

Our Ref: 17074

18 December 2017

Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNally,

CONCEPT AND DETAILED DEVELOPMENT APPLICATION FOR LORETO NORMANHURST REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

We are writing on behalf of Loreto Normanhurst, the proponents for a Concept and Detailed Development Application for Loreto Normanhurst at 91-93 Pennant Hills Road, Normanhurst.

As the proposed development comprises additions to an existing school and has a Capital Investment Value (CIV) in excess of \$20 million it is State Significant Development (SSD) for the purposes of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

In accordance with Clause 3 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) the purpose of this letter is therefore to request the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the proposed development.

To support the request for the SEARs this letter provides an overview of the proposed development, sets out the statutory context, and identifies the key likely environmental and planning issues associated with the proposal.

1.0 Background and History of the Site

Established in Normanhurst in 1897, Loreto Normanhurst is an independent, Catholic day and boarding school for girls from Years 5 to 12. The School is administered by a School Board and the Institute of the Blessed Virgin Mary (Loreto Sisters). The Normanhurst site contains the junior and senior school campuses.

Loreto Normanhurst is in need of redevelopment to upgrade and provide quality boarding facilities, to improve access arrangements to bring them into line with current accessibility standards, and to improve movement and spatial relationships whilst focusing on the future growth of the school ensuring that it remains appropriate into the future. The staged redevelopment will increase the student population from 1150 to 2000 students over 30 years, with additional Kindergarten to year 4 students, it will develop a new early learning centre and upgrade and replace school buildings, boarding and sporting facilities. It is anticipated that the development will be delivered in separate stages, over a period of up to 30 years.

In addition to seeking approval for building envelopes and a maximum student cap of 2000 students as part of the Concept SSD for the Masterplan, the DA will also seek consent for the first stage of the detailed works for a new boarding facility, an upgrade of the Mary Ward Wing building, and a new early learning centre.

2.0 The Site

2.1 Site Location and Description

Loreto Normanhurst is located within the suburb of Normanhurst on Sydney's Upper North Shore approximately 3km south of Hornsby and 25km north of Sydney CBD. The school is located in the local government area of Hornsby Shire Council.

The School is located between Pennant Hills Road, Osborn Road and Mount Pleasant Avenue and is surrounded by a mix of low residential development. The site is located approximately 450m south of Normanhurst shops and train station.

An aerial photo of the site is provided at **Figure 1**.

