

31 July 2019

Jason Maslen  
Senior Planning Officer | Social and Infrastructure Assessments  
Infrastructure Assessments  
GPO Box 39 Sydney NSW 2000

Dear Mr Maslen,

**Re: SSD-8996 - Loreto Normanhurst - 91-93 Pennant Hills Road and 6-12 Mount Pleasant Avenue, Normanhurst.**

I refer to the above development proposal and provide the following comments from Council.

#### Planning

The proposed development is inconsistent with DA/1227/2018 for an 80 place child care centre on the school site which relies on existing car parking within the Loreto School site. Details of the proposed child care centre needs to be considered with the proposed SSD application.

The proposed boarding house building would result in excessive height, bulk and scale when viewed from adjacent properties in Mount Pleasant Avenue.

#### Heritage

The Loreto Convent Group at 91-93 Pennant Hills Road and 16-22 Mount Pleasant Avenue, Normanhurst is included as a local heritage item (Built, Archaeological and Landscape Item No. 607) in Part 1 - Heritage Items and in Part 3 – Archaeological Sites, in Schedule 5 of the *Hornsby Local Environmental Plan 2013* (HLEP).

The site is not located within the vicinity of heritage properties, including No.82 Pennant Hills Road (Item 606) and No.4 Mount Pleasant Avenue (Item 603), Normanhurst listed under Schedule 5 of H LEP.

The Conservation Management Plan (CMP) prepared by Perumal Murphy Alessi dated July 2008 and Heritage Impact Statement (HIS) prepared by Weir Phillips Heritage January 2019 submitted with the documentation has been reviewed and heritage comment is provided in the tables below.

#### Concept Master Plan

Proposal/Concept	Comment
New Boarding house	Concerns raised under Stage 1 comment below
Upgrade Mary Ward Wing building to accommodate year 12 boarders. Addition of another level above existing building.	The limited information provided does not clearly detail the impact of the proposed changes to the fabric to enable assessment. Change should be limited, reversible and include reinstatement of former floor plan wherever possible and include interpretation. Existing floor plans and elevations to scale should be provided. Concern is raised to the addition of another level to this building as it would alter the original form of the building and appearance.
Remove dock to create new courtyard	No heritage concern raised.
Early learning centre (ELC)	Heritage comment provided under separate DA lodged.

New Primary School buildings	Could be considered on merits, subject to details of proposal, scale and assessment of impacts.
All weather field, underground carpark & possible facilities management, located off Osborn Road.	Could be considered on merits, subject to details of proposal and assessment of impacts.
Mount Pleasant Pavilion, Stadium, function centre possible facilitates management or ECO centre	Could be considered on merits, subject to details of proposal and assessment of impacts.
Relocate main reception, staff and administration to eastern side of 1897 convent building. Removal of level 5 toilet block above 1897 convent building.	<p>Insufficient detail is provided to enable assessment of impact of proposed changes to the original 1897 convent building and Angel wing building. These works do not appear to be consistent with the CMP policies for conservation of the highly significant fabric of the convent. There is also limited proposed conservation works, maintenance, interpretation plans detailed in the Master plan.</p> <p>The Convent and Angel wing building should not be further altered or lost without detailed assessment of remaining original fabric. Conservation works should include reinstatement of removed original elements and the original spatial relationship with the 1897 convent building.</p> <p>Subject to detailed information being provided the removal of unsympathetic elements would be considered.</p> <p><b>These works should not be supported without adequate detailed plans and fabric analysis. No works should occur that are not consistent with the CMP policies or Burra Charter principles.</b></p>
New 3 court gym & multi-use hall	Could be considered on merits, subject to details of proposal and assessment of impacts.
Reduce roadways within campus, new paths and landscaping.	Could be considered on merits subject to detailed landscape heritage report and assessment to the heritage listed Loreto College grounds.
Secondary school expansion adjacent to the Chapel building	<p>The development of this area in proximity to the heritage listed chapel would have an adverse impact on the setting of the chapel and the relationship with the original convent and Angel wing building. The development of this area would have an adverse cumulative impact, in addition to the current unsympathetic impact of the circa 1980/90s administration wing. No further development should occur in this area to maintain the significance of the built items and the landscaped grounds. Overall, the front of the school should remain undeveloped and landscaped. <b>This component of the master plan should not be supported in heritage terms.</b></p>
Envelope 3 – Future development (adjacent Pennant Hills Road; north east of the convent and chapel) to be determined; underground carpark	<p>The proposed concept development is of a height and scale that would be out of character with the scale of the heritage items on the site. The structure would adversely impact the landscaped setting of the convent and chapel on the northern and eastern sections of the site. The listed grounds would also be adversely impacted, as well as the original setting of the listed entry and gates. Development in this section should remain largely landscaped as a link to the original setting and understanding of the site. This development could also irreversibly remove potential for historic views of the convent to be revealed. In addition, views internally from the Covent and chapel area out of the site would be adversely impacted, by the proposed building.</p> <p>It is suggested that proposed future buildings for this area be located elsewhere. For example, in Mount Pleasant Avenue adjacent the new ELC, and the current sports courts in Mount Pleasant Avenue relocated to Envelope 3 and landscaped. Alternatively, locate new buildings to Envelope 9, 7 or 6.</p> <p><b>The redevelopment proposed would have an adverse impact and is not supported in heritage terms.</b></p>

