

PREFERRED PROJECT REPORT AND STATEMENT OF COMMITMENTS
SUBMITTED TO NSW DEPARTMENT OF PLANNING AND INFRASTRUCTURE

Extension of Shore School onto the Graythwaite site at 20 Edward Street, North Sydney

Prepared on behalf of
Sydney Church of England Grammar School (Shore) North Sydney

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Attachments

1	Letter from the DPI, dated 20 December 2011, identifying key issues to be addressed in the PPR
2	Preferred Project Report – Transport Aspects, by Halcrow
3	Summary of submissions, by WSP Environment & Energy (WSP)
4	Justification for the proposed height non-compliance
5	PPR consultation activities, by WSP
6	ACOR response to stormwater issues raised by North Sydney Council

1.0 INTRODUCTION

A Revised Environmental Assessment (**Revised EAR**) for the proposed extension of Sydney Church of England Grammar School (**Shore**) onto the Graythwaite site at 20 Edward Street, North Sydney (the **site**) was publicly exhibited from 9 November 2011 until 9 December 2011.

Following exhibition, the Department of Planning and Infrastructure (**DPI**) in its letter dated 20 December 2011 (**Attachment 1**) has identified the following key issue and additional information requirement:

The department notes that a new pick-up and drop-off facility forms part of the concept plan, and a range of conceptual options have been provided within the Transport and Accessibility Impact Assessment. Notwithstanding that the proposed facility will be the subject of a future development application, the department considers that a “preferred option” needs to be established in the concept plan, in consultation with North Sydney Council. The department requests that any response to submissions report or preferred project report be accompanied by a preferred pick-up and drop-off facility option, in sufficient detail that it can be assessed as part of the concept plan determination.

In accordance with Section 75H(6) of the *Environmental Planning and Assessment Act, 1979 (EP&A Act)*, this Preferred Project Report (**PPR**) responds to the DPI request that the Concept Plan identify and assess the impact of the preferred pick-up facility¹. It also addresses the issues raised in submissions and provides an amended Statement of Commitments.

The PPR has been prepared by Robinson Urban Planning Pty Ltd, on behalf of Shore. It should be read in conjunction with the Revised EAR (dated October 2011). The PPR is accompanied by the following information:

- PPR Attachments:
 - 1 Letter from the DPI, dated 20 December 2011
 - 2 Preferred Project Report – Transport Aspects, by Halcrow
 - 3 Summary of submissions on the Revised EAR, by WSP
 - 4 Justification for the proposed height non-compliance
 - 5 PPR consultation activities, by WSP
 - 6 ACOR response to stormwater issues raised by North Sydney Council
- Amended Planning Parameters Report (Issue F dated February 2012), by Tanner Architects (including a specific guideline in relation to the State Heritage Register (**SHR**) curtilage, as requested by the Heritage Branch

¹ The DPI letter inadvertently refers to a pick-up and drop-off facility, whereas the revised EAR only proposed a pick-up facility.

2.0 ADDITIONAL INFORMATION – PICK-UP FACILITY

As set out in the letter at **Attachment 1**, the DPI has requested additional information in relation to selection of a preferred option for the new student drop-off and pick-up facility. As set out in the Revised EAR, the project includes a pick-up facility only.

The preferred pick-up option selected in this PPR provides a one way link road through the School with vehicles entering via Union Street to access the pick-up facility then departing to Hunter Crescent (referred to as Option 2 in the Transport & Accessibility Assessment accompanying the Revised EAR). As noted in the Revised EAR, the detailed design of the pick-up facility would be subject to a separate approval and would be completed as part of the Stage 2 works.

Halcrow has prepared a Transport Report to accompany this PPR which describes and assesses the preferred pick-up facility option (**Attachment 2**). The following information has been extracted from the Halcrow report.

2.2 Additional On Site Student Pick-up Facilities

The revised Concept Application included a number of options for provision of an additional formal vehicle “pick-up” facility on the School site. These options were developed following feedback from community open days held during the EA process. The full set of options was documented in the Transport and Accessibility Impact Assessment².

In response to submissions on the Concept Application, the Department of Planning and Infrastructure has requested that Shore School, in consultation with North Sydney Council, select a preferred option for the additional “pick-up” facility to be included in the Preferred Project.

2.2.1 Purpose of an Additional “Pick-up” Facility

The only existing formal vehicle pick-up of students at the School is provided at the Preparatory School which is accessed via Edward and Mount Streets.

The purpose of the new pick-up facility is to provide additional capacity to accommodate for a possible increase in the Preparatory School population (nominally a maximum of 100 extra students to add to the current population of 240) that could be part of the Stage 2 approval and to relieve the pressure on the existing Edward Street facility.

² Graythwaite Part 3A Concept Application and Stage 1 Project Application, Transport & Accessibility Assessment (Halcrow, 4 October 2011).

2.2.2 Consultation with Council Officers

A meeting was held with Council officers (7 February 2012) to provide a briefing on the project and to obtain feedback from Council on the selection of a preferred option.

The following key principles were identified by Council for consideration in the selection of a preferred “pick-up” facility option.

- The extent of vehicle queuing area on Shore land is to be maximised so as to minimise the implications of vehicles queuing from the site on to the external road network.*
- Significant changes to the operation of the road network are unlikely to be acceptable to the Local Traffic Committee.*
- Minimise the number of vehicle access points (i.e. driveways) to and from the School site.*
- Minimise the impact to existing trees along the School’s road frontages as these provide amenity and visual screening to adjacent residents.*

The Council officers at the meeting noted that any preferred option put forward by the School would need to be approved by the Council Traffic Committee and then possibly the Council.

2.2.3 Description of the Preferred Pick-up Facility Concept

The preferred option for the additional “Pick-up” facility is Option 2 as shown in Appendix A.

The key features of this option include:

- Construction of an internal road providing a link between Union Street and Hunter Crescent.*
- The link road will utilise the existing driveways at:*
 - Union Street – car park access*
 - Hunter Crescent*
- The link road to include the existing circulation aisle within the car park beneath the tennis courts.*
- Construction of a pick-up zone with capacity to accommodate a minimum of 4 vehicles adjacent to a designated student waiting area.*
- Vehicles to enter via Union Street, access the pick-up area and depart to Hunter Crescent (i.e. one way flow through the School).*
- On site queuing area = approximately 100 metres or 16 vehicles.*

Through discussions with residents and the School and our on site observations it is noted that the afternoon pick-up period at the existing Edward Street pick-up facility is the critical period with regard to congestion on the surrounding road network.

