northern beaches council

28 July 2020

Mr David Way
Senior Planning Officer
Social and Infrastructure Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2150

Our Ref: 2020/435922

Dear Mr Way,

St Luke's Grammar School Senior Campus and Sports Centre
210 Headland Road, and 800 Pittwater Road, Dee Why 224 Headland Road North Curl Curl (SSD-10463)

Thank you for providing Northern Beaches Council with an opportunity to comment on the State Significant Development (SSD) application which seeks approval to a senior campus and sports centre for St Lukes Grammar School.

It is understood that the proposed development is for a change of use at No.800 Pittwater Road, Dee Why for occupation by St Luke's Grammar – Senior School Campus. The proposal includes extensive new works primarily for alterations, additions and extensive refurbishment to No.800 Pittwater Road, Dee Why (new senior school campus) as well as additional works within No. 224 Headland Road, North Curl Curl (new sporting facilities). It is noted that the delivery of the project will be undertaken in stages.

Council has reviewed the architectural plans prepared by Tonkin Zulaikha Greer, the Environmental Impact Assessment (EIA) prepared by DFP and the supporting documents made available on the Major Projects page of the NSW Planning Portal. Council has compiled a set of planning, environmental and infrastructure related key issues and assessment requirements that should be considered in the assessment of the SSD. The detailed referral responses provided by Council's Internal Units are contained in an addendum for your information. Whilst numerous issues are identified in Council's submission the key issue of concern for Council is that of traffic and parking impacts.

Northern Beaches Council acknowledges the consultation and engagement activities that have St Luke's Grammar have conducted with neighbouring landowners and relevant community groups that have been documented in Part 5 of the (EIA). It is important to note that Northern Beaches Council has in the past placed limitations on further incremental increase to the school enrolments, principally due to the associated school traffic management problems and insufficient car parking. It is therefore critical that St Luke's Grammar are committed to continued consultation with the local community, residents, businesses and stakeholders in order to clarify issues related to this SSD, and those of traffic and parking management that are of critical concern to the community so that the issues can be addressed and incorporated into the appropriate design response for the proposed development.

Key issues that Council wishes to raise are:

1. Permissibility

Warringah LEP 2011

Warringah LEP 2011 (WLEP) is the local planning instrument applicable to the site.

The site has a split zoning, namely:

- No. 800 Pittwater Road, Dee Why, B5 Business Development Zone
- No. 224 Headland Road Curl Curl IN1 General Industrial and
- No. 210 Headland Road, Curl Curl R2 Residential (existing school site).

SEPP (Educational Establishments and Child Care Facilities) 2017
Educational establishments are not permitted within IN1 General Industrial Zones (224 Headland Road) under the WLEP. As such, the proposal relies on clause 35(6) of the Educational Establishments and Child Care Facilities SEPP for the extension of the school into this site. Part 4 of the Education SEPP sets out specific development controls for schools.

Clause 35(1) of the Education SEPP provides that development for the purpose of a school may be carried out by any person with development consent on land in a 'prescribed zone' (as defined within Clause 33 of the Education SEPP).

The B5 Business Development Zone (No.800 Pittwater Road) and R2 Low Density Residential Zone (No.210 Headland Road) are identified as prescribed zones for the purposes of Clause 35(1) and makes the proposal permissible with consent on these sites.

The IN1 General Industrial Zone (No.224 Headland Road) is not a prescribed zone. Therefore, development for the purpose of an educational establishment is prohibited on 224 Headland Road under the WLEP. Whilst it is acknowledged that under Section 4.38(3) of the Environmental Planning and Assessment Act, development consent for State Significant Development (SSD) may be granted despite the development being partly prohibited by an environmental planning instrument, it is Council's opinion that any new development that is prohibited under an EPI, but allowed only by virtue of s4.38(3) of the Environmental Planning and Assessment Act must not result in any adverse amenity or design impacts and allows use of the school facilities to be shared with the community.

Clause 35(6) of the Education SEPP sets out the following provisions:

> *(6) Before determining a development application for development of a kind referred to in subclause (1), (3) or (5), the consent authority must take into consideration:*
> *(a) the design quality of the development when evaluated in accordance with the design quality principles set out in Schedule 4, and*
> *(b) whether the development enables the use of school facilities (including recreational facilities) to be shared with the community*.

In response to **Clause 35(6)(a),** TZG Architects have prepared a Design Statement which assesses the proposal against the seven (7) design quality principles set out under Schedule 4 of the Education SEPP. The assessment provided by TZG Architects Design Analysis Report in regard to the design quality principles is detailed. Subject to the amendments required to address the urban design, heritage and landscape issues

contained in this referral response the proposal has the potential to represents a high level of design quality, as required by Clause 35(6)(a).

In response to **Clause 35(6)(b),** the EIA notes that the proposed development seeks to enable the use of the school facilities by community groups, including after-hours use. The EIA provides reference to the sports centre at No.224 Headland Road being made available for hire by local schools and sporting groups. Further information is required on the use of the sports facility for community groups in order to ensure that requirements of clause 35(6)(b) are fully addressed. To this end it is recommended that the Operation Plan of Management (POM) is amended to provide further detailed consideration to ensure it comprehensively addresses the balance between the school use and community use of the facility. Clarity around what extent the development will be available to be used by the "community" beyond St Luke's Grammar School (including other schools, sporting groups, general public etc) is required to be fully expressed in the POM.

Clause 35(9) outlines that the provisions of a development control plan that applies to a development of a kind referred to in Clause 35(1) (development for the purpose of a school) is of no effect.

Notwithstanding Clause 35(9), the application has been assessed against the objectives of the controls contained within Warringah DCP, including, but not limited to:

Clause B6 (Side Boundary setbacks), B8 (Front Boundary Setbacks), B10 Rear Boundary Setbacks), C2 (Traffic and Access), C3 (Parking), C3 (A) (Bicycle Parking and End of Trip Facilities), C4 (Stormwater, C4 Erosion and Sediment), C7 (Excavation and Landfill), C8 (Demolition and Construction), C9 (Waste Management) , D1 Landscape Open Space and Bushland Setting), D4 (Noise), D9 (Building Bulk), D10 (Building Colours and Materials), D11 (Roofs), D12 (Glare and Refection), D13 (Front Fences and Front Walls), D14 (Site Facilities), D16 (Swimming Pools), D17 (Tennis Courts), D18 (Accessibility), D20 (Safety and Security), D21 Provision and Location of Utility Services, D22 (Conservation of Energy and Water), D23 (Signs), E1 (Preservation of Trees or Bushland Vegetation), E7 (Development on land adjoining Public Open Space) and E10 (Landslip Risk).

Clause 42 of the Education SEPP states the following in relation to the application of development standards to SSD:

> *Development consent may be granted for development for the purpose of a school that is State Significant Development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted.*

Under clause 4.3 of the WLEP, an 11 metre maximum height of building development standard applies to No.800 Pittwater Road. The existing building and the proposed skylights breach this development standard. Clause 42 has the effect of removing the requirement for a Clause 4.6 variation. Notwithstanding this, detailed comments of potential impacts associated with the breach in the height limit, are provided in this response below.

2. Urban Design

The proposal generally satisfies the SEARs and Council's Urban Designer raises no significant issues with the proposal, however recommends that the following matters are addressed:

School Campus Connectivity

The proposed links connecting No.224 Headland Road and No.800 Pittwater Road, being both the internal lift connection and previously approved pathway and stair connection is a logical and well-founded strategy. The circulation as a nodal point in the scheme provides a single and clear wayfinding strategy between the sites across the whole campus.

With just a single lift to provide this link, there is the potential to introduce a second lift in the main vertical circulation core to accommodate for the growth of student numbers over time. Given the scope and size of the campus and projected increase in numbers over time it would be prudent to provide several lifts.

No. 800 Pittwater Road

Architectural Design Statement

In concurrence with the Government Architect NSW (GANSW) comments regarding the use of the plexiglass fencing elements, there needs to be testing that looks to an alternate material. An alternate must sit in harmony with the sandstone elements and the greater natural landscape context of the natural podium whilst tying in with the form and architectural style and horizontal banding of the building expression could be further tested.

A combination of landscaped planting elements combined with subtle detail in the fencing elements, noting it fronts Pittwater Road and frames the foreground and context of the whole site is encouraged.

Space Planning Stage 2

The culmination with the stage 3 works demonstrates a clearly articulated and consolidated spatial planning regime. The only question is how the staging of works, with regards to the facade treatment will play out and affect current students, staff and users of the site and the general public. See further commentary below in Staging Report section.

Noise Barrier Wall

Council concurs with the comments of the GANSW on the plexi-glass noise wall barrier. This issue is complex as the plexi-glass offers a reduced bulk/built form impact to the streetscape and views to the heritage building and is a well considered landscape response to the forecourt. Whilst noting support of deletion of the plexi-glass element, the applicant is encouraged to further test alternate options with the view to considering retention of the plexi-glass if further testing does not prove to result in a better urban design outcome.

Understanding the constraints of the acoustic requirements along with the visual and aesthetic result of a solid barrier wall of lapped and capped timber or opaque material (not a preferred option) this aspect of the development presents a difficult position.

The option presented in the Noise Barrier Wall Design Statement of the Urban Design Report integrates well with the topography, provides a clarity of wayfinding and addresses the context of the site geology, topography and built form heritage well. It is less desirable

to fence off the forecourt of No. 800 Pittwater Road, and a better outcome to have a clarity of view to the existing/proposed building in it's context.

Option Testing Plexi-glass Noise Barrier

Noting the variegated ground plan treatment of the landscaping that articulates is there an opportunity to provide a plexi-glass screen that follows this meandering line of articulation that can be planted out with larger and smaller planting treatments at various points along this line to assist to soften the effect of a long straight plexi-glass wall. Possibly an option worth testing that could provide additional acoustic attenuation through the depth of planting and plexi-glass combined so as to break up the long linear elevation of plexiglass.

