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David Gibson
Department of Planning & Environment
23-33 Bridge Street
SYDNEY NSW 2000

Council Ref: DA205/15
(LD) (CIS)

15 December 2015

Dear Sir,

RE: SCECGS Redlands School Concept Proposal and Stage 1 Development
Your Ref: SSD 6454

North Sydney Council appreciates the opportunity to provide further comment on the concept proposal and Stage 1 development for the SCECGS Redlands School senior campus.

North Sydney Council has reviewed the '*Response to Submissions*' provided by the Applicant and wish to make the following comments:

1. Planning

NSLEP 2013

Building Height

Clause 4.3(3) of NSLEP 2013 states that the maximum permitted building height on the site is 12 metres. North Sydney Council acknowledges that some amendments have been made to the building envelope and heights of the proposed New Sports Hall and Drama Building (Stage 2) and the New Humphreys Building (Stage 4). Notwithstanding, North Sydney Council is of the firm view that the scale of the New Humphreys Building (Stage 4) being a maximum of 22.4m is still incompatible with the sites adjoining and opposite along Waters Road that are zoned R4 High Density Residential with a maximum permissible building heights of 12m (**refer to Figures 1 and 2 below**).



Figure 1 – Extract from Height of Building Map in NSLEP 2013

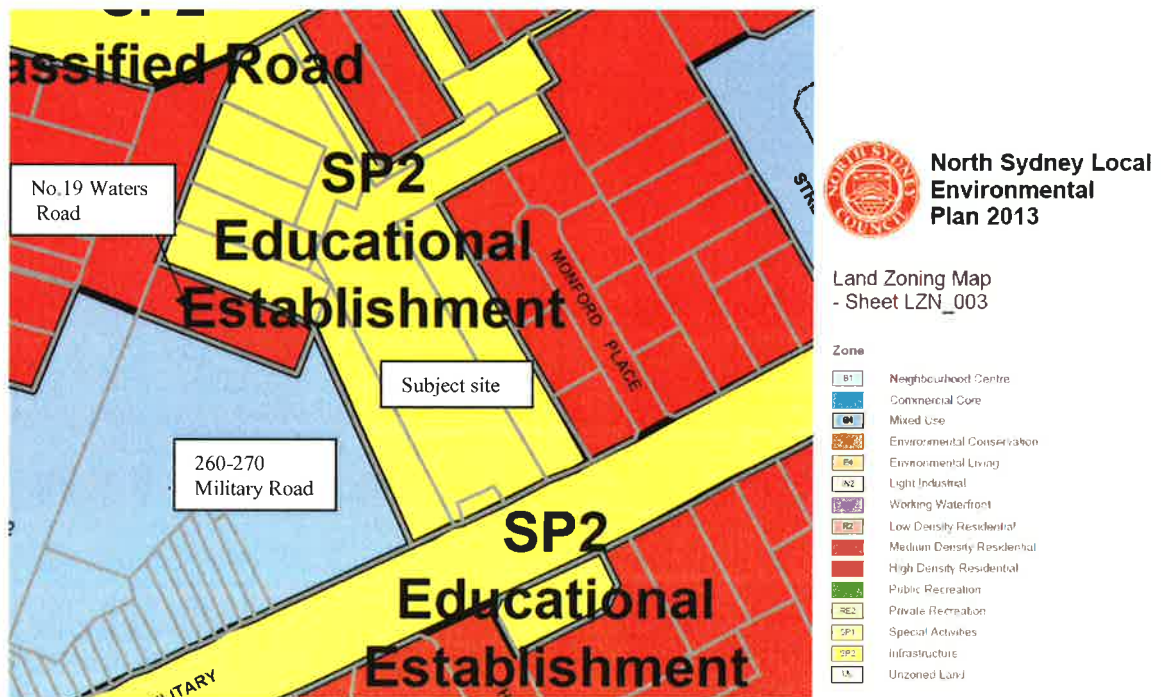


Figure 2 – Extract from Land Zoning Map in NSLEP 2013

The New Humphreys Building (Stage 4) is proposed at a building height of between 14.1m (RL91.64) and 22.4m (RL99.24) which is significantly higher than maximum building heights (12m) permissible on sites adjoining (No.19 Water Road) and opposite (No's 26, 28 and 30 Water Road).

