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Preliminary Environmental Assessment Ravenswood School for Girls

Henry Street,
Gordon NSW 2072

Submitted to the Department of Planning and Environment
On Behalf of Ravenswood School for Girls

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Report Revision History

Revision	Date Issued	Prepared by	Reviewed by	Verified by
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This document is preliminary unless approved by a Director of City Plan Strategy & Development

CERTIFICATION

This report has been authorised by City Plan Strategy & Development, with input from a number of other expert consultants, on behalf of the Client. The accuracy of the information contained herein is to the best of our knowledge not false or misleading. The comments have been based upon information and facts that were correct at the time of writing this report.

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Appendix	Document	Prepared by
A	Preliminary Concept Plans	BVN

1. Introduction

This Preliminary Environmental Assessment (PEA) report has been prepared by City Plan Services (City Plan) on behalf of Ravenswood School for Girls, Gordon (Ravenswood). Ravenswood (i.e. the proponent/ applicant) is seeking approval for a Development Application (DA) for alterations and additions to the existing primary and secondary school at Henry Street, Gordon. The proposal includes the construction of buildings and facilities on two separate parcels of land known as development area 1 and development area 2.

The proposal satisfies the definition of State Significant Development (SSD) pursuant to Schedule 1 Clause 15 of *State Environmental Planning Policy (State and Regional Development) 2011* (State and Regional Development SEPP) given that it is consistent with the definition of an 'educational establishment' and has a capital investment value (CIV) of more than \$20 million for the purpose of alterations or additions to an existing school.

In accordance with Schedule 2, Part 2 of the Environmental Planning and Assessment Regulation 2000, we hereby seek the Secretary's Environmental Assessment Requirements (SEARs) to enable the preparation of an Environmental Impact Statement (EIS) to accompany an application for the proposal as required under Section 4.12(8) of the EP&A Act.

This report describes the site and its locality, as well as the proposed development. The report also includes an initial assessment of the proposal's potential impacts on the environment.

1.1 Structure

This report is structured as per the following sections:

- **Section 1: Introduction** – Provides an overview of the project intent and report structure.
- **Section 2: Site and Surrounding Area** – Details the site and context in relation to the surrounding land uses.
- **Section 3: Proposed Development** – Provides details of the proposed development, which is to be the subject of a future EIS and consistent with the SEARs once they have been received.
- **Section 4: Planning Framework** – Outlines the planning framework applicable to the site.
- **Section 5: Preliminary Environment Assessment** – Identifies the key matters to be considered as part of a detailed assessment of the proposal within a future EIS.
- **Section 6: Consultation** – Provides details of consultation with relevant stakeholders
- **Section 7: Justification** – Provides an overview of the proposals consistency with strategic policy.
- **Section 8: Conclusions** – Provides a summary of the proposal and its potential impacts.

2. Site and surrounding area

2.1 Existing Sites

Ravenswood School is an independent girls school catering for day and boarding students in Kindergarten to Year 12. The school is located at Gordon in the Ku-ring-gai local government area (LGA).

The main school campus is bound by Pacific Highway to the west, Ravenswood Avenue to the north, Cecil Street to the south and Henry Street to the east. The other portion of the development site is located on the eastern side of Henry Street abutting the railway line. This undeveloped portion of the site is privately owned and occupied by Ravenswood, and currently accommodates an informal at-grade car park.

The main school campus is an irregular shaped parcel of land. The length of the property in a north-south direction measures approximately 218 metres at its longest. In an east-west direction it measures approximately 197 metres at its widest point. The Henry Street at-grade car park site is also irregular in shape and has a frontage of approximately 80.94m to Henry Street.

2.2 Proposed Development Sites

The focus of this request is for two portions of land owned by Ravenswood, being:

- Development area 1 - This approximately 1,600 m² portion of land is located at the corner of Pacific Highway and Cecil Street and comprises only part of Lot 100, DP 776580; and
- Development area 2 – This 1,644 m² site is located at Lot 1, DP 10924983 in Henry Street.

Development area 1 is located within the main school campus and is zoned SP2 – Infrastructure: Educational Establishment. Development area 2 is zoned R4 – High Density Residential. The 2 development areas are illustrated at Figure 1 and Figure 2 below.



Figure 1: Development area 1- Cecil Street site

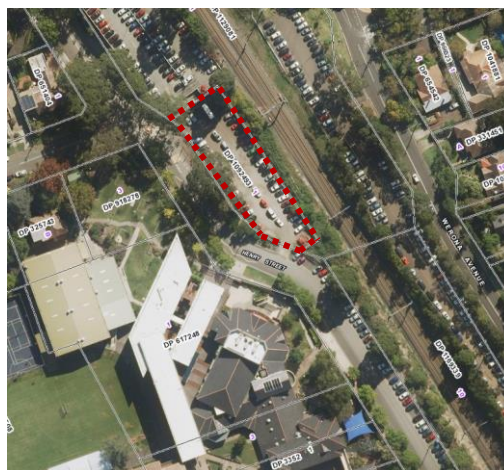


Figure 2: Development area 2- Henry Street site

2.3 Legal Description

The main Ravenswood school campus comprises of ten (10) lots known as:

- Lots A and B, DP 325743;
- Lot 3, DP 918278;

- Lot 1, DP 617248;
- Lots 3-5, Section 1, DP 3352;
- Lots A and B, DP 333045 and;
- Lot 100, DP 776508.

Of the lots listed above, the Cecil Street site (development area 1) occupies only a small portion of Lot 100, DP 776508.

The school also owns and occupies adjoining properties for educational and school related purposes. This includes Lot 1, DP 1092493 Henry Street (development area 2) which is located on the eastern side of the road adjacent to the rail corridor.

2.4 Site History

Ravenswood was first established in 1901. In 1925 the Methodist Church purchased the school and in 1935 boarding accommodation was introduced.

Ravenswood has been a Uniting Church School since 1977 and a member of the Association of Heads of Independent Girls' Schools (AHIGS).

The school continues to be located on its original site, being a single campus within the suburb of Gordon. The school, however, has progressively expanded over the years, with the acquisition of new properties and the upgrading of facilities. The vacant Henry Street site has been used in more recent years for parking associated with the school.

Ravenswood currently caters for approximately 1100-1200 students from Kindergarten to Year 12 and 200 staff members.

2.5 Site Features

Existing built form

The main school campus contains an educational establishment in the form of a Kindergarten to Year 12 private girls school in a range of buildings including old existing dwelling houses that have been converted to teaching facilities and the more recently constructed purpose-built Mabel Fidler building. In addition to the learning areas, the school grounds feature quadrangles and courtyards, an oval, play equipment, tennis courts, a multi-purpose complex with heated swimming pool, gymnasium and assembly hall. An informal car park is provided at the Henry Street site for approximately 45 vehicles.

Topography

The Cecil Street site (development area 1) has an approximate 2 metre fall away from the Pacific Highway and over 5 metre fall from the existing Corner House towards the oval. The Henry Street site (development area 2) has a cross fall of over 5 metres from the high point at the southern boundary to the low point at the north-western corner.

Access and Parking

The main vehicular ingress/egress to development area 1 is currently off the Pacific Highway via 2 separate driveways along the site's western boundary. Limited car parking is currently located in this portion of the school campus.

The Henry Street site is currently undeveloped and is informally used by staff as an off-street car parking area. This portion of the site has a single combined vehicle entry/exit driveway.

Vegetation and Trees

The development sites are located in an urban area and have been significantly disturbed. There are no known areas of biodiversity significance on the sites, nor are there any flora or fauna species that have been identified as being endangered under any legislation.

The main campus contains large trees and landscaped areas along its perimeter. Landscaped areas are also located in the south-west portion of the school, between the

existing buildings and around the car parking area off the Pacific Highway. A large, significant tree located immediately to the north of building 'M' is located within development area 1.

The Henry Street site is clear of any vegetation. Large established trees, however, are located within the road reserve approximately midway along the street frontage of the Henry Street site.

European Heritage

Under the KLEP 2012 the main school campus is identified as containing a heritage item of state significance. The small Colonial style building known as 'Iolanthe' is located adjacent to the northern side of the oval with its definable curtilage (as per the State Heritage Register listing curtilage) abutting the oval. Although new development is proposed on Lot 100, DP 776508, the new development will not be located within the defined state listed curtilage of 'Iolanthe' and will be well separated from the State heritage item.

In addition to 'Iolanthe' the school is also located adjacent to five (5) identified local heritage items and a heritage conservation area. A summary of the heritage listings is provided at Table 1 and Table 2 below.