No. 224 Headland Road

External treatment of the building should indicate the link and connection to the No.800 Pittwater Road site demonstrating its connection to the greater campus.

Staging

The staging demonstrates a logical and ordered development of the site given the constraints of the availability and end of lease of the respective tenancies across the site.

Consideration to an effective treatment to the hoardings during construction with temporary external structures/scaffolding during this time will be foremost on the minds of the users of the site.

Staging of works, and the effects on the elevational presentation, particularly between stages 2 and 3, and how the landscape treatment to the frontage of site maintains a semblance of order and aesthetic treatment should be considered.

An interesting precedent is the use of Reg Mombasa hoarding illustrations at the Wynyard Station bus interchange in the Sydney CBD which provide a moment of interest and distraction to the works beyond. Site hoardings that provide support or a welcome face to the community and users across the site should be considered in the overall construction staging program.

ESD

The proposed Green Star (design and as-built) certification process identified in the ESD report is supported by council and the recommendations provided should be reflected in the final design.

A response to the GANSW Environmental Design in Schools should look to address the following key priorities: Air, Comfort, Light, Noise, Water, Energy, Landscape and Materials.

3. Heritage

Clause 5.10 of WLEP requires the consent authority to consider the effect of the proposed development on the heritage significance of any item. The building at No.800 Headland Road is heritage listed under Schedule 5 of WLEP and requires the conservation of the semi-circular section in the north-east corner, building front entry and clock tower. In addition, adjoining heritage items include Stony Range Flora Reserve and the Bus Shelter on Pittwater Road and the impact of the development on neighbouring items is also of relevance.

The proposed redevelopment of the heritage building at No.800 Pittwater Road generally satisfies the requirements of Clause 5.5 of WLEP and SEARs. However, the following design modifications are recommended.

Building form and facade

The new design fails to interpret the solidity and fenestration pattern of the original facade. The existing glazing on the western facade is proposed to be replaced with a new facade of solidity and fenestration which is not a lot different than the existing in terms of the location of the external walls.

The original facade was located behind the leading edge of the clock tower with a parapet and recessed upper storey facade as well a large overhang. Similarly, the area to the left of the main entrance was also behind the leading edge of the tower. This original design ensured that the asymmetrical clock tower and building entrance took prominence as part of the original design, which has been lost in later additions.

While the proposal does adopt a strong horizontal architectural statement, by adopting the line of the current Officeworks building for its new walls and large overhangs, this component will continue to affect views to and from the clock tower. It would be preferable if the overhangs are removed and the upper section on the southern end recessed, thereby reinstating the original parapet wall. This will help to interpret the solidity and fenestration and the articulation of the original fabric. Slightly recessed glazing behind this parapet wall could complete the second storey. By doing this the proposed second storey area will need to be reduced (a reduction in the size of the proposed atrium may be considered to regain the required internal area).

The original colonnade on the ground floor should be reinstated. This again will result in a slightly reduced internal floor area but will help the building to regain its original fabric on the western facade.

A similar design approach should apply to both sides of the main entry on the western facade, so as to retain the prominence of the tower element and also retain significant views to the tower and to the semi-circular canteen element at the north-west end of the building.

Roof

The proposed roof form incorporating sawtooth roofs is acceptable from a heritage perspective as they will provide natural light into the central area of the building without compromising the facade treatment. However, it would be preferable if the height of the sawtooth roof was reduced, to minimise its visibility on the western facade, as the original roof was not readily visible above the original parapet.

Materials and finishes

The preferred external colours are “Option 2 – Half-strength blue”, with the heritage fabric rendered white to reflect the original finish.

From a heritage perspective, the preferred external colours would be those shown as “Option 3 - Neutral” in the Architectural Design Report (page 58). In addition to this, it is preferred that original components be painted in original colours (e.g. white), with the new components painted in a slightly different neutral shade. In doing so, the original fabric components would be clearly identifiable, but with the whole facade still presenting with a neutral palette, reflecting the original architectural design concept.

No objections are raised to the use of other colours (e.g. blue) for building components behind the facade, as darker colours will ensure that the heritage facade is prominent and distinct and that new building additions are recessive

Signage

Proposed signage is generally acceptable. However, consideration should be given to a reduction in the size of proposed Sign 2, the main sign on the southern end of the front facade, so that it does not dominate the facade and compete with the heritage clock tower.

Clock tower

The plans and renders provided do not show the existing window on the north-eastern corner of the heritage listed tower. This window must remain and must not be removed as it is an essential element of this heritage listed structure.

Additionally, the clock face must be retained in any redevelopment and a condition imposed to require it to be restored to a functioning clock.

Fencing

No objections are raised to the proposed fencing along Pittwater Road. It is understood that it needs to act as a noise barrier, so the use of a clear acrylic top is supported to enable visibility of the heritage item, while still providing security and noise reduction. Such a solution is preferable to a solid fence or metal fence of 1.8 metres. The vertical fins however should only be in a neutral tone, so as to blend in with the facade of the heritage building and not compete with it.

Heritage Bus Shelter

It is recognised that this heritage listed bus shelter is not part of the site owned by the school, however, the bus shelter was an integral part of the original development. It would be preferable if, as part of this redevelopment, the school restores and paints the bus shelter, in colours which match the redeveloped heritage building at No.800 Pittwater Road. In this way the connection between these two heritage items can be maintained. In addition, it would be appropriate for the bus shelter to be included within the Heritage Interpretation Plan, which should be required by any approval.

In summary, design modifications to the building components on either side of the original clock tower, are considered necessary to ensure that the prominence of the remaining original components of the original Top Dog factory are celebrated. By setting back these components, views to the clock tower will be restored and it will also provide an opportunity to better interpret the original design character of these horizontal elements. In accordance with the Heritage Impact Statement (City Plan Heritage - November 2019) submitted with the application, any approval should include conditions. Please refer to addendum to this letter for suggested heritage conditions.

4. Aboriginal Heritage

An Aboriginal Cultural Heritage Assessment (ACHA) was prepared by Eco Logical Australia on 4 March 2020 in accordance with the SEARs requirements. The Assessment notes:

"*The ACHA has identified that zero Aboriginal heritage sites will be harmed by the proposed development. There is nil archaeological potential across the entirety of the study area and no archaeological mitigation measures are required."*

Given the above, the Aboriginal Heritage Office considers that there are no Aboriginal heritage issues for the proposed development.

Under the National Parks and Wildlife Act 1974 (NPW Act) all Aboriginal objects are protected. Should any Aboriginal Cultural Heritage items be uncovered during earthworks, works should cease in the area and the Aboriginal Heritage Office assess the finds. Under Section 89a of the NPW Act should the objects be found to be Aboriginal, the Department of Planning, Industry and Environment (DPIE) and the Metropolitan Local Aboriginal Land Council (MLALC) should be contacted.

5. Landscape

The site offers a symbolic 'gateway' to the coast strip east of Pittwater Road and landscape treatment shall enhance the visual and physical perception of this 'gateway', whilst respecting and highlighting the historic built items of the building at No.800 Pittwater Road, and allowing other parts of the building to sit within a landscape setting. The proposed landscaping generally satisfies the requirement of WLEP, WDCP 2011 and SEARs. However, the following concerns shall be addressed with design modifications:

Landscape Treatment to No.224 Headland Road

The proposed landscape treatment at No.224 Headland Road is limited due to the intensified sporting activity and associated parking, apart from planters to separate buildings and the external car park. It is recommended that the car parking arrangement be reviewed to introduce tree planting along the western boundary by reducing car spaces, and thus activating the Green Travel Plan proposal to reduce dependence on car use as public transport and improved pedestrian and cyclist opportunities are available with this development proposal.

Where possible, and as recommended in the Arboricultural Impact Assessment report, existing boundary planting to the Headland Road frontage shall be retained and/or replaced to provide a softening of the development upon the streetscape amenity.

Landscape Treatment to Pittwater Road

To enhance the 'gateway', incorporate the built forms with the landscape, and improve the visual amenity from public places / roads, a boundary landscape buffer along Pittwater Road shall be provided of suitable width to support tree planting as envisaged in the architectural image of section 4.3 3D View, exterior 3, through a redesign of the external layout including adjusted arrangement of the ramp, external area, and pick-up/drop-off area, represented in the stage 3 proposal. Any planting shall recognise the heritage and visual value of the heritage items of the building at No. 800 Pittwater Road.

Planting Schedule

A Plant Schedule is provided and the self-seeding tree species (referenced in the referral attached) susceptible of spreading into bushland shall be removed from the list and replaced with a suitable non-invasive species.

Arboricultural Assessment

An Arboricultural Impact Assessment is provided with the development proposal reporting on the 62 existing trees. The recommendations of the arborist report are accepted and include tree protection measures to ensure the retention of the recommended species, including protective fencing, trunk and ground protection, and engagement of a Project Arborist to supervise tree protection measures.

6. Biodiversity

As required under the SEAR's the SSD includes a Biodiversity Development Assessment Report (BDAR) prepared by an accredited assessor in accordance with the Biodiversity Assessment Method. The BDAR has assessed that the development site has been cleared of remnant vegetation and replaced with a modified landscape which includes native and exotic vegetation plantings. No threatened flora or fauna species were identified on site, and potential impacts to biodiversity are low, and have been avoided and minimised where possible. The proposed development footprint will result in removal of a small amount (0.035 ha) of planted native vegetation and 0.06 ha of horticultural plantings and opportunistic weeds. Potential prescribed impacts have been assessed, and a serious and irreversible impact is unlikely. The BDAR has also assessed the potential biodiversity impacts of the development against other relevant Commonwealth, State and Local planning controls, concluding that impacts are minor in nature.