As documented in the Transport and Accessibility Assessment Report³ the drop-off activities in the morning are spread out over a period of generally 90 minutes whereas the afternoon pick-up generally occurs within a 15-30 minute window between 3:00pm – 3:30pm.

Hence the proposed “pick-up” facility will only operate in the afternoon to provide additional capacity during the peak pick-up period.

2.2.4 Assessment of Preferred Concept

i. Demand for New Pick-up Facility

The peak demand for an on site “pick facility” is associated with Preparatory school students. Senior School students have a significantly higher proportion of travel via public transport and after school sporting activities where students are bussed to sporting facilities at Northbridge.

The Preparatory School currently has 240 students. Surveys of the existing “pick-up” facility in Edward Street indicated that there is a peak pick-up demand in the order of 40 vehicles during a 15 minute period between 3:00pm and 3:15pm.

This equates to a rate of 1 vehicle for every 6 students arriving within a 15 minute period.

Should Stage 2 of the Concept Plan be approved there is potential to increase the preparatory school population from 240 to 340 students.

For Stage 2 the demand for the pick-up facilities is estimated to increase from 40 vehicles to 57 vehicles in the peak 15 minute period between 3:00pm - 3:15pm

It is proposed that the number of students to be collected from a pick-up facility will be evenly distributed between the existing Edward Street facility and the new Union Street – Hunter Crescent facility, namely 29 vehicles at each location.

ii. Capacity of Proposed Pick-up Facility

Observations of the existing Edward Street facility indicate that the average loading time of vehicle is 1:05 minutes. This was surveyed from the point where it pulls

³ Graythwaite Part 3A Concept Application and Stage 1 Project Application, Transport & Accessibility Assessment (Halcrow, 4 October 2011)

into the loading area, students are loaded into the vehicle and the vehicle pulls away from the loading area.

Based on these surveys the proposed pick-up facility which can accommodate 4 vehicles at once has a capacity to accommodate approximately 55 vehicles within a 15 minute period.

Therefore the proposed Union Street – Hunter Crescent pick-up facility could accommodate the likely peak 15 minute demand of 29 vehicles. In fact there is likely to be spare capacity giving the School greater ability to plan the distribution of the respective loads according to class sizes.

iii. Vehicle Queues

Queuing theory⁴ has been applied to the proposed additional pick-up facility to determine the probability of vehicle queues extending back from the loading area, through the car park and onto Union Street.

The analysis is based on a theoretical capacity of 220 vehicles per hour with a 20% reduction for contingencies and a vehicle queuing length of 16 vehicles.

The queuing analysis presented in Appendix B indicates that the 95th percentile queue lengths to be:

- Demand of 40 vehicles per 15 minute period = 14 vehicles*
- Demand of 29 vehicles per 15 minute period = 7 vehicles*

The queuing analysis indicates that the proposed available queuing area is sufficient to accommodate vehicle queues associated with the pick-up facility on site.

iv. Intersection Operation

An aaSIDRA analysis was undertaken for the proposed site entry to the pick-up facility driveway in Union Street.

The analysis was based on the surveyed two way flows along Union Street during the operation of the proposed pick-up facility (namely 3:00pm – 3:30pm) and a peak demand of 40 vehicles in a 15 minute period.

The analysis provided the following results:

- Intersection Level of Service: LoS A*
- Average Intersection Delay (worst movement): 9.8 seconds sec / veh*

⁴ Transportation and Traffic Engineering Handbook (ITE) p303

- 95th percentile queue in Union Street: 9.1 metres (1-2 vehicles)

The analysis indicates that there would be minimum vehicle delays and queuing in Union Street during the period of the proposed pick-up facility operation.

v. Sight Distances at Union Street

Under the preferred option, vehicles access in the proposed pick-up facility will be entering from Union Street. No exit movement for these vehicles would occur at Union Street. It is proposed that during the operation of the pick-up facility all vehicles will exit to Hunter Crescent.

The available sight distances both from vehicles waiting to turn into the Union Street driveway to approaching cars and from cars approaching the site along Union Street to a potential car queuing in Union Street waiting to turn into the driveway comply with the minimum AS2890.1 requirements for driveway access.

It is observed that Option 1 of the Revised EA which is similar to Option 2 except that traffic passes between the car park and Union Street would have similar traffic characteristics but was not favoured by Council and the community due to the potential loss of landscaping between Union Street and the car park.

vi. Parking

The preferred pick-up option will result in the loss of 4 existing car spaces from the existing car park under the tennis courts in order to facilitate the through traffic. This enhances the need for the proposed additional parking spaces associated with Stage 2.

vii. Summary

The provision of an additional on site pick facility has been included as part of the preferred concept application. The provision of an additional facility has been in part a response to community feedback and the School's desire to address existing and potential future issues associated with congestion in Edward Street arising from the capacity of the existing pick-up facility.

The preferred option has been selected to be Option 2 which provides a one way link road through the School running between Union Street and Hunter Crescent.

The analysis presented in this assessment indicates that the preferred pick-up option can operate satisfactorily with regards to containing vehicle queues on site and minimising the implications and modifications to the surrounding road network.

As such it is concluded that the preferred option (Option 2) is consistent with the key principles identified by Council for the selection of a preferred option.