Table 1: Summary of State heritage items on the main school campus site

Item name	Address	Legal property description	Significance	Item no.
"Iolanthe", dwelling house	681 Pacific Highway, Gordon	Lot 100, DP 776508	State	I10

Table 2: Summary of adjacent local heritage items and the heritage conservation area

Item name	Address	Legal property description	Significance	Item no.
Dwelling House	8 Cecil Street, Gordon	Lot 2, DP 315196	Local	I2
Dwelling House	12 Cecil Street, Gordon	Lot A, DP 392997	Local	I3
Dwelling House	14 Cecil Street, Gordon	Lot 1, DP 389243	Local	I4
Dwelling House	724-726 Pacific Highway, Gordon	Lot 1, DP 130693 & Lot 1, DP 120508	Local	I12 & I74
Yarabah Avenue Conservation Area	Area centred around Yarabah Avenue, Gordon		Local	C18

Aboriginal Archaeology

A search of the Aboriginal Heritage Information Management System (AHIMS) database found that no Aboriginal objects, sites or places have been registered on the subject site or within a 200-metre radius of the site.

Utilities and Infrastructure

The subject site is located in an existing and well-established urban area of Sydney with access to important utility services including electricity, water, sewerage, telecommunications and gas. The subject site also has existing connections to Council's stormwater and drainage system for the locality.

The Gordon Railway Station and bus interchange is located approximately 400 metres north of the site.

Bushfire

The site is not identified as being located within a Bush Fire Prone area on Council's mapping.

Flooding

The site is not identified as being affected by flooding on Council's mapping.

Watercourses & Riparian Zones

The site has been developed to the boundaries and contains no mapped watercourses running through it. There are no Riparian Zones contained within the site.

2.6 Location and Context

The development sites are located approximately 12 kilometres north-west of the Sydney Central Business District (CBD) in the Upper North Shore suburb of Gordon. The Gordon Town Centre, Railway Station and bus interchange is located approximately 400 metres north of Ravenswood school. The location of the site is shown in Figure 3.

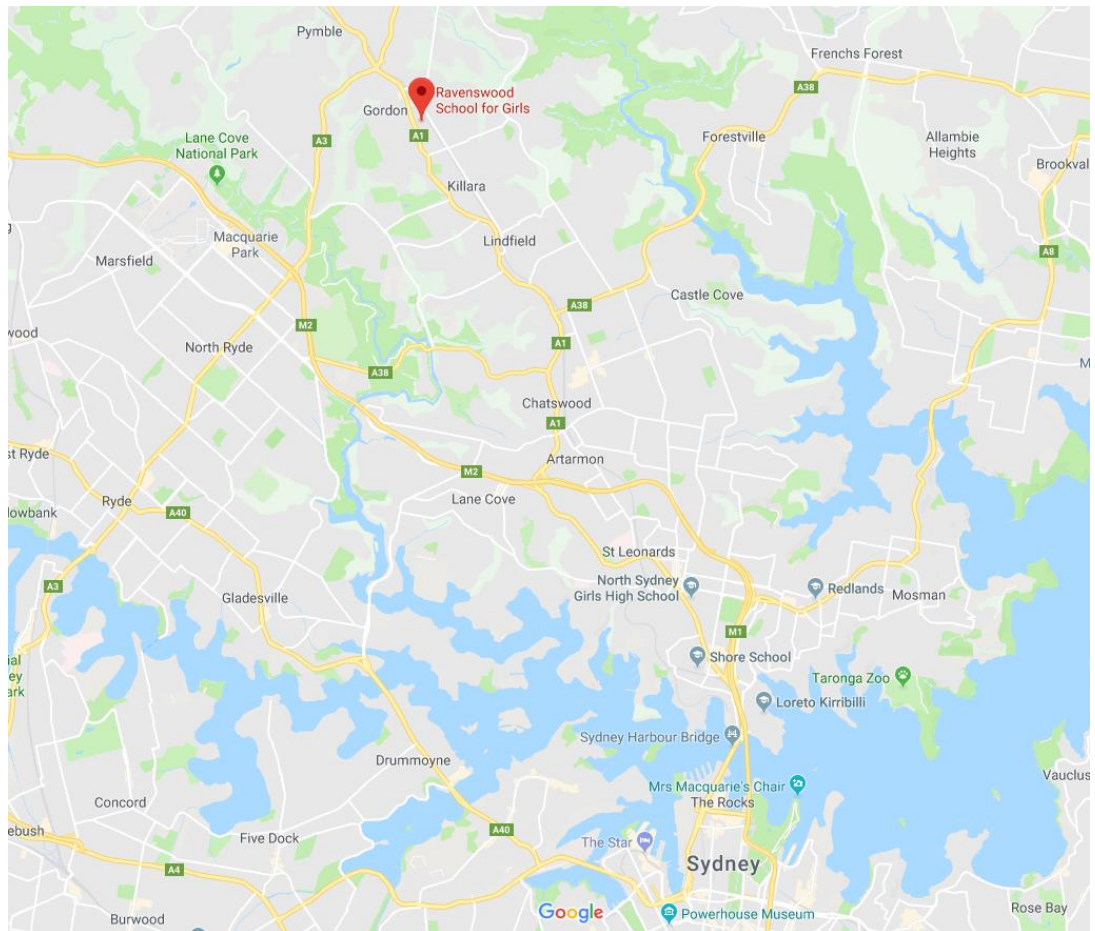


Figure 3: Site location (source: Google Maps)

Ravenswood is zoned for educational purposes, while the adjacent land to the north, south and west is zoned R4 High Density Residential. To the east of the site is the T1 Northern railway line.

Land immediately to the north of the school is characterised by 3 and 4-storey residential flat buildings, with at-grade and multi-storey car parking located on the eastern side of Henry

Street adjacent to the railway line. A small area of land west of the site is zoned R2 Low Density Residential and accommodates 2-storey residential accommodation.


The land to the south of the site and south of Cecil Street is emerging as a higher density residential precinct. It is currently characterised by detached dwelling houses, however, recently a number of higher density (4-storey) residential flat buildings have been developed in this location. The Gordon Uniting Church and community centre is located on the south-eastern corner of the intersection of the Pacific Highway and Cecil Street. The site context is shown in Figure 4.



Figure 4: Site land use context (Source: BVN)

The additional buildings proposed will build on the emerging land use context of the locality. It will support the precinct by providing increased educational facilities in close proximity to an existing town centre with adequate infrastructure, including public transport via the railway station and bus interchange.

It is understood that Ku-ring-gai Council is currently planning the development of a cultural and civic hub on Council owned land at the corner of Pacific Highway and Damaresq Street. In undertaking this project, Council seeks to maximise the opportunity to work collaboratively with the private sector in an effort to activate and the revitalise the Gordon Town Centre. Flow on benefits to the community include significant public domain works, community facilities and civic space provision and improved pedestrian connectivity.



As demonstrated in this section, the locality of the subject site is experiencing significant change and the proposed buildings and facilities will be consistent with the emerging land uses.

3. Proposed Development

3.1 Proposed Development Summary Overview

Ravenswood school currently provides classes from Kindergarten to Year 12 and accommodates approximately 1100 - 1200 students and 200 staff members.

The proposed alterations and additions to the existing school include:

- Demolition of 2 existing buildings in the south-west corner of the main school campus known as “Brown House” and “White House”.
- Construction of a new 4-storey purpose-built student learning centre (SLC) in the south-west corner of the school adjacent to the Pacific Highway. The SLC will include general purpose learning areas (GPLA's)/classrooms, breakout areas, study areas, staff facilities, outdoor terrace and under-croft area;
- Construction of a multi-level car park and administration building at the Henry Street site, accommodating 2 levels of car parking and 2 levels of administration facilities.
- Associated works such as tree removal, drainage works, landscaping, retaining walls, relocation of existing driveway crossings, etc.

Brown House and White House currently accommodate a range of staff facilities and some classrooms. Limited on-site car spaces are located adjacent to the 2 buildings. The proposed development is likely to result in a net increase of 10 new classrooms.

The car park and administration facilities proposed on the Henry Street site will accommodate additional staff facilities to support administration of the school. The building will provide new and updated centralised facilities that are currently provided throughout the campus, together with additional parking and staff areas.

Preliminary concept plans for the proposed SLC, and multi-level car park and administration building have been prepared by BVN and are included at **Appendix A** of this report. The plans include location plans, floor plans, and indicative building envelopes and heights for the proposed new school buildings.

Construction of the proposed development is planned to occur in stages.