The BDAR has calculated a biodiversity offset of one ecosystem credit, reflecting the low integrity of native vegetation within the site. Trees within the adjoining flora reserve will be protected and landscaping of the new site is proposed in order to minimise potential indirect impacts.

The mitigation measures within the BDAR recommend that landscaping in the development site is to use locally derived native species and those found within the PCTs present (PTC 1776). The submitted Landscape Plan does not fully satisfy that mitigation measure, and it is recommended that the species palette is revised.

7. Transport

Council's Transport Unit have expressed serious concerns with the proposal and note that the applicant has not addressed the possibility of removing access off Harbord Road and providing access solely on Pittwater Road for the proposed Senior Campus. Noting that the applicant has mentioned some topographic items, they have not specifically stated if these can be overcome to achieve a better outcome for the site.

The following recommendations are provided and the Department of Planning, Industry and Environment must seek resolution of these critical issues before finalising the assessment of the SSD.

Access via Pittwater Road

The preference of Council is that the access be provided on Pittwater to avoid the potential of rear end collisions when turning from Pittwater Road onto Harbord Road, being that the access point is close to the intersection.

An access directly off Pittwater Road would provide better accessibility and improve safety. Further, the reconfiguration would support the possibility for additional parking capacity.

Traffic volumes and RMS input

The traffic volumes assumed for the Senior Campus, are deemed adequate. RMS input in the assessment of the application is required as the proposal will directly impact a set of signals and the state road network.

The anticipated net decrease in traffic generation of the site is deemed beneficial on the network.

Further information

There is insufficient information provided with the application and additional information is required to address the below issues:

- How the increase in the student numbers at No.210 Headland Road will impact the local traffic network, particularly in regard to pick-up/drop-off periods. The following information is required:

- Comparison of the existing student mix at No.210 Headland Road would suggest that approximately 27% of the junior students and 17% of the senior students, arrive by car.
- This this would indicate that once the senior campus operates at 100% capacity, 1,000 students will be attending the Junior Campus at the above rate of drop-off and pick-up.
- This would relate to an increase of almost 300 students to the junior campus.
- In accordance with the rates adopted in the applicant's traffic report, the rate of drop-off and pick-up will increase by approximately 50 movements in the peak 1 hour.
- This will have a significant impact on the local area, particularly as the current School Traffic Management Plan is still not seen as operating at optimum performance. This is noted through a number of site visits, observations and local concerns raised whereby queueing has been seen to extend near to No.224 Headland Road from the drop-off/pick-up bay on Tango Avenue.
- The afternoon service appears to operate to a near satisfactory level, albeit the impact only occurs for approximately 15min in the afternoon and is therefore within tolerance levels.

- Confirmation of the number of parking spaces 'required' by students needs to be summarised in a table. It is unclear on what basis the applicant has determined 25 parking spaces to be sufficient for 600 senior students, particularly when public parking is minimal due to the location of the Senior Campus.

- Whilst the Green Travel plan appears to promote the use of public transport for students, it is stated that approximately 17% of the existing senior students will arrive by car. However, it does not indicate the number of senior students parking, both on and off-street. Further clarification is required as this will determine whether the proposed 25 parking spaces for Senior Staff will be adequate on the new senior campus.

8. Health

Noise

The development is expected to generate noise and also will be impacted by noise from the roadway and surrounding industrial areas. An acoustic report has been submitted, as per the SEARs, which addresses how noise entering and exiting the site will be mitigated.

From this report a number of recommendations have been proposed which should be included as specific conditions in the event that approval is granted.

Contamination

The proposal involves a change of use of No.800 Pittwater Road and No.224 Headland Road from commercial, (medical) to an educational use. Furthermore, No.800 Headland Road has a historic factory use. In accordance with SEPP 55 (Contamination) and the SEARs requirements, a phase 2 contamination report has been submitted. The report identifies that two samples contained elevated nickel and lead. The areas where the sample identified exceedances of the heavy metals are areas not proposed to be excavated. Based on this information Council's Health Unit have advised that further remediation may not be required as long as hard surfaces are mainlined. However, the Department should satisfy itself, prior to determination, that the proposed site will be made suitable for the proposed use.

In addition, the Department should address issues with respect of asbestos by means of conditions to ensure compliance of the removal of asbestos in accordance with the relevant legislation. Please refer to suggested Health conditions in the attached referrals.

Food

The plans show proposed food premises within the proposed development. The Department should ensure that suitable conditions are included in any future consent to ensure the businesses comply with current Australian standard fit out requirements for food premises and their registration with Council.

Pool

The proposal provides limited detail for the pool, as such it is recommended that the Department include conditions in any future consent requiring the construction of the pool to meets proper water quality treatment and facility design and to ensure the public pool is registered with Council.

9. Waste

The operational waste management plan appears to provide on-site arrangements for waste management appropriate for the development. The temporary waste storage area at No.800 Pittwater Road for Stage 2 should be enclosed and adequately screened from view from Pittwater Road and Harbord Road.

The plan for waste storage areas at both locations should demonstrate how an appropriate collection vehicle will both enter and leave the site in a forward direction.

The plan states in the introduction that "demolition and construction waste (is) addressed in a separate report." However, this document could not be located for review. The proposal shall ensure all arrangements for demolition and construction waste management be duly considered.

10. Stormwater

The Stormwater Management report prepared by Northrop (dated 29/5/2020 Revision 2) has been reviewed and it is accepted that the plan has been prepared generally in accordance with Councils Water Management Policy (Former Warringah Council).

In regard to stormwater quality the proposal plans for No.800 Pittwater Road (stages 2 and 3) utilise and enlarge an existing stormwater detention tank. The consultant has used the DRAINS model to determine site discharge and storage requirements to the 1 in 100 AEP storm event. The pre-developed condition as advised at the previous pre lodgement meeting (PLM) was to be “state of nature” and this requirement has been achieved.

The stage 1 redevelopment at No.210 Headland Road does not require on site stormwater detention as the proposal is an internal reconfiguration of the existing building. Stormwater quality controls are not required either.

The stage 2 and 3 stormwater quality plan has used a mixture of pit inlet baskets and stormwater cartridge filters. The Music model has demonstrated that this treatment train will meet the water quality objectives of Councils Water Management Policy.

11. BCA

The proposed development including reports relating to Access and BCA compliance have been reviewed with respect to aspects relevant to Building Certification and Fire Safety Group. There are no objections to the development, subject to Compliance with the BCA and all relevant Standards. In addition, the following reports are to be taken into consideration as part of the design and construction:

- Concept Fire Engineering Report by MCD dated 14/11/2019
- Fire DA support Statement by MCD dated 14/11/2019
- BCA Compatibility Statement by Group DLA dated 5/2/2020
- Access Review Report by Funktion dated 4/3/20

Planning Summary

This submission provides a comprehensive overview of the information and issues expected to be resolved for a development of this scale prior to determination.

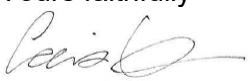
The applicant is strongly encouraged to resolve the issues raised in Council’s submission in order to provide a state of the art environmentally sustainable facility which can be sited as a benchmark for future similar developments. Council welcomes the opportunity to make a further submission on the application should amended plans and additional details be submitted to address issues raised during the exhibition period. Further consultation with Council, the community and other stakeholders on this State Significant Development will ensure the best possible outcome for this site and the locality.

Attached for your information are the detailed referral responses from Councils Internal Units which include suggested conditions that could be imposed subject to the resolution of the key issues identified in this submission.

Once again, Council thanks you for the opportunity to provide comments on the SSD.

Should you require any further information please contact Anne-Marie Young, Principal Planner on 8495 6507.

Yours faithfully



Louise Kerr
Director, Planning and Place

northern beaches council

Memo

To:	Development Assessment
From:	Aboriginal Heritage Office
Date:	13 July 2020
Subject:	AHO comments on SSD for St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291)
Record Number:	2020/422690

Development Application No. SSD-10291
Address: 800 Pittwater Road, Dee Why and 224 Headland Road, Curl Curl.

Reference is made to the proposed development at the above area and Aboriginal heritage.

An Aboriginal Cultural Heritage Assessment (ACHA) was prepared by Eco Logical Australia on 4 March 2020:

> "The ACHA has identified that zero Aboriginal heritage sites will be harmed by the proposed development. There is nil archaeological potential across the entirety of the study area and no archaeological mitigation measures are required."

Given the above, the Aboriginal Heritage Office considers that there are no Aboriginal heritage issues for the proposed development.

Under the National Parks and Wildlife Act 1974 (NPW Act) all Aboriginal objects are protected. Should any Aboriginal Cultural Heritage items be uncovered during earthworks, works should cease in the area and the Aboriginal Heritage Office assess the finds. Under Section 89a of the NPW Act should the objects be found to be Aboriginal, the Department of Planning, Industry and Environment (DPIE) and the Metropolitan Local Aboriginal Land Council (MLALC) should be contacted.

NORTHERN REGION ABORIGINAL HERITAGE OFFICE

Kind regards,
Susan Whitby
Aboriginal Heritage Officer
Lane Cove, North Sydney, Ku-ring-gai,
Willoughby, Strathfield & the Northern Beaches Council.
29 Lawrence Street, Freshwater NSW 2096

northern beaches council

Memo

Development Assessment

To: Anne Marie Young
Principal Planner

From: Engineering - Robert Barbuto
Principal Engineer - Major Developments

Date: 20 July 2020

Subject: **Engineering Comments** - SSD - St Luke's Grammar School (SSD 10291)

Record Number: 2020/425254

The Stormwater Management report prepared by Northrop (dated 29/5/2020 Revision 2) has been reviewed and it is accepted that the plan has been prepared generally in accordance with Councils Water Management Policy (Former Warringah Council).

