

22 May 2019

218945

Mr Jim Betts  
Secretary  
NSW Department of Planning & Environment  
320 Pitt Street  
SYDNEY NSW 2000

Dear Mr Betts,

## **Request for Secretary's Environmental Assessment Requirements Fort Street Public School Expansion – State Significant Development**

We are writing on behalf of School Infrastructure NSW (SINSW), the applicant for a potential future expansion and redevelopment of Fort Street Public School at Upper Fort Street, Millers Point.

The expansion of Fort Street Public School is critical to ensuring long-term primary school capacity within the catchment, and will result in significantly improved teaching and learning facilities and open space. Further, the project will facilitate the refurbishment of several important heritage items, including the Fort Street Public School building itself, the Bureau of Meteorology Building, and the Messenger's Cottage.

As the proposal is for alterations and additions to an existing school with a capital investment value (CIV) of greater than \$20 million (see cost estimate at **Attachment A**) it is State Significant Development (SSD) for the purposes of the *Environmental Planning and Assessment Act 1979* (the Act).

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.

This letter is accompanied by the following:

- Cost Estimate prepared by MBM Quantity Surveyors (**Attachment A**);
- Preliminary Design Report prepared by FJMT (**Attachment B**);
- Biodiversity Assessment Waiver Request prepared by Ethos Urban (**Attachment C**); and
- Preliminary Arboricultural Assessment prepared by Birds Tree Consultancy (**Attachment D**).

## **1.0 The site**

The site is located in the north of the Sydney CBD, south west of the southern landing of the Sydney Harbour Bridge and adjacent to the Sydney Observatory. The site is surrounded on all sides by the Cahill Expressway as it becomes the on-ramp to the Bradfield Highway. The site is connected to the surrounding areas by one road bridge and two pedestrian bridges.

The site is made up of nine (9) lots and has an area of 6,192m<sup>2</sup>, as outlined below in **Table 1**. A site context map is provided at **Figure 1** and an aerial photograph of the site is shown at **Figure 2**. Photographs of the existing site are provided at **Figure 3 - Figure 6** below.

**Table 1 Site Area**

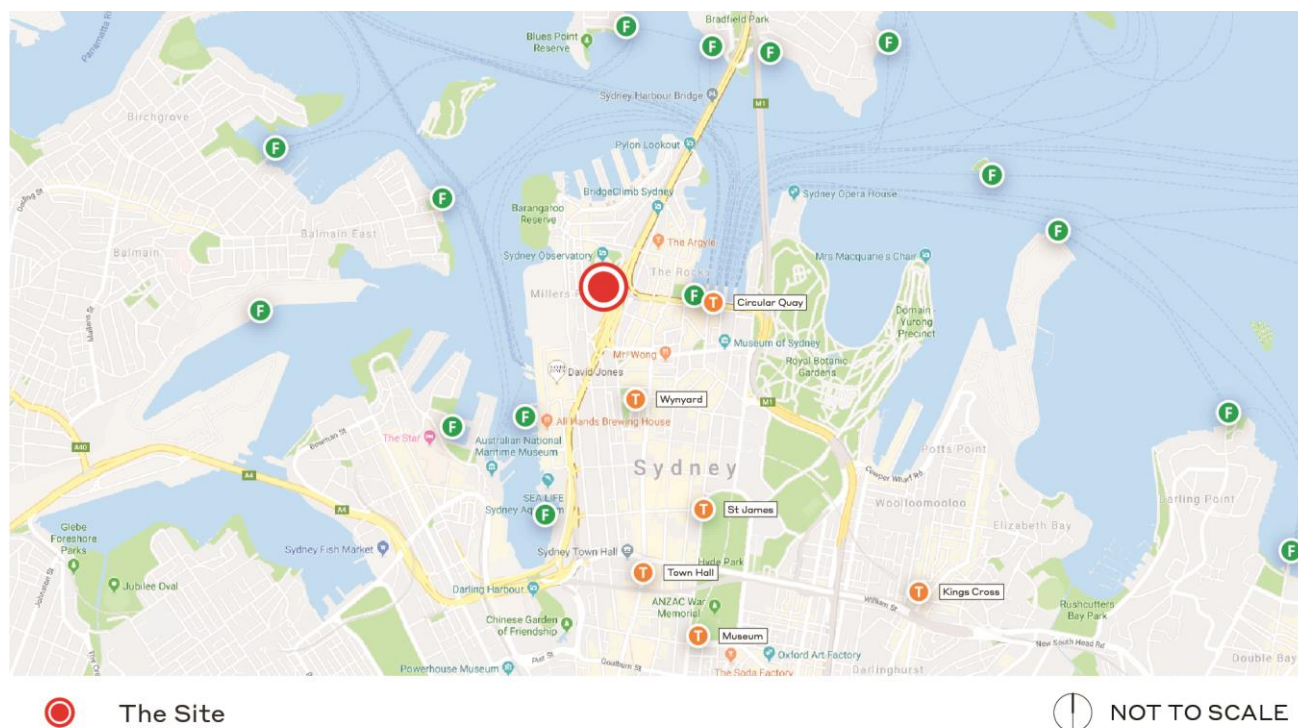
Lot	Area (m <sup>2</sup> )
Lot 106 DP 748340	342.3
Lot 107 DP 748340	152.6
Lot 108 DP 748340	876.2
Lot 2 DP 732592	2,280
Lot 3 DP 732592	386.7
Lot 4 DP 732592	260.8
Lot 9 DP 732592	155.6
Lot 2 DP 244444	135
Lot 5 DP 258013	1,603
<b>Total</b>	<b>6,192.2</b>