Tanner Architects has confirmed that the preferred pick-up facility option described and assessed above is appropriate from a heritage perspective and consistent with the endorsed CMP. In relation to other access and pick-up options suggested in submissions on the Revised EAR, Tanner Architects advise that:

- A vehicular route extending north-south through the site would potentially bisect the property through the sensitive Upper Terrace zone (refer levels of significance diagram in the CMP, page 109). The area between Graythwaite House and the proposed East Building would necessarily become a shared pedestrian and vehicular zone and it is likely that requirements to safely separate pedestrians from vehicles would result in a visually and physically defined roadway. From a heritage perspective, a road in this location is contrary to the historic use of the property and is not consistent with the objectives of the conservation policies which aim to reconstruct the House and its landscape setting to their late nineteenth / early twentieth century appearance. Consistent with CMP policies, the project seeks to remove vehicles from the area in the immediate vicinity of the House. The adverse impacts noted here would be greater if the route was contemplated for bus use.
- Historically, visitors' primary entry to the property was from Union Street to the south and via the main driveway, an experience terminated by imposing views of Graythwaite House at the upper part of the site. Access via Edward Street would involve traffic entering the site from the historic utilitarian entry to the north, which would confer much greater prominence to the House's less architecturally distinguished rear elevation and service wings. Also, entry from Edward Street for buses would probably require some removal of branches of a large fig on the Graythwaite site near the Edward Street entrance which is not desirable.
- The project described in the Revised EAR retains the historic driveway at its original single-vehicle width. Alternative access proposals may require widening to accommodate the additional volume of traffic. The proposed passing bays will accommodate the limited two way traffic visiting the House from Union Street and will have a relatively minor impact on the heritage importance of the driveway.
- A vehicular route extending north-south through the site is likely to require the removal of historically significant and mature trees along the east boundary.
- A turning circle located at the north-east corner of the Graythwaite site, at Edward Street, would require removal of significant trees to both the north and east boundaries, and is therefore undesirable from a heritage perspective.
- Any proposal for a turning circle at Edward Street that would affect the frontage of the heritage listed Preparatory School is undesirable from a heritage and aesthetics perspective.

3.0 RESPONSE TO SUBMISSIONS

The DPI website notes that a total of 220 submissions were received in response to public exhibition of the Revised EAR. The submissions are categorised on the DPI website as follows:

- 109 supports
- 81 objects
- 20 comments⁵

WSP has reviewed and summarised the submissions (refer to the submissions summary at **Attachment 3**) and notes that the DPI website includes a number of duplicates (as submissions were lodged via more than one means of delivery). The total number of submissions is therefore **190** categorised as follows:

- 95 supports
- 77 objects
- 18 comments

The total of 190 submissions also includes instances where more than one submission was received from a single household or family group (for and against).

In general the submissions categorised as **supports** stated that they were:

- Very supportive of the heritage conservation of the buildings and grounds with several people noting that Graythwaite has been neglected
- Very supportive of Shore's ownership noting that this will enable beneficial use of the buildings and grounds and that Shore has commitment and resources to complete the conservation works
- Very supportive of the size and nature of the project
- Recognised that Shore's purchase of the site and expansion of the existing school will have a lesser impact than a development that would have resulted if the site had been purchased by a developer
- Supportive of allocation of the Graythwaite purchase proceeds to high standard hospital care in a more appropriate location.

The Council/Agency submissions are summarised as follows:

- NSC – Objects to the project on the basis of overdevelopment, traffic and parking, some heritage issues, water management (see later detailed discussion)

⁵ In preparing their summary of submissions, WSP noted that some of the submissions categorised as "comment" also expressed views on whether the project or part of it should proceed.

- Heritage Council – Concept plan satisfactorily addresses endorsed CMP, minor amendments to Planning Parameters Report and Statement of Commitments, Heritage Branch/Council welcomes opportunity to provide further input on future applications.
- Office of Environment and Heritage – Requests some minor additional ecological conditions.
- Rail Corp – No comments on Project. Requests further consultation at Stages 2 and 3.
- Sydney Water – No objection.
- Transport and Maritime (formerly known as the RTA) – No objection.

A proportion of the objections can generally be grouped into the following four localised groups:

- **Edward Street** – Very concerned about current traffic congestion in Edward Street and possibility of further increases, some interest in the size of the East Building, supports buses in William Street and pick-up in Union/Hunter Crescent.
- **William Street** – Objections to traffic increases in William Street; concerns about after hour activities.
- **Union Street** - Objections to traffic increases in Union Street.
- **Bank Street** – Objection to West Building and traffic increases in Union Street.

In summary, the objections primarily relate to the following matters:

1. Traffic and access
2. Building envelope and height non-compliance (Stage 2 – East Building and Stage 3 - West Building)
3. Process and legal issues
4. Landscaping and tree removal
5. Water management (linked to ESD and heritage)
6. Heritage design issues (Union Street fence and Graythwaite House details)
7. NSC Recommended Consent Conditions.

More detail on the issues raised on each of these matters and Shore's response follows. Where the issue was raised in a specific submission, the objection reference is noted.

1. Traffic and access

Objection

(a) Increased traffic (buses and cars) associated with the potential population increase, overdevelopment.

Response

This objection is not valid.

Traffic and Transport

NSC commissioned an independent traffic consultant (Colston Budd Hunt and Kafes) to assess the Halcrow traffic studies included in the Revised EAR. Council's independent consultant concluded that:

- *The proposed parking provision is considered to be appropriate;*
- *We also agree with the estimates of traffic generation in the Halcrow report. We also generally agree that the surrounding roads will be able to cater for the additional traffic from the proposed development.*
- *We do not consider that provision of buses on the site would be an efficient or appropriate use of the land. Buses service the site for short periods, generally during the afternoons, and would be most appropriately accommodated on the street, where potential safety conflicts with students can be better managed and the bus zones can be used for other purposes at other times. William Street is considered the most appropriate location for bus operations at the site. It is recommended that a condition of consent be included requiring future applications to include, subject to North Sydney Traffic Committee approval, implementation of a bus zone in William Street to serve the school during the afternoon period.*
- *We consider... and therefore recommend that the on-site provision for set down and pick-up occur with entry from Union Street and exit to Hunter Crescent. It is recommended that a condition of consent be included requiring additional onsite provision for set down and pick-up operations generally in accordance with the amended transport report, with details to be provided in association with future applications. Provision of an on-site area for set down and pick-up operations from Union Street/Hunter Crescent will reduce the reliance on Edward Street and spread traffic more evenly around the area.*

In summary, Council's independent traffic consultant fully supports the Halcrow report and the project. Notwithstanding, the Halcrow Report (Section 3.3) accompanying this PPR (**Attachment 2**) responds to the transport issues raised in the NSC and the community submissions.