In regard to stormwater quality the proposal plans for 800 Pittwater Road (stages 2 and 3) utilise and enlarge an existing stormwater detention tank . The consultant has used the DRAINS model to determine site discharge and storage requirements to the 1 in 100 AEP storm event. The pre developed condition as advised at the previous pre lodgement meeting (PLM) was to be "state of nature" and this requirement has been achieved.

The stage 1 redevelopment at 210 Headland Road does not required On site stormwater detention as the proposal is an internal reconfiguration of the existing building. Stormwater quality controls are not required either.

The stage 2 and 3 stormwater quality plan has used a mixture of pit inlet baskets and stormwater cartridge filters. The Music model has demonstrated that this treatment train will meet the water quality objectives of Councils Water Management Policy

northern beaches council

Memo

To: Development Assessment

From: Environmental Health – Max Payne

Date: 17 July 2020

Subject: **Environmental Health comments** on SSD for St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291)

Record Number: 2020/435770

Environmental Health has reviewed the proposed development for potential for noise generation and its control, potential for contamination, operation of food businesses, fit out of food preparation areas, Public pool design and operation.

Noise

The development is expected to generate noise and be impacted by noise from the roadway and surrounding industrial areas. An acoustic report has been submitted with the application which addresses how noise entering and exiting the site will be mitigated. From this report a number of recommendations have been proposed. Some conditions have been proposed to ensure actions listed in the acoustic report are completed others will be completed due to their placement on the provided plans.

Food

The plans show proposed food premises within the proposed development. Conditions have been provided to ensure the businesses comply with current Australian standard fit out requirements for food premises and their registration with Council prior to OC.

Pool

The proposed development shows the inclusion of a public pool. The proposal provides limited detail for the pool and as such a condition of consent has been provided to ensure the construction of the pool meets proper water quality treatment and facility design. A condition has also been provided to ensure the public pool registers with Council prior to OC.

Contamination

Asbestos – A condition has been provided for the identification and removal of asbestos identified in the asbestos register and management plan.

The phase 2 contamination report identifies that two samples contained elevated nickel and lead. The areas where the sample identified exceedances of the heavy metals are areas not proposed to be excavated and therefore do not require further remediation as long as hard surfaces are mainlined. A condition has been imposed for further investigation should other excavation be proposed.

Recommendation

Approval - subject to conditions

Proposed condition

Prior to CC – Asbestos removal

Engage appropriately qualified and experienced persons to assess the nature and extent of any asbestos contamination on the premises and prepare a detailed methodology and plan for the lawful removal of any asbestos from the premises. The plan must be submitted to the Principal Certifying Authority.

Reason: To ensure compliance with relevant regulations, protection of environment and human health.

During works - Asbestos removal

Engage appropriately qualified and experienced persons to carry out and supervise the removal of asbestos in accordance with the methodology prepared prior, relevant policies, procedures and requirements of Safework NSW.

Reason: To ensure compliance with relevant regulations, protection of environment and human health.

Prior to OC – Asbestos removal

Submit to the Principal Certifying Authority documentation and certification from appropriately qualified and experienced persons confirming that the Clean-up Works have been carried out and completed in accordance with the Clean-up Plan. This documentation is to include an asbestos clearance certificate (including air monitoring results).

Reason: To ensure compliance with relevant regulations, protection of environment and human health.

During works - Off-site Disposal of Contaminated Soil - Chain of Custody

‘Chain of Custody’ documentation shall be kept and submitted for the transport of any validated fill material from the site. Any fill material is to be disposed at a licenced waste facility. Details demonstrating compliance are to be submitted to the Principal Certifying Authority and Council within seven (7) days of transport.

Reason: For protection of environment.

During works – Compliance with the recommendations of the phase 2 detailed site investigation

The recommendations of the phase 2 detailed site investigation by Martens Consulting engineers referenced as P1907215JR03V01 dated October is to be complied with during works.

Reason: To protect human health and the environment.

During works - Requirement to Notify about New Contamination Evidence

Any new information revealed during demolition works that has the potential to alter previous conclusions about site contamination or hazardous materials shall be immediately notified to the Council and the Principal Certifying Authority.

Reason: To protect human health and the environment.

Prior to CC – Public pool design and construction

A suitably qualified person is to design the public pool and plant equipment to meet the requirements set out in chapter 7 of the NSW Health swimming pool and spa pool advisory document. Schematics of the water processing equipment and plans of the pool and plant room are to be provided to the Principle Certifying Authority prior to CC.

Reason: To ensure that aquatic facilities are designed to not pose a risk to public health

Prior to OC – Public pool design and construction

The public pool, plant rooms and associated facilities are to comply with the plans and schematics submitted to the Principle Certifying Authority. Prior to any Occupation Certificate (OC) being issued certification is to be provided by a suitably qualified person that the fit-out complies with the plans and schematics

Reason: To ensure that aquatic facilities are designed to not pose a risk to public health

Prior to OC – Registration of public pool

The public pool must be registered with the Appropriate Regulatory Authority, prior to Occupation Certificate being issued.

Reason: public pools are required to be registered with the Appropriate Regulatory Authority.

Ongoing - Waste collection and delivery times

Waste collection and deliveries for the premise must not occur between the hours of 6:00pm and 7:00am Monday to Sunday, without prior approval of Council.
Reason: to minimise disruption to neighbouring properties.

Ongoing – Hours of operation for grounds maintenance
The maintenance of grounds must not occur between the hours of 6:00pm and 7:00am Monday to Sunday, without prior approval of Council.
Reason: to minimise disruption to neighbouring properties.

Ongoing – Sound power level of plant equipment

The sound power level of all mechanical plant equipment shall not exceed the levels indicated in table 8 of the environmental noise assessment by Day design PTY LTD report number 6479-5.1R dated 3 April 2020.

Reason: To maintain the amenity of surrounding residences.

Prior to CC – Mechanical plant equipment and acoustic controls

All mechanical plant equipment to be installed as part of the development are to be identified and notified to the Principle Certifying Authority prior to CC. The acoustic treatment of all plant rooms and equipment is to be designed in a detailed acoustic assessment to meet the noise reduction requirements of the industrial noise policy.

Reason: To protect the amenity of surrounding residents

Prior to OC - Mechanical plant equipment and acoustic controls

Certification is to be provided to the Principle Certifying Authority that proposed mechanical equipment and their acoustic controls developed as part of the detailed acoustic assessment have be installed and meet the required RW ratings.

Reason: To ensure adequate noise attenuation fittings are correctly installed to protect the amenity of surrounding residents.

Prior to OC – Kitchen Design, construction and fit out food premise

The construction fit-out and finishes of any food premises within the development must comply with Standard 3.2.3 of the Australian and New Zealand Food Standards Code, the Food Act 2003 and Australian Standard AS 4674 ‘Design, construction and fit out of food premises’. Prior to any Occupation Certificate (OC) being issued certification is to be provided by a suitably qualified person that the fit-out complies with the above requirement.

Reason: To ensure that the kitchen complies with the design requirements.

Prior to OC – Registration with Council food business

The food business must be registered with the Appropriate Regulatory Authority, prior to Occupation Certificate being issued.

Reason: Food premises are required to be registered with the Appropriate Regulatory Authority.

northern beaches council

Memo

To: Anne-Marie Young – Principal Planner

From: Heritage - Janine Formica/Oya Guner/Brendan Gavin

Date: 20 July 2020

Subject: **Heritage Comments** - St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291) – 800 Pittwater Road and 224 Headland Road, Dee Why

Record Number: 2020/425371

Please find below, Council's heritage comments in response to the exhibition of the proposal for redevelopment of 800 Pittwater Road and 224 Headland Road, Dee Why by St Luke's Grammar School (SSD-10291).

Heritage Listings

This proposal affects a listed heritage item located on 800 Pittwater Road, Dee Why being ***Item I49 - Former Wormald Building (front entrance, tower and curved former canteen only)*** and also adjoins two other heritage items, ***Item I5 – Bus Shelter, 800 Pittwater Road*** and ***Conservation Area C6 - Stony Range Flora Reserve, 802 Pittwater Road.***

Further details of the *Former Wormald Building*, as described within the Warringah Heritage Inventory are:

Statement of Significance
An excellent representative & relatively rare example of early post-war factory architecture. Displays high creative & technical integrity. Historically evidence of the growth of industry in the area. Socially, a landmark which many local people worked in.