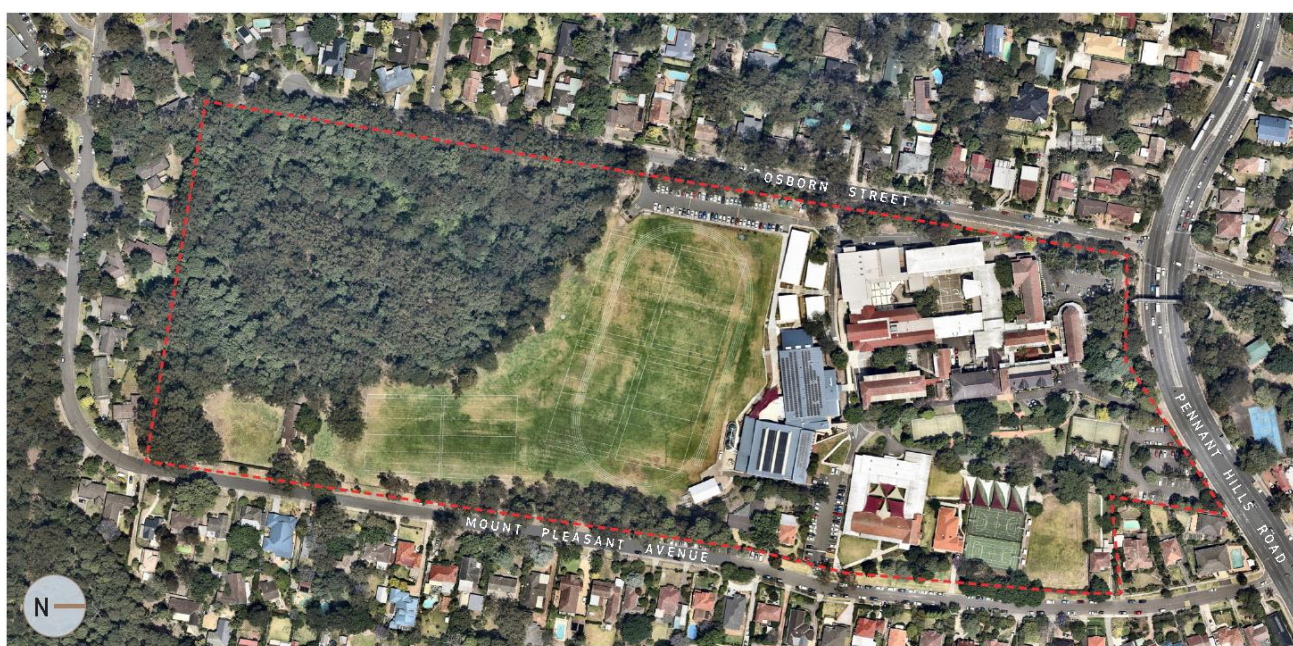


Figure 1 - Aerial photo

Source: Nearmap and AJ+C

The School campus is legally described as Lot 16 in DP 6612, Lot 1 in DP 34834, Lot 1 in DP114580, Lot 3 in DP 1217496, Lot C in DP36627, Lot 1 in DP 809066, Lots 20-23 and 25-36 in DP 6612 (respectively) and has an area of approximately 13.5 hectares. The land is owned by the Trustees of the Loreto Property Association. The site is zoned R2 Low Density Residential under *Hornsby Local Environmental Plan 2013* (LEP 2013).

The Loreto Convent group, grounds, gates and cemetery are listed as a heritage item in LEP 2013. The Loreto Convent (the original section and gate) and Loreto Convent Cemetery are also classified by the National Trust of Australia (NSW).

The School slopes down from Pennant Hills Road in the north to the south, and comprises a series of existing buildings that range in height and age in the northern part of the site. The existing school oval, playing fields, bushland and cemetery are located towards the southern end of the site.

The bushland also contains an area classified as Blue Gum High Forest and endangered ecological community under the Environmental Protection and Biodiversity Conservation Act 1999 and NSW Threatened Species Act 1995. The site contains bush fire prone land.

The site is accessible via six driveways one from Mount Pleasant Avenue, one from Pennant Hills Road and four from Osborn Road. The main pedestrian entrances are from Pennant Hills Road and Osborn Road. An oblique aerial view of the site, showing the topography and scale of existing buildings, is provided at **Figure 2**.