Population increase

Population increase, and Shore's policy on growth, is set out at Section 6.10 of the Revised EAR (pp. 90-92, Volume 1A).

Objection***(b) Localised traffic issues including parking by boys and potential use of the oval******Response***

This objection is not valid.

See above comments in relation to Council's independent traffic consultant's findings.

Objection***(c) Desire for pedestrian/cycle connections from Edward to Union Streets******Response***

This objection is not valid.

The Graythwaite site is now in private ownership and Shore has a duty of care to its students and boarders. Notably, North Sydney Draft Development Control Plan 2010 recognises this and does not require public access to the site.

2. Building envelope and height non-compliance (Stage 2 – East Building and Stage 3 - West Building)

Objection

(a) Height of the eastern part of the East Building (Stage 2)

Submission 24733 (Edward Street Precinct Committee) and Submission 25039 (NSC)

(b) Size and location of the West Building (Stage 3) and potential amenity issues (noise, overlooking and visual impact)

Various Bank Street residents and Submission 25039 (NSC)

Response

These objections are not valid.

The Revised EAR (at Sections 7.4 and 7.5) assesses the visual impact of the project and its potential impacts on residential amenity (overshadowing, privacy, noise, wind and views) and concludes that the impacts are reasonable.

Although there is no statutory requirement for a Part 3A project to comply with development standards, the proposed departure from the 8.5m height standard in North Sydney Local Environmental Plan 2001 (**NSLEP 2001**) is further justified in **Attachment 4** of this PPR. Although not required, this justification has been structured as a State Environmental Planning Policy No. 1 (**SEPP 1**) objection. This has been completed to aid a proper assessment of the reasonableness of the proposed departure.

In relation to the West Building, which is raised as an issue in multiple objections, the justification notes that:

- The setback of the building from the western side boundary exceeds 20m to ensure possible impacts are internalised within the Graythwaite site.
- The building conforms to the height standard of 8.5m at the western interface with the neighbouring residential properties.
- Owing to the irregular nature of the site topography in this area (with the site sloping from east to west and north to south), parts of the building - equivalent to approximately 10% of the total building volume – exceed a height of 8.5m. These parts of the building are setback variously between 27m and 32.5 from the western boundary.
- The north-south orientation of the building, the limited apertures to its western façade and its stepped form ensure that the areas which exceed a height of 8.5m do not result in a loss of privacy or overshadowing for the adjoining properties.
- Alternative development options to redistribute the building volume below the 8.5m height standard, while also conforming with the heritage

parameters in the endorsed CMP, would result in a reduction of the setback from the western boundary to 8.8 metres (refer diagrams SK-01 to SK05 in **Attachment 4**).

- The height of the West Building conforms to the policies contained within the endorsed Graythwaite CMP.
- Owing to the topography and existing and proposed dense vegetation, the proposed building will not be visible from significant public vantage points from Union Street or from more distant vantage points to the west.
- The site of the proposed West Building is an area of limited heritage and archaeological value.
- Development in other areas of the site, such as the Union Street lower terrace, would result in a considerably greater heritage and visual impact on the site and its surroundings.

3. Process and legal issues

Objection

(a) Lack of consultation

Response

This objection is not valid.

Consultation carried out up to submission of the Revised EAR is set out in the Revised EAR (Section 5.0 and Appendix O). Since completing the Revised EAR, Shore has also initiated the following consultation activities (as summarised at **Attachment 5**:

- | | |
|------------------|---|
| 12 November 2011 | Open Day No. 2 (held during the Revised EAR exhibition period). Informal comments received by each of Shore's representatives are set out in Attachment 5 . |
| 7 December 2011 | Shore and its advisors from Halcrow and WSP attended the Edward Street Precinct meeting (also during the exhibition period). The discussions that took place are reflected in the Edward Street submission to the DPI. |
| 27 January 2012 | Shore and its advisors met with the DPI to discuss their requirements and the process requirements subsequent to the Revised EAR exhibition period. |
| 7 February 2012 | Shore met with the NSC Traffic Manager and the Acting Planning Manager to discuss options for the pick-up facility. The attending Council officers advised that the Union Street option entering through the car park was |

preferred. The officers, however stressed that a formal response from the Council would need consideration by its Traffic Committee and possibly the elected Council. To facilitate this, Shore agreed to submit a short report on its preferred option to Council's Traffic Committee (coinciding with submission of this PPR).

Soon after lodging the Revised EAR, Shore offered to meet with NSC via its Executive Planner (George Youhanna). The offer was not taken up.

Objection

(b) Concern over legality of process – re-exhibition and inclusion of the proposed new pick-up facility

Response

This objection is not valid.

Shore discussed this with the DPI and it was confirmed that submission and re-exhibition of the Revised EAR (as a replacement to the original EAR) was lawful. The addition of a new Statement of Commitment to provide a pick-up facility at Stage 2 does not compromise the validity of the process, particularly given that the commitment confirms that the detailed design of the pick-up facility will be subject to a further application (in conjunction with the detailed design of the Stage 2 project). This process will ensure that Stage 2 (and any potential population increase associated with that stage) does not proceed until the detailed design of the pick-up facility has been resolved and approved.

Objection

(c) A master plan is needed for the combined campus.

Response

This objection is not reasonable.

The Revised EAR includes a very comprehensive analysis of the site and its surrounds and is accompanied by (and consistent with) an endorsed CMP.

4. Landscape and tree removal

Objection

Excessive tree removal, existing palms should not be relocated

Response

This objection is not valid.

Taylor Brammer, Landscape Architects, advise that:

There are still some submissions that object to the proposed landscaping based on tree removal. Many of these submissions do not appear to have

read the detail of the landscape/arborist reports or at least the submissions do not reveal this.

North Sydney Council's Landscape Development Officer has indicated that the proposal is generally satisfactory, subject to conditions. This is in contrast to some of the commentary of the NSC cultural landscape assessment which seeks to preserve certain habitat not endorsed by the Taylor Brammer works. Retention of the habitat referred to by NSC is not mentioned by either OEH or Cumberland Ecology as being important. Also, the commentary by NSC overlooks a number of clear commitments by the proposal about staging of weed removal etc. Notwithstanding, Shore is not in disagreement with the need for detailed Vegetation Management Plans and detailed Landscape specifications to assist in implementation.

