years. Although the tree is located on the adjacent property, it is close enough to the boundary that the proposed development would be within its estimated TPZ. The adjoining tree will be retained with the implementation of specific protection measures during the development. The TPZ for the identified Tree is 7.8m measured at a radial distance from the centre trunk taken from the estimated DBH. Notwithstanding, the AIA considered that the TPZ criteria should be considered void as the solid bedrock and the rock boundary wall appears to have formed an effective barrier for any significant structural roots. This assumption is based on the size, weight, components, age, construction and general appearance of excellent stability of the stone boundary wall. The full encroachment will be determined when verification of roots within the Main Campus has occurred. Further, the identified tree may require some targeted reduction pruning of several lower lateral branches during the installation of the vertical garden and/or the new landscape plantings. It is anticipated that minor pruning only will be required of less than 10% of the trees total canopy cover. In order to provide certainty, root investigations have been completed by ArborSafe and an addendum report was prepared and accompanies this application as **Appendix R**. Exploratory trench work was undertaken on 9 October 2018 by means of a third party contractor utilising a Hydro-Vac truck to limit any potential root impact. Three (3) roots were identified within the trench as being large enough, generally over 40mm in diameter to warrant further consideration. Two of the roots were identified as originating from the stump of a previously removed tree, so has no bearing on the assessment, while the remaining root was identified as originating from the subject tree. The root penetrated through a weep hole within the base of the wall, 3.2m to the northwest of the subject tree's trunk alignment. The root was 60mm in diameter, measured 150mm out from the wall, with the diameter being smaller where it penetrated the weep hole. No displacement of any kind was observed within the stones of the wall.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	AborSafe has concluded at a distance of 3.2m from the truck alignment the root would likely be outside the theoretical Structural Root Zone (SRZ) of the subject tree. Combined with the roots relatively small size and the stability of the wall itself against the remaining root system and associated soil volume, it is considered that serving the root would have minimal to no structural bearing on Tree 60. Overall, it is considered the removal of the garden bed within the courtyard of the St Aloysius College Main Campus, as part of the proposed development, would have minimal effect on the health and structure of the subject tree, Tree 60.
Additionally, the community request an open site visit, so that their concerns can be expressed to the Minister or the delegated individual.	The College has provided a number of consultation sessions with the local community to discuss the future development of the College. Please note, the College is not required to hold an open site visit unless requested by the Minister. Any feature consultation will be held at the request of the DoPE and the Independent Planning Commission (IPC).
ADDITIONAL COMMENTS	
It is considered there is no contextual evaluation of the school operations to ascertain what is working and what is not. Design principles cited in the PMDL Architectural Design Statement, do not reference the amenity of the adjacent residential areas – they only relate to the teaching environment.	PMDL have provided an assessment against Schedule 4 of *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (Education SEPP) as part of their response in **Appendix D**. The principles of 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 meet these principles.
As a lighting plan was not submitted and there are no structural details for the 2.4 metre high perimeter glass wall, it is considered the specialist reports that address visual impact and heritage impact are misleading and not accurate.	As agreed in additional consultation meetings with members of the adjoining residence of Craiglea House, a Lighting Concept Plan has been prepared by Umow Lai and accompanies this application as **Appendix J**. Refer to previous discussion.

<table>
<tr><th>ISSUES RAISED BY AGENCIES AND ORGANISATIONS</th><th>PROPONENT'S RESPONSE</th></tr>
<tr><td>The Visual Impact montages are not certified as being true and accurate which should be required for a development of this magnitude. There should be night time montages too.</td><td>The Visual Impact Analysis was prepared by Roberts Day, a third party consultant. The accuracy of the VIA is based on the following process and information:

▪ Plotting the vantage points using accurate survey details of the site and proposal;
▪ Digitally linking the co-ordinate data into Google Earth;
▪ Creating a 3D Sketchup model of the terrain;
▪ Digitally linking the massing model of the proposed built form to the GE for broader context understanding and to match the model view to the phot position and view angle;
▪ Photo-editing the hybrid photo/model views to reflect landscaping, intended built form, and lighting.