The significant non compliances with the height control for this building is contrary to the Aim of Plan 1.2(2)(b)(i) and building height objectives 4.3(1)(c), (e) and (f) of NSLEP 2013 which seek to:

1.2 Aims of Plan

- (b) in relation to the character of North Sydney's neighbourhoods:*
- (i) to ensure that new development is compatible with the desired future character of an area in terms of bulk, scale and appearance, and*

4.3 Height of buildings

- (1) The objectives of this clause are as follows:*
- (c) to maintain solar access to existing dwellings, public reserves and streets, and to promote solar access for future development,*
- (e) to ensure compatibility between development, particularly at zone boundaries,*
- (f) to encourage an appropriate scale and density of development that is in accordance with, and promotes the character of, an area.*

Such variations in height must be justified by a strategic level study which is absent here.

A further reduction in the scale of the New Humphreys Building (Stage 4) and a greater setback from the western boundary of the site would significantly improve solar access, particularly between the critical hours of 10.30am and 12noon during winter solstice, to the ground floor living rooms of the townhouses at No.19 Water Road.

The fencing around the proposed tennis courts on the roof of the New Sports Hall and Drama Building (Stage 2) will remain highly visible from Military Road (south western end) with a top of fence height (RL101.69) that is between 6.7m and 8.1m above the maximum height control. The sites to the west of the School have a maximum building height of 16metres. The top of the tennis court fence would be more than 3 metres above permissible height limit for surrounding development. The proposed height would not only be visible from the public domain but also incompatible with the desired built form, massing and scale of the Waters Neighbourhood Character Statement as detailed in Part C, Section 5.2.3 in NSDCP 2013.

Building setbacks

The proposed New Learning Hub (Stage 1) has between a nil (staircase) and 1.735m side setback to the eastern boundary of the site which is considered insufficient for a building of this scale and does not provide for adequate building separation with the existing townhouse development at No's 8-12 Winnie Street. The eastern façade of the building is between 5.5m and 6.8m above the maximum permissible building height (12m). A greater building setback to this eastern boundary should be provided with additional deep soil landscaping to minimise the visual impact of the building on this adjoining property.

The proposed New Sports Hall (Stage 2) has between a 2m (Level 3) and 4.25m (Level 4) setback to the eastern boundary of the site which is also considered to be insufficient and does not provide for adequate building separation with the existing residential flat buildings at No's 4 and 6 Monford Place. The eastern façade of the building is between 3.9m and 4.4m above the maximum permissible building height (12m). A greater building setback to this eastern boundary should be provided with additional deep soil landscaping to minimise the visual impact of this building on this adjoining property.

Site coverage and landscaped area

North Sydney Council's Development Control Plan 2013 (NSDCP 2013) specifies maximum site coverage (45%) and minimum landscaped area (40%) controls. The amended proposal remains significantly non compliant with the maximum site coverage control in NSDCP 2013. The amended proposal should incorporate greater deep soil landscaping across the site to improve the landscape buffer with adjoining properties and the public domain and to maximise the absorption of the surface drainage water across the site.

Privacy

Privacy louvres should be provided on the eastern façade of the New Sports Hall to ensure reasonable privacy is provided from the corridor (Level 3) which provides access between proposed buildings on the School Site and the residential flat building on the adjoining sites at No's 4 and 6 Monford Place.

2. Heritage

The SCECGS Redlands School is listed as a heritage item under NSLEP 2013 for its social significance being a well established private school as well as for the historic and the aesthetic significance of the Adams Centre (former Cremorne Post Office), the Liggins Building and the Lang Gymnasium.

Council's Conservation Planner has reviewed the amended plans and provided the following comments:

a) Adams Centre (Stage 5)

The design of the proposed three storey addition is still considered to be unsatisfactory and fails to satisfy Clause 5.10 of NSLEP 2013 or Part B, Section 13 of NSDCP 2013 because the proposed addition will impact upon the setting and curtilage of the former Cremorne Post Office. The amended proposal has provided an increased setback to the former Cremorne Post Office, however the proposed bulk and scale of the addition is still considered to be unsympathetic to this modestly scaled single-storey heritage listed building. The proposed addition would be monolithic in character, whilst the former Cremorne Post Office is highly articulated with multiple pitched roof planes, has a highly detailed façade and has almost a domestic quality. The proposed addition will therefore visually overwhelm and dominate this building. The design of the Adam's Centre is therefore not considered to be acceptable in the context of the former Cremorne Post Office.

