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# **KINCOPPAL ROSE BAY**

Submissions Report  
SSD-10325

Prepared for  
**KINCOPPAL ROSE BAY SCHOOL**  
July 2021

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# 1. INTRODUCTION

This Submissions Report relates to a Concept Proposal and Stage 1 Application for alterations and additions to the existing Kincoppal Rose Bay School at 2 Vacluse Road and 3-13 Vacluse Road, Vacluse NSW 2030 (Lot 104, DP1092747). On behalf of Kincoppal Rose Bay School (**the Proponent**), this Submissions Report has been prepared to address the matters raised by government agencies and relevant stakeholders throughout the public exhibition period (between December 2020 and January 2021).

## 1.1. BACKGROUND AND PROJECT CONTEXT

This State Significant Development Application (**SSDA**) for alterations and additions to Kincoppal Rose Bay School was lodged with the Department of Planning, Industry and Environment (**the Department**) in November 2020 (SSD-10325). In accordance with Section 4.22 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the proposal comprises a staged SSDA which includes a Concept Proposal for a site-wide campus masterplan and a Stage 1 Application for detailed works.

### Summary of Proposed Development

This SSDA seeks approval for the staged redevelopment of Kincoppal Rose Bay, including:

- **Concept Proposal** for alterations and additions to the existing facilities at Kincoppal Rose Bay, including:
  - Reconfiguration of the existing Hughes Centre for a new multi-purpose teaching facility up to a maximum of three (3) storeys in height (RL 60.5).
  - Reconfiguration of the Circulation Hub including access improvements up to a maximum of four (4) storeys in height (RL 60.5).
  - Boarding House Extension up to a maximum of three (3) storeys in height (RL 50.5).
  - Stage 1 Application for detailed works (set out as follows).
- **Stage 1 Application** for detailed works including alterations and additions to the existing facilities at Kincoppal Rose Bay, including:
  - Traffic management works to the Junior School.
  - Expansion of the Early Learning Centre (ELC).
  - Upgrades and extensions to the Junior School including an outdoor roof terrace learning area and vertical circulation upgrades and access improvements.
  - Provision of a Car and Bus Parking Area, including associated landscaping and the removal of 16 trees.
  - Expansion and refurbishment of the Year 8 Learning Centre.
  - Refurbishment of the Senior School Main Entrance Forecourt, Reception / Foyer.
  - Increase in staff and student numbers, up to a maximum of 1,205 students and a maximum of 185 staff.

The detailed works proposed as part of the Stage 1 Application are proposed to be constructed across several sub-phases. These sub-phases are set out in **Table 2**. Refer to **Section 3.1** of this Submissions Report for the full description of the proposed development.

## 1.2. OVERVIEW OF SUBMISSIONS

The SSDA was publicly exhibited between 8 December 2020 and 29 January 2021. During this time, a total of seven (7) submissions were received from public authorities (including State and Commonwealth agencies).

The public authorities that made submissions relating to the proposal included:

- NSW Environmental Protection Authority (EPA).

- Biodiversity and Conservation Division of the DPIE Environment, Energy and Science Group (EES).
- Sydney Water.
- Woollahra Municipal Council.
- Transport for NSW (TfNSW) / Roads and Maritime Services (RMS).
- Ausgrid.
- Heritage NSW (Aboriginal Cultural Heritage Regulation).

There were no submissions received from special interest groups, members of the local community or individuals. All submissions were managed by the Department, which included registering and uploading the submissions on the Department's 'Major Projects website (SSD-10325).

## Categorising Key Matters Raised

In accordance with the Department's Guidelines, *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*, the key issues raised in the submissions have been grouped into categories that relate to the environmental impacts of the proposal.

The key issues raised in the submissions can be broadly grouped into the following categories:

- Increase in staff and student numbers.
- Traffic, parking, and access.
- Tree removal and landscaping.
- Built form, urban design, and visual impacts.
- Aboriginal cultural heritage and archaeology.
- Other environmental matters (including minor clarifications).

Since only a small number of submissions were made, this Submissions Report provides a response to each individual submission within the Submissions Register at **Appendix A**. Refer to **Section 5** of this Submissions Report for detailed responses to the key issues raised in the submissions.

## 1.3. RESPONSE TO SUBMISSIONS

This Submissions Report outlines the refinements and clarifications to the proposed development, and a response has been provided to all concerns raised within the submissions. With the exception of the Junior School vertical circulation link, there has been no changes or amendments to the overall bulk or scale of any built forms.

In response to key issues raised in the submissions, the following minor refinements have been made to the proposal since the application was publicly exhibited:

- Minor increase in the overall provision of on site car parking, motorbike parking, and bicycle parking.
- Identify potential locations for PV panels and rainwater collection tanks across the site.
- Refinements to the Junior School vertical circulation link to address its perceived bulk and scale when viewed from the Harbour.
- Provision of shade structures to the ELC outdoor area.
- Reduction in overall footprint of the basement car park (as part of the Bus and Car Parking Area).
- Provision of a landscaped buffer along the southern boundary adjacent to the proposed Bus and Car Parking Area.

## 1.4. UPDATED EVALUATION

The refinements and clarifications made in responses to key issues raised within the submissions are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

Beyond those impacts previously assessed within the *Environmental Impact Statement* (EIS), there will be no additional impacts as a result of the refinements and clarifications to the proposal. Rather, the refinements include additional measures to ensure any previously known and assessed impacts will be appropriately managed and mitigated where relevant.

The Concept Proposal and Stage 1 Application for detailed works at Kincoppal Rose Bay (including minor design refinements and clarifications) is in the public interest, and is therefore considered acceptable.

## 1.5. STRUCTURE OF THIS REPORT

This Submissions Report has been prepared in accordance with the Department's Guidelines, *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*, and is structured as follows:

- **Section 2** – Engagement and actions taken since exhibition.
- **Section 3** – Clarifications on the proposed development.
- **Section 4** – Minor refinements to the proposed development.
- **Section 5** – Detailed response to key issues raised in submissions.
- **Section 6** – Conclusion.

## 1.6. SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following technical reports and documentation.

Table 1 – List of Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Submissions Register	Urbis
Appendix B	Updated Mitigation Measures	Urbis
Appendix C	List of Plans for Approval	Urbis
Appendix D1	Concept Architectural Plans – Site Wide	BVN
Appendix D2	Concept Architectural Plans – Circulation Hub	BVN
Appendix D3	Concept Architectural Plans – Hughes Centre	BVN
Appendix D4	Concept Architectural Plans – Boarding House	BVN
Appendix E1	Revised Detailed Architectural Plans – Junior School and ELC	BVN
Appendix E2	Revised Detailed Architectural Plans – Bus and Car Parking	BVN
Appendix E3	Revised Detailed Architectural Plans – Year 8 Centre	BVN

<b>Appendix</b>	<b>Report</b>	<b>Prepared By</b>
<b>Appendix E4</b>	Revised Detailed Architectural Plans – Senior School Main Entry	BVN
<b>Appendix F</b>	Revised Design Report	BVN
<b>Appendix G</b>	Concept Landscape Plans	Turf Design Studio
<b>Appendix H</b>	Detailed Landscape Plans	Turf Design Studio
<b>Appendix I</b>	Addendum Transport Impact Assessment	CBRK
<b>Appendix J</b>	Revised Civil Plans	Henry & Hymas
<b>Appendix K</b>	Addendum Civil Engineering Report	Henry & Hymas
<b>Appendix L</b>	Preliminary Acid Sulfate Soils Assessment	JK Environments
<b>Appendix M1</b>	Revised Geotechnical Report (Bus and Car Parking Area)	JK Geotechnics
<b>Appendix M2</b>	Revised Geotechnical Report (ELC)	JK Geotechnics
<b>Appendix M3</b>	Revised Geotechnical Report (New Entry Road)	JK Geotechnics
<b>Appendix N</b>	ESD Report	Cundall
<b>Appendix O</b>	Revised Preliminary (Stage 1) Contamination Report	JK Environments
<b>Appendix P</b>	Revised Remediation Action Plan	JK Environments
<b>Appendix Q</b>	Addendum Aboriginal Cultural Heritage Statement	Coast History & Heritage
<b>Appendix R</b>	Addendum Acoustic Statement	Acoustic Dynamics
<b>Appendix S</b>	Revised Construction Management Plan	Mahady Management
<b>Appendix T</b>	Addendum Heritage Statement	Design 5



## 2. ENGAGEMENT

This section summarises the pre-lodgement consultation that was undertaken, as well as the actions that have been taken since public exhibition in order to address the issues raised within the submissions. This includes further engagement with public agencies and government authorities.

### 2.1. PRE-LODGE MENT CONSULTATION

#### Community Consultation

Prior to lodgement of the application in November 2020, extensive consultation was undertaken by Elton Consulting with the local community. The purpose of this consultation was to inform the local community about the proposed development and to allow the opportunity for the community to provide feedback on the proposal. This feedback helped to inform the final design of the Concept Proposal and Stage 1 Application for detailed works.

The following engagement activities were undertaken prior to lodgement of the application:

- **Website and Email Notification** – Information about the proposed development was provided on the School's website including updated fact sheets and details of the new facilities, upgrades, and refurbishment works.
- **Dedicated Project Email Address** – [krkconsultation@elton.com.au](mailto:krkconsultation@elton.com.au) was set up for the community to provide direct feedback, ask questions and/or register for project updates.
- **Community Postcard Drops**– A postcard was distributed to immediate neighbours within the vicinity of the school who could potentially be impacted by the proposed development. The postcard informed the community about the site-wide Campus Masterplan, an overview of the planning approval process and information about how to obtain more details (through the website, via email or call, registering for updates).
- **Community Information Session** – A community information sessions was held on the 18 June 2019 between 5.30pm and 7.30pm at the Senior School (within the Hughes Centre). The purpose of the information session was to inform the community about the proposal and provide the community with an opportunity to ask questions. The local community was also encouraged to register for project updates.
- **School Community Newsletter and Communications** – A notification about the proposed development was also placed within the School's newsletter.