Therefore, the visual impact photomontages are certified as being true and accurate.</td></tr>
<tr><td>The SSD Application form states that the project will give rise to 350 operational jobs. These jobs are not addressed in any of the documentation and when added to the existing 329 jobs result in an even greater non-compliance with onsite car parking standards. We note that stakeholder meetings with TfNSW and the RMS documented in Appendix 7 of the community consultation report are based on false numbers ie the number of staff is reported in the minutes as being 156 staff. Not 329 plus 350.</td><td>Current staff numbers as issued in Section 2.5 of the submitted EIS, are reiterated in the table below:

Existing Staff Numbers
<table><tr><th>Staff Type</th><th>Current Numbers</th></tr><tr><td>Teaching (Full time and part time)</td><td>122</td></tr><tr><td>Support (Full time and part time)</td><td>63</td></tr><tr><td>Casual</td><td>15</td></tr><tr><td>Co-curricular (coaches)</td><td>102</td></tr><tr><td>Tutors (Instrumental)</td><td>37</td></tr><tr><td>Total Staff (Full time and Part time)</td><td>339</td></tr></table>
Notwithstanding, there is no intention to increase staff numbers as part of this application.</td></tr>
</table>

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
While the application is based on a vision to impact the learning environment there is no analysis that illustrates how the proposed classroom comply with the current education standards: ▪ How much space is required for 1244 students; ▪ Will the additional space bring the school environment into compliance as implied by the principal or deliver a surplus in space so that the school can freely increase student numbers.	The design for the Main Campus therefore provides for six (6) general learning spaces which serve as home room for each of Years 7-10. These are indicated on drawings DAU125 and DAU126. The six (6) stream structure matches the current enrolment and structure, and is not designed to accommodate additional student enrolments. The spaces provided are appropriate for a typical number of students per class, are in line with education facility norms. Specialist spaces, including science and art, are in addition to the general learning areas and are provided to meet the curriculum needs of the school in relation to NESA requirements and the academic focus of the College. Therefore, the proposed design addresses the College's brief requirement for contemporary learning environments, and is not based on any future increase in enrolment numbers. Once again there is no intention to increase student numbers under this application.
No digital computer-generated imaged have been prepared for any of the works to illustrate for residents what they will be looking at in the future. It is a reasonable requirement to expect photo quality montages to be submitted with a $140 million application.	We acknowledge the request; however, the digital computer-generated image is not a statutory requirement as part of this statutory process.
No community benefit is provided. The school does not pay Section 94 Contributions, although this is implied in the EIS. The funding for these works is largely federal government funding. St Aloysius does not pay Council rates. They are taking away residential amenity but not giving anything back to the Kirribilli community.	Noted. These concerns are beyond the scope of the proposed development. The project is in the public's best interest as its key impacts have been minimised through amendments to the design throughout the design process. The residual impacts will be localised and managed. Importantly, its benefits will be significant and widespread for the entire community.
CRAIGLEA STRATA COMMITTEE	
Concern over the Community Consultation Report prepared by Willowtree Planning Consultant which fails to accurately account the concerns of the Craiglea Strata Committee and that the EIS documentation fails to	During design development, based on the extensive consultation with the relevant stakeholders, the design team sought to address the matters raised through design alterations, focusing primarily on the proposed built form works to the Main Campus, as they were considered a key point of interest, to the residents of Craiglea House.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
address how Craiglea's concerns have been addressed in the final development proposal and supporting documentation, noting it is a requirement specified in the SEARs.	The following changes occurred out of consideration for community feedback for the original submission of the SSDA: ▪ Refinement of rooftop landscape buffer zones and privacy screening between the Man Campus and the residential properties to the east; ▪ Refinement of rooftop mechanical plant location in order to provide adequate setback from the boundary and appropriate levels of screening; and ▪ Infilling of existing drenched window opening on the existing south-eastern façade of Upper Pitt Street. Following the public exhibition period, and subject to the accompanying RTS, the following further amendments have been proposed to the building form: ▪ The development envelope of the redeveloped north-east wing has been reduced to be consistent with the height of the current north-east wing building envelope, resulting in a reduction to the proposed parapet height by **270mm**, at and **RL of 43.22**; ▪ The proposed acoustic barrier has been designed engineered to minimise visual impact. A 200mm thick structural element will sit below the parapet height to support the proposed glazed parapet; The acoustic barrier has been engineered to ensure the screen above the 1200mm parapet is a clear frameless acoustic glass, with no metal posts or support frames obscuring view corridors. ▪ Retention of 'Tree 60' located on the adjoining property, Craiglea House. It is important to note that St Aloysius' College are committed to working closely with its neighbours throughout the construction process.
Both SSD Applications are looking to guide development over the next 20-50 years however they fail to adequately address the issue of student growth. The St Aloysius Application states there will be no increase in student and staff numbers beyond natural growth while Loreto states it will limit student growth to 30 pupils.	The College is currently used as an educational establishment for boys with an overall population of **1244** students across the three (3) campus. The student population and enrolment of **1244** students is currently broken down into the following: ▪ **Junior Campus: 321 students; and** ▪ **Senior and Main Campus: 923 students.**