The proposal enhances a substantial portion of the evolved landscape character of the site that consists of a variety of native trees and shrubs that have been planted in the main by the Friends of Graythwaite and is located on the middle slopes below the former tennis courts. This design approach to the site acknowledges the contribution by the community in recent times and retains the heritage elements to the site that are located within this area. The habitat value of this area is acknowledged as a dense thicket but as noted by Cumberland Ecology and OEH not being important habitat. The character and form of this thicket is not being changed substantially and the extensive weeds that are present in portions of this thicket are to be removed through the application of a Vegetation Management Plan to be instigated by Shore School on the site.

Several submissions question the proposed relocation of the Palms.

The proposed relocation of the palms are a response to the heritage values of the site in that the palms are not original heritage planting to the site, not being evident in the photographic historical evidence of the site in the period of the early 20th century. It is the position of the consultant team that the relocation of the palms to the approximately 10-15 metres west of their current location will enhance the heritage values of place by allowing for an unimpeded view of the front façade of Graythwaite House when viewed from the south thus allowing a clearer interpretation of the house in its setting and reflecting a more accurate historical view of the House from Union Street.

Other submissions are directed more to privacy issues for the Bank Street properties rather than a holistic view of the whole landscape proposal. The Shore proposals are already committed to providing adequate landscape in the western areas to respond to these issues.

The early works plans that have been prepared provide for substantial screening and layering of planting to the Bank Street properties. The plans detail a combination of native plantings that will provide the appropriate

amenity to the site and increase the depth and complexity of planting replacing the dominant weedy character that exists in this portion of the site.

One submission has the view that T163 is alive and well, just a little twisted - ignores Arborist advice

In reference to T163, the Moreton Bay Fig has been identified as substantially structurally unsound by the Arborist. Further, the tree is compromising the heritage listed Bamboo grove, with its roots entangled through the grove. The subject tree is of very poor form and in a senescent state and the proposal to remove and replace with a new Moreton Bay Fig adjacent to its current location is part of the proposed overall management of the garden. The current condition of a poor form and entanglement with the Bamboo is a reflection of the poor landscape management practices that have been undertaken on the site by the former owner and evidence that the garden is in need of a comprehensive landscape management plan that the school has undertaken to prepare and implement.

I refer to the report dated the 8th February prepared by ACOR Consultants Pty Ltd in relation to issues raised in relation to the stormwater, ground water and surface water across the site. This report reiterates and confirms the carefully considered proposal for the retention and ongoing strategies for the confirmation of the status quo in relation to the water regime across the site and the incorporation of the important heritage values. The current waterlogged portion of the site that consists of mown grass is to be appropriately drained and water re directed to the downward slopes. The natural ecological values of this portion of the site are marginal, consisting of the mown grass. The proposal reinforces the ecological values of the site through the retention and improvement of the grove of planting to the southern portion of the site. It is my opinion that the landscape proposal appropriately balances WSUD/ecological/landscape heritage objectives with the functional stormwater obligations.

In relation to relocation of the existing palms, Tanner Architects advise that the purpose for the proposed removal of these trees is to reconstruct the landscaped setting of Graythwaite House to its late nineteenth century/early twentieth century appearance, consistent with the heritage objectives for the site as a whole.

The heritage impact of their proposed relocation is also assessed in the Statement of Heritage Impact (Revised EAR, Appendix H):

The palm trees are to be relocated from their current location in front of Graythwaite House further to the west to enhance views of the House from the middle and lower terraces and the entry driveway—this is also a positive heritage outcome. Their retention would also maintain evidence of the hospital era plantings on the Graythwaite site.

5. Water management on site (linked to ESD and heritage)

Submission 25039 (NSC)

Objection

Redesign the stormwater consent to retain the existing natural landscape

Response

This objection is not valid.

ACOR (refer to **Attachment 6**) has prepared a detailed response to the drainage and landscape comments made by Council's Conservation Planner. ACOR conclude that:

From the above considerations responding to the particular issues raised by Council, we remain of the opinion that the stormwater management plan as depicted on the attached drawing no. SY100450 - C1.02 - Rev. H addresses and satisfies the site constraints.

The proposed stormwater management plan presents a well-balanced and holistically considered design, particularly with regard to the competing constraints of heritage and hydrology that the site presents, and achieves a water sensitive urban design within that balance.

We believe that Council's comments, as outlined above, are not in keeping with the spirit or intent of the proposal as a protective and sustainable adaptive use of this recognised heritage property, and consequently impose onerous and unreasonable constraints on the future use and development of the land.

We therefore suggest that the Draft Conditions of Consent proffered by Council in their report be thoroughly reviewed and revised to incorporate the compelling objectives of protecting and sustaining the building and landscape heritage values of the property which we believe the current stormwater management proposal achieves in concert with the landscaping and

architectural considerations, rather than Council erroneously placing priority upon creation of artificial wetland habitat as is currently the case.

6. Heritage issues

Objection

(a) Union Street fence should be lowered

Submission 25039 (NSC)

Response

This objection is not valid.

Tanner Architects has confirmed that as proposed, the timber picket fence is purposefully designed to interpret the original timber paling boundary fence while allowing for public visibility of Graythwaite House and landscape (refer architectural drawing AR.DA.5001). Even though Council identifies the fence design as non-conforming, Council's heritage advisor supports the proposed fence design (submission 25039, pages 17 and 21). The fence design is also supported by the NSW Heritage Branch.

Objection

(b) CMP may be revised to support alternate development proposals

Submission 25032 (Community Groups)

Response

This objection is not valid as the CMP has already been endorsed.

This submission raises a concern that the purpose of Policy 5 of the CMP is to provide a mechanism to allow the School to revise the document to support alternative development proposals.

Regular review of CMPs is good conservation practice to allow the management of historic places to respond to changing circumstances. Moreover it is a requirement of the NSW Heritage Branch for CMPs to include a policy statement to prompt future reviews. It is noted that any proposal to change to the conservation policies would require Heritage Branch review and approval prior to their implementation. Endorsement of the CMP by the NSW Heritage Council is valid for five years and re-endorsement of the document would require its review.