The community will continue to be updated about the progress of the Kincoppal site-wide Campus Masterplan through:

- Website updates.
- Via email (for those individuals who registered for updates).
- Local notifications about further engagement activities.

Overall, the local community provided positive feedback about the proposed development and did not raise any concerns in relation to the following:

- Building height, design or visual impacts.
- Landscaping.
- Approach to heritage.
- Impacts associated with traffic or parking.
- Timeframes associated with the staged construction of the project.

Refer to the Community Consultation Outcomes Report (dated July 2020, and October 2020) as originally submitted with the application for further details.

Importantly, no submissions were made by special interest groups, members of the local community or individuals in response to public exhibition of the submitted Concept Proposal and detailed Stage 1 Application. This is directly related to the extensive engagement and consultation undertaken prior to lodgement of the application.

## **Agency Consultation**

Prior to lodgement of the application, several briefing sessions and meetings were held with public agencies. This included Woollahra Council and Transport for NSW (TfNSW).

Overall, the feedback provided by Woollahra Council was positive. Feedback provided by TfNSW was received in October 2020 and addressed as part of the Traffic Accessible Impact Assessment submitted with the application.

## **2.2. POST-EXHIBITION ENGAGEMENT**

### **Further Agency Engagement**

The application was publicly exhibited between 8 December 2020 and 29 January 2021. On 1 February 2021, the Department issued a letter requesting additional clarification regarding various aspects of the proposed development.

On 3 March 2021, a (virtual) meeting was held with officers at the Department to discuss some of the matters raised in this letter, including:

- Increase in staff and student numbers.
- Clarification regarding the Concept Proposal and Stage 1 Application for detailed works (as well as associated documentation requirements).
- Traffic and car parking.
- Other environmental matters (including additional investigations).

On 10 March 2021, a (virtual) meeting was also held with officers from Heritage NSW and the Department. The purpose of this meeting was to discuss Aboriginal Cultural Heritage and the potential impacts of the proposed development on several locations of moderate to high archaeological potential that are located within the site's boundary.

The outcome of these meetings is set out in more detail within the following sections of this Submissions Report.

### 3. CLARIFICATIONS ON THE PROPOSED DEVELOPMENT

On 1 February 2021, the Department issued a letter requesting clarification regarding the proposed development. Specifically, the Department requested additional information to better understand which components of the proposed development form part of the Concept Proposal, and which components form part of the Stage 1 Application for detailed works.

This section provides an overview of the proposed staged SSDA (including various sub-phases) associated with the Concept Proposal and the Stage 1 Application for detailed works.

#### 3.1. DESCRIPTION OF DEVELOPMENT

This SSDA seeks approval for the staged redevelopment of Kincoppal Rose Bay School, including:

- **Concept Proposal** for alterations and additions to the existing facilities at Kincoppal Rose Bay, including:
  - Reconfiguration of the existing Hughes Centre for a new multi-purpose teaching facility up to a maximum of three (3) storeys in height (RL 60.5).
  - Reconfiguration of the Circulation Hub including access improvements up to a maximum of four (4) storeys in height (RL 60.5).
  - Boarding House Extension up to a maximum of three (3) storeys in height (RL 50.5).
  - Stage 1 Application for detailed works (set out as follows).
- **Stage 1 Application** for detailed works including alterations and additions to the existing facilities at Kincoppal Rose Bay, including:
  - Traffic management works to the Junior School, including:
    - A new internal link road.
    - Designated drop-off/pick-up zone.
    - Elevated pedestrian walkway and access improvements.
    - Additional car parking (including reconfiguration of existing parking).
  - Expansion of the Early Learning Centre (ELC) and associated outdoor play area, including additional car parking.
  - Upgrades and extensions to the Junior School, including:
    - A new outdoor roof learning area.
    - Vertical circulation upgrades and access improvements.
    - Reconfiguration of existing car parking.
    - Associated landscaping and infrastructure works.
  - Provision of a Car and Bus Parking Area adjacent to the Senior School main entry gates comprising:
    - Seven (7) at grade bus parking spaces.
    - Construction of a single basement level, comprising 29 car parking spaces and three (3) motorcycle spaces.
    - Reconfiguration of existing at grade car parking spaces.
    - Associated landscaping and infrastructure works, including the removal of 16 trees.
  - Expansion and refurbishment works to the Year 8 Learning Centre, including the provision of 18 bicycle spaces.
  - Refurbishment of the Senior School Main Entrance, Forecourt, Reception / Foyer, including

- Widening of the exit road.
  - Designated drop-off/pick-up zone.
  - Pedestrian access improvements.
  - Associated landscaping and infrastructure works.
- Increase in staff and student numbers, up to a maximum of 1,205 students and a maximum of 185 staff.

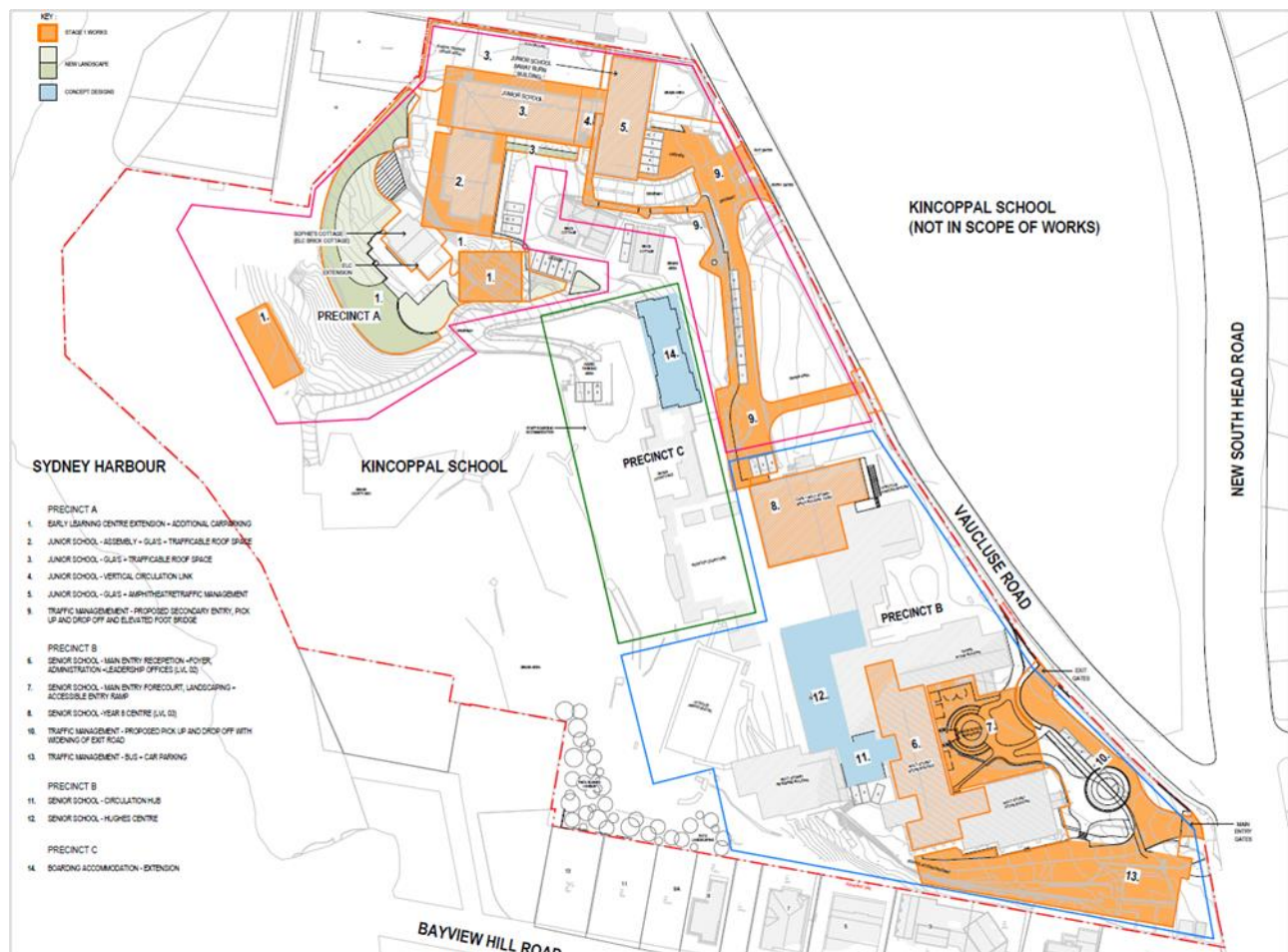
The detailed works as part of the Stage 1 Application are proposed to be constructed across several sub-phases. These sub-phases are set out in more detail in **Section 3.2** below.

## 3.2. CONSTRUCTION PHASES

The proposed phasing of construction as part of the Concept Proposal and Stage 1 Application for detailed works has been documented within the revised Architectural Plans, included at **Appendix D1**, and is consistent with the updated description of development set out in **Section 3.1**.

For clarity, the proposed phasing of construction is also illustrated in **Figure 1** and summarised in **Table 2** below.

Figure 1 – Proposed Concept Masterplan (including Stage 1 Application for Detailed Works)



Source: BVN (2021)

The proposed phasing of the Concept Proposal is expected to involve works initially to the Circulation Hub, followed by the Hughes Centre and the Boarding House Extension. However, the exact phasing is not yet known and will be confirmed as part of any subsequent Development Application(s).

Refer to **Section 5.1** for additional information regarding the proposed increase in staff and student numbers associated with the Concept Proposal and Stage 1 Application for detailed works.