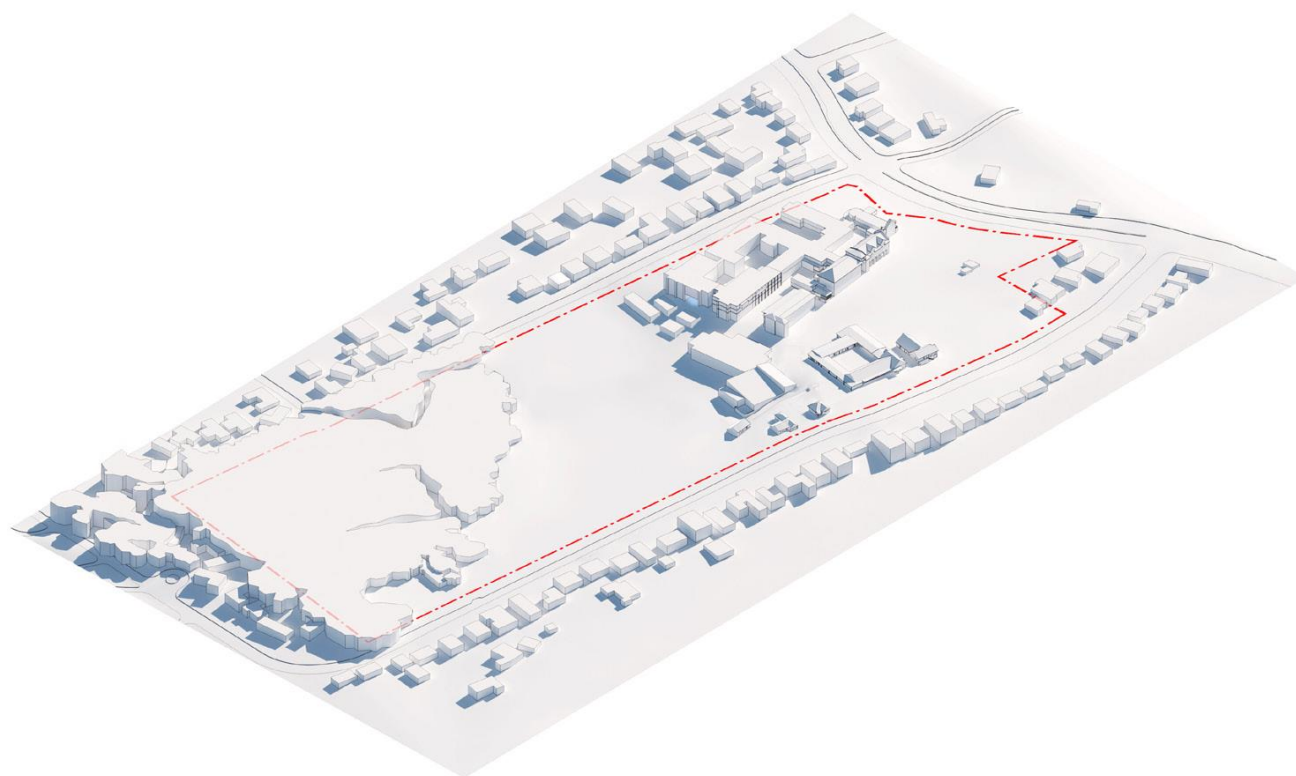


Figure 2 - Oblique aerial view

Source: AJ+C

3.0 Description of the Proposed Development



An overview of the proposed development is provided below. Preliminary concept plans prepared by AJ+C are attached. The majority of the works are concentrated in the northern part of the school.

Concept approval will be sought for the 2047 masterplan including increasing the student cap to 2000 students with detailed consent to be sought for works for the boarding house, adaptive reuse of the existing Mary Ward building, the early learning centre. The existing 2017 masterplan and the proposed 2047 Masterplan are shown in **Table 1**.

The Concept Masterplan (refer to **Figure 3**) will seek approval for the following:

- Building envelopes;
- Reconfiguration and renovation and of existing school buildings and facilities;
- Open recreation space and landscape concept;
- Increase of student number cap by 850 students from 1150 to 2000 students;
- Pedestrian and circulation arrangements, and
- Associated car parking provision.

Table 1 - Loreto Normanhurst Masterplans

Existing 2017 Site Plan	Proposed 2047 Masterplan
	 <p>Legend:</p> <ul style="list-style-type: none"> EXISTING BUILDING EXISTING ROAD SPORTS FIELD SPORTS FIELD EXISTING BUILDING EXISTING ROAD <p>Sites and Descriptions:</p> <ul style="list-style-type: none"> SITE A: Boarding, dining, parking, dock, kitchen SITE B: Upgrade Mary Ward building to accommodate either 50 year 12 boarders new lift SITE C: Remove dock to create new courtyard SITE D: Early Learning Centre SITE E: Primary School SITE F: All weather field Under ground car park Facilities management (possible location) SITE G: Mount Pleasant Pavilion Stadium Function centre Facilities management (possible location) or ECO centre (possible location) SITE H: Relocate main reception Relocate staff and administration Increase interface between staff and students SITE I: New three court gym Multi-use hall SITE J: Secondary School expansion SITE K: Reduce roadways within campus Create new paths Create new landscape including new "Garden Plaza" SITE L: Secondary School expansion SITE M: Future development to be determined Under ground car park SITE N: Gonzaga Barry Centre auditorium Amphitheatre ECO centre (possible location) SITE O: Bush chapel Bush recreational facilities SITE P: Upgrade aquatic centre