Objection**(c) Inadequate information has been provided to assess the potential impacts of the East Building on Graythwaite House**

Submission 25039 (NSC):

Response

This objection is not valid.

Tanner Architects has confirmed that the design for the East Building is consistent with Figure 6.1 of the CMP which describes the appropriate location for sensitive new development on the site and with Policy 88 regarding development to the east of Graythwaite House. The specific requirements of this policy were determined in collaboration with the NSW Heritage Branch to ensure that visual impacts on the setting of Graythwaite House are minimised.

The revised Concept Plan - including the proposed East Building - is supported by the NSW Heritage Council Approvals Committee, and their submission notes that their detailed comments will be provided in response to Development Application for the project.

Objection**(d) Tom O'Neill building should be retained**

Submission 25039 (NSC):

Response

This objection is not valid.

Tanner Architects advise that demolition of buildings of moderate significance is permitted by the endorsed CMP which states that:

Demolition/removal of buildings and structures that make only a little or moderate contribution to the heritage significance of the Graythwaite may occur provided that there is no substantial adverse impact on the heritage significance of the site

(Policy 92, CMP page 157)

Policy 41, CMP in particular allows for the retention, adaptation or demolition of the Tom O'Neill Building. Retention of the structure is proposed in the medium term and was considered in the longer term, however its narrow plan form and internal spatial configuration make it difficult to adapt for teaching purposes. Demolition of the building will facilitate appropriate and effective re-use of the Graythwaite site as a whole for educational purposes.

Tanner Architects also note that demolition of the structure and its replacement with an appropriate scaled and sited building is supported by the NSW Heritage Council, as part of the revised Concept Plan.

Comment**(e) Amend Planning Parameters Report and Statement of Commitment to address comments from the Heritage Branch**

Submission 25149 (Heritage Council)

Response

This comment is reasonable.

The PPR includes an amended Planning Parameters Report (Issue F dated February 2012) that includes the requested guideline.

7. NSC recommended consent conditions

Submission 25039 (NSC)

Objection

If consent is granted, detailed conditions should be imposed.

Response

Table A sets out the response of Tanner Architects and other Shore advisors to the draft conditions prepared by NSC.

Table A Response to North Sydney Council conditions (selected conditions)

NSC recommended condition	Response
C6 Fire and BCA Upgrade works	Agree
C8 Heritage Architect to be commissioned	Agree
C9 Sandstone re-pointing	Agree
C* Heritage	
<ul style="list-style-type: none"> Lowering of height of lift 	<p>Disagree. The proposed lift at Graythwaite House has been sited to minimise its heritage impact, i.e. at the rear of the building in an area previously altered and with no impact on the principal facades of the House. Its height is determined by the minimum headroom required for the shaft at first floor as advised by a lift manufacturer. The proposed structure is similar to others recently designed by Tanner Architects for historic places including at the historic 1830s Female Orphan School, Parramatta, and Dunbar House, Watsons Bay. At both these buildings the lift shaft exceeds the height of the eaves. The design of the lift, as part of the proposed adaptive reuse of Graythwaite House, is supported by NSW Heritage Council.</p>
<ul style="list-style-type: none"> Fire and BCA Upgrade works 	Agree
<ul style="list-style-type: none"> Original features with medium, high or exceptional significance are to be retained. 	<p>Disagree. This requirement is too prescriptive. Features of exceptional and high significance are to be retained, however some features of moderate significance may require alteration / removal to achieve fire safety and BCA compliance. For example the ground floor north-west annexe to the House, assessed as being of moderate significance, is proposed to be adapted to accommodate compliant WCs, and the first floor rear verandah is proposed to be altered to accommodate installation of the lift.</p> <p>Tanner Architects suggest the following alternative wording:</p> <p><i>Fire and BCA upgrade works should be undertaken to have the least impact on significant fabric and in a manner consistent with the policies of the endorsed Graythwaite CMP.</i></p>
<ul style="list-style-type: none"> All new work should reflect the character of the building 	<p>Disagree. This could be interpreted to mean that new work should adopt the historic details of the House, which may not be appropriate. Tanner Architects suggest the following alternative wording:</p> <p><i>All new work should be sympathetic to the historic character of the building.</i></p>
<ul style="list-style-type: none"> Fire fighting equipment and egress detection systems 	Agree. (Although the requirement to submit details to Council may frustrate commencement of the Stage 1 works and any reference to further approval from Council should be deleted).
<ul style="list-style-type: none"> Fire equipment and detection panels 	Agree

NSC recommended condition	Response
• Fire panel	Agree , if feasible and compliant. Further advice will be required from the fire engineer.
• Building and fire regulations	Disagree . The literal use of historic details and materials may not be appropriate. Tanner Architects suggest the following alternative wording: <i>All building and fire regulations, notices and signs are to be sympathetic to the historic character of the building.</i>
• Emergency lighting	Disagree . As above.
• Hose reels and fire extinguishers	Agree
• Alternative fire solution	Agree , if feasible and compliant. Further advice will be required from the fire engineer.
• First level verandah and Widow's Walk balustrades	Agree . (Although the requirement to submit details to Council may frustrate commencement of the Stage 1 works and any reference to further approval from Council should be deleted).
• Fire places and chimney	
• Dormer windows and windows on stair landings	
• Air conditioning and/or heating	
• Existing glazing not substituted with double glazing	Agree
<p>NB: All of the above heritage conditions are very specific and many involve the referral of more detail to NSC for approval. This may delay commencement/completion of the Stage 1 works and Tanner Architects suggest that all of the above heritage conditions could be replaced with the following:</p> <p><i>Fire safety and BCA upgrade works and installation of new services should have the least impact on significant fabric and be undertaken in a manner consistent with the policies of the endorsed Graythwaite Conservation Management Plan, under the direction of an experience conservation architect.</i></p>	
C* Landscape Heritage	Disagree , see point 5 above and ACOR response (Attachment 6).
C* Landscaping	
D1 Photographic Survey	Agree . (Although the requirement to submit details to Council may frustrate commencement of the Stage 1 works and any reference to further approval from Council should be deleted).
E2 Re-use of Sandstone	
E8 Removal of Extra Fabric	
E21 Aboriginal Heritage	Delete . The archaeology Statement of Commitment (Table B and C , Section 4.0 of this PPR) addresses the requirements of Heritage Branch
Conditions relating to Concept Plan	