Table 2 – Summary of Concept Masterplan and Proposed Development Phases

Staging	Precinct / Location	Proposed Development	Proposed Phases
<b>Stage 1 Application – Detailed Works</b>	<b>Precinct A</b> – Junior School & ELC	Traffic Management Works, including: <ul style="list-style-type: none"> <li>Internal link road</li> <li>Drop-off/pick-up zone</li> <li>Elevated pedestrian walkway / access improvements</li> <li>Additional 5 x car parking spaces (and reconfiguration of existing parking)</li> </ul>	<b>Phase A-1</b>
		Early Learning Centre (ELC) Expansion, including 11 x additional car parking spaces.	<b>Phase A-2</b>
		Alterations and additions to the Junior School, including: <ul style="list-style-type: none"> <li>A new outdoor roof learning area, and vertical circulation upgrades and access improvements</li> <li>Reconfiguration of existing car parking, and associated landscaping and infrastructure works</li> </ul>	<b>Phases A-3 – A-5</b>
	<b>Precinct B</b> – Senior School	Bus and Car Parking Area, including: <ul style="list-style-type: none"> <li>Construction of a single basement level, comprising car parking and motorcycle parking</li> <li>At grade bus parking spaces (and reconfiguration of existing parking)</li> <li>Associated works, including removal of 16 trees</li> </ul>	<b>Phase B-1</b>
		Expansion of the Year 8 Learning Centre	<b>Phase B-2</b>
		Alterations and additions to the Main Entrance, Forecourt and Reception / Foyer including: <ul style="list-style-type: none"> <li>Widening of the exit road</li> <li>Drop-off/pick-up zone</li> <li>Pedestrian access improvements and associated works</li> </ul>	<b>Phases B-3 – B-4</b>
<b>Concept Proposal</b>	<b>Precinct B</b> – Senior School	Reconfiguration of the Circulation Hub	<b>TBC – Subject to subsequent Development Application(s)</b>
		Alterations and additions to the Hughes Centre	
	<b>Precinct C</b> – Senior School	Boarding House Extension	

The Architectural and Landscape Plans have also been repackaged to reflect the refined description of development, and to clearly illustrate which components of the proposed development relate to the Concept Proposal and which components relate to the Stage 1 Application.

The updated list of plans for approval is included at **Appendix C**. The updated plans that this application seeks approval for have been listed in ***red italics***, and the outdated plans (as originally submitted) are listed in ~~strike through~~.

The revised Architectural and Landscape Plans are included at **Appendix D** through **Appendix H** (inclusive).

## 4. REFINEMENTS TO THE PROPOSED DEVELOPMENT

In response to the key issues raised within the submissions, several minor design refinements and clarifications have been made to the proposed development. This section sets out the refinements that have been made to the proposed Concept Proposal and Stage 1 Application for detailed works.

### 4.1. OVERVIEW OF DESIGN REFINEMENTS

The following table summarises the minor refinements and clarifications proposed since public exhibition and in response to submissions made, and as a result of further engagement with the Department.

Importantly, these refinements are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

Table 3 – Design Refinements to Proposed Development

Location	Proposed Refinements	Appendix
Site-Wide	<p>Increase in provision of car parking on site including the provision of an additional three (3) car parking spaces, three (3) motorcycle spaces and 18 bicycle spaces.</p> <p>These car parking spaces form part of the Stage 1 Application for detailed works, although will be constructed to align with the various sub-phases.</p>	Appendix D1
Site-Wide	Identify potential locations for PV Panels and rainwater collection tanks across the site.	Appendix D1
Junior School	Remove southern portion of the two upper levels of the Junior School vertical circulation link, resulting in a minor overall increase of 7.4 m <sup>2</sup> Gross Floor Area (GFA) to the Junior School.	Appendix E1
ELC	Provision of shade structures to ELC outdoor area.	Appendix E1
Bus and Car Parking Area	<p>Reduction in overall footprint of the basement car park as part of the Bus and Car Parking Area, and adjustments to total provision of car parking, including:</p> <ul style="list-style-type: none"> <li>Loss of one (1) car parking space within the single level basement car park.</li> <li>Provision of three (3) motorcycle spaces.</li> </ul>	Appendix E2
Bus and Car Parking Area	Provision of landscaped buffer along the southern boundary adjacent to the proposed Bus and Car Parking Area	Appendix H

Refer to the Concept Architectural Plans (**Appendix D1**), the Detailed Architectural Plans (**Appendix E1 and E2**), and the Detailed Landscape Plans (**Appendix H**) for further details on the design refinements made since public exhibition.

## 4.2. UPDATED JUSTIFICATION AND PROJECT EVALUATION

In accordance with the Department's Guidelines, *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*, this section provides the justification for the project and an updated evaluation of the project as a whole.

This evaluation includes matters for consideration within Section 4.15 of the *Environmental Planning and Assessment Act 1979* (EP&A Act 1979) and the principles of ecologically sustainable development (ESD) within Schedule 2 (Part 3) of the *Environmental Planning and Assessment Regulation 2000* (the Regulations). This evaluation is set out in **Table 4** and **Table 5** below.

Table 4 – Updated Section 4.15 Assessment

Consideration	Comment
Environmental Planning Instrument	<p>The proposed refinements include a reduction to the overall bulk and scale of the Junior School vertical circulation link by removing the two upper levels at the southern portion. Although this refinement results in a minor increase of 7.4 m<sup>2</sup> GFA, the site is not subject to a maximum floor space ratio (FSR) control. This refinement to the Junior School circulation link also improves views to the heritage-listed school when viewed from the Harbour.</p> <p>Therefore, the proposed refinements and clarifications do not change the assessment against the relevant State and Local Environmental Planning Instruments set out within Section 5 of the EIS.</p>
Draft Environmental Planning Instruments	<p>The proposed refinements and clarifications do not change the assessment against the relevant draft Environmental Planning Instruments set out within Section 5 of the EIS.</p>
Development Control Plans	<p>The provision of 31 car parking spaces on site (incorporating refinements to address the shortfall of three car parking spaces), three (3) motorcycle spaces and 18 bicycle spaces complies with the relevant requirements of the Woollahra DCP 2015. The proposed refinements also reduce the overall bulk and scale of the Junior School vertical circulation link when viewed from the Harbour.</p> <p>Although it is noted that Clause 11 of the <i>State Environmental Planning Policy (State and Regional Development) 2011</i> excludes the application of DCPs to State Significant Development Applications (SSDAs).</p>
Any Matters Prescribed by the Regulations	<p>This EIS has been prepared in accordance with Schedule 2 of the <i>Environmental Planning and Assessment Regulations 2000</i>. This includes an updated evaluation against the principles of ESD, set out in <b>Table 6</b> below.</p>
Likely Impacts of the development	<p>This EIS and Submissions Report has been prepared in accordance with Sections 6 and 7, Part 3 in Schedule 2 of the Regulations. The likely impacts of the proposal have been outlined in Section 6 of the EIS, and the key matters raised within the submissions have been addressed within <b>Section 5</b> of this Submissions Report.</p>
Suitability of the Site	<p>The site is still considered suitable for the proposed development (as refined) for the following reasons:</p> <ul style="list-style-type: none"> <li>▪ The land is zoned SP2 (Infrastructure 'Educational Establishments') pursuant to the <i>Woollahra Local Environmental Plan 2014</i> (WLEP 2014).</li> </ul>



Consideration	Comment
	<p>The proposal is permissible with consent and consistent with the land use objectives of the SP2 zone.</p> <ul style="list-style-type: none"> <li>▪ The proposal is also consistent with the objectives of the relevant planning policies and complies with the planning controls.</li> <li>▪ The proposal will provide state-of-the art upgrades to an existing educational establishment by redeveloping the campus within its existing footprint and within the existing site boundary.</li> <li>▪ There are no significant environmental constraints limiting development on the site that are unable to be avoided, remedied or mitigated.</li> <li>▪ The proposal will improve the existing provision of on-site parking and significantly improve the efficiency of the existing drop-off and pick-up facilities.</li> </ul>
Any Submissions made in Accordance with this Act or the Regulations	<p>All submissions made in accordance with the EP&amp;A Act and the Regulations have been considered following exhibition of the application.</p> <p>Responses to the key matters raised within the submissions is set out within <b>Section 5</b>. Key matters raised by each submitter have also been addressed, with detailed responses included in the Submissions Register at <b>Appendix A</b>.</p>
The Public Interest	<p>The proposal is in the public interest for the following reasons:</p> <ul style="list-style-type: none"> <li>▪ The proposed Concept Proposal and Stage 1 Application for detailed works (including minor refinements and clarifications) has been prepared having regard to <i>State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017</i> (Education SEPP) and the WLEP 2014, and the works are permissible with consent.</li> <li>▪ The proposal will deliver significant traffic management works (including a new internal link road, two designated drop-off/pick-up zones, and a net increase in on site parking). This will improve the operation of the surrounding road network by reducing congestion. It will also improve safety for pedestrians and local residents.</li> <li>▪ The proposal has had regard to Council's planning policies and is consistent with the aims and objectives of the relevant planning controls for the site.</li> <li>▪ The proposal is suitable for the site as evidenced by the site analysis and various site investigations, including geotechnical, site contamination, flooding and traffic impact assessments.</li> <li>▪ Subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unacceptable impacts on adjoining or surrounding properties or the public domain in terms of traffic, heritage, social, economic or environmental impacts.</li> <li>▪ It will result in the provision of a high-quality educational environment for staff and students which supports high quality learning outcomes.</li> </ul>

Consideration	Comment
	<ul style="list-style-type: none"> <li>It will contribute positively to energy efficiency and environmental sustainability. The design has adopted and incorporated several ESD features to reduce energy consumption during the life of the proposed development.</li> </ul> <p>The Concept Proposal and Stage 1 Application for detailed works is in the public interest and any environmental impacts are able to be managed, subject to appropriate conditions of consent.</p>

Table 5 – Evaluation Against the Principles of ESD

Principle	Comment
<b><i>The Precautionary Principle</i></b>	<p>The proposal will not involve serious threats or irreversible environmental damage. Rather, the proposal will deliver additional landscaping across the site, and apply industry best practice ESD initiatives and climate change adaptation initiatives.</p> <p>An appropriate due diligence has been, and will continue to be, conducted throughout the development process to ensure the precautionary principle is satisfied. Due diligence includes conducting required studies to address all requirements of the <i>Secretary's Environmental Assessment Requirements</i> (SEARs) and all statutory provisions in all relevant planning instruments, including the <i>Biodiversity Conservation Act 2016</i>, and the relevant state and local environmental policies.</p>
<b><i>Inter-Generational Equity</i></b>	<p>The proposal will provide healthy internal and external environments for staff and students today and in the future. The landscaping principles of ecological restoration and habitat creation will deliver benefits to current and future generations. The principle will be addressed by ensuring the development complies with the principles set out in the <i>Government Architect NSW Environmental Design in Schools Manual</i> (October 2018).</p>
<b><i>Conservation of Biological Diversity and Ecological Integrity</i></b>	<p>The school includes extensive grounds with an existing site coverage of less than 40%. This ensures the natural and local ecology of the site is maintained in this important urban waterfront location. The landscape design will further enhance the biological diversity and ecological integrity of the site.</p>
<b><i>Improved Valuation, Pricing and Incentive Mechanisms</i></b>	<p>The design and operation of the school will reduce energy and water consumption and greenhouse gas emissions. Life Cycle Costing will be used throughout the design process to justify capital investment and reduce ongoing impacts.</p>

In accordance with the Department's Guidelines (dated July 2021), an updated table of proposed mitigation measures is included at **Appendix B** which has regard to the economic, environmental and social impacts of the proposal.