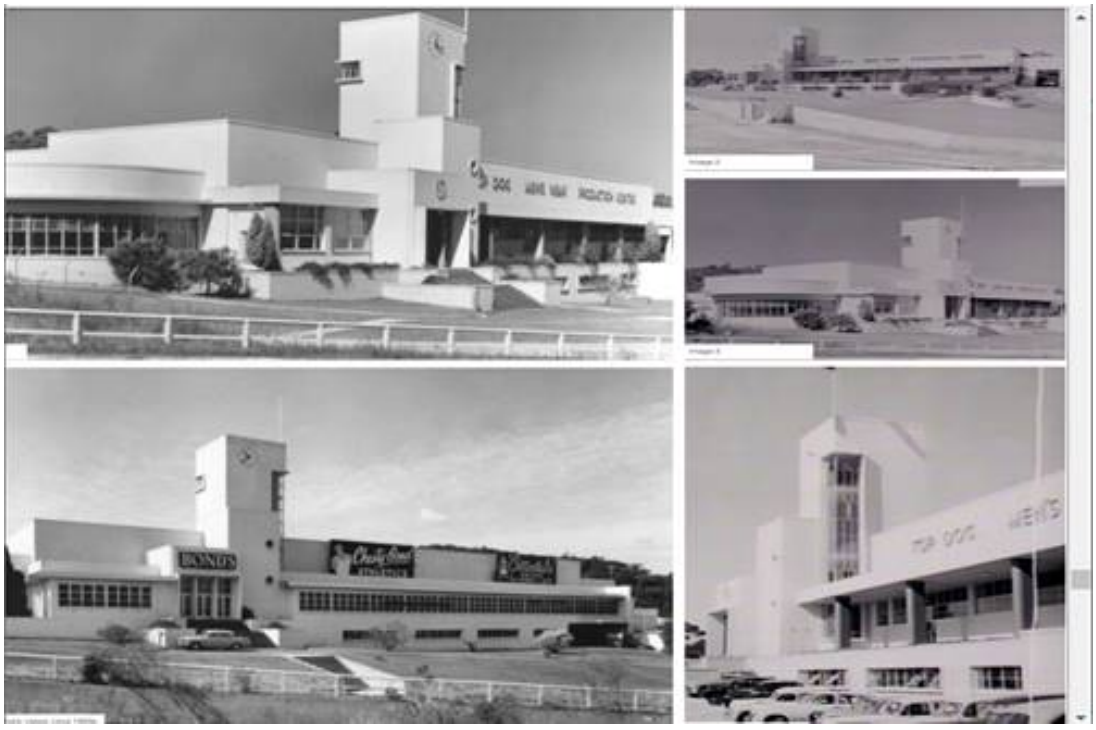
Physical Description
Factory building with rendered masonry walls. Largely single storey with prominent off centre tower with clock, full height steel framed corner windows etc. Asymmetrical design. Large straight parapet, continuous bands of metal framed windows. Set up high.

The following image shows the original building, before any alterations and additions, (Source: Warringah Local Studies).

Figure 68: The Top Dog Men's Wear production centre designed by Spencer, Spencer and Bloomfield photographed by Ted Hood with the James' service station and Sydney bus in the foreground, c. 1951 (Source: Warringah Local Studies).

The building was built in 1949 as the Top Dog Menswear Production Centre, to a design by Spencer, Spencer & Bloomfield. The building won the prestigious Sir John Sulman Medal for Architecture in 1950. Changes to the original fabric were made by later occupants - Bonds Industries; Fire Control Pty Ltd and Wormald International. Most recent changes were made in the 1990's for Officeworks use of the building.

The pictures below show the original façade and the changed façade when occupied by Bonds, which introduced and infill of the colonnade. Further internal changes and external changes were made to the western façade in the 1990s, including large overhangs and double height glazing on either side of the main entry, for Officeworks.



Given the degree of modifications and changes to the building, the heritage listing was changed so that it only applied to specific original components of the original building, being the front entrance, clock tower and curved former canteen area

Heritage Comments

This application is for expansion of the existing St Luke's Grammar school to two nearby sites. The proposal includes alterations and adaptive re-use of the existing heritage building at 800 Pittwater Road, for the purposes of a new senior school campus, which will have a vertical connection with the other redeveloped site at 224 Headland Road.

This proposal is a good opportunity to reinstate some of the original fabric and architectural form of the *Former Wormald Building*, particularly in relation to the western façade as this is the most important façade from an architectural heritage perspective and the most visible façade to the community, being highly visible from both Pittwater Road and Harbord Road. The proposal is an opportunity to celebrate the heritage significance which remains on site, restore original components and interpret the long history of industrial usage of the site.

The relevant documents have been reviewed from a heritage perspective and the following comments are provided:

Building form and façade
Although, the proposal is an improvement on the existing building, it is considered that more could be done. It is considered that the new design fails to interpret the solidity and fenestration pattern of the original façade. The existing glazing on the western façade is proposed to be replaced with a new façade of solidity and fenestration which is not a lot different than the existing in terms of the location of the external walls.

The original façade was located behind the leading edge of the clock tower with a parapet and recessed upper storey façade as well a large overhang. Similarly the area to the left of the main entrance was also behind the leading edge of the tower. This original design ensured that the asymmetrical clock tower and building entrance took prominence as part of the original design, which has been lost in later additions.

While the proposal does adopt a strong horizontal architectural statement, by adopting the line of the current Officeworks building for its new walls and large overhangs, this component will continue to affect views to and from the clock tower. It would be preferable if the overhangs are removed and the upper section on the southern end recessed, thereby reinstating the original parapet wall. This will help to interpret the solidity and fenestration and the articulation of the original fabric. Slightly recessed glazing behind this parapet wall could complete the second storey. By doing this the proposed second storey area will need to be reduced (a reduction in the size of the proposed atrium may be considered to regain the required internal area).

The original colonnade on the ground floor should be reinstated. This again will result in a slightly reduced internal floor area but will help the building to regain its original fabric on the western facade.

A similar design approach should apply to both sides of the main entry on the western façade, so as to retain the prominence of the tower element and also retain significant views to the tower and to the semi-circular canteen element at the north-west end of the building.

Roof
The proposed roof form incorporating sawtooth roofs is acceptable from a heritage perspective as they will provide natural light into the central area of the building without

compromising the façade treatment. The 1951 picture below shows a similar original roof form. However, it would be preferable if the height of the sawtooth roof was reduced, to minimise its visibility on the western façade, as the original roof was not readily visible above the original parapet.

Materials and finishes
It is understood that the preferred external colours are "*Option 2 – Half-strength blue*", with the heritage fabric rendered white to reflect the original finish.

From a heritage perspective, the preferred external colours would be those shown as "*Option 3 - Neutral*" in the Architectural Design Report (page 58). In addition to this, it is preferred that original components be painted in original colours (e.g. white), with the new components painted in a slightly different neutral shade. In doing so, the original fabric components would be clearly identifiable, but with the whole façade still presenting with a neutral palette, reflecting the original architectural design concept.

No objections are raised to the use of other colours (e.g. blue) for building components behind the façade, as darker colours will ensure that the heritage façade is prominent and distinct and that new building additions are recessive.

Signage
Proposed signage is generally acceptable. However, consideration should be given to a reduction in the size of proposed Sign 2, the main sign on the southern end of the front façade, so that it does not dominate the façade and compete with the heritage clock tower.

Clock tower
The plans and renders provided do not show the existing window on the north-eastern corner of the heritage listed tower. This window (see photo below) must remain and must not be removed as it is an essential element of this heritage listed structure.

Additionally, the clock face must be retained in any redevelopment and a condition imposed to require it to be restored to a functioning clock.

Fencing
No objections are raised from a heritage perspective to the proposed fencing along Pittwater Road. It is understood that it needs to act as a noise barrier, so the use of a clear acrylic top is supported to enable visibility of the heritage item, while still providing security and noise reduction. Such a solution is preferable to a solid fence or metal fence of 1.8 metres. The vertical fins however should only be in a neutral tone, so as to blend in with the façade of the heritage building and not compete with it.

Heritage Bus Shelter
It is recognised that this heritage listed bus shelter is not part of the site owned by the school, however the bus shelter was an integral part of the original development. It would be preferable if, as part of this redevelopment, the school restores and paints the bus shelter, in colours which match the redeveloped heritage building at 800 Pittwater Road. In this way the connection between these two heritage items can be maintained. In addition, it would be good if the bus shelter was included within the Heritage Interpretation Plan, which should be required by any approval.

Conclusions

This proposal will not impact upon the heritage significance of the adjoining heritage items - Stony Range Flora Reserve and the Bus Shelter on Pittwater Road.

The proposed redevelopment of the heritage building at 800 Pittwater Road is supported from a heritage perspective, however design modifications are recommended. In particular, design modifications to the building components on either side of the original clock tower, are considered necessary to ensure that the prominence of the remaining original components of the original Top Dog factory are celebrated. By setting back these components, views to the clock tower will be restored and it will also provide an opportunity to better interpret the original design character of these horizontal elements.

A neutral palette is the preferred exterior treatment, with the original components clearly identifiable.

Proposed Conditions

In accordance with the Heritage Impact Statement (City Plan Heritage - November 2019) submitted with the application, any approval should include conditions requiring:

Photographic Archival Recording
A built heritage specialist is to develop an archival record (before, during and after) of areas implicated by the works in accordance with the Heritage Division of the NSW Office of Environment & Heritage guidelines Photographic recording of Heritage Items Using Film or Digital Capture (2006).

To be submitted to Council's Heritage Advisor for approval prior to Construction Certificate.

Heritage Interpretation Plan
A built heritage specialist is to develop a Heritage Interpretation Plan for the proposed development in accordance with the Heritage Division of the NSW Office of Environment & Heritage publications, Interpreting Heritage Places and Items (2005) and Heritage Interpretation Policy (2005).

To be submitted to Council's Heritage Advisor for approval prior to Construction Certificate.

Monitoring
The built heritage specialist is to be on site during all critical processes that require specialist knowledge and methodology. Should any discoveries be made apparent during the absence of the built heritage specialist, they are to be notified immediately and work in that area is to cease.

The built heritage specialist is to undertake regular inspections to suit the works. Timing and frequency to be agreed with the contractor. The built heritage specialist is to monitor the works and ensure that compliance conditions pertaining to heritage fabric are met.

All new work associated with heritage fabric to be discreetly dated as such. All junctions between new and original fabric to be reversible and easily identifiable as such.

Schedule of Conservation Works
A built heritage specialist is to develop a Schedule of Conservation Works that identifies the works required to remedy issues identified, as well as guide repairs, restoration or reconstruction. The schedule of conservation works should be prepared in accordance with the NSW Office of Environment & Heritage Maintenance Series.

To be submitted to Council's Heritage Advisor for approval prior to Construction Certificate.

