



Prity Cleary  
Assessment Officer  
NSW Department of Planning and Environment

2 April 2019

Dear Prity,

**SCEGGS Darlinghurst Concept and Stage 1 Development Application -  
Objection**

I am writing to object to the above application for the following principal reasons.

In summary, I am concerned that the proposed concept, which will involve the demolition of heritage buildings and loss of amenity to the neighbourhood, is not shown to be necessary and does not properly consider the likely impacts from the increased size of the school facilities for which authorisation is being sought.

**The “statement of present intent”**

The EIS conclusions rely on a “statement of present intent” regarding the school’s avowed intention not to increase the student population or the area of the school campus. The use of a “statement of intent” in this way, rather than a binding commitment, raises serious concern as to the justification for the substantial increase in the school’s facilities and may well result in the school “changing its intention” in the future, in order to deploy the very substantially expanded facilities to support an increase in the school population, without any proper assessment of the impacts of such a development on the neighbourhood.

I would urge the Department to reject such an approach. At a minimum, the environmental and amenity impacts of the development proposal (including noise, traffic and parking impacts) should fall to be assessed on the basis of its *potential* to substantially increase the school population in the future.

## **Heritage impacts**

The proposal also involves the demolition of heritage buildings, some of which are over 100 years old. Those buildings make important contributions both to the heritage character of the site and also the surrounding conservation area and those parts of the proposal which call for them to be demolished (e.g. in the case of the 1920s Wilkinson Building) or obscured from public view (e.g. in the case of the 1830s "Barham" building) will have a serious adverse impact on the environmental heritage of the City of Sydney and the heritage conservation area. The proposal lacks any substantive assessment of those substantial heritage impacts and does not adequately justify them (e.g. by explaining why the buildings cannot be retained and adapted for future use or why public views cannot be retained).

The proposal also involves increases in the heights of buildings on the site, which significantly exceed the height of building development standard, including a 7-storey building which is not adequately set back from the existing terraces in Thomson and Bourke Streets. These height increases and the overall bulk and scale of the proposed development are manifestly inappropriate in the context of the surrounding heritage conservation zone.