This updated table demonstrates that there will be no additional environmental impacts as a result of the proposed refinements and clarifications. Rather, the refinements include additional measures to ensure any previously known and assessed impacts will be appropriately managed and mitigated where relevant.

## 5. DETAILED RESPONSE TO SUBMISSIONS

In accordance with the Department's Guidelines, *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*, the key issues raised in the submissions have been grouped into categories which relate to the environmental impacts of the proposal.

These key issues include:

- Increase in staff and student numbers.
- Traffic, parking, and access.
- Tree removal and landscaping.
- Built form, urban design, and visual impacts.
- Aboriginal Cultural Heritage and archaeology.
- Other environmental matters (including minor clarifications).

This section provides a detailed response to each of these key issues. Since only a small number of submissions were made, a response to each individual submission is included within the Submissions Register at **Appendix A**.

### 5.1. INCREASE IN STAFF AND STUDENT NUMBERS

On 24 April 2017, an application was approved (DA/550/2016) by Woollahra Council which included a condition capping the school's maximum student population. This condition of consent was applied to the Year 12 Learning Hub application which was subsequently modified on 31 August 2017 (under DA/550/2016/3).

The 2017 modification amended the condition to cap the school's maximum student population at 970 students (rather than 900 students, which was a typographical error). An extract of the condition is set out as follows:

*"Staff and student number shall be capped at existing levels to minimise adverse traffic and parking impacts associated with the proposal"*

*"The existing permitted student numbers are 970 students attending Kincoppal from Kindergarten to Year 12, and 20 children attending the child care centre."*

The cap was initially imposed based on the student numbers provided in the submitted Traffic and Parking Assessment, and not on the basis of any adverse environmental impacts or traffic constraints. As such, this SSDA seeks to provide an updated student cap for Kincoppal Rose Bay to accommodate long term growth at the school.

As part of the Department's preliminary assessment of the proposal, additional information was requested regarding the proposed increase in staff and student numbers, how this staging will occur over the next 10 years, and what services and facilities will support this staged increase.

It was also requested that additional information be provided to confirm whether the proposed increase in 42 students (as part of the Boarding House Extension) forms part of the Concept Proposal or the Stage 1 Application for detailed works.

The proposal seeks an increase in the overall student numbers from an existing capacity of 955 to a maximum of 1,205 students. The proposal also seeks a proportionate increase in staff numbers from existing levels (150 staff) up to a maximum of 185 staff. This results in an increase in 250 students and 35 staff. For clarity, the proposed increased in staff and student numbers is summarised in **Table 6** below.

Table 6 – Proposed Increase in Staff and Student Numbers

Component	Existing	Proposed	Additional
Early Learning Centre	40 students	70 students	<b>+30 students</b>
Junior School (Kindergarten – Year 6)	372 students	445 students	<b>+73 students</b>
Senior School (Year 7 – Year 12)	543 students <i>includes 148 boarders</i>	690 students <i>Includes 190 boarders</i>	<b>+147 students</b> <i>Includes +42 boarders</i>
<b>TOTAL STUDENTS</b>	<b>955 students</b>	<b>1,205 students</b>	<b>+250 students</b>
<b>TOTAL STAFF</b>	<b>150 staff</b>	<b>185 staff</b>	<b>+35 staff</b> <i>Incl. +6 boarding staff</i>

While the intention in the application (as originally submitted) was for the increase in staff and student numbers to accommodate long term growth at the school, and for this growth to occur organically and incrementally, it is acknowledged that additional clarification is required to ensure that any potential environmental impacts associated with this proposed increase have been adequately addressed and mitigated. This is particularly important for any impacts associated with traffic, parking and access as a result of the proposed increase in staff and student numbers.

The proposal has been refined to achieve greater clarity around the proposed increase in staff and student numbers by seeking consent for an overall increase in staff and student numbers (rather than a staged or incremental increase over a period of 10 years). This overall increase is supported by minor refinements to the provision of car parking and the delivery of traffic management works. These refinements are set out in more detail in **Section 5.2** below.

The proposal is therefore seeking consent for the overall increase in staff and students (up to a maximum of 1,205 students and 185 staff). This is consistent with the proposed increase in staff and student numbers set out within the application as originally submitted (as the traffic modelling conservatively assumed that the increase in staff and students would be accommodated as part of the detailed Stage 1 Application). Importantly, for assessment purposes this overall increase in staff and student numbers will be accommodated entirely as part of the Stage 1 Application for detailed works.

While the proposed Boarding House Extension (as part of the Concept Proposal) is anticipated to accommodate 42 additional boarders and six (6) additional boarding house staff, for simplicity of assessment, this has been included as part of the overall increase in staff and students and will be accommodated as part of the Stage 1 Application for detailed works. Although it is important to note that the additional boarders and staff associated with the Boarding House Extension will be living on site, and therefore will not be traveling to and from the school each day.

However, for assessment purposes the anticipated increase in 42 additional boarders and 6 boarding house staff has been considered as part of the traffic modelling, provision of on-site car parking, and associated traffic mitigation measures which will be delivered as part of the Stage 1 Application for detailed works.

Given that the works to the Circulation Hub and Hughes Centre relate to improving accessibility within the site and upgrades to existing general learning areas, there will be no increase in staff or student numbers as part of the Concept Proposal.

## 5.2. TRAFFIC, PARKING AND ACCESS

### Provision of Car Parking

In Woollahra Council's submission, it was noted that the proposal as originally submitted did not provide adequate car parking, motorcycle parking and bicycle parking on site in accordance with the *Woollahra Council Development Control Plan 2015* (Woollahra DCP 2015) and the *RMS Guide to Traffic Generating Developments*.

The original proposal submitted in November 2020 included the provision of 28 car parking spaces, resulting in a shortfall of at least three (3) car parking spaces. No motorcycle spaces or bicycle spaces were included in the original application. In their submission, Woollahra Council noted that a total of 31 car parking spaces and three (3) motorcycle parking spaces should be provided on site. It was also recommended that the provision of bicycle parking is considered to accommodate increased demand.

In response to Council's submission, the proposal has been refined since public exhibition to comply with the relevant parking requirements. An additional three (3) car parking spaces will be provided on site to address the shortfall identified in Council's submission. This results in an overall provision of 31 car parking spaces on site (including four accessible car parking spaces) that will be delivered as part of the proposed development. The provision of these spaces will form part of the Stage 1 Application for detailed works, although will be constructed to align with the various sub-phases identified in **Table 7** below.

With the 103 car parking spaces that currently exist on site, and the provision of 31 parking spaces as part of the Stage 1 Application for detailed works, the school will accommodate 134 car parking spaces on site. This meets the requirements of the Woollahra DCP 2015 and the *RMS Guide to Traffic Generating Developments*.

In addition, the Stage 1 Application for detailed works has been refined to include the provision of five (5) car parking spaces as part of the first phase of works (Phase A-1), comprising traffic management works to the Junior School), and an additional 11 car parking spaces as part of the ELC expansion (Phase A-2). This ensures that any potential environmental impacts associated with the overall increase in staff and student numbers will be adequately addressed and mitigated as part of the first phases of works.

A summary of the proposed phasing and provision of additional car parking spaces is set out in **Table 7** below.

Table 7 – Summary of Stage 1 Application and Provision of Additional Car Parking

Staging	Precinct / Location	Proposed Development	Proposed Phases
<b>Stage 1 Application – Detailed Works</b>	<b>Precinct A</b> – Junior School & ELC	<b>Traffic Management Works</b> , including: <ul style="list-style-type: none"> <li>Internal link road</li> <li>Drop-off/pick-up zone</li> <li>Elevated pedestrian walkway / access improvements</li> <li><b>Additional 5 x car parking spaces</b> (and reconfiguration of existing parking)</li> </ul>	<b>Phase A-1</b>
		Early Learning Centre (ELC) Expansion, including <b>11 x additional car parking spaces</b> .	<b>Phase A-2</b>
		Alterations and additions to the Junior School	<b>Phases A-3 – A-5</b>
	<b>Precinct B</b> – Senior School	Bus and Car Parking Area, including: <ul style="list-style-type: none"> <li>Construction of a single basement level, comprising car parking and motorcycle parking</li> </ul>	<b>Phase B-1</b>