In addition to these requirements, the following conditions are also recommended:

External colours
All original building fabric should be painted white to clearly differentiate original fabric from new construction. New fabric on the front (western) façade should be in a neutral palate, so as not to compete with the original building features. Any vertical fins on the

façade or fence should also be neutral in colour, so as not to detract from the identified heritage significance of the building.

Restoration of Clock
The original clock face is to remain (or replaced like-for-like) and restored so that it is a working functional clock.

Restoration of Bus Shelter
The original bus shelter located adjacent to the proposed fence for the school, is to be restored and painted in similar colours to the main façade of the building.

Windows – Clock Tower
No changes are allowed to the existing location of windows on the clock tower. Any replacement of fabric must strictly be “like for like”.

northern beaches council

Memo

Development Assessment

To: Anne Marie Young
Principal Planner

From: Landscape – Joseph Tramonte

Date: 20 July 2020

Subject: Landscape Comments – SSD - St Luke's Grammar School (SSD 10291)

Record Number: 2020/423885

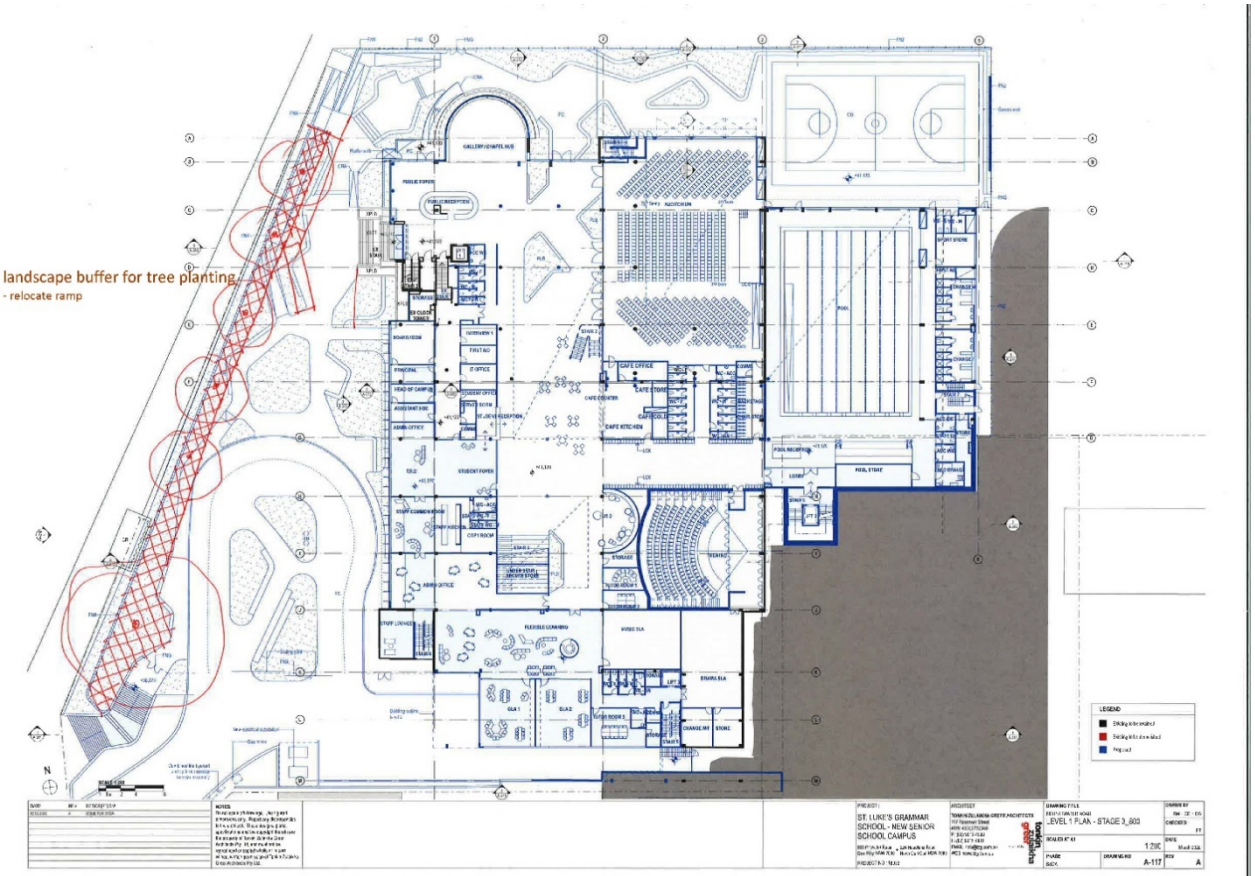
The change of use and alterations and additions for two buildings to an educational establishment. Proposed re-purposing includes office spaces, learning spaces, auditorium, pool and sporting complex upon land at 800 Pittwater Rd and 224 Headland Road North Curl Curl.

Landscape Assessment

The site offers a symbolic 'gateway' to the coast strip east of Pittwater Rd and landscape treatment shall enhance the visual and physical perception of this 'gateway', whilst respecting and highlighting the historic built items of the building at 800 Pittwater Road, and allowing other parts of the building to sit within a landscape setting.

Landscape Plans are provided and generally the proposals are accepted subject to resolution of the following concerns:

- The proposed landscape treatment at 224 Headland Road is limited due to the intensified sporting activity and associated parking, apart from planters to separate buildings and the external car park. It is recommended that the car parking arrangement be reviewed to introduce tree planting along the western boundary by reducing car spaces, and thus activating the Green Travel Plan proposal to reduce dependence on car use as public transport and improved pedestrian and cyclist opportunities are available with this development proposal.
- Where possible, and as recommended in the Arboricultural Impact Assessment report, existing boundary planting to the Headland Road frontage shall be retained and/or replaced to provide a softening of the development upon the streetscape amenity.
- To enhance the 'gateway', incorporate the built forms with the landscape, and improve the visual amenity from public places / roads, a boundary landscape buffer along Pittwater Road shall be provided of suitable width to support tree planting as envisaged in the architectural image of section 4.3 3D View, exterior 3, through a redesign of the external layout including adjusted arrangement of the ramp, external area, and pick-up/drop-off area, represented in the stage 3 proposal. Any planting shall recognise the heritage and visual value of the heritage items of the building at 800 Pittwater Road.



- A Plant Schedule is provided and the following self-seeding tree species susceptible of spreading into bushland shall be removed from the list and replaced with a suitable non-invasive species.

Arboricultural Assessment

An Arboricultural Impact Assessment is provided with the development proposal reporting on the 62 existing trees, and concludes:

- 2 trees are assessed with a High retention value. Both are proposed for retention.
- 7 trees are assessed to have a Medium retention value. One of the Medium retention value trees is proposed for removal, without a design alternative.
- 43 trees are assessed to have a Low retention value.
- 10 trees are assessed as undesirable species or in poor health.
- 26 trees are recommended for removal to facilitate development works. One of Medium retention value, and the remaining species are listed as either exhibiting Low retention value or are undesirable species or in poor health.
- 10 of these trees are recommended for removal irrespective of development.
- Offset planting is recommended.

The recommendations of the arborist report are accepted. The report provides tree protection measures to ensure the retention of the recommended species, including protective fencing, trunk and ground protection, and engagement of a Project Arborist to supervise tree protection measures.

northern beaches council

Memo

To: Development Assessment

From: Traffic - Patrick Bastawrous & Phil Devon

Date: 6 July 2020

Subject: **Traffic comments** on SSD for St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291)

Record Number: 2020/435019

Council's Traffic Team raise the following comments:

For ease of reference, the proposed campus at 800 Pittwater Road will be referred to as the Senior Campus, whilst the existing campus at 210 Headland Road will be referred to as the junior Campus.

- The applicant does not seem to have addressed the possibility of removing access off Harbord Road and provide access solely on Pittwater Road for the proposed Senior Campus. Noting that the applicant has mentioned some topographic items, they have not specifically stated if these can be overcome to achieve a better outcome for the site.
    - The preference of Council is that the access be provided on Pittwater to avoid the potential of rear end collisions when turning from Pittwater Road onto Harbord, being that the access is close to the intersection.
    - An access directly off Pittwater Road would provide better accessibility and improve safety. Further, the reconfiguration would support the possibility for additional parking capacity.
- The traffic volumes assumed for the Senior Campus, are deemed adequate. RMS input is required as the application will directly impact a set of signals and the state road network.
- The net decrease in traffic generation of the site is deemed beneficial on the network.
- Further information is required as to how the increase in the student numbers at 210 Headland Road will impact the local traffic network, particularly in regard to pick-up/drop-off periods.
    - Comparison of the existing student mix at 210 Headland Road would suggest that approximately 27% of the junior students and 17% of the senior students, arrive by car.
    - This this would indicate that once the senior campus operates at 100%, 1000 students will be attending the Junior Campus at the above rate of drop-off and pick-up.

    - This would relate to an increase of almost 300 students to the junior campus.
    - In accordance with the rates adopted in the applicant's traffic report, the rate of drop-off and pick-up will increase by approximately 50 movements in the peak 1 hour.
    - This is deemed significant on the local area, particularly as the current School Traffic Management Plan is still not seen as operating at optimum performance. This is noted through a number of site visits, observations and local concerns raised whereby queueing has been seen to extend near to 224 Headland Road from the drop-off/pick-up bay on Tango Avenue.
    - The afternoon service appears to operate to a near satisfactory level, albeit the impact only occurs for approximately 15min in the afternoon and is therefore within tolerance levels.