4. Planning Framework

4.1 Strategic Planning

4.1.1 Greater Sydney Region Plan

The Greater Sydney Region Plan (the Plan), *A Metropolis of Three Cities*, is the current metropolitan strategic planning document prepared by the Greater Sydney Commission (GSC) and finalised in early 2018. The Plan is a 20-year plan to manage the growth and change occurring in Greater Sydney. A key component of the Plan is built on a 40-year vision of a “30-minute city” where the people of Greater Sydney will live within 30 minutes of jobs, education, health facilities, services and great places. This vision is consistent with the directions established in the GSC’s *Directions for Greater Sydney*, which are a set of common guiding principles that will assist in navigating the city’s future summarised as follows:

- | | |
|---------------------------------------|----------------------------|
| 1. A city supported by infrastructure | 6. A well connected city |
| 2. A city for people | 7. A city in its landscape |
| 3. Housing the city | 8. An efficient city |
| 4. A city of great places | 9. A resilient city |
| 5. Jobs and skills for the city | 10. A collaborative city |

Within the Plan these ten (10) directions are presented through the themes of liveability, productivity and sustainability with a continued focus on collaboration and integrating land use and infrastructure.

The Plan expands on the three cities concept established in *Towards our Greater Sydney 2056*, which was an amending documentation to the previous metropolitan document *A Plan for Growing Sydney*. The three cities are the Western Sydney Parklands City, the Central River City and the Eastern Harbour City.

The Plan is accompanied by District Plans that set out the planning framework for the districts in the region.

4.1.2 North District Plan

The *North District Plan* proposes a 20-year vision for the North District in Greater Sydney. The Central City District covers the Hornsby, Hunter’s Hill, Ku-ring-gai, Lane Cove, Mosman, North Sydney, Northern Beaches, Ryde and Willoughby LGAs. The Plan is a guide for implementing the *Greater Sydney Region Plan* at a district level. It is a bridge between regional and local planning and is to inform local environmental plans and any PPs.

Importantly, the NSW Department of Education estimates an expected increase of 6,150 children aged four years and under, with more than half of this projected growth to be in the Ryde and Ku-ring-gai LGAs. The NSW Department of Education also estimates a 20 percent increase in students, being an extra 21,900 students, that will need to be accommodated in both government and non-government schools in the North District by 2036. Growth is projected to be greatest in Ryde, Ku-ring-gai, Northern Beaches and Hornsby LGAs, with Ku-ring-gai expecting an increase of 5,733 students by 2036.

These two strategic documents support the continued use of the site for educational purposes and recognise the need to provide increased services and facilities within established schools such as Ravenswood.

4.2 Environmental planning instruments

The following Environmental Planning Instruments (EPIs) apply to the subject site and proposed development:

- Environmental Planning & Assessment Act 1979 and Environmental Planning & Assessment Regulations 2000
- Biodiversity Conservation Act 2016
- State Environmental Planning Policy (State and Regional Development) 2006;
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy (Exempt and Complying Development Codes) 2008;
- State Environmental Planning Policy No. 55 – Remediation of Land
- State Environmental Planning Policy No. 64 – Advertising and Signage
- Ku-ring-gai Local Environmental Plan (Local Centres) 2012; and
- Ku-ring-gai Local Centres Development Control Plan 2017.

4.2.1 Environmental Planning & Assessment Act 1979 and Environmental Planning & Assessment Regulations 2000

The Environmental Planning and Assessment Act, 1979 (the Act) is the principle planning and development legislation in NSW. The proposed development will require consent under the provisions of Part 4 of the Act and requires an application to the Department of Planning & Environment (DPE).

The Minister for Planning is the consent authority for State significant development (SSD). Section 4.12(8) requires preparation of an Environmental Impact Statement (EIS). This document requests SEARs to assist with preparation of the EIS.

It is not anticipated that the proposed development will be classified as “integrated development” under section 4.46 of the Act and therefore will not require the concurrence of an external authority.

4.2.2 Biodiversity Conservation Act 2016

The Biodiversity Conservation Act 2016 (BC Act) commenced on 25 August 2017 and sets out, among other things, to establish a scientific method for assessing the likely impacts on biodiversity values of proposed development and land use change.

Under Section 7.7 of the BC Act, a development application for Part 4 activity is not required to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the development is likely to significantly affect threatened species.

The impacts of the proposed development will be negligible in terms of biodiversity loss. It is therefore considered that the proposal will not have a significant impact on biodiversity values identified under the BC Act and will not trigger any requirement to enter into the Biodiversity Offsets Scheme.

4.2.3 State Environmental Planning Policy (State & Regional Development) 2011

The State and Regional Development SEPP was adopted on 1 October 2011 and identifies development or sites that are considered to be classified as SSD or State Significant Infrastructure (SSI). SSD is generally classified based on its size, economic value or potential impacts on the environment.

Pursuant to subclause 8(1)(a) and (b) of the SEPP, development is declared to be SSD for the purposes of the EP&A Act if it is deemed to satisfy the following criteria:

8 Declaration of State significant development: section 4.36

(1) Development is declared to be State significant development for the purposes of the Act if:

(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and

(b) the development is specified in Schedule 1 or 2.

The proposed development is a type of development that is not permissible without development consent under Part 4 of the EP&A Act and is development specified in Schedule 1 of the SEPP being alterations and additions to an existing school with a Capital Investment Value (CIV) of greater than \$20 million.

15 Educational establishments

... (2) Development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school.

The proposal is therefore classified to be SSD for the purposes of the EP&A Act and is required to be determined by the Minister. SSD applications must be accompanied by an Environmental Impact Statement (EIS). This document has been prepared to have the project registered as State significant and request the SEARs.

4.2.4 State Environmental Planning Policy (Educational Establishments & Child Care Facilities) 2017 (ESEPP)

The ESEPP contains provisions to facilitate the both construction of new and the upgrade/expansion of existing early education and child-care facilities, schools, TAFEs and universities. It aims to streamline approval processes to save time and money and deliver greater consistency for such development across NSW. Overall, the SEPP balances the need to deliver additional educational infrastructure with a focus on good design.

Part 4 of the ESEPP identifies specific development controls for schools. The development will consider these specific development controls in the SEPP. The main school campus is zoned SP2 – Infrastructure: Educational Establishment and therefore permits development for the purposes of a school. Clause 35(1) of the ESEPP states that development for the purpose of a school may also be carried out by any person with development consent on land in a “prescribed” zone. For the purposes of this clause, the R4 High Density Residential zone is listed as a prescribed zone. The proposed use of the Henry Street site for the purposes of a school is therefore permissible with consent pursuant to Clause 35 of the ESEPP.

In determining any application, subclause 35(6) of the ESEPP, requires that a consent authority take into consideration the design quality of a new school when evaluated in accordance with the 7 ‘design quality principles’ contained within Schedule 4 of the SEPP. Furthermore, consideration must be given to how the proposed development can be designed to allow for the use of the school facilities (including recreational facilities) to be shared with the community.

Part 7 of the ESEPP relates to traffic generating development. Development for the purposes of an educational establishments that will result in the facility being able to accommodate 50 or more additional students and involves either a new premises or enlargement of an existing

premises is considered Traffic Generating Development. The proposed development will require the DA to be referred to Roads and Maritime Services (RMS) for comment.

4.2.5 State Environmental Planning Policy (Infrastructure) 2007

The proposed development will be subject to the relevant provisions within *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP). In particular, consideration must be given to clauses 85-87 of the SEPP which relate to development in or adjacent to rail corridors and identifies certain performance standards that must be met in terms of rail safety, excavation and impacts from rail noise.

Clause 87 contains provisions relating to the impact of rail noise or vibration on non-rail development, including schools and child care facilities. This will subsequently include the consideration of the DP&E's *Development Near Rail Corridors and Busy Roads – Interim Guideline*, in the design of the proposed development for the school.

Clause 104 of the ISEPP ensures that the Roads and Maritime Services (RMS) is given the opportunity to comment on development nominated as 'traffic generating development' in Schedule 3. The proposed development is unlikely to trigger the criteria under Schedule 3 of the ISEPP but must still be referred to the RMS under Part 7 of the ESEPP.

4.2.6 State Environmental Planning Policy (Exempt & Complying Development Codes) 2008

State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP) identifies development which is exempt or complying. The policy states that any development that occurs on land containing an identified heritage item of state or local significance, cannot be classified as exempt or complying.

1.16 General requirements for exempt development

(1) To be exempt development for the purposes of this Policy, the development:

... (c) must not be carried out on land that is, or on which there is, an item that is listed on the State Heritage Register under the Heritage Act 1977, or that is subject to an interim heritage order under that Act, and ...

1.17A Requirements for complying development for all environmental planning instruments

(1) To be complying development for the purposes of any environmental planning instrument, the development must not:

... (d) be carried out on land that:

(i) comprises an item that is listed on the State Heritage Register under the Heritage Act 1977 or on which such an item is located, or

(ii) is subject to an interim heritage order under that Act or on which is located an item that is so subject, or

(iii) is identified as an item of environmental heritage or a heritage item by an environmental planning instrument or on which is located an item that is so identified.