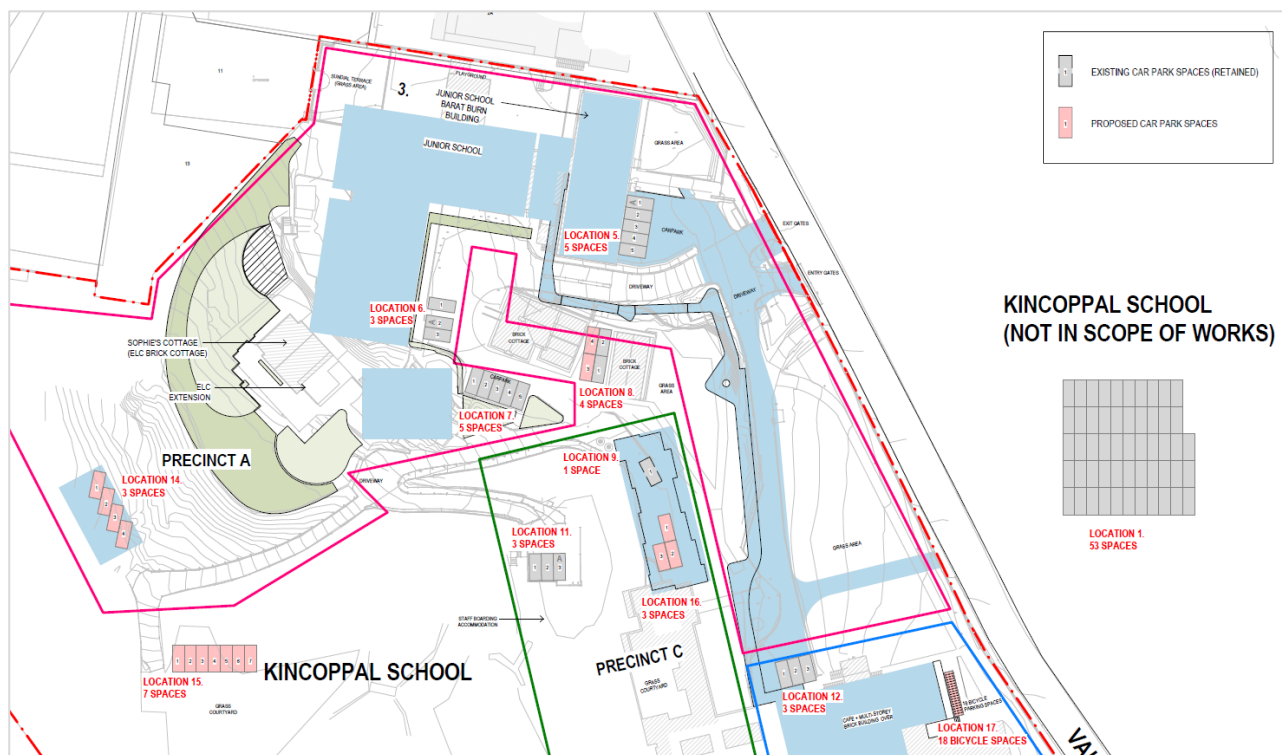
Staging	Precinct / Location	Proposed Development	Proposed Phases
		<ul style="list-style-type: none"> <li>At grade bus parking spaces (and reconfiguration of existing parking)</li> <li>Associated works, including tree removal</li> </ul>	
		Expansion of the Year 8 Learning Centre	<b>Phase B-2</b>
		Alterations and additions to the Main Entrance, Forecourt and Reception / Foyer including: <ul style="list-style-type: none"> <li>Widening of the exit road</li> <li>Drop-off/pick-up zone</li> <li>Pedestrian access improvements</li> <li>Associated works</li> </ul>	<b>Phases B-3 – B-4</b>

In conjunction with the traffic management works proposed as part of the first phases of works to the Junior School and ELC, the provision of additional car parking will therefore facilitate the proposed increase in staff and student numbers as part of the Stage 1 Application.

A total three (3) motorcycle spaces will also be provided within the Bus and Car Parking Area (as part of Phase B-1), and 18 bicycle parking spaces will be delivered adjacent to the Year 8 Learning Centre (as part of Phase B-2). This meets the relevant parking requirements of the Woollahra DCP and the *RMS Guide to Traffic Generating Developments*.

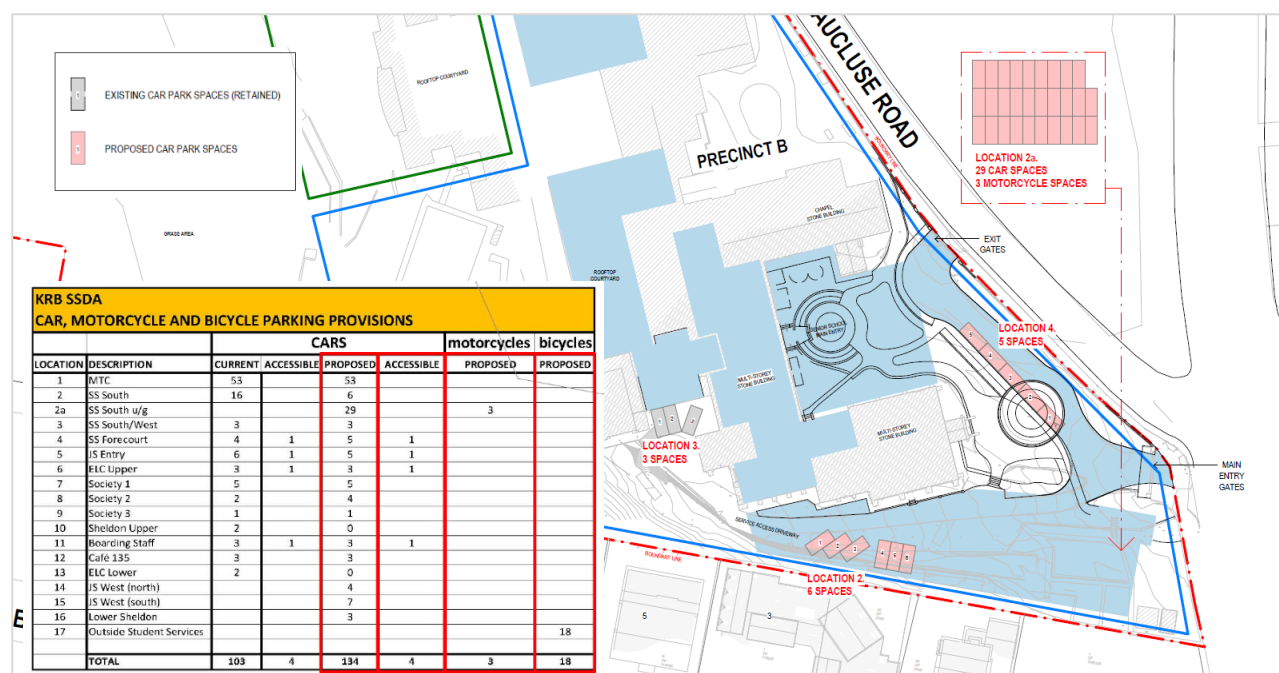
The proposed location of additional car parking, motorcycle parking and bicycle parking is illustrated in **Figure 2** and **Figure 3** below.

Figure 2 – Extract of Existing and Proposed Car Parking Spaces (ELC and Junior School)



Source: BVN (2021)

Figure 3 – Extract of Existing and Proposed Car Parking Spaces (Senior School)



Source: BVN (2021)

Refer to the Concept Architectural Plans at **Appendix D1**, the Detailed Architectural Plans at **Appendix E1** and **Appendix E2**, and the Addendum Transport Impact Assessment at **Appendix I** for further details on the proposed delivery and location of on site car parking and traffic management works.

## Traffic Modelling to Reflect Overall Increase

As part of the preliminary assessment of the proposal, the Department also requested clarification regarding the proposed traffic modelling and the associated increase in staff and student numbers. If the proposal is seeking an overall increase in staff and student numbers (as opposed to an incremental increase over a period of 10 years), the Department noted that additional traffic modelling would not be required.

As noted in **Section 5.1**, the proposal has been refined to seek consent for an overall increase in staff and student numbers. The traffic modelling submitted as part of the original application conservatively assumed that the maximum of 1,205 students and 185 staff will be accommodated on site as part of the Stage 1 Application for detailed works. Given that the proposal is seeking consent for an overall increase (as opposed to an incremental increase over 10 years), additional traffic modelling is not required.

However, an Addendum Transport Impact Assessment (TIA) has been prepared which responds to submissions from both TfNSW and Woollahra Council, and provides further clarity on several matters raised by the Department. This Addendum TIA incorporates updated traffic analysis (SIDRA modelling) and has considered the likelihood of vehicular queuing on Vacluse Road due to increased traffic generation.

The additional drop-off/pick-up zone that will be delivered as part of the first phase of works (Phase A-1) to the Junior School will divert queuing on site within the school's site boundary and away from the surrounding road network. This will result in improved efficiency of the existing drop-off/pick-up operation at the school, particularly during the afternoon peak pick-up period, reduce traffic queues along Vacluse Road, and improve traffic conditions in the area.

In addition, the updated analysis found that the additional traffic as a result of the proposed increase in staff and student numbers will not have a noticeable impact on the operation of the signalised intersection of New South Head Road and Vacluse Road, or on the expected traffic queue lengths at New South Head Road. The Addendum TIA concludes that there will be minimal change in the operation of this intersection as a result of the proposed development, and that this intersection will continue to operate at the same level of service as today.

Refer to the Addendum Transport Impact Assessment at **Appendix I**, and the detailed Submissions Register at **Appendix A** for further details.

## 5.3. TREE REMOVAL AND LANDSCAPING

### 5.3.1. Tree Removal and Retention

As part of the preliminary assessment of the proposal, the Department also requested additional clarification regarding which trees are proposed to be removed and retained, as well as the total number of trees proposed for removal.

The application as originally submitted included an Arborist Report (Appendix J of the EIS) which assessed 26 trees located near the main entrance to the Senior School. These 26 trees are within 15 metres of the proposed construction footprint of the Bus and Car Parking Area.

In accordance with Clause 2.3.2 of the Australian Standard 4970 (2009) for the *Protection of Trees on Development Sites*, each tree has been allocated a Retention Value based on the tree's Useful Life Expectancy and Landscape Significance with consideration to the health, structure, condition and site suitability. All trees have been allocated one of the following four Retention Value, which include:

- **High Value** – Priority for retention.
- **Moderate Value** – Consider for retention.
- **Low Value** – Consider for removal.
- **Remove** – Recommended for removal irrespective of works.

To facilitate the construction of the proposed Bus and Carparking Area (Phase B-1) and the alterations and additions to the Main Entrance (Phases B-3 – B-4) as part of the Stage 1 Application for detailed works, the proposal includes the removal of 16 trees. A total of 10 trees will be retained.

Refer to the complete list of trees to be removed and retained, as set out below in **Table 8** and **Table 9**, respectively.