- Confirmation of the number of parking spaces 'required' by students needs to be summarised in a table. It is unclear on what basis the applicant has determined 25 parking spaces to be sufficient for 600 senior Students, particularly when public parking is minimal due to the location of the Senior Campus.
- Whilst the Green Travel plan appears to promote the use of public transport for students, it is stated that approximately 17% of the existing senior students will arrive by car. However, it does not indicate the number of senior students parking, both on and off-street. Further clarification is required as this will determine whether the proposed 25 parking spaces for Senior Staff will be adequate on the new senior campus.

northern beaches council

Memo

To: Development Assessment

From: Bushland & Biodiversity - Robert Blackall

Date: 14 July 2020

Subject: Biodiversity comments on SSD for St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291)

Record Number: 2020/410086

As required under the SEAR's, the application includes a Biodiversity Development Assessment Report (BDAR) prepared by an accredited assessor in accordance with the Biodiversity Assessment Method. The BDAR has assessed that the development site has been cleared of remnant vegetation and replaced with a modified landscape which includes native and exotic vegetation plantings. No threatened flora or fauna species were identified on site, and potential impacts to biodiversity are low, and have been avoided and minimised where possible. The proposed development footprint will result in removal of a small amount (0.035 ha) of planted native vegetation and 0.06 ha of horticultural plantings and opportunistic weeds. Potential prescribed impacts have been assessed, and a serious and irreversible impact is unlikely. The BDAR has also assessed the potential biodiversity impacts of the development against other relevant Commonwealth, State and Local planning controls, concluding that impacts are minor in nature.

The BDAR has calculated a biodiversity offset of one ecosystem credit, reflecting the low integrity of native vegetation within the site. Trees within the adjoining flora reserve will be protected and landscaping of the new site is proposed in order to minimise potential indirect impacts.

The mitigation measures within the BDAR recommend that landscaping in the development site is to use locally derived native species and those found within the PCTs present (PTC 1776). The submitted Landscape Plan does not fully satisfy that mitigation measure, and it is recommended that the species palette is revised.

northern beaches council

Memo

To: Development Assessment

From: Building Control – Peter Rowan

Date: 8 July 2020

Subject: Building Control comments on SSD for St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291)

Record Number: 2020/400047

The proposed development including reports relating to Access and BCA compliance have been reviewed with respect to aspects relevant to Building Certification and Fire Safety Group. There are no objections to the development, subject to:

1) Compliance with the BCA and all relevant Standards.

2) The following reports being taken into consideration as part of the design and construction:

   i) Concept Fire Engineering Report by MCD dated 14/11/2019

   ii) Fire DA support Statement by MCD dated 14/11/2019

   iii) BCA Compatibility Statement by Group DLA dated 5/2/2020

   iv) Access Review Report by Funktion dated 4/3/20.

northern beaches council

Memo

To: Development Assessment

From: Urban Design – Lea Lennon

Date: 17 July 2020

Subject: Urban Design comments on SSD for St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291)

Record Number: 2020/ 421534

Please find following Urban Design review primarily of the Architectural Design Report and various other documents relative and contained within the SSD submission for the St Lukes development proposal.

For clarity, comments have been categorised as they pertain directly to Appendix 7 of Environmental Impact Statement.

Appendix 7 - ARCHITECTUAL DESIGN REPORT

1. Introduction

Project Overview
The proposal represents a logical and orderly development of the site in line with the requirements of the future needs of St Lukes and the broader community.

The Brief
In the current climate it is understood that new pedagogical styles of teaching and learning require robust and flexible spaces whilst offering education that is relevant to today's needs for the future of students.

Project Staging
The staging report has been reviewed and comments are provided at the end of these notes.

2. The School

Design Considerations for Pedagogy
The proposed design demonstrates the considered design solutions to allow for flexibility of future learning models, whilst addressing current requirements for education establishments and the student cohort.

Destination 2030

Understanding the future of education and the requirements to address changing needs of pedagogy and by virtue their learning environments is acknowledged in the applicant's statement.

New Direction
It is acknowledged that with new pedagogical directions come new spatial requirements in the scope, design and architectural responses to education spaces.

About the School
The increased capacity, directions for the school and the overall site strategy can be supported.

The Current Campus
It is acknowledged that the need for expansion of the St Lukes' Campus is a result of the need for increasing pressures on the education sector to provide high quality education institutions.

3. Consultation

- **Government Architect NSW**
- **Northern Beaches Council**
- **Aboriginal Community**
- **Community**

It is duly noted that the above-mentioned consultations have taken place and informed the documentation as presented in the Environmental Impact Statement (EIS).

4. The Site

Site Location
The site sits at a confluence of arterial roads and a changing topographic landform and is a landmark heritage building in the local area. It also abuts a key nature reserve, Stony Range Regional Botanic Garden and is surrounded by commercial and light industrial land uses.

Site Analysis
The documentation adequately describes the adjoining land zoning and environmental conditions, both natural and man made (road noise).

Access and Movement Analysis
The access and movement diagrams demonstrate significant constraints across the site, and as such acknowledgement of strategies to address the constraints; public transport, pedestrian access, cycle access, vehicle access, drop off zones and proposed parking for students, staff and cycles is adequately described in the analysis.

Opportunities
The overall site strategy demonstrates visual and physical connections to community, circulation and links across the site are readily achievable. Additionally, the opportunities offered by the site elevation, existing building strengths in the foundational structure and the opportunities to develop a

sustainable precinct are clearly demonstrated in the documentation provided in the Architectural Design Statement.

Constraints
The internal site connections and vertical circulation to address the dramatic site topographic change can be supported. Noting that a plan of management will be put in place to address some of the site constraints; accessibility, lack of connection, parking and accessibility, the constraints and solutions seem readily achievable. Reference is made to the access report.
In terms of existing building volume control the documentation demonstrates rigorous design development and testing has been undertaken to achieve a modest yet robust solution to achieve the goals of the client program.

Active Transport Linkages
Council acknowledges that a Green Travel Plan has been provided and will be implemented by the school. Further, the internal site connections demonstrated in the documentation which address pedestrian connectivity through the whole school campus through to the Pittwater Road public transport and pedestrian links can be supported. Refer Traffic commentary for further discussion on future transport actions and connections.

Planning Controls Review
The developed design has addressed the primary principles of the Warringah 2011 DCP and LEP. Further discussion on relevant controls can be found further in this response.

Heritage Context
The heritage building and site adjacency to the Stony Range Regional Botanic Garden are extensively addressed by the applicant in the EIS and are discussed further in this response.

Stony Range Regional Botanic Garden
View analysis and proposal of a timber slatted fence that allows for views into and through the reserve can be supported. The visual connection with the fencing strategy will provide a welcome green prospect and connection between to two sites.

Site Photos
As documented.

5. Urban Design

School Campus Connectivity
The proposed links connecting 224 Headland Road and 800 Pittwater Road, both the internal lift connection and previously approved pathway and stair connection is a logical and well founded strategy. The circulation as a nodal point in the scheme provides a singular and clear wayfinding strategy between the sites across the whole campus.

With just a single lift to provide this link it is queried whether there is the potential to introduce a second lift in the main vertical circulation core to accommodate for the growth of student numbers over time. Given the scope

and size of the campus and projected increase in numbers over time there may be times when it is prudent to provide several lifts.

Building Height
The increased height (beaches of control) which is set back within the site is acceptable. The result of the introduction of the saw-tooth roof which references the history of the building and the greater industrial site is a relevantly appropriate response to the environmental conditions and the history and typology of light industrial buildings in the immediate local area.
Given the strategy allows for an increase in natural daylight deep into the plan the benefits of the passive design strategies far outweigh what may be seen as a negligible height control breach across the scope of the site when viewed from a public place.

Building Massing
The building massing has for the most part remained true to the original mass, scale and proportions of the original heritage building. The additions/extensions to the building in response to the client brief and requirement for programmatic spaces have been carefully articulated so as not to dominate the building mass and proportions. The south eastern extension sits deep in the site and is subservient to the elevation of the main building mass. As such the proposed slight increase in building mass can be supported.
Similarly the link building to 224 Headland Road serves a critical purpose connecting the campus through vertical circulation. The addition, as viewed from the public realm will have a negligible effect on the existing massing, bulk and scale of the overall site.

Site Set-backs
Generally there is no change to the building footprint aside from the addition to the north eastern sector of the building which has a negligible effect on the surrounding environment and immediate neighbouring properties. The proposal is generally supported.

Street View Analysis
The street view analysis provided demonstrates there is very little increase in the bulk and scale of the building or any impacts on the public realm and views to the site from the surrounding contexts.

6. Design 800 Pittwater Road

Architectural Design Statement
It is acknowledged that the building fronting 800 Pittwater Road is distinctively local and acknowledged by the applicant as an iconic part of the built fabric history of the local area and broader precinct.

Historical photos of the Top Dog Men's Wear building and heritage expression shows an exposed colonnaded façade to Pittwater Road. Clearly the original intent of the design expression and the built form in the context and landscape addressed orientation and passive design controls through architectural elements.
The comparative renders demonstrating the proposed articulation of the heritage façade including the use of elemental architectural devices address the mitigation of heat gain and have been expressed in a style and form

sympathetic to the original design intent of the heritage nature of the building. The proposed design demonstrates an understated bulk and scale, that sits comfortably within the context, landscape and topography.

In concurrence with the GANSW comments regarding the use of the plexiglass fencing elements, testing that looks to an alternate material that sits in harmony with the sandstone elements and the greater natural landscape context of the natural podium whilst tying in with the form and architectural style and horizontal banding of the building expression could be further tested. Possibly a combination of landscaped planting elements combined with subtle detail in the fencing elements, noting it fronts Pittwater road and frames the foreground and context of the whole site is encouraged.

The industrial typology of the saw tooth roof, both functional and expressive is supported. The intent to address the context of the greater site area and uses of the zone, along with the mitigation of large banks of expressionless flat rooves and the strategy for bringing natural light into the main volume of the building is supported.
It will be great to see the time keeper clock in operation again, following its closure/ceasing operation in the 80's, signalling new life to the precinct.