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
This is inconsistent with the population growth projections of the Draft North District Plan. These projections state 'by 2036 significant growth in the primary and secondary school aged population is expected to result in an increase in school enrolments of around 29, 000 or 21°/« based on current enrolments in government and non-government schools'. Both applications rely on limited growth projections as the basis of their environmental assessment arguing no increase in student and staff numbers means no increase in environmental impact.	Student numbers can vary term to term, and year to year, ordinarily attributed to natural growth for Educational Establishments. Refer to **Section 2.4** of the RTS Report.
The proposed development are not based on any robust analysis on how they operate, at the present time, within the broader Kirribilli community. An assessment of adequate baseline data was a requirement of the SEARs that were issued for both SSD Applications. Analysing baseline data is essential to understanding what is working, what isn't working and what needs improved. There is an underlying presumption across both applications that there are no issues with how these schools currently function as part of the broader Kirribilli community. They assume no projected increase in student or staff numbers and conclude there will be no greater environmental impact resulting from the execution of their plans. This is a convenient yet unsupported proposition.	The project is in the public's best interest as its key impacts have been minimised through amendments to the design throughout the design process. The residual impacts will be localised and managed. Importantly, its benefits will be significant and widespread for the entire community. The benefits include: ▪ The proposed development is of a high quality in terms of built form, bulk and architectural treatment and responds positively to the proportions of the adjoining development. The proposed will make a positive contribution to the built form of the school and create an attractive streetscape; ▪ The proposal will significantly improve landscaping and open space area of the school with the rooftop terrace and learning areas, and associated landscaping improvements, and new multi-purpose subterranean sports facility; ▪ New essential and support services and infrastructure will bring a range of social and public benefits to the local community and broader region. The Project will provide enhanced sport and recreational facilities. At present, the College relies on off-site facilities for its sporting programmes. The introduction of the sports facilities will help to relieve demand on these facilities and surrounding road network. Once again, it is noted there is not intention to increase student numbers under this application. Therefore, no foreseen cumulative impacts will occur.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
The starting point for any master planning and design process is to define the baseline operating condition. This includes strengths, constraints and opportunities. At the present time, the impact from how these schools operate extends well beyond their campus boundaries and these applications must evaluate this operating context-both internal from within the school campus and external outside of the school campus.	The proposed development has been subject to a comprehensive assessment process, to determine the most appropriate design outcome for both the College community, and the residents of Kirribilli. This has formed the backbone of the SSDA that is currently before the DoPE.
An external assessment is required before a development can establish a 20 or 50 year framework for growth.	The State Significant Development Application is undertaken under a defined statutory process to which the College is following.
The SEARs issued required an assessment to be made of cumulative impacts. In accordance with the SEARs cumulative impact should be assessed having regard to the day to day operation of the school, traffic generation, parking demand, pedestrian movement, open space demand and construction impact.	The College is an existing development within the context of the Kirribilli Peninsular. As part of the original EIS, and the subject Response to Submissions, the cumulative impact has been assessed and considered throughout the design process, including, but not limited to: ▪ Traffic and Parking; ▪ Noise; ▪ Built form and urban design; and ▪ Construction management. Overall, it is considered the SDDA has adequately considered the requirements of the SEARS, revised on 22 November 2017.
In terms of construction impact, it is understood that the first stage of construction for the Main Campus will have a 7-year construction timeframe and will generate around 100 construction jobs on-site. When this construction program is added to that of Loreto there will be a significant impact on street parking	A detailed Construction Traffic Management Plan will be prepared by the contractor prior to the commencement of works, and signed off by North Sydney Council prior to the issuing of a Construction Certificate. In relation to the two SSDA projects occurring within Kirribilli, as aforementioned, the College has met with Loreto Kirribilli on a number of occasions over the course of the last two (2) years and have held fruitful conversations regarding the State Significant Developments being submitted by both schools.