Table 8 – Trees Proposed to be Removed

Tree No.	Species	Maturity	Retention Value
Tree 2	<i>Grevillea Robusta</i> / Silky Oak	Semi Mature-Early Mature	Moderate
Tree 3*	<i>Erythrina x Sykesii</i> / Coral Tree	Well Established	Remove
Tree 4	<i>Podocarpus Elatus</i> / Plum Pines	Semi Mature-Mature	Moderate
Tree 5	<i>Podocarpus Elatus</i> / Plum Pines	Semi Mature-Mature	Moderate
Tree 6	<i>Podocarpus Elatus</i> / Plum Pines	Semi Mature-Mature	Moderate
Tree 7*	<i>Celtis Sinensis</i> / Hackberry	Juvenile	Remove
Tree 8	<i>Howea Forsteriana</i> / Kentia Palm	Semi Mature	Low-Moderate
Tree 9*	<i>Nerium Oleander</i> / Oleander	-	Remove
Tree 10	<i>Harpephyllum Caffrum</i> / Kaffir Plum	-	Low
Tree 11	<i>Harpephyllum Caffrum</i> / Kaffir Plum	Well Established / Mature	Moderate
Tree 12	<i>Harpephyllum Caffrum</i> / Kaffir Plum	Well Established / Mature	Moderate
Tree 13	<i>Harpephyllum Caffrum</i> / Kaffir Plum	Well Established / Mature	Moderate
Tree 14	<i>Populus Alba</i> / Silver Poplars	Dead	Remove



Tree No.	Species	Maturity	Retention Value
Tree 15	<i>Populus Alba</i> / Silver Poplars	Mature	Low
Tree 16*	<i>Olea Europea</i> / Wild Olive	Well Established	Remove
Tree 26	<i>Harpephyllum Caffrum</i> / Kaffir Plum	Semi Mature	Low
<b>TOTAL</b>			<b>16 Trees</b>

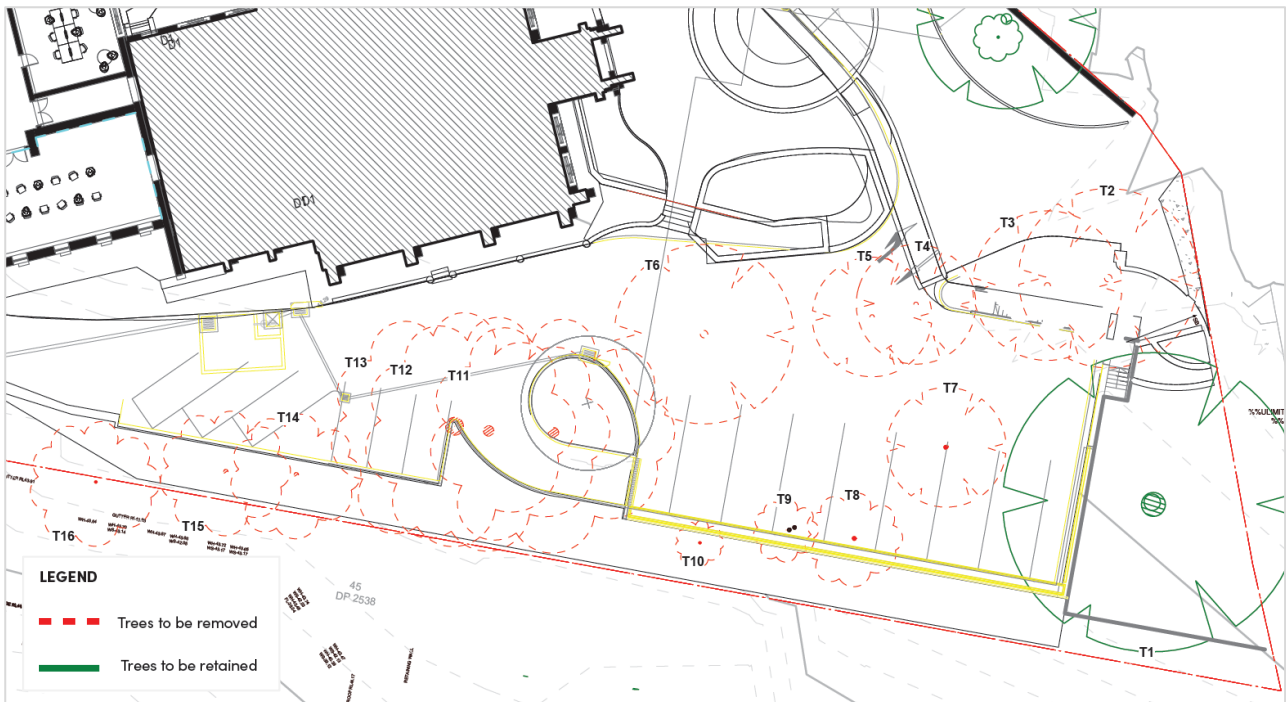
\*Trees 3, 7, 9 and 16 are identified on Woollahra Council's *Noxious and Exempt Tree Species List* (Chapter E3 Tree Management, Section E3.4.1 of the Woollahra DCP 2015)

Table 9 – Trees Proposed to be Retained

Tree No.	Species	Maturity	Retention Value
Tree 1	<i>Magnolia Grandiflora</i> / Bull Bay Magnolia	Mature	High
Tree 17	<i>Banksia Integrifolia</i> / Coastal Banksia	Semi Mature	Moderate
Tree 18	<i>Banksia Integrifolia</i> / Coastal Banksia	Semi Mature	Moderate
Tree 19	<i>Washingtonia Robusta</i> / Californian Fan Palms	Mature	High
Tree 20	<i>Washingtonia Robusta</i> / Californian Fan Palms	Mature	High
Tree 21	<i>Phoenix Canariensis</i> / Canary Island Date Palms	Well Established	Moderate – High
Tree 22	<i>Phoenix Canariensis</i> / Canary Island Date Palms	Well Established	Moderate – High
Tree 23	<i>Phoenix Canariensis</i> / Canary Island Date Palms	Well Established	Moderate – High
Tree 24	<i>Phoenix Canariensis</i> / Canary Island Date Palms	Well Established	Moderate – High
Tree 25	<i>Ficus Rubiginosa</i> / Port Jackson Fig	Well Established	High
<b>TOTAL</b>			<b>10 Trees</b>

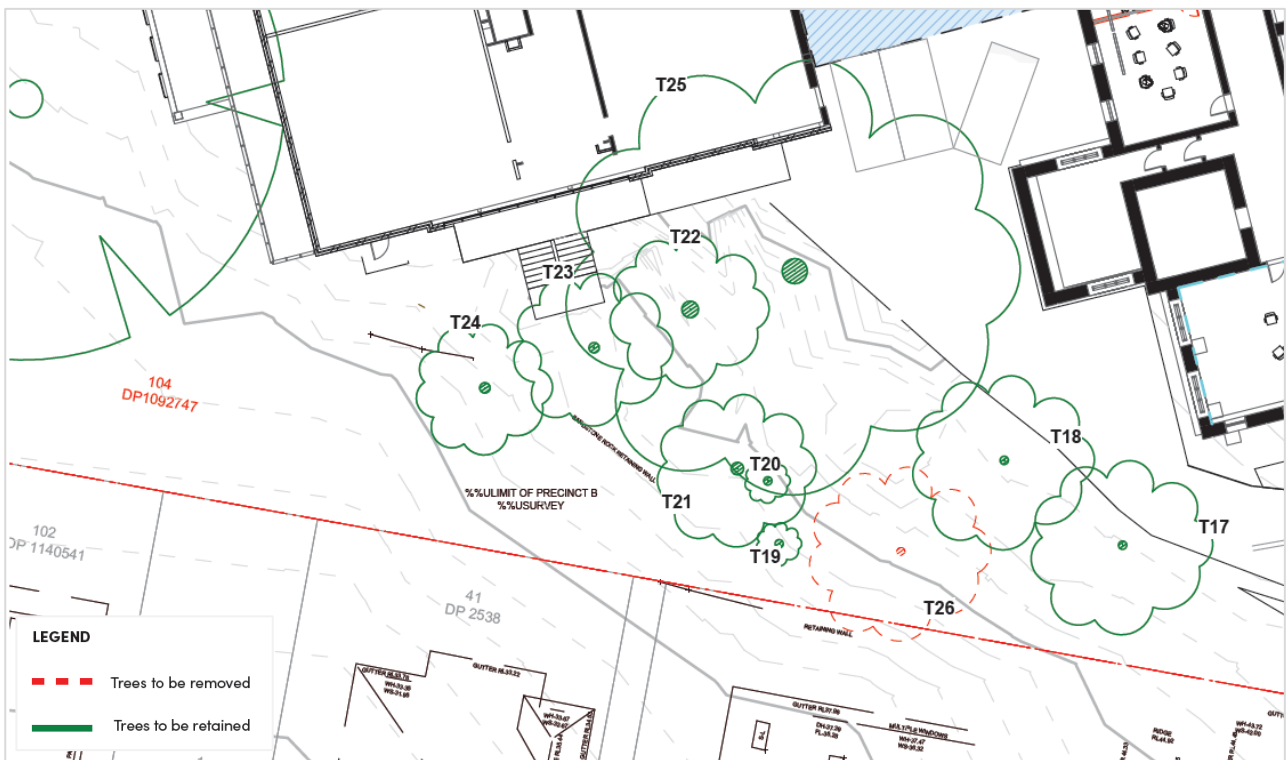
The location of the trees that are proposed to be removed and retained are also shown in **Figure 4** and **Figure 5** below.

Figure 4 – Tree Management Plan (Sheet 01)



Source: Turf Design Studio (2021)

Figure 5 – Tree Management Plan (Sheet 02)



Source: Turf Design Studio (2021)

Of the 10 trees that are proposed to be retained, four (4) are considered to have a High Retention Value and are significant trees which provide a high contribution to the amenity of the area. The retention and preservation of these trees has been prioritised as part of the proposed development.