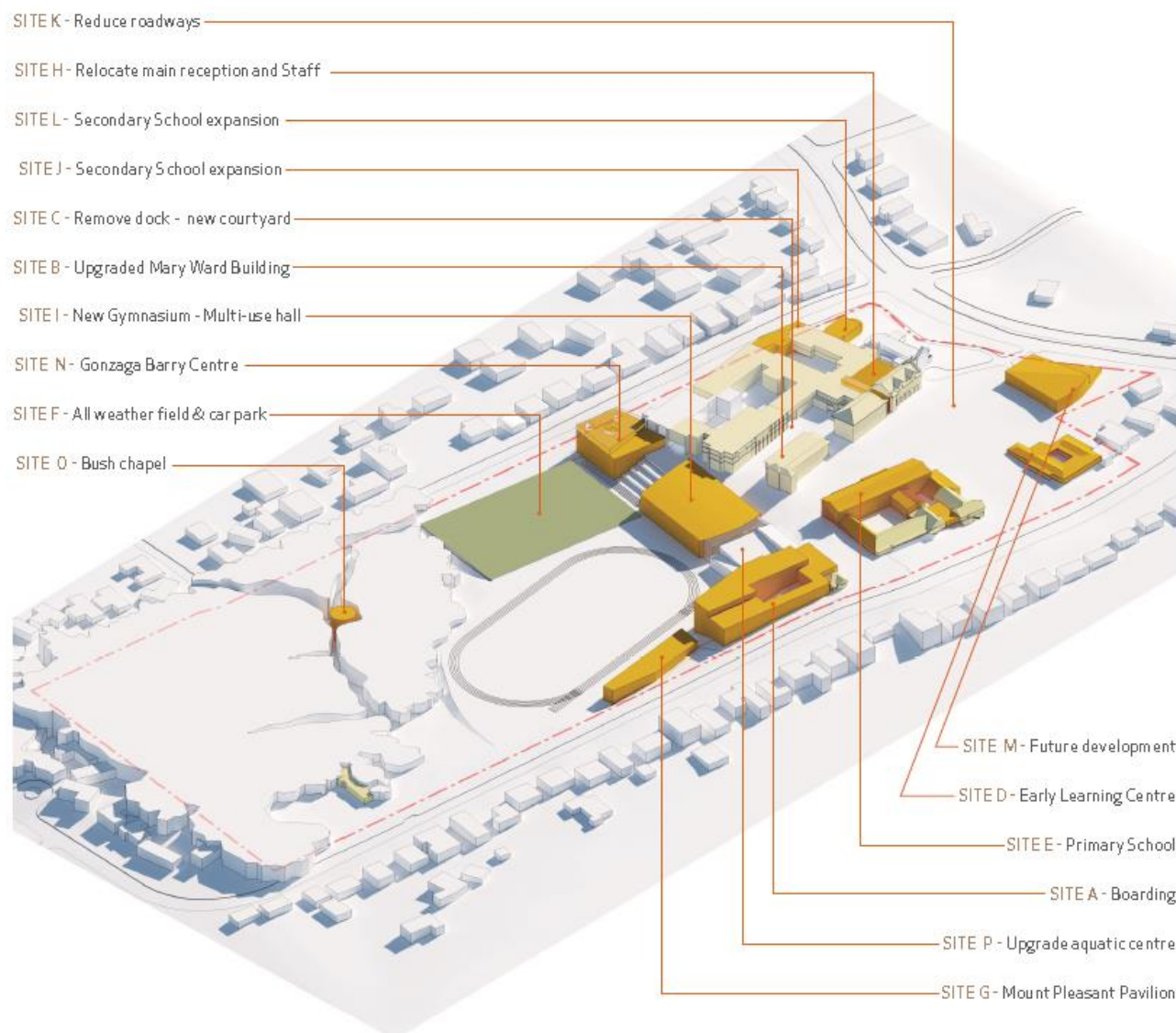


Figure 3 - Proposed 2047 Masterplan

Source: AJ+C

The development application will also seek consent for the first stage of the detailed works for the new boarding facility, and upgrade of the Mary Ward Wing building, the early learning centre, as detailed below:

1. Building A – Construction of a new part two, part three and five storey boarding house, to accommodate 220 boarders and basement carpark within the proposed development envelope;
2. Building B – Reconfiguration and adaptive re-use of the Mary Ward Building (boarding house) to accommodate 50 boarders;
3. Building D - Construction of a new one storey early learning centre for 70 children, and new at grade short term carpark.

Future separate DAs will be lodged for the detailed design and construction of the other stages of the Masterplan.

4.0 Planning context

4.1 Environmental Planning and Assessment Act 1979

The EP&A Act establishes the assessment framework for SSD. Under Section 89D of the EP&A Act the Minister for Planning and Environment is the consent authority for SSD. Section 78A(8A) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the Regulations.

Pursuant to Section 83B of the EP&A Act, a DA may set out the concept proposal for development of the site, including the first stage of detailed works.

4.2 State Environmental Planning Policy (State and Regional Development) 2011

The *State Environmental Planning Policy (State and Regional Development) 2011* identifies development which is declared to be State Significant. Clause 15 of Schedule 1 of the policy provides that the proposed development as described herein is SSD, as follows:

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

As the proposal is for the purposes of alterations and additions to an existing school and has a total estimated CIV of over \$20 million, it is SSD.

4.3 State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017

The *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* aims to make it easier for child-care providers, schools (including private schools), TAFEs and universities to build new facilities and improve existing ones by streamlining the planning process to save time and money and deliver greater consistency across NSW.

Under Schedule 4 of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017, proposals for schools need to address Schools-design quality principles. There are seven principles which provide a guide for the development of schools to ensure that facilities are well-designed, appropriately located, and fit for purpose. The principles aim to ensure that the design of school infrastructure responds appropriately to the character of the area, landscape setting and surrounding built form to ensure that schools and school buildings are an integral part of the community.

Parts 3 and 4 provide provisions relevant to the development of early education and schools which will need to be considered as part of the future DA.

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

State Environmental Planning Policy No. 55 – Remediation of Land aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment.

SEPP 55 will be addressed as part of the EIS.

4.5 Current Zoning and Development Controls

4.5.1 Hornsby Local Environmental Plan 2013

Hornsby Local Environmental Plan 2013 (LEP 2013) is the applicable local planning instrument for the proposed development and establishes the relevant land uses and other development standards for the site. Specifically:

- The proposed School redevelopment is permissible in the R2 Low Density Residential zone. The proposal is consistent with the zone objectives for each of the land use zones.
- The whole of the site has a height limit of 8.5m.
- There is no maximum FSR applying to the site.
- The Loreto Convent group, grounds, gates and cemetery are listed as local heritage item 607 and Archaeological site A60 in the LEP2013.
- The bushland located in the southern portion of the site is identified on the Biodiversity map in the LEP 2013.

4.5.2 Hornsby Development Control Plan 2013

Hornsby Development Control Plan 2013 (DCP 2013) contains detailed built form and other development controls. Whilst there are no objectives or other controls in DCP 2013 specifically relate to schools, the proposal will have regard to the requirements applying to permitted development in the R2 zone.

Whilst it is proposed that the project will have regard to the key DCP controls outlined above, it is noted that DCP 2013 (along with any other DCP) will carry no weight in the assessment due to the status of the application as a SSD DA.

5.0 Overview of likely environmental and planning issues

The impacts and risks associated with the proposal are summarised below and will be addressed in detail in the EIS. Overall, the risks from the proposal are considered to be low, as development is concentrated within the existing School grounds and will not generate any environmental impacts that cannot be managed appropriately.