The Cecil Street site contains an item of state heritage significance, being Item "110" under the *Ku-ring-gai Local Environmental Plan (Local Centres) 2012*, known as the "Iolanthe" dwelling house situated in the north-western corner of the site. The "Iolanthe" dwelling house

is located within Lot 100 in DP 776508 and is also identified in the NSW State Heritage Register.

The SEPP therefore cannot be applied to any development contained within the Cecil Street site (development area 1). The development proposed on the Henry Street site also does not satisfy the requirements of the Codes SEPP and therefore cannot be considered exempt or complying development.

4.2.7 State Environmental Planning Policy No. 55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) was introduced in 1998 to ensure consent authorities took into account land contamination or possible land contamination. Clause 7 of SEPP 55 states that consent must not be granted to the carrying out of development on land unless the consent authority has considered whether the land is contaminated and requires remediation.

While the main Ravenswood campus is currently used for school purposes and no change of use is proposed, a Phase 1 Environmental Site Assessment will be undertaken to consider potential site contamination impacts associated with the existing Henry Street site and the proposed demolition activities.

4.2.8 State Environmental Planning Policy No. 64 – Advertising and Signage

No signage is proposed as part of the development. Any building or business identification signage not being exempt or complying development under *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008*, however, will address the requirements of SEPP 64 including the assessment criteria listed under Schedule 1.

4.2.9 Ku-ring-gai Local Environmental Plan (Local Centres) 2012

The main school campus site is zoned SP2 – Infrastructure: Educational Establishment pursuant to the Ku-ring-gai LEP (Local Centres) 2012. The Henry Street site is zoned R4 – High Density Residential pursuant to the LEP.

Educational establishments are not permitted in the R4 zone under the *Ku-ring-gai Local Environmental Plan (Local Centres) 2012* (LEP). However, as indicated above, permissibility for an educational establishment is achieved through Clause 35(1) of the ESEPP as the Hemery Street portion of the proposed development will occur in a prescribed zone.

It is recognised that the provisions in the Ku-ring-gai LEP (Local Centres) 2012 do not apply to the site as they are otherwise overridden by the provisions contained within the State and Regional Development SEPP as applicable to the proposal. Nonetheless, the provisions of the KLEP 2012 will be considered in the preparation of the application. Relevant clauses of the LEP are provided in Table 3.

Table 3 Relevant provisions of the KLEP 2012

Clause	Comment
2.1 Land use zones	Clause 35(1) of the Education and Child Care SEPP states that development for the purpose of a school may be carried out by any person with development consent on land in a prescribed zone. The proposed use of the Henry Street site for the purposes of a school is permissible with consent in the R4 zone pursuant to Clause 35 of the ESEPP.
2.3 Zone objectives	With respect to development for the purpose of an educational establishment the objectives of the zones need to be considered. Objectives of the SP2 zone are: To provide for infrastructure and related uses.

	<p>To prevent development that is not compatible with or that may detract from the provision of infrastructure.</p> <p>Objectives of the R4 zone are:</p> <p>To provide for the housing needs of the community within a high density residential environment.</p> <p>To provide a variety of housing types within a high density residential environment.</p> <p>To enable other land uses that provide facilities or services to meet the day to day needs of residents.</p> <p>To provide for high density residential housing close to public transport, services and employment opportunities.</p>
4.3 Height of buildings	<p>The height of a building is not to exceed the maximum height shown for the land on the Height of Buildings Map. While the map indicates a maximum height of 17.5 metres for the R4 zoned land, the land is also located within 'Area 1'. As such, a maximum height of 11.5 metres applies if the site is 1,800 square metres or less and a maximum height of 14.5 metres applies if the site is more than 1,800 square metres but less than 2,400 square metres.</p> <p>A height of 14.5 m therefore applies to the R4 zoned Henry Street site.</p> <p>No maximum permissible height applies to the main school campus which is zoned SP2.</p>
4.4 Floor space ratio (FSR)	<p>The FSR for a building is not to exceed the maximum FSR shown for the land on the FSR Map. While the map indicates a maximum FSR of 1.3:1 for the R4 zoned land, this land is also located within 'Area 5'. As such, a maximum FSR of 0.8:1 applies if the site is less than 1,800 square metres and a maximum FSR of 1:1 applies if the site is 1,800 square metres or more but less than 2,400 square metres.</p> <p>An FSR of 0.8:1 therefore applies to the R4 zoned Henry Street site.</p> <p>No maximum permissible FSR applies to the main school campus which is zoned SP2.</p>
4.6 Exceptions to development standards	<p>Flexibility is provided in the LEP for certain development standards to achieve better outcomes by allowing flexibility in particular circumstances.</p>
5.3 Development near zone boundaries	<p>Flexibility is provided where the investigation of a site and its surroundings reveals that a use allowed on the other side of a zone boundary would enable a more logical and appropriate development of the site and be compatible with the planning objectives and land uses for the adjoining zone.</p>
5.10 Heritage conservation	<p>Development consent is required to erect a building on land on which a heritage item is located. The consent authority may, before granting consent to any development require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item concerned. A heritage impact assessment will be required as part of the DA.</p>
6.1 Earthworks	<p>Earthworks will form part of the DA.</p>
6.2 Stormwater and water sensitive urban design	<p>A stormwater management plan will accompany the DA and will ensure that any adverse impacts on the land on which the development is to be carried out and all adjoining properties are avoided or mitigated. Water sensitive urban design principles will be incorporated into the drainage design.</p>

4.2.10 Ku-ring-gai Local Centres Development Control Plan 2017

Pursuant to Clause 11 of the State and Regional Development SEPP a Development Control Plan (DCP) (whether made before or after the commencement of this SEPP) does not apply to State Significant Development (SSD).

Notwithstanding this, the relevant provisions of the *Ku-ring-gai Local Centres Development Control Plan 2017* (KDCP 2017) will be considered in the design and layout of the proposed redevelopment of the school.

5. Preliminary Environmental Assessment

The following information has been compiled to assist the Department in the preparation of the SEARs for an Environmental Impact State (EIS), which is required to accompany a SSD application for a new school.

The key environmental considerations associated with the proposed development are outlined in the following section of the report noting that where not already done so, specialist consultants will be engaged, and the required studies will be undertaken to address these issues.

5.1 Land Use and Operation

Land use in the study area includes low, medium and high density residential development, with the Gordon Town Centre, railway station and bus interchange located approximately 400 metres north of the school. Immediately to the east of the site is the T1 Northern railway line, with a multi-level commuter car park adjoining the northern boundary of the Henry Street portion of the subject site. The main Ravenswood school campus is an established school site accommodating facilities for Kindergarten to Year 12 students. The Henry Street portion of the site is currently undeveloped and is used as an informal at-grade car park.

The proposal is for a minor expansion to an existing school. The main impact on land use is the erection of the new multi-level student learning centre, car park and administration areas, with the development resulting in a net increase of 10 classrooms. The creation of additional classroom spaces will allow flexibility in timetabling and for students to access more functional and consolidated spaces.

The additional classrooms and administration spaces will have minor change or impact to the existing operational element of the school, whilst the new car park will provide parking facilities to support the existing school operations.

As part of the EIS, consideration will be given to adjacent and nearby land uses and potential impact such as hours of operation, out of school activities, traffic and access, noise, and site management. As the proposed development is for the minor expansion of an existing school operation and will principally operate during school hours, potential impact on land use is likely to be mild to moderate.

5.2 Built Form, Design and Visual Impacts

The locality includes a mix of low, medium and high density residential uses, with the railway line and parking areas dominating the land to the east. The proposed development will involve the demolition of 2 existing single-storey buildings in the south-west corner of the main school campus. These buildings have frontage to the Pacific Highway and adjoin an old two-storey house at the corner of Cecil Street. The Henry Street portion of the site is currently vacant.

The proposed 4-storey SLC and 4-storey car park/administration building will be larger than the surrounding built form and will alter the current visual environment especially from the Pacific Highway. As part of the overall design of the buildings, consideration will be given to setbacks, building materials, associated landscaping, overshadowing, solar access, privacy and any view loss.

The visual impact of the proposed development will also be considered in context of likely future development in the area, recognising that a number of high density (4-storey) residential flat buildings have recently been developed in this location and that much of the adjoining R4 zone land has not yet been redeveloped. The proposed car park/administration building also does not adjoin any sensitive land uses, noting that it would be located adjacent to a multi-level commuter car park and the rail corridor.

5.3 Traffic, Transport and Access

Ravenswood school is located within walking distance of the Gordon Railway Station and bus interchange. School bus services and pick-up zones also operate from Henry Street and Cecil Street.