<table>
<tr><th>ISSUES RAISED BY AGENCIES AND ORGANISATIONS</th><th>PROPONENT'S RESPONSE</th></tr>
<tr><td>demand and traffic movement not to mention extensive amenity impacts having regard to noise, dust, visual privacy and view impact. It is essential that the cumulative impacts of construction are addressed now as part of these SSD applications.</td><td>Discussions to date have been centred on how the two schools are able to work together to ensure that any approved works are conducted in a manner that is least disruptive to the local community. Both schools are very conscious of the need to ensure close co-ordination of construction schedules and planning in partnership with local groups and authorities.

In addition to multiple discussions about the projects, Loreto and the College have met to specifically discuss the coordination of high level programming and construction traffic across both projects. The combined project programme review noted the most intensive times of construction across both projects would not overlap. The major construction phase for the College (Phase 2) would occur after Loreto's planned demolition and bulk excavation. In terms of traffic management for construction, vehicles for each school would enter Kirribilli from different points. The only area of concurrent activity would occur at Carabella Street, which would be effectively managed through localised CTMP's for each project.</td></tr>
<tr><td colspan="2">URBAN CONCEPTS LETTER OF OBJECTION</td></tr>
<tr><td>Validity of the Master Plan process</td><td>The Concept Master Plan and Stage 1 Built Form approval has been prepared in accordance with the requirements of the EP&A Act. As reiterated above, SSDA 8669 is being assessed under a defined statutory process.

Refer to discussions above, and Section 2.9 of the Response to Submissions Report.</td></tr>
<tr><td>Lack of On-Site Car Parking</td><td>An addendum Traffic Statement has been prepared by Positive Traffic and accompanies this response as Appendix F. As reiterated in Appendix F, the existing on-site parking provision for each Campus is provided in the Table below. It is noted the on-site parking is for the staff of the College only. No students are allowed to utilise the existing on-site parking.

<table>
<tr><th>Campus</th><th>Parking Provision</th></tr>
<tr><td>Main Campus</td><td>▪ The Main Campus does not contain any parking but does include a loading dock facility;</td></tr>
<tr><td>Senior Campus</td><td>▪ The Site contains:
o Fourteen (14) car parking spaces;</td></tr>
</table>
</td></tr>
</table>

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	<table><tr><td></td><td>○ Two (2) Motorbike Parking Spaces; ○ Ten (10) bicycle parking spaces. ▪ Vehicular access is provided via Robertson Lane; ▪ The parking on-site is available to the staff of the College.</td></tr><tr><td>Junior Campus</td><td>▪ Ten (10) car parking spaces are located on Site, available to Junior Campus staff.</td></tr><tr><td>Star of the Sea Catholic Church</td><td>▪ In addition to the on-site parking, an existing arrangement allows the use of the 17 car spaces within the Star of the Sea Catholic Church, on Willoughby Street, Kirribilli by the staff of the College; ▪ Access is provided via Willoughby Street.</td></tr><tr><td>**TOTAL**</td><td>▪ 41 Car Parking Spaces ▪ 2 Motorbike Parking Spaces ▪ 10 Bicycle Spaces</td></tr></table> Applying the NSDCP 2013 car parking rate of 1 parking space per 6 staff, the College as a whole would require 30 car parking spaces. As per Appendix F, this calculation has been formed on the following Equivalent Full Time (EFT) staff population by type: **Senior School:** ▪ Teaching: 93.6 EFT; ▪ Non-Teaching: 44.3 EFT; **Junior School:** ▪ Teaching: 21.2 EFT; ▪ Non-Teaching: 16.1 EFT. **TOTAL: 176 EFT Staff**