5.1 Urban Design and Built Form

The EIS will address the height, density, bulk and scale of the proposed development within the context of the locality. The application will demonstrate how the proposal integrates with the local environment, and how the form, layout and siting of the buildings achieve appropriate design and amenity outcomes for users of the site, and residents of the adjoining properties.

The EIS will include a comprehensive response in relation to:

- The proposed buildings, and will assess compatibility with the scale of existing buildings on the site and surrounding residential buildings.
- The proposed development in terms of scale and density and will assess consistency with the character of the area and the heritage character of the site.
- The development in terms of materials and finishes and response to the materials of the School's existing buildings.

5.2 Environmental Amenity

The EIS will assess any amenity impacts on adjoining properties including acoustic impacts, visual privacy and overshadowing and how the proposal intends on mitigating impacts where they do occur.

5.3 Heritage

The School site is identified as a local heritage item under LEP 2013. Whilst the proposed works are not expected to impact directly on the Loreto Convent group, grounds, gates and cemetery, it will involve development in close proximity to these identified items. As such the EIS will be accompanied by a Heritage Impact Statement to assess the impacts of the proposal on the site's heritage significance.

5.4 Traffic and Parking

As there will be an increase in student and staff numbers on the site, there will be an increase in traffic volumes and parking demand in the locality in addition to changes to the drop-off/pick-up arrangement and vehicular access/egress to the site.

The traffic and parking implications of development will be considered, and a traffic and parking assessment will be prepared by a specialist traffic consultant and submitted with the EIS. The report will assess the access arrangements and the design and operation of the proposed parking.

5.5 Tree Removal and Landscaping

The proposal will require the removal of selected trees. The future application will need to assess the health and significance and potential impacts on trees within and adjoining the site. The DA will also need to outline the landscape strategy for the site and detailed landscape works to support the new buildings.

5.6 Biodiversity, Flora and Fauna

The bushland in the southern part of the site contains an area classified as Blue Gum High Forest and endangered ecological community. Ecological impacts will be assessed by a qualified consultant and the assessment will be provided with the submission of the EIS.

5.7 Geotechnical / Site Contamination

Geotechnical and contamination reports will be prepared to assess the site's subsurface conditions and to determine the suitability of the site for the proposed development. The report will detail any engineering measures required for the construction of the proposed development.

5.8 Stormwater

A stormwater strategy for the site and detailed stormwater plans for the new buildings will be provided with the EIS.

5.9 Bushfire

The land is bush fire prone land as shown in Council's records. A buffer zone is identified as being 100m from Category 1 (e.g. forest, woodlands, heath, wetlands etc.). A bushfire statement will accompany the EIS to address this matter.

5.10 BCA

A BCA Report will be submitted as part of the EIS to confirm that the proposal will be capable of complying with the relevant provisions of the BCA.

5.11 Accessibility

An Access Statement will be prepared by a qualified accessibility consultant to ensure the proposed development will be capable of providing universal access to all areas in accordance with relevant Australian Standards.

5.12 Waste Management

A Waste Management Plan will be submitted with the EIS to outline the management and monitoring of the waste generated as part of the school. The Waste Management Plan will also outline storage, collection points and method for removal.

5.13 Services Plan and Details

The existing site services will be augmented to service the proposed development; further information will be provided as part of the EIS.

5.14 Construction Impacts

The EIS will address and consider the following construction impacts of the detailed development:

- Noise and vibration.
- Soil, groundwater and geotechnical attributes of the site and environs.
- Access, parking and traffic.
- Stormwater and air-borne pollutant control.

6.0 Consultation

In preparing the EIS, a Consultation and Community Engagement Strategy will be developed to detail the consultation activities undertaken in preparation of the Masterplan. It is anticipated that the following key stakeholders and government agencies will be consulted with:

- Existing residents in the surrounding area.
- Roads and Maritime Services.
- Transport for NSW.
- Office of Environment and Heritage.
- Hornsby Shire Council.

7.0 Conclusion

We trust that the information detailed in this letter is sufficient to enable the Secretary to issue SEARs for the preparation of an EIS. Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962

Yours sincerely,



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Enc:

- Concept Architectural Drawings prepared by AJ+C