The south-west corner of the existing school campus is currently accessed via 2 separate driveways off the Pacific Highway, while the Henry Street site is accessed via a single entry/exit driveway.

There will be an increase in traffic during the construction phase. Construction vehicles will include construction and delivery trucks and a crane for lifting construction materials and equipment into position. There will also be some minor increase in traffic generation as a result of the proposed development.

A Traffic & Parking Assessment will be prepared to consider the impact of vehicles on the local road network. To assist with peak flow traffic, it is likely that some traffic management changes will be required. An initial review has been undertaken by Colston Budd Rogers & Kafes Pty Ltd and suggests that various measures will be investigated to minimise traffic effects and improve the existing student set-down/pick-up operations during morning and afternoon peak periods. Opportunities to improve upon the existing situation include:

- remove on-street parking in Cecil Street during the morning and afternoon peak periods;
- increase the capacity of the student set-down/pick-up zone in Cecil Street;
- remove on-street parking at the intersection of Cecil Street and Henry Street to improve traffic arrangements;
- increase capacity of student set-down/pick-up zone in Henry Street;
- relocate the existing bus zone in Henry Street;
- implement traffic measures at the northern section of Henry Street to improve traffic arrangements.

Further measures to minimise the effects of parents/carers setting down and picking up students during the morning and afternoon peak periods include:

- encourage parents/carers to allow older children to travel by public transport;
- introduce programs such as 'Big Sister/Little Sister' which will match older students with younger students, who live in the same area, to travel together on public transport;
- encourage car-pooling to increase the number of students per car and to reduce the total number of cars accessing Cecil Street and Henry Street;
- review the staggering of the start and finishing times of the year groups at the school;
- review the management and the method of collection of students during the afternoon pick-up period; and
- increase the number of private school buses transporting students to and from school, to reduce the number of students travelling by car.

These measures will help to minimise the number of vehicles present at the school at any given time.

The new SLC will also require one of the existing driveways off the Pacific Highway to be relocated. The relocated position will be further away from the signalised intersection and is therefore unlikely to have a significant impact on existing traffic operations. Referral to RMS, however, will be required given the Pacific Highway is a classified road.

5.4 Parking

Ravenswood school currently provides approximately 105 on-site staff parking spaces. A further 40 spaces are provided on the eastern side of Henry Street adjacent to the railway

line. These spaces are leased by the school from Ku-ring-gai Council. The Henry Street site also provides an additional 45 informal car parking spaces.

The new SLC will displace approximately 10-20 on-site car parking spaces. The proposed alterations and additions will also result in a net increase of 10 new classrooms which will generate the need for additional parking.

Application of Council's DCP parking rates to the proposed and existing development results in a parking requirement of approximately 225 spaces. As part of the Traffic & Parking Assessment consideration will be given to the location, arrangement and number of car parking spaces provided for the school. It is anticipated that the school will maintain 95 spaces, continue to lease 40 on-street spaces in Henry Street and provide 2 levels of parking for some 90 vehicles on the Henry Street site.

5.5 Noise and Vibration Impacts

Ravenswood is an existing isolated school site located in a predominantly residential area. The Cecil Street site has frontage to the Pacific Highway, while the Henry Street site adjoins the Northern railway line.

Noise and vibrations from train movements and traffic related noise from the Pacific Highway, has the potential to impact on the school operations. Construction noise also has potential to impact on the existing school activities, as well as on neighbouring premises. As the proposed development is for the minor expansion of an existing school, daily operations post construction are unlikely to have a significant impact on the surrounding residential areas in terms of increased noise.

A Noise Impact Assessment will be prepared to consider potential demolition, construction and operational noise impacts. A separate Vibration Analysis will also be undertaken for the Henry Street site given its proximity to the rail corridor and to determine if the proposed works will have any impacts on the rail operations. The assessments will consider all relevant policies and guidelines including:

- Environment Protection Authority (EPA) 2000, Industrial Noise Policy (INP)
- Department of Environment and Climate Change (DECC) 2009, Interim Construction Noise Guideline (ICNG)
- Department of Environment and Climate Change and Water (DECCW) 2009, Assessing Vibration: A Technical Guideline
- Development Near Rail Corridors and Busy Roads – Interim Guideline (Department of Planning 2008).

5.6 Site Contamination

The existing school campus is currently used for educational purposes. The existing Henry Street site is currently used as an informal car park.

A Preliminary Site Investigation (PSI) will be undertaken by a suitably qualified consultant to consider potential contamination issues and will accompany the future SSDA. As no change of use is proposed to the existing school campus, it is not anticipated that any significant contamination issues will be identified. If required, a Phase 2 Assessment including soil sampling will be undertaken on the Henry Street site given it is currently unsealed and has been used for parking purposes.

A hazardous building materials survey will also be undertaken prior to the demolition of the existing 2 buildings (Brown House and White House). The demolition of any structures containing hazardous materials will be carried out by a licensed asbestos removal contractor. During construction an 'Unexpected Finds Protocol' will also be adopted to address any unexpected soil contamination.

It is considered that the proposed development will be capable of satisfying the provisions of SEPP 55 and will not pose a risk to human health or the environment in terms of contamination and is suitable for school related uses.

5.7 Sediment, Erosion and Dust

The site has been used for school purposes for many years. While the Henry Street site is currently used as a car park, it has not been formally sealed or line-marked.

Construction activities have the potential to generate wind borne dust. Dry and windy conditions will generate additional dust from exposed soil. Movement of vehicles and wind conditions will therefore need to be monitored during construction and appropriate mitigation measures will need to be implemented. Environmental management measures are likely to only be required during construction, with the additional operational activities unlikely to result in any adverse air impacts.

Construction of the development also has the potential to result in erosion and subsequent loss of topsoil. Excess soil from construction will need to be managed on site or disposed off-site. A soil erosion and sediment control plan will be prepared to accompany the DA.

5.8 Drainage

Council's mapping indicates that the proposed development areas are not located in a flood zone. Existing stormwater management provisions are currently in place on the school site.

Redevelopment of a site, including enlarged building footprint and additional paved areas, has the potential to impact on surface flows. Additional or changed stormwater flows can also impact on drainage regimes and downstream properties. If stormwater is not adequately managed, it may cause drainage issues on site.

A stormwater management plan, including water sensitive design, will be prepared in accordance with relevant policies and guidelines to minimise operational water quality impacts and manage downstream water.

5.9 Vegetation and Tree Removal

The existing school campus has been extensively developed and cleared of most vegetation. The Henry Street site is completely vacant. The remaining vegetation around the school site is limited to some large trees and landscaping mainly along the boundaries of the site or within the footpath reserves.

Given the site is located with an existing and well-established urban area and has been subject to extensive development, it is considered unlikely that the development site contains any significant communities or habitats. Council's mapping also indicates that no threatened flora species are located in the study area.

Based on the proposed development footprint some trees adjacent to the Pacific Highway will require removal. Initial investigations suggest that these trees are not significant. A large native tree, however, is located immediately behind the new proposed SLC and will require protection. Careful consideration has been given to the building footprint to manage preservation of this tree.

An Arborist Report and Landscape Concept plans will accompany the DA. Measure will also be adopted during construction to ensure that all trees located outside the building footprint, including trees within Council's footpath reserve, are protected.

5.10 Heritage – Aboriginal

A search of the Aboriginal Heritage Information System (AHIMS) database identifies no Aboriginal sites, places or objects in or near the development areas.

Given the development sites have been subject to extensive development and clearing, and are located in an established urban environment, it is considered highly unlikely that the sites

are of any Aboriginal heritage significance. A more detailed assessment as part of the EIS is therefore considered to be unnecessary. Environmental management measures, however, will be adopted during construction in the event of any unexpected finds.

5.11 Heritage – European

The site contains a known item of European state heritage significance. The small Colonial style building known as 'Iolanthe' is located adjacent to the northern side of the oval with its definable curtilage (as per the State Heritage Register listing curtilage) abutting the oval. The curtilage of the house is also strongly defined by the Pacific Highway and the fencing of the school tennis courts to the rear of the house. Iolanthe is described as a modest single storey brick building with an iron roof.

In addition to 'Iolanthe' there are three listed local heritage items in Cecil Street to the south of the main school site. These comprise No. 8 Cecil Street a Federation era cottage utilised by the staff of the school; No.12 Cecil Street, a Federation era private residence and No. 14 Cecil Street, a Federation style residence in private ownership. These three buildings are at a considerable distance from the proposed development and are separated visually from it by existing development on the school site. Two (2) additional local heritage items and the Yarabah Avenue conservation area is also located to the west of the school site on the opposite side of the Pacific Highway.