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	In light of the above, at present, the College has a combined total of 43 parking spaces across the three (3) campuses; 41 general vehicles and 2 motorcycle, as outlined in the Table above. Therefore, it is considered the College as a whole has an excess of 13 parking spaces. As such, the proposal provide adequate on-site parking to accommodate the generated demand by the existing education establishment. Evidently, this demand can be accommodated with little reliance on street parking. This will further be supported by the accompanying Green Travel Plan (**Appendix F**).
Lack of Kiss n Ride Facility	As stated in **Section 2.3.2** of the RTS Report, and abovementioned, 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 accommodate additional pick-up and drop-off on or at the campus. However, the College is committed to ensuring that existing student drop-off and pick-up continues to be well managed. The College will continue to work with local residents to alleviate their concerns, through the provision of a future Plan of Management.
Impact on Pedestrian Infrastructure	A Green Travel Plan has been prepared by High Range Analytics Pty Ltd and accompanies this application as an annexure to **Appendix F**.
Inappropriate Building Character and Context	The proposed development is in relation to an existing established Educational Establishment. A Character Assessment has been prepared by Roberts Day and accompanies this application as **Appendix J**. The Character assessment identifies that the Site is surrounded by four (4) sub-characters. The assessment concludes the proposal *genuinely respects and responds to the Kirribilli local character and community values, the 4 sub character interfaces and that the interface between the proposed built form and adjoining character is considered appropriate*. The proposals appropriate response to the surrounding character is further reinforced in that the proposal will not change the existing streetscapes and setbacks which are compatible with the Kirribilli Neighbourhood Local Character.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
Hours of Use	A comprehensive assessment of the existing and proposed use of the school facilities, in particular the Main Campus, outside of school hours, has been prepared by St Aloysius College and accompanies this application as **Appendix P**.
Lack of Open Space and Recreational Facilities	The proposed open space is contextually appropriate for the College being located in a dense inner city suburb. The activation of the rooftop as a recreation area provides a nett increase in open space on the Main Campus, and this open space is foreseen to have significantly greater amenity than the existing courtyard. At present, the existing Main Campus features no landscaped elements, whereas the proposal includes significant and carefully considered landscaped space on the rooftop terrace, improving both the amenity for both users and those who overlook the Site. In addition, the future development of the Junior Campus will further contribute and complement to the provision of functional active recreational space.
Failure to Address Junior School Works	Concept Approval is sought for the building envelopes for alterations and additions to the Junior Campus. As previously reiterated in the EIS submitted to the DoPE in March 2018, the Junior Campus Concept Plan aims to provide a greater variety of learning settings, consolidating Year Groups, developing a more contemporary library and resource centres, and increasing common and covered areas. The proposed concept plan creates: ▪ An additional level of teaching and learning space is proposed to the top of the existing building fronting Humphrey Place; and ▪ New multi-purpose, sub-terranean sports facility: the main volume of the sports facility will be located along the Crescent Place boundary, set into the ground such that the trafficable roof will align with the existing podium. The northern end of the proposal would address a new lowered courtyard approximately 2m below existing ground level, which will be linked to the existing quadrant courtyard. The concept is considered respectful of the heritage value of the Junior Campus main building and appropriate curtilage will be provided around the item of heritage significance located on the Site. The built form sits within the

<table>
<tr><th>ISSUES RAISED BY AGENCIES AND ORGANISATIONS</th><th>PROPONENT'S RESPONSE</th></tr>
<tr><td></td><td>existing development on the Site with minimal visual impacts and no undue impacts on the amenity of neighbouring properties.

Concept Plans accompanied the EIS submission and were published on the DoPE planning portal, providing detail on the proposed building envelopes.

Preliminary assessments accompanied the EIS to assess the impact of the proposed concept plan. The provided information is considered sufficient for concept approval. Further detailed studies will accompany any future built form development application for the Junior Campus.</td></tr>
<tr><td>Inadequacy of Consultation</td><td>In accordance with SEARs issued for SSDA 8669, consultation has been undertaken with the relevant public authorities, the community and North Sydney Council. The following table summarises the meetings, presentation, briefings and information sessions held during the consultation process, including subsequent meetings following the submission of the EIS (as highlighted below):