By contrast, all 16 trees that are proposed to be removed have a Low to Moderate Retention Value. Of the total of 16 trees that are proposed to be removed, four (4) are listed on Woollahra Council's *Noxious and Exempt Tree Species List* within Chapter E3, Section E3.4.1 of the Woollahra DCP 2015. This includes Trees 3, 7, 9 and 16.

Trees 3, 7 and 16 are identified within Group A within Council's *Noxious and Exempt Tree Species List*, in which these trees can be removed without development consent, irrespective of height. Tree 7 is identified within Group B which allows its removal provided if it is less than 10 metres in height. Given that Kincoppal is identified as a heritage item in Schedule 5 of the WLEP 2014, where the description includes the 'grounds and trees', development consent is required for the removal of these four trees.

It is noted that Woollahra Council does not support the removal of Tree 2. However, this tree continues to maintain poor canopy health due to a number of upper canopy limbs having failed. It also has several exposed and decayed roots adjacent to the foundations of the main entrance to the Senior School. This structure has affected the abiotic development of these structural roots.

It is also understood that Council does not support the removal of Trees 4-6 and 11-13, and that further consideration should be given to alternative design approaches to potentially facilitate the retention of these trees. A response to the issues raised relating to tree removal and the design and layout of the Bus and Car Parking Area is provided in the following section.

### 5.3.2. Consideration of Alternative Design Approaches

To facilitate the construction of the proposed Bus and Carparking Area (Phase B-1) and the alterations and additions to the Main Entrance (Phases B-3 – B-4) as part of the detailed Stage 1 works, the removal of 16 trees is required.

Although several alternative design options and locations were considered as part of these phases of work, the location of the Bus and Car Parking Area was selected as the most appropriate for the following reasons:

- While consideration was given to relocating the Bus and Car Parking Area slightly further to the north from its current position, the basement footprint would encroach on the Senior School Main Building. This would create a potential hazard for students and staff who regularly enter and exit the campus at this location. This Main Building is a distinguishing and important feature of the site's heritage character. As a result, the basement footprint associated with the Bus and Car Parking Area has been setback from the Main Building to minimise any impacts to the school's most prominent building.
- Consideration was also given to relocating the Bus and Car Parking Area slightly further to the south from its current position. However, the proposed landscape buffer along the southern boundary that is included as part of the revised proposal would be compromised. This would also result in unacceptable impacts to visual and acoustic privacy to the neighbouring properties to the south.
- All alternative locations across the site that were considered are located at lower levels of the site and would require significant excavation and remediation works, along with significant tree removal and disturbance to the natural landscape.
- The proposed location of the Bus and Car Parking Area is also screened from by the Senior School Main Entry building when viewed from the harbour. The provision of the Bus and Car Parking Area at the lower levels of the campus would likely be visible from the harbour, and result in unacceptable visual impacts.
- The Bus and Car Parking Area needs to be located close to the adjoining internal road to avoid unnecessary vehicles hazards and potential safety issues near heavily populated student areas.

As a result, the removal of 16 trees is unavoidable to facilitate the provision of the Car and Bus Parking Area, all of which have a Low to Moderate Retention Value. The location of the proposed Car and Bus Parking Area is there considered the most appropriate location within the site.

Refer to the Concept Landscape Plans at **Appendix G**, the Detailed Landscape Plans at **Appendix H**, and the Revised Design Report at **Appendix F** for more information on the consideration of alternative design approaches.

## 5.4. BUILT FORM, URBAN DESIGN AND VISUAL IMPACTS

In Woollahra Council's submission, some concerns were raised about the perceived bulk and scale of the proposed vertical circulation link to the Junior School when viewed from the Harbour. The proposed alterations and additions to the Year 8 Centre were also not supported as it eliminated views to the existing heritage building when viewed from the Harbour.

Various alternate configurations and external treatments have been explored and tested to address the perceived bulk and scale of the proposed Junior School vertical circulation link. This included consideration of potential refinements to the facade treatment of the existing envelope as well as potential refinements to the internal layout and configuration of the circulation link. The overall height of the circulation link was also explored but this is subject to the final height of the lift overrun and associated mechanical plant / machinery which is not yet known. The height of the Junior School vertical circulation link (as originally submitted) represents an anticipated worst case scenario which may be able to be reduced once the final lift selection is made.

As part of exploring alternate options for the Junior School vertical circulation link, it was determined that the height of the facade treatment should be consistent around the whole circulation element to ensure the massing is simple and clear. It was also found that a different articulation or treatment of the envelope would not achieve the intent of reducing the perceived bulk and scale of the Junior School vertical circulation link when compared to the design as originally submitted.

The design of the vertical circulation link has been subsequently refined. This refinement involves removing the southern portion of the two upper levels of the circulation link to reveal more of the existing Barat Burn facade, as shown in **Figure 7** and **Figure 9** below. This also involves refinements to the internal configuration to reduce the width of the screening element externally.

As a result, this refinement provides better visibility to the original eastern part of the Barat Burn building when viewed from the south-west within the school grounds, as well as longer views from the west and north west. This also improves the appearance of the circulation link by breaking down the extent of the blank facade when viewed from the Harbour. Overall, the removal of the southern portion of the two upper levels reduces the perceived bulk and scale when viewed from the Harbour by allowing it to be read as a more modest contemporary addition to the Junior School.

This refinement has resulted in a minor increase in 7.4 m<sup>2</sup> in GFA to the Junior School. Refer to the Revised Design Report at **Appendix F**, the Detailed Architectural Plans (Junior School and ELC) at **Appendix E1** and the Addendum Heritage Statement at **Appendix T** for further details of the refinements to the Junior School circulation link.

Figure 6 – Aerial View of Proposed Junior School Circulation Link (as Originally Submitted, November 2020)



Source: BVN (November 2020)



Figure 7 – Aerial View of Proposed Junior School Circulation Link (as Refined, June 2021)



Source: BVN (July 2021)

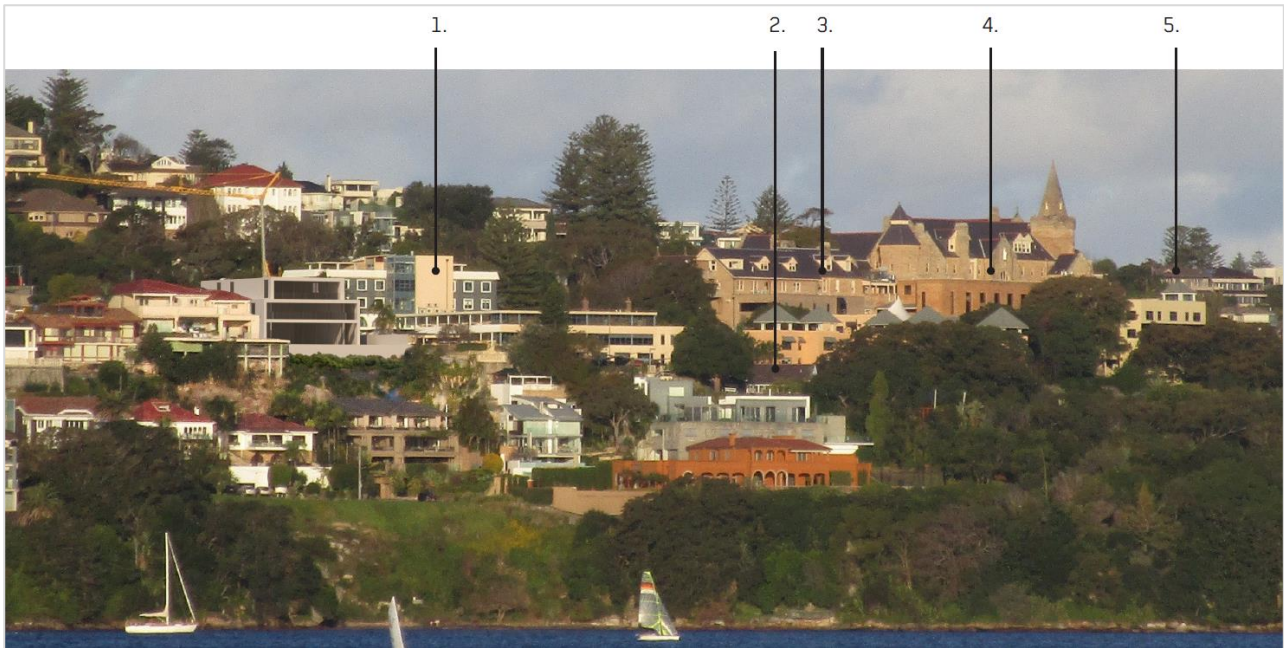
The proposed design of the Year 8 Centre has been considered to ensure it respects and responds to the existing heritage buildings on site, particularly when viewed from the Harbour.

Importantly, it is noted that views from the Harbour are changing views. When viewed from the north west (including from the Junior School and its grounds), the existing Claremont Villa Building will be substantially screened by the proposed alterations and additions to the Year 8 Centre. However, it is already substantially obscured by existing buildings, particularly the 1958 addition immediately to the north. When viewed from the Harbour further towards the west, this view of the existing Claremont Villa then opens up.

The Year 8 Centre has been designed to step back from the south to specifically minimise intrusion into these changing views, while also retaining a formal relationship with the gabled language of the Claremont Villa and the 1958 addition. The gabled roof form is sympathetic to the existing heritage building and are scaled to sit below the existing ridge height of the Noviceship Wing additions and the Claremont Villa. Views to the Claremont Villa from the Harbour are largely uninterrupted due to the positioning of the proposed addition at the northern end of the Noviceship Wing which sits above the 1976 Science Block addition. This is shown in **Figure 9** below. Sightlines to the upper roof dormer windows also remain at most angles when viewed from the harbour.