Understanding the requirement to meet the programmed spatial requirements of the school the southern and eastern extensions of the building are logical additions to the built form and massing, demonstrating no significant impacts to the overall built form bulk and scale. Therefore the proposed additions can be supported.

The additional extension to the east demonstrates there will be no significant impacts and is therefore supported.

What is demonstrated through the renders expresses the new pedagogy which supports community and the collegiate intent of the space. The double height volume to the central communal area as a large internal courtyard space frames and supports student activity and collegiate support.

Structural Design Statement
The proposed structural strategy of retention of elements where feasible is supported for its sustainable whole of life approach to the proposed re-use of the building.

Precedent Images
The proposed approach to the retention and enhancement of the building's history and significant context, supported by the high-quality precedents illustrated can be supported.
The framework of the existing building and its re-use provides a flexible framework anchored by the key 'fixed' program elements of the pool and theatre. The high quality finishes proposed to the internal fit-out demonstrate the pursuit of quality and enhanced educational outcomes.

Design Quality Principles
The principles outlined and detailed in the Architectural Design Report address all the key principles set out by GANSW 'Better Placed" Sustainable Design in Schools' policy. In particular, the enhancement of the existing historic context

across the site suggests a rigorous testing and analysis of elements of building form and material and a broader site response of considered design excellence.

The whole of life flexibility in the planning regime presents both opportunities for short term and long term adaptation to address changing regimes in pedagogical models whilst also able to adequately address the staging of the construction program to flexibly address current requirements as they arise. Aesthetics have been carefully considered and rigorously address the heritage and industrial context of the building and greater site.

Options Analysis
Clearly there has been a rigorous investigation of options across the site driven by programmatic requirements and client brief. The selected option represents a logical and ordered rationalisation of space; volume, void, circulation, poche, with a spatial organisation that provides clear wayfinding across the whole site.

Heritage Approach
As previously alluded to in the Architectural Design Statement Section of this response, the architectural response to the heritage aspect of the site has been well considered and can be supported.

Environmentally Sustainable Design (ESD)
The strategies and principles identified in the ESD Approach, including the detailed information provided in the ESD report regarding approach to attainment of 4 Star Green Star (Design & As-built) certification, are generally supported.

Roof Form Skylight
The proposed refurbishment/re-instatement of the saw-tooth roof typology to enhance the properties of natural light and passive stack effect ventilation through the main hall and void space are supported. The additional bulk and scale represented by this design element is inconsequential when considering the increased sustainability and occupant experience benefits to the proposed development.
The subsequent effect of the roof form has the additional benefit of breaking down to finer grain details and articulation of the overall roof form.

Space Planning Stage 2
The staging strategy of a ‘least work required’ strategy over the three stages presents a logical and orderly succession of works over the whole construction program. The spatial planning, which has been tested through an options analysis, demonstrates a well-considered management of construction and staging of space planning regime, including the activation of the outdoor landscape and connection to the Stony Range Regional Botanic Garden. The benefits of this outdoor space over the life of the staging is well considered for the health and wellbeing benefits offered to the school cohort over the construction staging and is thus supported.

The culmination with the stage 3 works demonstrates a clearly articulated and consolidated spatial planning regime. The only real question is how the staging of works in regards to the façade treatment will play out and affect current students, staff and users of the site and the general public. See further commentary below in Staging Report section.

Building Services Integration
A holistic and sustainable approach to the retrofitting of the existing building to bring it up to current NCC standards has no doubt been dealt with several constraints, not least the performance of the building fabric to meet current NCC performance requirements.

Materials Strategy
The understated nature of the exterior palette, selected to complement and re-invigorate the heritage faced is supported.
Similarly the interior palette will provide for a lively and playful complement to the building's neutral and somewhat timeless exterior palette.

Exterior Colour Strategy
The colour palette option 2 which identifies white for the original heritage elements, darker blue to assist to reduce bulk and recede the building into the landscape and the shading devices' de-saturation of the St Lukes blue palette are subtle and well articulated across the building and can be supported.

Noise Barrier Wall
It has been discussed herein that Council is in concurrence with the GANSW position on the plexi-glass noise wall barrier. This is a difficult position in that the plexi-glass offers a reduced bulk/built form impact to the streetscape and views to the heritage building and well considered landscape response to the forecourt. Whilst noting support of deletion of the plexi-glass element the applicant is encouraged to further test alternate options with the view to considering retention of the plexi-glass if further testing does not prove to result in a better urban design outcome.
Understanding the constraints of the acoustic requirements along with the visual and aesthetic result of a solid barrier wall of lapped and capped timber or opaque material (not a preferred option) this aspect of the development presents a difficult position.
The option presented in the Noise barrier Wall Design Statement of the Urban Design Report integrates well with the topography, provides a clarity of wayfinding and addresses the context of the site geology, topography and built form heritage well. It is less desirable to fence off the forecourt of 800 Pittwater Road and a better outcome to have a clarity of view to the existing/proposed building in it's context.

Option Testing Plexi-glass Noise Barrier
Noting the variegated ground plan treatment of the landscaping that articulates is there an opportunity to provide a plexi-glass screen that follows this meandering line of articulation that can be planted out with larger and smaller planting treatments at various points along this line to assist to soften the effect of a long straight plexi-glass wall. Possibly an option worth testing that could provide additional acoustic attenuation through the depth of planting and plexi-glass combined so as to break up the long linear elevation of plexiglass.

Signage
The signage distribution across the façade and at to the driveway entrance of the site can be supported.

Carpark Entrance
The preferred Option 2 for the carpark entrance can be supported.

Internal View Study
The renders for the internal aspects of the development demonstrate a well-articulated and legible space capable of providing for future flexibility and a strong community collegiate environment.
The open plan and void space, along with clearly articulated circulation zones is well considered and can be supported.

External View Study
As previously discussed, the external view study demonstrates the building sits well within the landscape and topography, does not represent excessive bulk and scale and achieves a well-structured response to the context and heritage of the site.

7. Design 224 Headland Road

Architectural Design Statement
The proposed re-use of the existing building as a sports centre and multi-purpose hall with two basketball courts and the uniform shop can be supported. External treatment of the building should indicate the link and connection to the 800 Pittwater Road site demonstrating its connection to the greater campus.

Structural Design Statement
The structural design strategy is logical and supports a sustainable approach to the building re-use. As such the strategy can be supported.

B. ENVIRONMENTAL IMPACT STATEMENT

Height of Buildings
It is outlined that there are several breaches of the building height control. Specifically, this is related to the saw-tooth roof element. It is assessed that the environmental comfort and positive daylighting strategies through the clerestory skylights made possible by the saw-tooth roof typology far outweigh the breaches of height control.
The aspect and view analysis provided with the documentation demonstrates that the impacts of this breach of height are minimal in terms of overshadowing neighbours, blocking of view line corridors or increased bulk and scale as viewed from a public place. As such the breaches demonstrated are acceptable.

C. STAGING REPORT

The staging demonstrates a logical and ordered development of the site given the constraints of the availability and end of lease of the respective tenancies across the site.

It will be of interest to how the frontage to Pittwater Road is dealt with in the interim periods. Obviously the timing between completion of stages is quite lengthy when thinking in terms of the period of time a student spends at the school and their subsequent experience during construction works.

Consideration to an effective treatment to the hoardings during construction with temporary external structures/scaffolding during this time will be foremost on the minds of the users of the site.

Staging of works and the effects on the elevational presentation, particularly between stages 2 and 3 and how the landscape treatment to the frontage of site maintains a semblance of order and aesthetic treatment should be considered.

An interesting precedent is the use of Reg Mombasa hoarding illustrations at the Wynyard Station bus interchange in the city which provide a moment of interest and distraction to the works beyond.

No doubt this has been considered, however site hoardings that provide support or a welcome face to the community and users across the site should be considered in the overall construction staging program.

D. ESD REPORT

The re-use of an existing building almost entirely within the existing building(s) footprint is supported.

The proposed Green Star (design and as-built) certification process identified in the ESD report is supported by council. The recommendations provided should be reflected in the final design.

A response to the GANSW Environmental Design in Schools should look to address the key priorities outlined;

- Air
- Comfort
- Light
- Noise
- Water
- Energy
- Landscape, and
- Materials

Demonstrated in the conceptual passive design diagram and the planning across the Village Centre, it is clear the strategy addresses the principles of passive ventilation, stack effect and thermal design.
The key planning and sectional strategy for the 800 Pittwater Road building is supported.

The daylighting strategies in the high level clerestory glazing elements is also supported for its mitigation of heat gain through direct daylight.

E. LANDSCAPE DRAWINGS

The Landscape design had been well considered and presents a well articulated urban design response, considered planting and a relevant level of green canopy coverage across the main outdoor areas and internal biophilic response. The landscape concept design can be supported.

northern beaches council

Memo

To: Development Assessment

From: Waste Services - Tony Walmsley, Manager

Date: 6 July 2020

Subject: Waste comments on SSD for St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291)

Record Number: 2020/ 417662

Waste Services provide the following comments in regard to the development application's 'Operational Waste Management Plan March 2020'

The operational waste management plan appears to provide on-site arrangements for waste management appropriate for the development.

The temporary waste storage area at 800 Pittwater Road for Stage 2 should be enclosed and adequately screened from view from Pittwater Road and Harbord Road.

The plan for waste storage areas at both locations should demonstrate how an appropriate collection vehicle will both enter and leave the site in a forward direction.

The plan states in the introduction that "demolition and construction waste (is) addressed in a separate report." The arrangements for demolition and construction waste management could not be located. Can the applicant advise where this is provided.