NSC recommended condition	Response
The design of the East Building (North and South): no higher than eaves of Graythwaite House	Delete The Concept Plan (East Building) already complies with this endorsed CMP policy and the Heritage Statement of Commitment (Table B and C , Section 4.0 of this PPR) requires compliance with the endorsed CMP.
The Design of the West Building: Maximum height of 8.5m	Delete The Concept Plan (West Building) departure from the 8.5m height standard is justified above at Point 2 and in Attachment 4 .
Detailed design of all landscape	Agree
Retention of the Tom O'Neill Centre	Disagree. Demolition of buildings of moderate significance is permitted by the endorsed CMP (Policy 92, CMP page 157). Policy 41 in particular allows for the retention, adaptation or demolition of the Tom O'Neill Centre. Retention of the structure is proposed in the medium term and was considered in the longer term, however its narrow plan form and internal spatial configuration make it difficult to adapt for teaching purposes. Demolition of the building will facilitate appropriate and effective re-use of the Graythwaite site as a whole for educational purposes. Demolition of the structure and its replacement with an appropriate scaled and sited building is supported by the NSW Heritage Council, as part of the revised Concept Plan.

4.0 STATEMENT OF COMMITMENTS

In accordance with Part 3A of the EP&A Act, **Tables B** and **C** respectively set out the final statement of commitments for the Concept Plan and Stage 1 Project Application.

Since exhibition of the Revised EAR, the commitments have been amended to make reference to this PPR and to address submissions (in particular agency comments). To readily show how the commitments have been amended since exhibition of the Revised EAR, new words are shown in **red**, with deleted words shown in ~~strike through~~.

Table B Draft Concept Plan statement of commitments

Subject	Commitment	Timing
1. General	<p>The project will be generally in accordance with the EAR prepared by Robinson Urban Planning Pty Ltd (and accompanying consultant reports) and the Architectural Plans (by Tanner Architects) and Landscape Plans (by Taylor Brammer) listed at Table 1 of the EAR following reports:</p> <ul style="list-style-type: none"> – Revised EAR (dated October 2011) prepared by Robinson Urban Planning (including Appendices) except as amended by the PPR. – Concept Architectural and Concept Landscape Plans listed at Table 1 of the Revised EAR. – PPR (dated February 2012) prepared by Robinson Urban Planning (including Attachments). 	During and after Construction
2. Heritage	<p>a) Future Project Applications will be in accordance with the endorsed CMP.</p> <p>b) Future Project Applications will be generally in accordance with the Planning Parameters (Issue F dated February 2012) document (by Tanner Architects).</p> <p>c) Future Project Applications will implement the recommendations of the SOHI (by Tanner Architects).</p>	Project Applications DAs and ongoing
3. Archaeology	<p>Should any Aboriginal or European objects be discovered at the site, then all works in the vicinity should cease immediately and the DECCW or Heritage Branch would be contacted.</p> <p>Should any Aboriginal objects or deposits be found on the site, all works in the vicinity should cease and the Office of Environment and Heritage should be contacted immediately.</p> <p>Should any unexpected historic archaeology be located on site all works in the vicinity should cease and a suitably qualified archaeologist should be contacted to assess the finds and determine appropriate mitigation strategies. If the finds are assessed as 'relics' as defined in the Heritage Act 1977, the Heritage Council must be notified in accordance with Section 146 of the Act.</p>	During construction
4. Transport	Future Project Applications will implement the recommendations of the Transport and Accessibility Impact Assessment (by Halcrow) in relation to non-car modes of travel.	Prior to and after occupation
5. Parking	By the end of Stage 2, a minimum of 48 car parking spaces will be provided on the Graythwaite site (in addition to any existing parking on the Shore site).	Prior to occupation of Stage 2
6. Traffic	<p>a) Provide a new pick-up facility on the Shore School site connecting Union Street and Hunter Crescent/William Street (described as Option 2 in the Revised EAR and PPR).</p> <p>b) Additional school bus stops are to be located in William Street and possibly Blue Street (subject to approval from North Sydney Council).</p>	Stage 2 or 3 Project Applications DAs
7. ESD	Future Project Applications will, to the greatest extent possible, implement the recommendations of the Indicative ESD Report, by SLR.	During and after construction

Subject	Commitment	Timing
8. Geotechnical	Future Project Applications for Stages 2 and 3 will include Geotechnical Investigations to ensure that appropriate excavation techniques and structural methodologies are employed.	Stage 2 and 3 Project Applications DAs
9. Disabled access	Future Project Applications will implement the recommendations of the Concept Plan Access Capability Statement (by Access Associates Sydney).	Project Applications DAs
10. Existing trees	Other than trees nominated for removal/transplanting on the Tree Removal Plan & Retention Plan by Taylor Brammer (LA.DA.002), future Project Applications will retain existing trees on the site and will implement the recommendations in the Development Impact Assessment, by Earthscape Horticultural Services.	Project Applications DAs
11. Public access to Graythwaite	Community access to the Graythwaite site will be available at nominated times throughout the year (eg. Heritage Week by arrangement). Community access will only be provided on the basis that it does not interfere with school activities.	On going
12. Contamination & hazardous materials	Future Project Applications will implement recommendations in the Soil Report and Supplementary Hazardous Materials Assessment Report (by WSP).	Stage 1, 2 and 3 Project Applications DAs
13. Water management	The recommendations of the IWMP (by ACOR) will be implemented.	Stage 1, 2 and 3 Project Applications DAs
14. BCA and Fire Engineering	Future Project Applications will comply with the Building Code of Australia (or proposed fire engineered solutions).	Prior to construction
15. Construction management	Construction Traffic Management Plans (CTMP) will be submitted to the DG for each development stage as part of the Construction Certificate following Project Application approval (see also 23).	Prior to construction
16. Construction noise and vibration	A noise and vibration management plan will be produced for Stages 2 and 3 identifying reasonable and feasible noise mitigation measures to reduce construction noise emissions.	Prior to construction (Stages 2 and 3)
17. Site consolidation or boundary realignment	The Graythwaite and Shore sites are to be consolidated (or the common boundary realigned) prior to the occupation of the East Building.	Prior to occupation of Stage 2
18. Excavation	The Rail Corridor Management Group will be consulted to ascertain its requirements for excavation in the vicinity of the railway tunnel.	Stage 2 Project Applications DA
19. Crime prevention	Crime prevention through environmental design measures will be considered at each stage of the development.	Stage 1, 2 and 3 Project Applications DAs
20. Waste	Shore will assess the feasibility of additional recycling measures (glass and plastic) as part of the Project Applications for Stage 2 and/or 3.	Stage 2 and 3 Project Applications DAs
21. Flora and fauna	Future Project Applications will implement the recommendations of the Flora and Fauna Report (by Cumberland Ecology). Prior to any demolition of roofs, a suitably qualified ecologist will ensure that there are no Eastern Bent-wing bats hibernating in the roofs. If hibernating bats are found, works are not to commence on the building until after the	Stage 1, 2 and 3 Project Applications DAs