<table>
<tr><th colspan="3">Summary of Consultation Sessions</th></tr>
<tr><th>Date</th><th>Consultation</th><th>Stakeholder</th></tr>
<tr><td rowspan="3">19 June 2017</td><td rowspan="3">Briefing</td><td>North Sydney Council</td></tr>
<tr><td>St Aloysius' College Staff</td></tr>
<tr><td>Design Team</td></tr>
<tr><td rowspan="3">18 October 2017</td><td rowspan="3">Briefing</td><td>TfNSW</td></tr>
<tr><td>RMS</td></tr>
<tr><td>Design Team</td></tr>
<tr><td>15 November 2017</td><td>Briefing Session</td><td>Community</td></tr>
<tr><td>16 November 2017</td><td>Briefing Session</td><td>Affiliates of the College</td></tr>
<tr><td>18 November 2017</td><td>Briefing Sessions</td><td>Community</td></tr>
<tr><td>31st January 2018</td><td>Additional Briefing Session</td><td>Residents of Craiglea</td></tr>
</table>
</td></tr>
</table>

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE

27th April – 28th May 2018	Exhibition Period	Government Agencies and Local Community
3rd May 2018	**Presentation**	**Milson Point Community Precinct**
8th May 2018	**Additional Briefing Session.**	**Residents of Craiglea**
19th June 2018	**Presentation**	**North Sydney Council**

During design development, based on the extensive consultation with the relevant stakeholders, the design team sought to address the matters raised through design alterations, focusing primarily on the proposed built form works to the Main Campus, as they were considered a key point of interest.

The following changes occurred out of consideration for community feedback for the original submission of the SSDA:

- Refinement of rooftop landscape buffer zones and privacy screening between the Man Campus and the residential properties to the east;
- Refinement of rooftop mechanical plant location in order to provide adequate setback from the boundary and appropriate levels of screening; and
- Infilling of existing drenched window opening on the existing south-eastern façade of Upper Pitt Street.

In response to the public exhibition period, and subject to the accompanying RTS, further amendments were proposed to the building form, as outlined below:

- The development envelope of the redeveloped north-east wing has been reduced to be consistent with the height of the current north-east wing building envelope, resulting in a reduction to the proposed parapet height by **270mm**, at and **RL 43.22**;
- The proposed acoustic barrier has been designed engineered to minimise visual impact. A 200mm thick structural element will sit below the parapet height to support the proposed glazed parapet. The acoustic

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	barrier has been engineered to ensure the screen above the 1200mm parapet is a clear frameless acoustic glass, with no metal posts or support frames obscuring view corridors. Therefore, in light of the above, it is considered adequate community consultation has been carried throughout the course of the SSDA process. The College has always held an open line of communication with residents of the local community, in particular the residents of Craiglea House, as evident in the table above, and the College has continued to be transparent has the proposed development has progressed from concept to detailed design.
CRAIGLEA CONCERNS	
Inadequate Consultation	Refer to discussions above.
Impact of the Development on the Heritage Significance of Craiglea	Heritage Impact Statements were prepared by NBRS Architecture and accompanied the original EIS submission as **Appendix 16**. It was recognised the Main Campus on Upper Pitt Street is not listed under NSLEP 2012 as an item of heritage significance, nor is it located within a Heritage Conservation Area. However, the Site is adjacent to several items of local heritage significance, including Craiglea House and the Jeffreys Street Local Heritage Conservation Area. The following statement of significance for Craiglea, 49 Upper Pitt Street, was included in the assessment: *An elegant late nineteenth century two storey mansion in the Italianate style, and the last still on its original subdivision extending from Pitt Street to Kirribilli Avenue. One of the best Italianate style mansions in Kirribilli now incorporated into a residential development in Kirribilli.* The proposed works have taken into consideration the location and settings of the heritage items in proximity to the Main Campus to minimis adverse visual impact. The eastern elevation of the new building and the landscaped roof terrace would be visible in some views from Craiglea. The existing balustrade height would be maintained, and extended by the installation of a glazed screen to address statutory height requirements needed for the landscaped roof terrace and to address acoustic and wind impacts. However, it is not considered that this would result in any detrimental impacts on the heritage significance of Craiglea House.