The bulk of the proposed addition needs to be manipulated into smaller elements to give a scale and sense of domesticity that it is both visually sympathetic and submissive to the former Cremorne Post Office. The facades of the proposed addition also require greater articulation, and the fenestration should have proportions and a rhythm that is sympathetic to the former Cremorne Post Office. The materials palette should also be responsive to the existing materials palette of the Post Office.

b) Liggins Building (Stage 3)

The proposed works to the Liggins Building should ensure that the new interior layout is sympathetic to the original room configuration and the original joinery and other original fabric, as well as the front and side elevations are conserved.

c) Lang Building (Gymnasium) (Stage 4)

The adaptation of the gymnasium into an auditorium may impact upon the heritage significance of the interior of the building. Any proposed new works should retain the exterior fabric of the gymnasium and ensure that the original interior volume remains legible.

3. Driveway

Council's Development Engineer has reviewed the amended plans and requested the following:

- (a) A minimum of three sections along the centre-line and extremities of proposed driveway crossings along Gerard Street and Military Road at a scale of 1:25@A3 are required. Sections are to be taken from the centre of the roadway through to the parking area/internal access road itself and must include all changes of grade and levels, both existing and proposed.
- (b) Existing driveway crossings that are not redundant on Waters Road, Winnie Street and Monford Place must be reconstructed to comply with AS 2890.1 once internal levels are altered.

The above information should be provided to North Sydney Council's Development Engineer so that appropriate engineering conditions can be recommended to ensure the protection of North Sydney Council's infrastructure prior to any demolition and construction works.

4. Traffic, Parking and Transport

Council's Traffic and Transport Operation's Manager has reviewed the amended plans and documentation and provided the following comments:

a) Parking provisions

The development now proposes a total of 92 (68 at Stage 1) parking spaces instead of 115. Whilst this is a reduction of 20% this does not provide an incentive for the 82 staff who currently travel to work by car to consider alternative options. The proposed supply of parking is aimed at addressing the peak demand which occurs on weekend sports days (1 day a week). There needs to be a balance between the weekday staff parking demands and the weekend sports day parking demands. It is still considered that the provision of a maximum of 70 parking spaces will improve the current weekday staff parking demand/requirements whilst providing some incentive for staff to consider alternative options and meeting some of the Saturday/ special event parking demand.

b) Green Travel Plan (GTP)

The Green Travel Plan (GTP) states “*While cycling is a healthy and sustainable way to travel, cycle routes in the area are dangerous given the volume of traffic on Military Road. Experienced cyclists are encouraged to ride to work. However, students are encouraged to walk or use public transport.*”

The purpose of the GTP is to bring awareness of different transport options to staff, parents and students. It is clear that the School does not wish to encourage students to cycle to and from school, however the GTP should be appropriately developed so that cycling is not actively discouraged. The annual review of the GTP and performance measures as proposed in the draft GTP is good. It is recommended that the final Green Travel Plan be submitted to Council for approval.

c) Vehicular Access

The carpark is proposed to be reduced to 92 parking spaces. The proposed driveway width on Gerard Street has been reduced from 12m to 9.3m. Wide vehicular crossings increase the length of the crossing for pedestrians which increases the area of conflict. Traffic flows are likely to be predominantly one way in during the morning peak and out in the afternoon. It is recommended that the driveway width be reduced to 6m, the standard width for a double width vehicle crossing and adequate for the anticipated traffic flow.

‘No right turn’ signage on its own is unlikely to prevent vehicles entering and exiting the driveway from the right. If the vehicle crossing is approved it is recommended that a median strip should be installed to restrict entry and exit to left-in, left-out to reduce turning conflicts and reduce conflicts with pedestrians, subject to Traffic Committee approval.

d) Bicycle parking

Bicycle parking (minimum of 20 spaces) should be provided as an option for students even if the School itself does not support students riding to school. It is expected that parents would ultimately decide whether their child can ride to school or not and facilities should be provided for those students who choose to do so.

5. Draft conditions of consent

North Sydney Council can provide the Department with revised draft conditions of consent if required.

I trust that North Sydney Council’s additional comments will be taken into consideration prior to the determination of this application. Should you have any questions regarding Council’s submission, please contact Luke Donovan, Senior Assessment Officer, on 9936 8100.

Yours faithfully,



Stephen Beattie

MANAGER, DEVELOPMENT SERVICES