Although located on the same allotment, the proposed Student Learning Centre (SLC) will not be located within the defined state listed curtilage of 'Iolanthe' and will be well separated from the State heritage item. The SLC would be located on the southern side of the oval and have little contextual relationship with the state heritage item. The SLC will have no physical impact on 'Iolanthe' and is unlikely to visually detract from it.

A statement of heritage impact will accompany the DA and will address issues relating to the potential impact of the proposed development on 'Iolanthe' and the other local heritage items.

5.12 Social and Economic

The NSW Department of Education estimates an expected increase of 6,150 children aged four years and under, with more than half of this projected growth to be in the Ryde and Ku-ring-gai LGAs. There is ongoing need for quality education. The NSW Department of Education also estimates a 20 percent increase in students, being an extra 21,900 students, that will need to be accommodated in both government and non-government schools in the North District by 2036. Growth is projected to be greatest in Ryde, Ku-ring-gai, Northern Beaches and Hornsby LGAs, with Ku-ring-gai expecting an increase of 5,733 students by 2036.

The upgrade and expansion of existing schools provides long term benefits for the community and provides less pressure to create new schools in already established areas. The provision of a school facilities through private sector interests also reduces the burden on government education funding sources.

This proposal will result in positive social impacts through the provision of new purpose built facilities. The alterations and additions to the existing school will also provide a positive economic injection into the area and the broader metropolitan area by providing additional employment opportunities through the construction and operational phases of the development.

The future environmental assessment will discuss the existing social and economic conditions and the potential impacts of the proposed development.

5.13 Waste

Waste facilities are provided for the existing school. The proposed development will utilise these existing facilities and where required additional services will be provided.

Construction waste is likely to include building material, soil, concrete and similar. The additional waste generated during operation of the expanded school is likely to be minor.

An assessment of the types and amounts of waste to be generated during the construction and operation of the proposed development will be undertaken and detailed in the environmental assessment.

5.14 Construction Management

The EIS will assess the potential environmental impacts associated with the construction of the proposed alterations and additions to the existing school and where appropriate, will propose appropriate mitigation and/or management measures to minimise these impacts.

A Construction Management Environmental Plan (CEMP), outlining methods to minimise and manage the potential impacts of the construction works on the environment, will accompany the EIS. Details of how the school will continue to operate during these construction works, including proposed mitigation measures will also be provided.



6. Consultation

Consultation with relevant stakeholders including Council, Roads and Maritime Services (RMS), RailCorp, the office of the Government Architect NSW (GANSW) and other government agencies and the local community will be carried out as part of the preparation of the EIS for the proposed alterations and additions to the existing school. Any consultation requirements identified in the SEARs will be met by the proponent as part of this process.

7. Justification

The *Greater Sydney Region Plan* is a 20-year plan to manage growth and change in Greater Sydney and is built on the 40-year vision of a “30 minute city” where the people of this region will be able to live within 30 minutes of jobs, education, health facilities, services and great places.

The proposed development will assist the State Government and GSC in achieving this vision by supporting existing education services within an existing and established urban area that is in close proximity to a town centre and railway station. The provision of adequate school facilities in this locality is important given that the population of school-aged children within the North District is expected to increase significantly over the next 20 years. The proposed alterations and additions will provide much-needed facilities in an area where they can be readily supported subject to the implementation of certain mitigation and management measures.

The proposed alterations and additions to the school will also maintain and enhance employment opportunities in the area while reducing the burden on government to facilitate new school facilities through funding.

The buildings proposed to be demolished were not purpose built for the school and currently do not accommodate the needs of the school. Given the site’s context the proponent is seeking to ensure that high quality, well designed and considered built forms can be achieved on the subject site to provide an excellent educational experience. The proposal will allow Ravenswood school to continue to provide the learning experience that is now expected to be delivered by education providers.

8. Conclusion

The proposal is for alterations and additions to the existing Ravenswood school at Henry Street, Gordon. The proposal involves demolition of 2 existing buildings in the south-west corner of the main school campus and construction of a student learning centre on development area 1, and construction of a multi-level car park and staff administrative building on development area 2 at Henry Street.

This SEARs request outlines the potential environmental impacts of the proposed development and how these will be considered and assessed in the preparation of the required EIS. The statutory framework and associated approvals required is also outlined.

A range of specialist reports will be required to accompany the EIS including:

- Architectural plans
- Landscape concept plans
- Traffic and parking assessment
- Heritage impact assessment
- Arborist report
- Geotechnical and phase 1 site contamination assessment
- Drainage concept plan
- Noise and vibration assessment.

Based on the information available at this time, the potential risks to the environment from the proposed development are presented and discussed. The future environmental assessment will consider matters that affect or may affect the environment in relation to the proposed development and where appropriate mitigation measures will be recommended.