Subject	Commitment	Timing
22. Noise	hibernation period. Future Project Applications will implement the recommendations of the Acoustic Impact Assessment (by SLR Consulting).	Stage 2 and 3 Project DAs
23. Out of bounds area	The western boundary of the Graythwaite Site is to be defined as an out of bounds area for students.	On going
24. RTA conditions	The Construction Certificate for each Stage will address the following: a) On-site Construction Management Plan required showing that proposed works will not impact on existing school activities. b) Off-site Construction Management Plan required showing vehicle routes. c) Delivery of materials should occur outside of school zone hours. d) Construction vehicles to be contained on site. e) Vehicles must enter and exit the site in a forward direction. f) All parking areas and accesses should comply with AS2890.1-2004. g) Parking for service vehicles should comply with AS2890.2-2002. h) Disabled parking must be signposted and comply with AS2890.6-2009. i) Sightlines (pedestrians & vehicles) not be compromised by landscaping, signage, fencing etc. j) All works/signage at no cost to the RTA.	Prior to construction

Table B Draft Project Application (Stage 1) statement of commitments

Subject	Commitment	Timing
1. General	<p>The project will be generally in accordance with the EAR prepared by Robinson Urban Planning Pty Ltd (and accompanying consultant reports) and the Architectural Plans (by Tanner Architects) and Landscape Plans (by Taylor Brammer) listed at Table 1 of the EAR following reports:</p> <ul style="list-style-type: none"> – Revised EAR (dated October 2011) prepared by Robinson Urban Planning (including Appendices) except as amended by the PPR. – Concept Architectural and Concept Landscape Plans listed at Table 1 of the Revised EAR. – PPR (dated February 2012) prepared by Robinson Urban Planning (including Attachments). 	During and after Construction
2. Parking	The project will include six visitor and one caretaker's car parking spaces (in addition to any existing parking on the Shore site).	Prior to and after occupation
3. ESD	The recommendations of the Sustainability Report and Indicative ESD Assessment (by SLR) (that are relevant to Stage 1) will be implemented.	During and after to construction
4. Disabled access	The detailed design of Stage 1 is to comply with the Stage 1 Project Application Access Capability Statement (by Access Associates Sydney).	During and after to construction
5. Existing trees	All trees on the site shall be retained except for the trees nominated for removal and transplanting on the Tree Removal Plan & Retention Plan (LA.DA.002 Rev P3, by Taylor Brammer). All construction and other activities will implement the recommendations in the Development Impact Assessment (by Earthscape Horticultural Services).	During and after to construction
6. Public access to Graythwaite	Community access to the Graythwaite site will be available at nominated times throughout the year (eg. Heritage Week by arrangement). Community access will only be provided on the basis that it does not interfere with normal school activities.	On going
7. Contamination & hazardous materials	The recommendations of the Soil Report (by WSP) and Supplementary Hazardous Materials Assessment Report (by WSP) are to be implemented as part of the Stage 1 project works.	Prior to occupation
8. Water management	The recommendations of the IWMP (by ACOR) (that are relevant to Stage 1) will be implemented.	During and after to construction
9. BCA and Fire Engineering	The recommendations of the BCA Reports (by David Langdon) will be implemented.	Prior to construction
10. Construction management	Construction activities are to implement the recommendations of the Construction Management Plan (by WSP). A detailed CTMP will also be prepared addressing the matters identified in the Transport and Accessibility Impact Assessment (by Halcrow).	Prior to and during to construction
11. Waste management	The project will implement waste minimisation and recycling measures.	After construction

Subject	Commitment	Timing
12. Lighting	External lighting will be designed to comply with Australian Standard AS4282 on "The Control of the Obtrusive Effects of Outdoor Lighting".	Prior to construction
13. Construction Certificates	The proponent will obtain all relevant construction and compliance certificates as required by the <i>Environmental Planning and Assessment Act, 1979</i> and the <i>Environmental Planning and Assessment Regulation, 2000</i> .	Prior to construction
14. Crime prevention	The crime prevention through environmental design measures set out in the EAR (that are relevant to Stage 1) will be implemented.	Prior to occupation
15. Transport	Implement a Workplace (Green) Travel Plan for Shore students and staff.	During and after construction
16. Flora and fauna	<p>Implement the recommendations of the Flora and Fauna Report (by Cumberland Ecology).</p> <p>Prior to any demolition of roofs, a suitably qualified ecologist will ensure that there are no Eastern Bent-wing bats hibernating in the roofs. If hibernating bats are found, works are not to commence on the building until after the hibernation period.</p>	Before, during and after construction

5.0 CONCLUSION

The project as described in the Revised EAR is unchanged, except for the proposed selection of a preferred option for the new student pick-up facility (as requested by the DPI).

As reasonable and relevant, issues raised in submissions have also been addressed. This includes additional and amended commitments.

The project as described in this PPR has considerable planning merit and is worthy of consent.