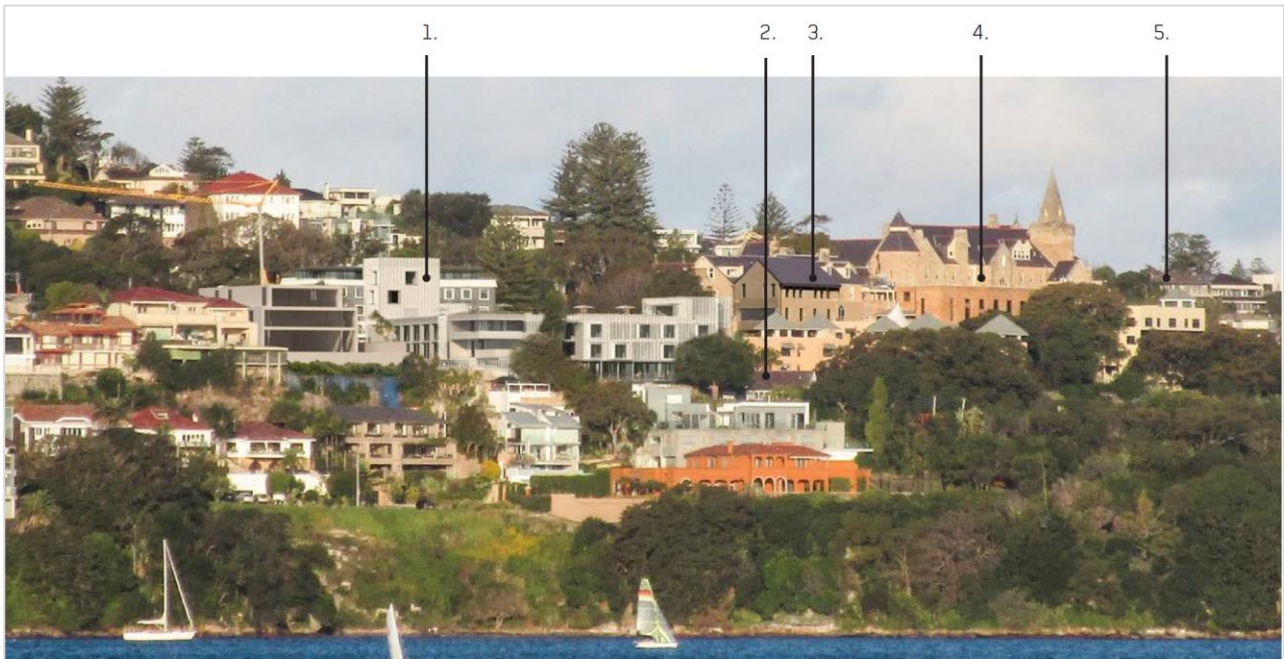
The proposed alterations and additions to the Year 8 Centre also include sympathetic materials which reflect the character of existing buildings. Refer to the Revised Design Report at **Appendix F**, the Detailed Architectural Plans (Year 8 Centre) at **Appendix E3** and the Addendum Heritage Statement at **Appendix T** for further details.

Figure 8 – Existing View of Kincoppal (Viewed from Sydney Harbour)



Source: BVN (2021)

Figure 9 – Proposed View of Kincoppal (Viewed from Sydney Harbour)



Source: BVN (2021)

## 5.5. ABORIGINAL CULTURAL HERITAGE AND ARCHAEOLOGY

The submission made by Heritage NSW noted that the proposed development has the potential to impact upon Aboriginal Cultural Heritage. As a result, Heritage NSW made several recommendations and requested further clarification on the extent and depth of excavation. It was also requested that further information is provided to demonstrate that potential impacts to the rockshelter will be avoided, and that potential impacts to areas of moderate and high archaeological potential are also minimised.

An Addendum Aboriginal Cultural Heritage Statement has been prepared which responds to each of the recommendations raised within this submission (included at **Appendix Q**). This is supported by additional geotechnical investigations on subsurface conditions at locations within the Kincoppal campus where deeper and/or more extensive excavation will be required as part of the proposal.

One area of high archaeological potential (known as the KRB Rockshelter) was identified during the preparation of the Aboriginal Cultural Heritage Assessment Report (ACHAR) (submitted as Appendix H to the EIS). The Boarding House Extension is the only component of the proposed development which is located in close proximity to the rockshelter.

The Boarding House Extension is part of the Concept Proposal and is therefore subject to subsequent Development Application(s). As a result, the detailed design of the Boarding House Extension has not been undertaken. However, additional geotechnical investigations have confirmed that the Boarding House structure can be built without any ground disturbance within the site and can be undertaken with no direct to the KRB Rockshelter.

Additional geotechnical investigations were undertaken within areas of moderate archaeological potential at various locations around the site which will involve ground disturbance as part of the proposed development. While the potential impact on Aboriginal Cultural Heritage at these locations was assessed as part of the original ACHAR, the Addendum at **Appendix Q** includes additional information which suggests that the potential for impacts to these areas is less than was initially considered.

As a result, the management strategies set out within Section 6.4 of the ACHAR (as submitted with the original application) are still considered appropriate for managing the potential impacts to Aboriginal Cultural Heritage that have been identified. Refer to **Appendix Q** for further details.

## 5.6. OTHER ENVIRONMENTAL MATTERS

Several requests for further clarification and additional information were also raised by the Department, as well as Council. These related to other environmental matters including sustainability / ESD, acoustic impacts, contamination, earthworks, geotechnical investigations and civil engineering.

Several addendum statements and technical reports have been prepared to address these requests for clarification and additional information, including:

- **Appendix L** – Preliminary Acid Sulfate Soils Assessment
- **Appendix M1** – Revised Geotechnical Report (Bus and Car Parking Area)
- **Appendix M2** – Revised Geotechnical Report (ELC)
- **Appendix M3** – Revised Geotechnical Report (New Entry Road)
- **Appendix N** – ESD Report
- **Appendix O** – Revised Preliminary (Stage 1 Contamination Report)
- **Appendix P** – Revised Remediation Action Plan
- **Appendix R** – Addendum Acoustic Statement
- **Appendix S** – Revised Construction Management Plan

Refer to the Submissions Register at **Appendix A** and the above appendices for further details.



## 6. CONCLUSION

This Submissions Report has responded to the key issues raised within the submissions regarding the staged alterations and additions to Kincoppal Rose Bay at 2 Vaucluse Road and 3-13 Vaucluse Road, Vaucluse. This Submissions Report is accompanied by:

- Updated Architectural and Landscape Plans which set out the proposed refinements to the original scheme and the clear identification of works associated with the Concept Proposal and the Stage 1 Application for detailed works.
- Supplementary reports and technical advice which provides additional clarification and further information regarding the proposed development where relevant.

The report and supporting documents have been informed by additional consultation and engagement with key stakeholders, including the Department, TfNSW and Heritage NSW.

### 6.1. UPDATED EVALUATION OF THE PROPOSED DEVELOPMENT

Importantly, the refinements and clarifications made in responses to key issues raised within the submissions are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

The Concept Proposal and Stage 1 Application for detailed works at Kincoppal Rose Bay (including minor design refinements and clarifications) is considered acceptable having regard to the following economic, environmental and social considerations:

- The site is zoned SP2 (Infrastructure 'Educational Establishments') which is identified as a 'prescribed zone' under Clause 33 Part 4 of the Education SEPP. Clause 35(1) of the Education SEPP permits development for the purpose of a school to be development with consent within a prescribed zone.
- The proposal is consistent with the objectives of the relevant planning policies and complies with the planning controls.
- The proposal will deliver significant traffic management works (including a new internal link road, two designated drop-off/pick-up zones, and a net increase in on site parking). This will improve the operation of the surrounding road network by reducing congestion associated with peak drop-off and pick-up periods. It will also improve safety for pedestrians and local residents.
- Subject to implementation of the identified traffic management works, the proposed increase in staff and student numbers will create additional capacity at the school while relieving capacity pressures from existing schools in the area.
- The proposal will result in alterations and additions to the existing school facilities which are compatible in terms of scale and use of the adjacent buildings within the site's campus and has been set back from neighbouring development.
- The proposal will also result in the development of a high quality educational environment for staff and students which supports high quality learning outcomes.
- The proposal has been designed to make a positive contribution to the overall built form of the site, having regard to topography, heritage significance and views from the Harbour. The proposed alterations and additions to existing buildings on site are sympathetic to the character of the surrounding neighbourhood, and respect visual privacy and significant views from the harbour and neighbouring residential developments.
- The proposal has been refined in response to the submissions received during the public exhibition period, and has taken into consideration the comments received during further post-exhibition engagement with public agencies and key stakeholders.

The Concept Proposal and Stage 1 Application for detailed works is in the public interest and any environmental impacts are able to be managed, subject to appropriate conditions of consent.



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## **APPENDIX A**

## **SUBMISSIONS REGISTER**

## **APPENDIX B**

## **UPDATED MITIGATION MEASURES**

## **APPENDIX C**

## **LIST OF PLANS FOR APPROVAL**

## **APPENDIX D**

## **CONCEPT ARCHITECTURAL PLANS**

## **APPENDIX E**

## **REVISED DETAILED ARCHITECTURAL PLANS**

## **APPENDIX F**

## **REVISED DESIGN REPORT**

## **APPENDIX G**

## **CONCEPT LANDSCAPE PLANS**



## **APPENDIX H**

## **DETAILED LANDSCAPE PLANS**

## **APPENDIX I**

## **ADDENDUM TRANSPORT IMPACT ASSESSMENT**

**APPENDIX J**

**REVISED CIVIL PLANS**

## **APPENDIX K**

## **ADDENDUM CIVIL ENGINEERING REPORT**

## **APPENDIX L**

## **PRELIMINARY ACID SULFATE SOILS ASSESSMENT**

## **APPENDIX M**

## **REVISED GEOTECHNICAL REPORTS**

## **APPENDIX N**

## **ESD REPORT**

## **APPENDIX 0**

## **REVISED PRELIMINARY (STAGE 1) CONTAMINATION REPORT**



## **APPENDIX P**

## **REVISED REMEDIATION ACTION PLAN**

## **APPENDIX Q**

## **ADDENDUM ABORIGINAL CULTURAL HERITAGE STATEMENT**

## **APPENDIX R**

## **ADDENDUM ACOUSTIC STATEMENT**

## **APPENDIX S**

## **REVISED CONSTRUCTION MANAGEMENT PLAN**

## **APPENDIX T**

## **ADDENDUM HERITAGE STATEMENT**