Appendix A: Concept Plans

RAVENSWOOD STUDENT LEARNING CENTRE

13 JULY 2018

FOR PLANNER REPORT

LOCATION PLAN



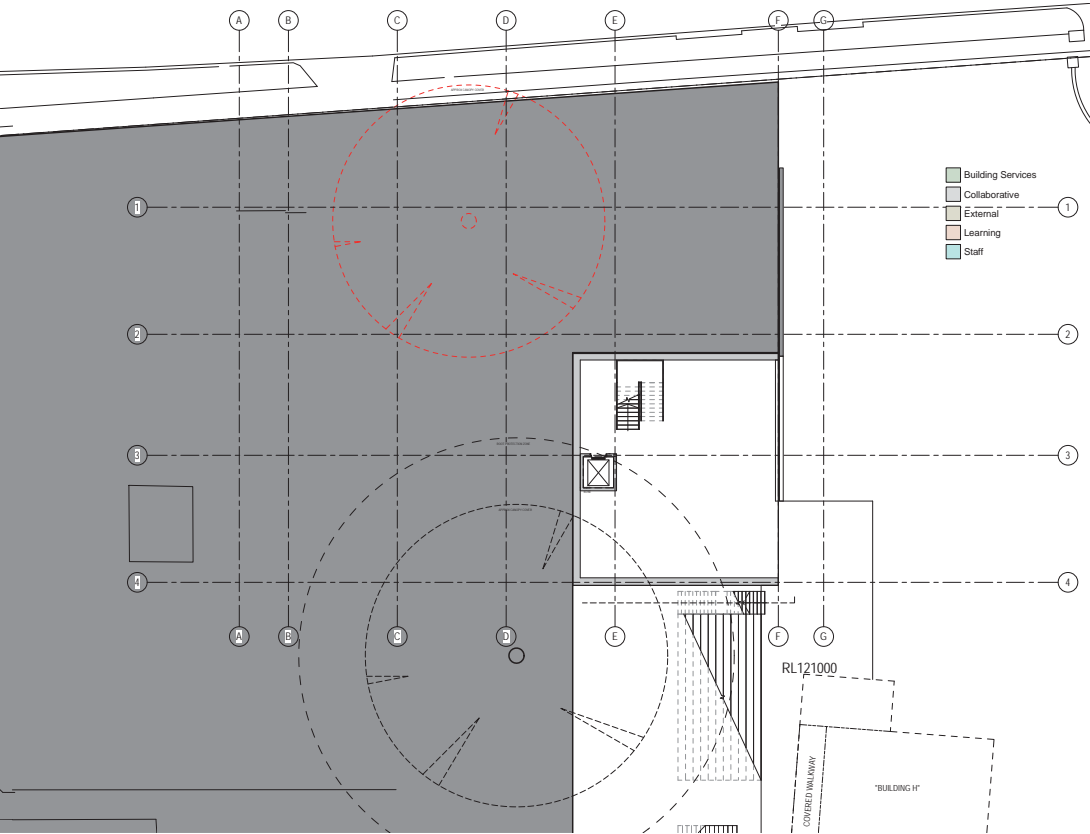
SITE CONTEXT PLAN



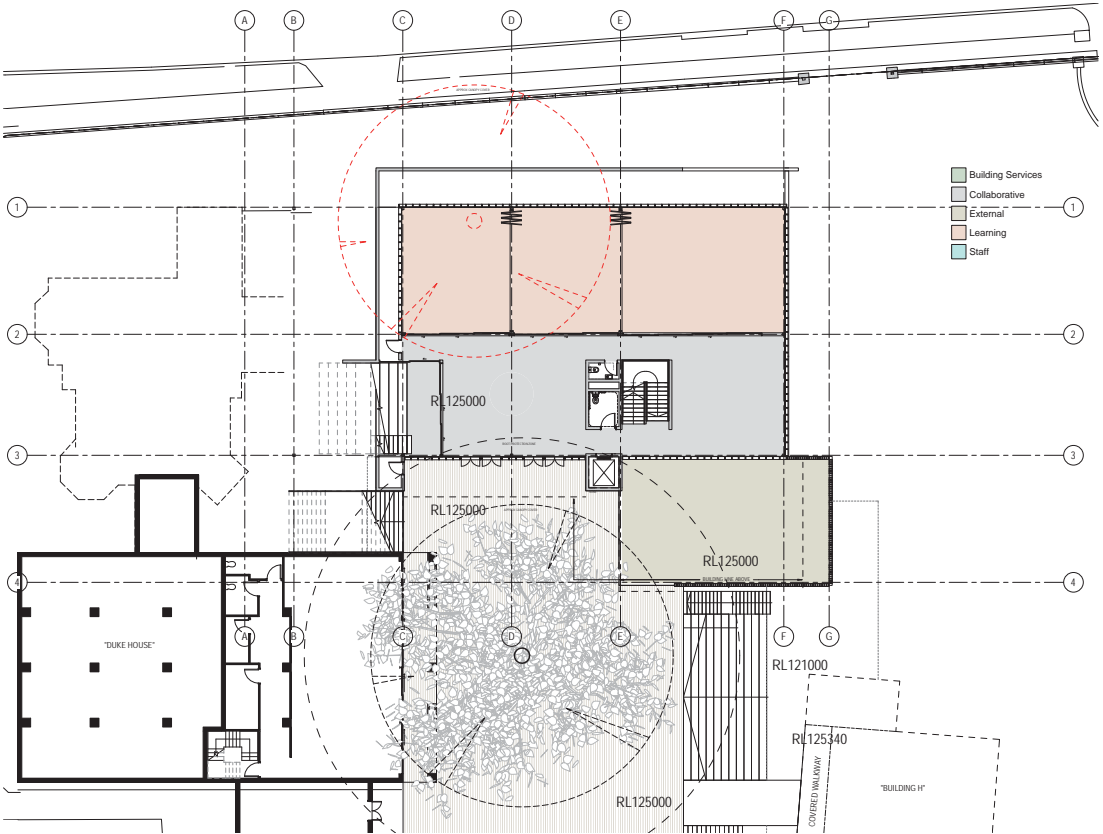
DEVELOPMENT AREA 1: STUDENT LEARNING CENTRE

FLOOR PLANS (INDICATIVE LAYOUT ONLY)

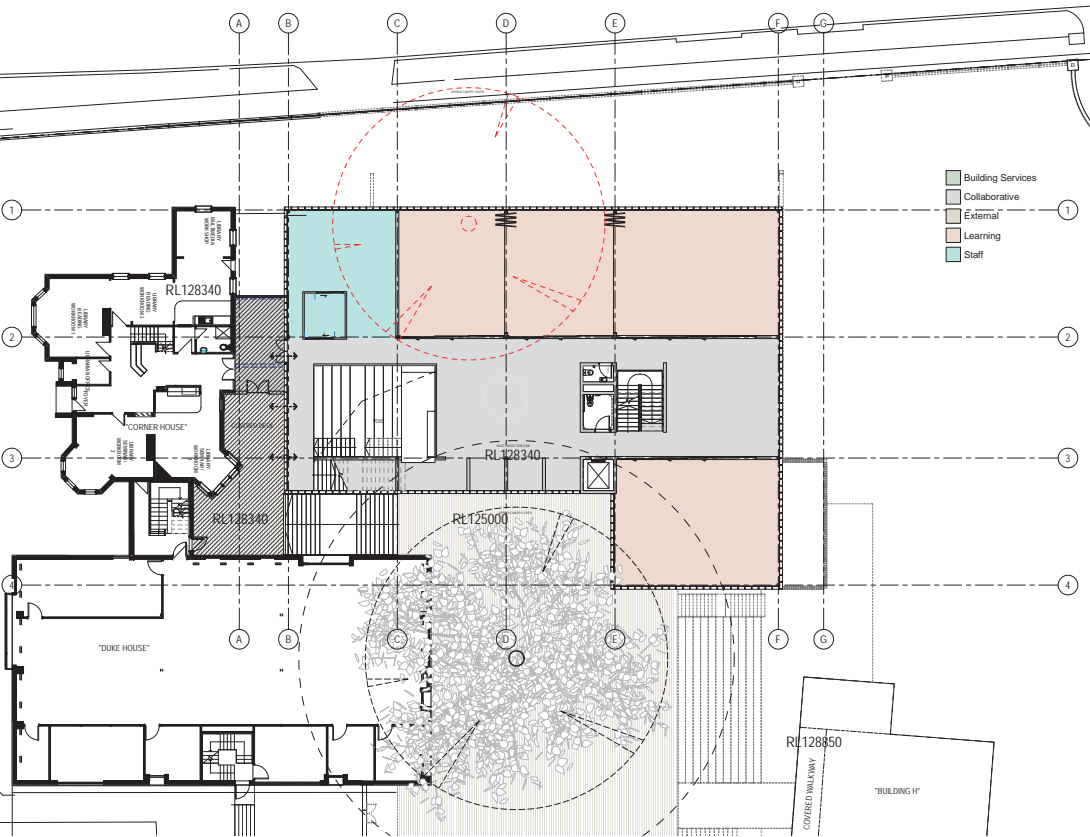
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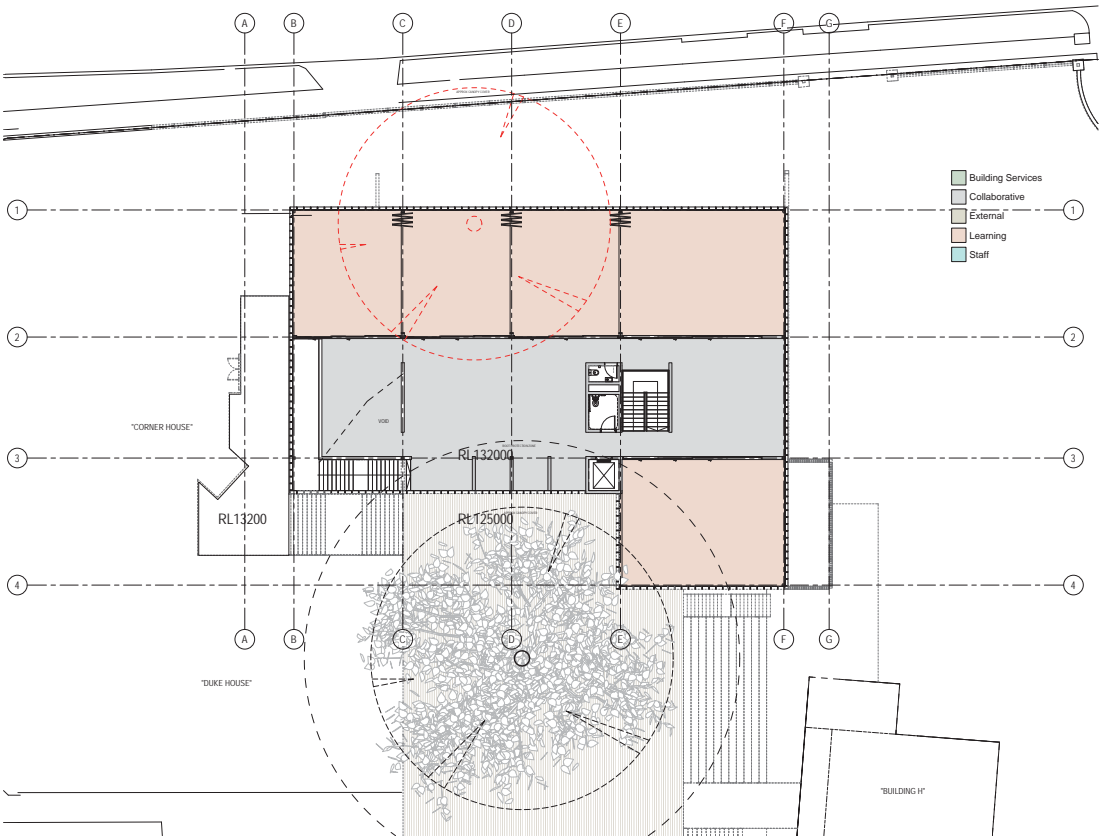
LEVEL 0