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	The proposed adaptation of the exterior of St Aloysius' College Main Campus, will be consistent with North Sydney Council requirements and commensurate with the materials and quality of recent developments in the immediate area. Further, the proposed scheme has been developed with consideration of Craiglea, and the potential impact on existing and original views associated with that house. The roof of the new development is consistent with the height established on the Site by the northern section of the building, adjoining Upper Pitt Street. In addition, the works would be wholly contained within Lot 10 of DP 880841 and would not affect the legal curtilage of Craiglea. Overall, the proposed development at the Main Campus has considered and addressed the Heritage Significance of Craiglea.
Solar Access and Overshadowing	As previously demonstrated, adequate solar access will be retained to neighbouring properties. Refer to **Appendix N** for further detail.
Inadequate Provision of Acoustic and Visual Privacy	The Main Campus is located adjacent to medium and High density residential development. The location of the North-East wing and infill building has been configured to ensure there are no undue impact on the visual privacy of the neighbouring developments. This has been achieved by the following: ▪ The built form has a varying setback 3.5m to 4.05m from the eastern boundary, separated by landscaped areas and is at a lower level, ensuring adequate separation; ▪ A 3-5 metre landscape buffer will be provided on the rooftop terrace to minimise opportunities for overlooking. Refer to **Section 2.1** of the RTS Report and **Appendix E** for further discussions. In terms of acoustic, SLR have prepared an addendum Noise Impact Assessment which accompanies this application as **Appendix I**. Under **Section 5.1.1.2** of the Noise Impact Assessment submitted with the original EIS, the noise model took into account hard surfaces and highly reflective materials on the rooftop terraces, as set out in the Landscape Plan

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	submitted with the EIS. The complete surface of the rooftop terrace was modelled as hard ground as a worst-case scenario. Any future proposed soft-landscaping will only have a positive impact by further lowering noise emissions. The original acoustic assessment predicted noise levels at the affected residential receivers for the existing operational scenario. It was concluded the relocation of quadrangle functional area, to the rooftop terrace would in fact improve the noise impact on adjoining residents, as any noise produced would be elevated. The reduction in noise generated would also be assisted with the erection of a 2.4m acoustic barrier. With the implementation of an acoustic barrier of 2.4m; noise models taken from 2.1m, around the perimeter of the proposed rooftop terrace of the infill building on the main campus, the proposed changes will in fact reduce the current school noise impacts on the most highly impact receivers.
Failure to Advance Plans That Address The Contextual Relationship between the College and Craiglea	The proposed development responds to the relationship between the College and Craiglea by maintaining the visual access to the harbour. The primary mass of the proposed building is consistent with the existing height and additional height is limited to frameless glass barriers with minimal visual impact. The proposed rooftop terrace and landscaping is compatible with the Craiglea House rooftop landscape design. Screening and vegetation provide privacy and contribute to celebration of the harbour lifestyle. Harbour views are unaffected and minor changes to the façade do not distract or detract from primary harbour views. Overall, the proposed development genuinely respects and responds to the local character, and the interface between the proposed built form and adjoining properties, including Craiglea House and is considered appropriate. The development proposal does not change the existing streetscapes and setbacks which are compatible with the Kirribilli Neighbourhood Local character accommodating narrow streets with limited landscaping and minimum front boundary setbacks.
Inappropriate Building Form	Kirribilli has dense and compact built forms with a mix of low, medium and high density developments including high rise apartments capturing views to the harbour. The proposed development is considered to respect and enhance the built form environment and character by: ▪ Carefully considering the interface with the proposed development and adjoining land use; ▪ Compatible bulk and scale to create consistent built form rhythm; ▪ Consistent roofscape character that is aligned with the scenic qualities visible from surroundings; ▪ Use of compatible materials to form a consistent streetscape;

ISSUES RAISED BY AGENCIES AND ORGANISATIONS	PROPONENT'S RESPONSE
	▪ Consistency with established street setbacks.
Lack of On-Site Landscaping and Open Space	Refer to discussions above.
Statutory Compliance	The Character Assessment (**Appendix J**), as prepared by Roberts Day, concludes the proposal *genuinely respects and responds to the Kirribilli local character and community values, the 4 sub character interfaces and that the interface between the proposed built form and adjoining character is considered appropriate.* The proposals appropriate response to the surrounding character is further reinforced in that the proposal will not change the existing streetscapes and setbacks which are compatible with the Kirribilli Neighbourhood Local Character. Overall, it is considered, the College remains as an iconic institute of learning in the Kirribilli Neighbourhood local area and does not compromise the scenic values of Kirribilli. In addition, PMDL has provided an assessment against Schedule 4 of the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (Education SEPP as part of their response at **Appendix B**. The principles in 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.