Gonzaga Barry Centre auditorium; Amphitheatre; possible ECO centre	Could be considered on merits, subject to details of proposal and assessment of impacts.
Bush Chapel & bush recreational facilities	The CMP 2008 policy states “ <i>no new buildings or built elements are permissible within the existing bushland located in the southern portion of the site. No additions or alterations to the cemetery, its size or perimeter walls are permissible.</i> ” Development of the bushland for a new chapel and the like should not be supported. <b>The addition of further structures would have an adverse impact on the natural heritage values of the bushland and the ‘isolated’ setting of the listed cemetery.</b>
Upgrade aquatic centre	Could be considered on merits, subject to details of proposal and assessment of impacts.

#### Stage 1 Application

Proposal	Comment
Demolition of the Loreto Community House and construction of a 3 to 6 story boarding house for 216 students, with underground car park and new landscaping.	The buildings to be demolished are documented as having no heritage value. The new boarding house building is of a significantly larger scale than the original heritage buildings on the site and appear to be inconsistent with the form and appearance of the original buildings. <b>A revised form, height and scale should be considered to complement the scale and style of the earliest buildings on the site.</b>
New Garden area – Removal of buildings between Mary Ward Wing and existing dining room building (Givendale wing) and associated works to make good the existing.	The buildings to be demolished are documented as having little heritage significance due to past alterations and additions. No heritage issues are raised to their removal or new garden area, subject to archival photographic recording of all affected areas (internally and externally) prior to any demolition or removal of all structures on the site. This would enable the evolution of the site to be documented.
New landscaping located in the current primary school carpark, designed to allow for outdoor assembly of the whole school population.	No heritage concerns raised with the circa 1990s primary school car park landscaping.
Removal and replacement of approximately 50 trees of varying significance.	Tree removal should be limited wherever possible and replacement of trees removed is supported. No significant trees should be removed, and the heritage listed grounds as listed on the heritage inventory sheet for the grounds should be retained. Comment from Council’s Tree Management team should be sought.
Augmentation of connection of services and utilities infrastructure	Should occur only in accordance with the CMP policy for services.

#### Heritage in the vicinity

The scale of future development in the Master concept plan (Envelope 3) has the potential to adversely alter the residential low scaled setting of the heritage item in the vicinity at No. 4 Mount Pleasant Avenue, Normanhurst.

#### Summary

Heritage concerns are raised to several proposed works within the State Significant Development application (Stage 1) and concept master plan which would have an adverse impact on the significance and setting of the item. Concern is raised to the form and scale of the boarding house; additional structures within the remnant bushland; redevelopment of the original Covent building, and circa 1920s/1950s buildings on the site. The development of the site to the north and north east of the convent and chapel buildings and area north west of the chapel is not supported due to the adverse impact on the listed grounds and setting of the significant

buildings on the site. The proposal should be amended to remove the adverse heritage impacts the proposed redevelopment would have on the listed site as follows:

1. The Master plan and stage 1 proposal should be amended to address the heritage concerns raised.
2. Archival photographic recording in accordance with Office and Environment and Heritage (OEH) guidelines should be required prior to any demolition works (internal and externally) to any structure on the listed site.
3. Augmentation of connection of services and utilities infrastructure is to occur only in accordance with the Conservation Management Plan 2008 (CMP) policy for services.

### Trees

Council raises concerns with the loss of high retention value trees on the site.

### Traffic and Safety

Council has previously received submissions from residents raising concerns with the following issues:

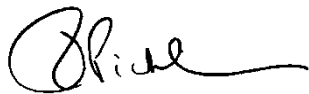
- a) Traffic generation and volumes in residential streets.
- b) On-street parking in residential streets.
- c) Vehicle access to the site.
- d) Safety concerns at the Pennant Hills Road / Mount Pleasant Avenue intersection.

The Traffic Assessment report (TAR) prepared by Asongroup needs to be updated to include the following:

- a) Existing pick up operation is to be reviewed and improved.
- b) With a 42.5% increase in students it can be argued that there will be a significant increase in queue length, this is not acceptable to the Branch as it would result in the pickup queue extending onto Osborn Road. Council has received many complaints from local residents regarding queuing onto Osborn Road issue during pickup time.
- c) ELC Operational Traffic Management Plan will be impacted by the Master Plan of Loreto. Although the Master Plan excludes the DA of ELC, staff of ELC will rely on car parking areas in Loreto. The TAR needs to have a discussion regarding the future impact to ELC staff parking.
- d) Will there be dedicated bus services for Loreto Normanhurst students?
- e) If so how are the buses to be catered for?
- f) Date of traffic counts has not been provided and is required.

Please contact me on telephone 9847-6731 or email [rpickles@hornsby.nsw.gov.au](mailto:rpickles@hornsby.nsw.gov.au) should you wish to discuss this matter further.

Yours sincerely



R PICKLES  
Manager Assessments  
Planning Division

TRIM Reference: P2017/02310