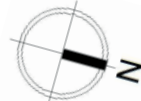
LEVEL 1



LEVEL 2



LEVEL 3



NTS

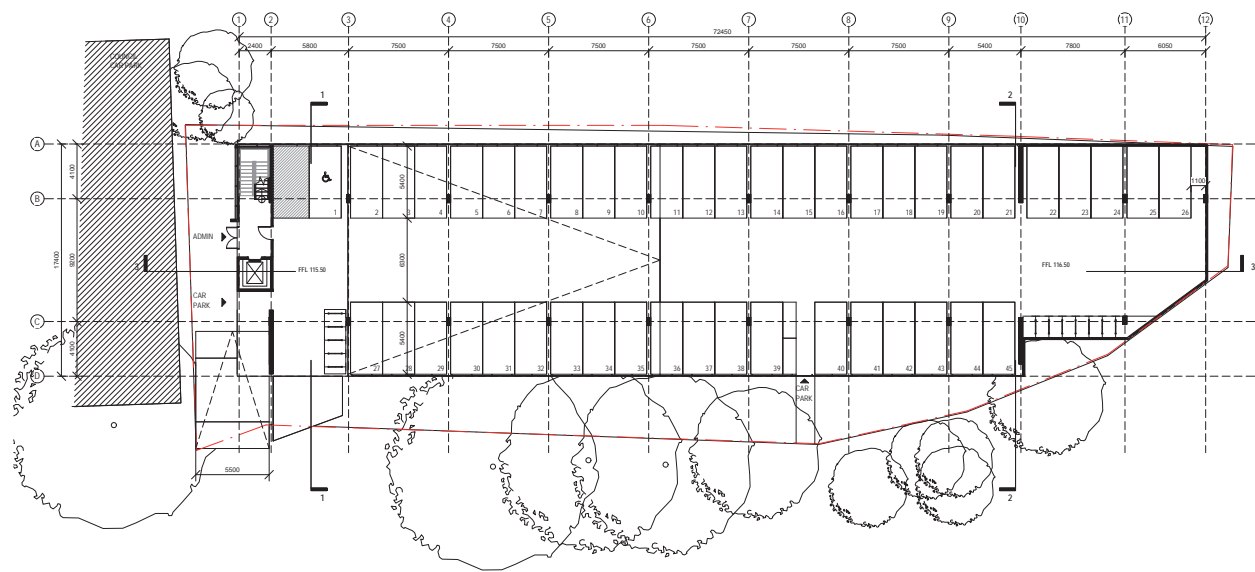
DEVELOPMENT AREA 1: STUDENT LEARNING CENTRE

ARTIST IMPRESSION: EAST ELEVATION LOOKING WEST

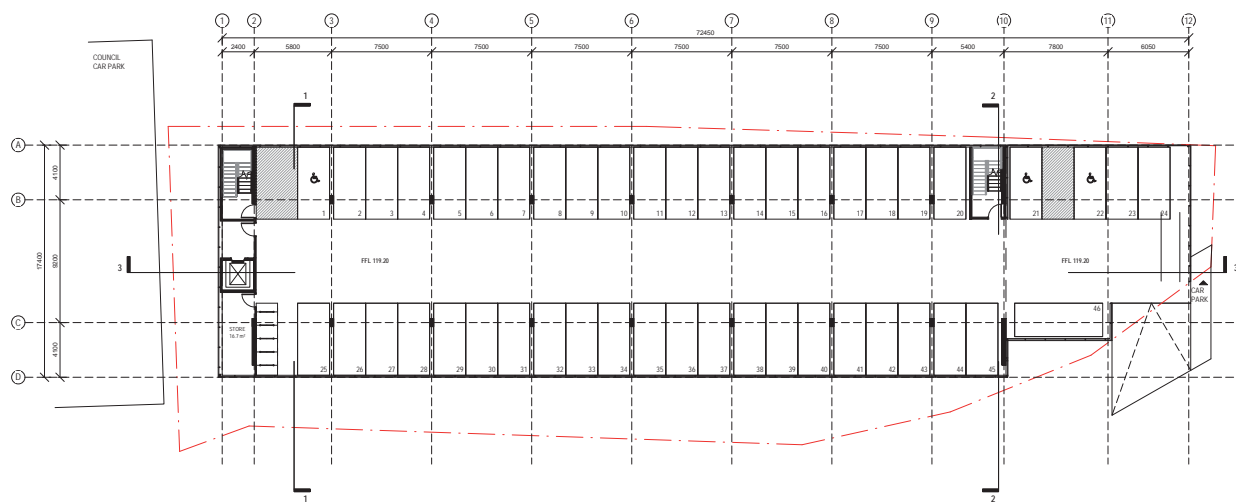


DEVELOPMENT AREA 2: CARPARK AND ADMINISTRATION BUILDING

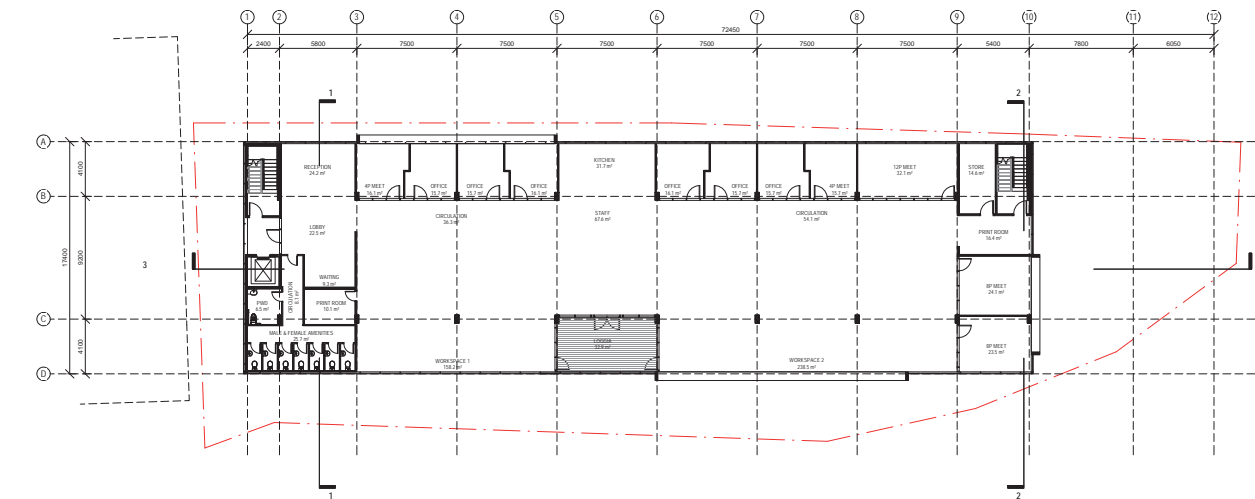
FLOOR PLANS (INDICATIVE PROPOSAL)



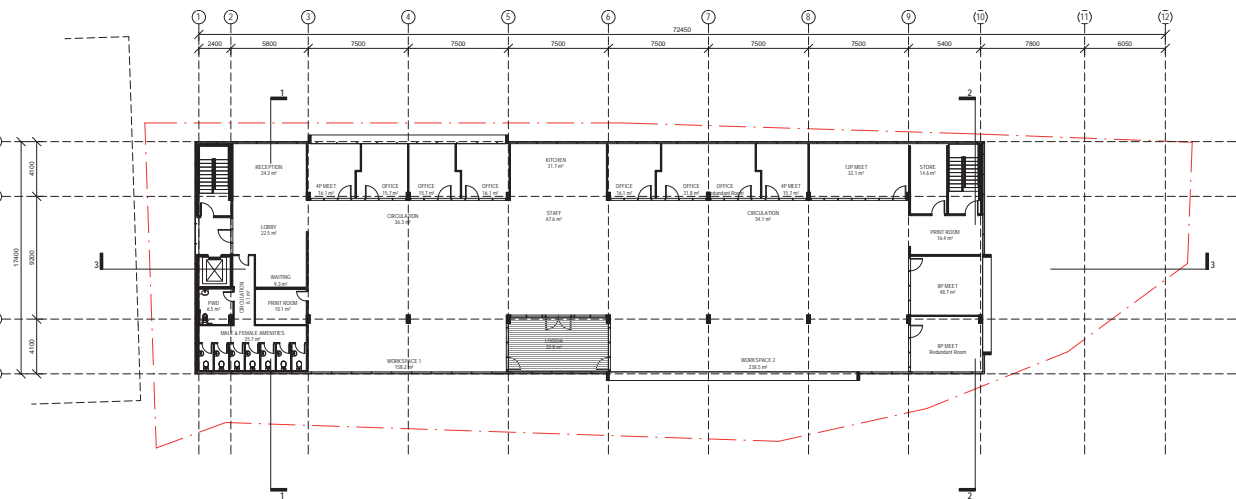
LEVEL 0



LEVEL 1



LEVEL 2



LEVEL 3



NTS

DEVELOPMENT AREA 2: CARPARK AND ADMINISTRATION BUILDING

PERSPECTIVE: SOUTHWEST (HENRY STREET) VIEW TOWARDS PARKING ENTRY