The site falls under the *Sydney Local Environmental Plan 2012* (SLEP 2012), however is located outside of Central Sydney (as designated by SLEP 2012). It is not affected by the Sydney Cove Redevelopment Authority (SCRA) Scheme.

The site is zoned B8 Metropolitan Centre. A broad range of uses, including educational establishments, are permitted with consent in the zone. The site is not affected by any height or floor space ratio development standards.

The whole of the site is included within the State significant Millers Point / Dawes Point Heritage Conservation Area (C35). Most of the site is also listed as a locally significant heritage item within Schedule 5 of SLEP 2012, comprising the following items:

- 1936 – Bureau of Meteorology including interior;
- 1937 – Messenger's Cottage for Sydney Observatory including interior; and
- 1938 – Fort Street Primary School site including buildings and their interiors, fig trees and grounds.



**Figure 1** Site context map

Source: Google Maps + Ethos Urban



**Figure 2** Site aerial photograph

Source: Nearmap + Ethos Urban





**Figure 3** Messenger's cottage (fore) and Bureau of Meteorology building (behind)



**Figure 4** Environmental Education Centre Building

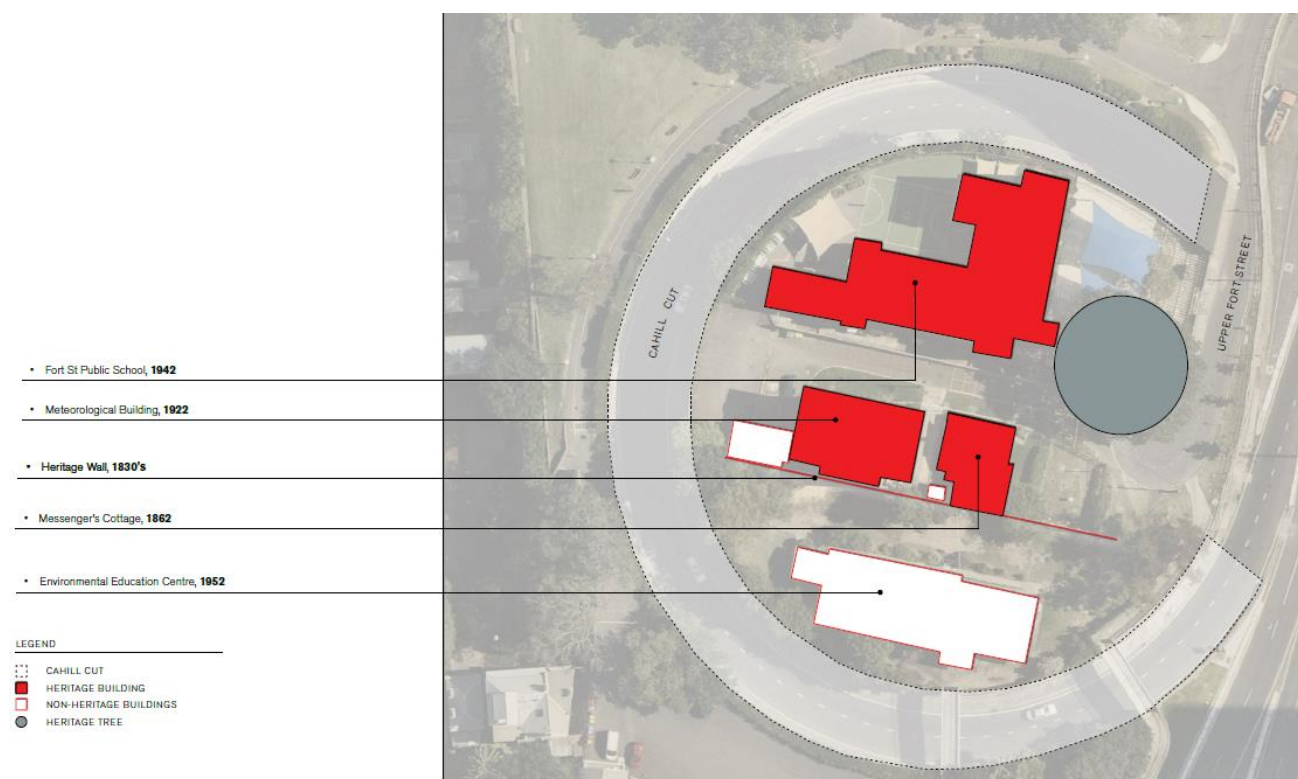


**Figure 5** Fort Street School building and outdoor play area



**Figure 6** View of the Cahill cut (facing west)

**Figure 7** shows the location of the various buildings on the site.



**Figure 7** Location of existing buildings

Source: FJMT

## 2.0 Description of proposed development

The anticipated scope of the SSD application is as follows:

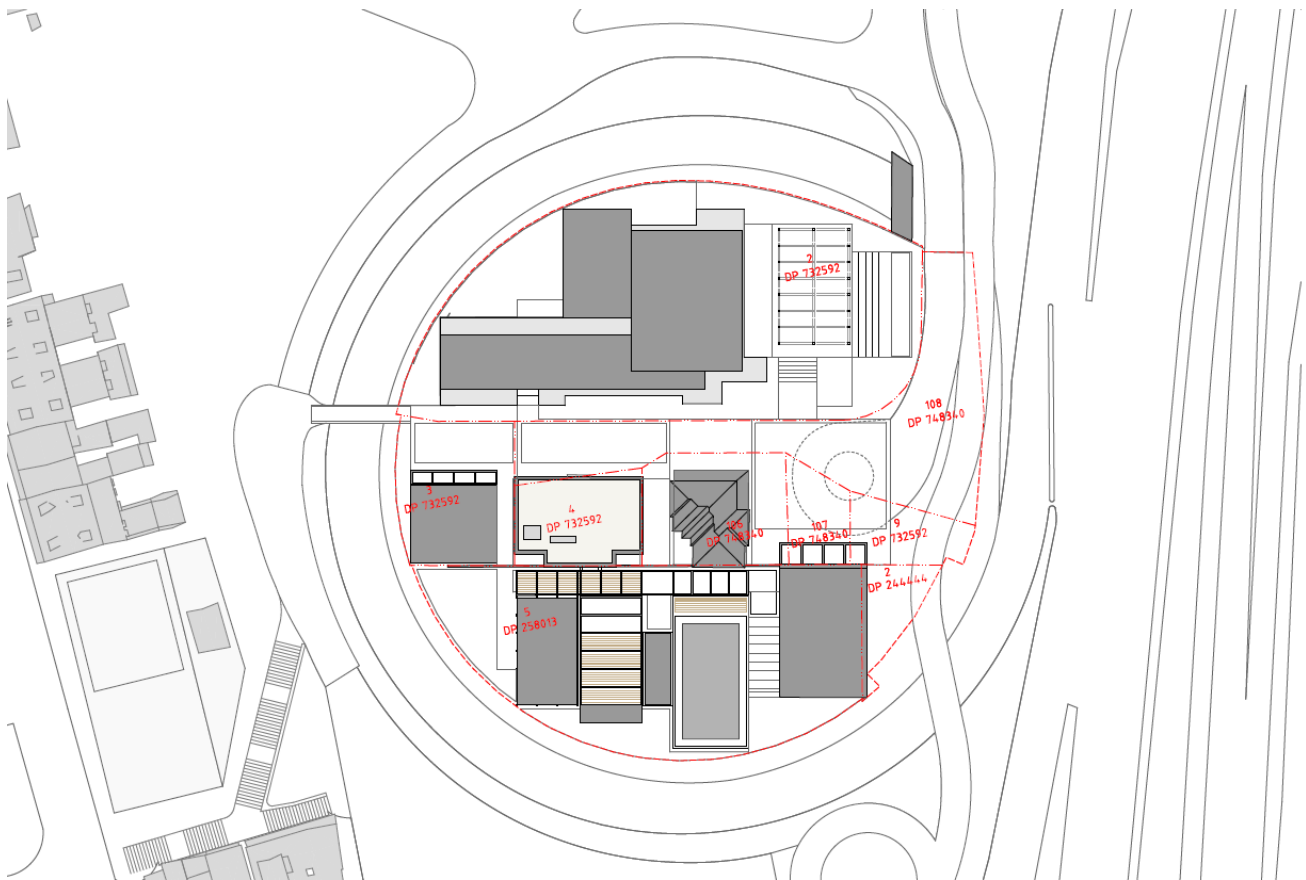
- **Fort Street Public School Building (3 storeys)**
  - Demolition of existing toilet block
  - Expansion of building, including addition of new roof structure, to accommodate new and refurbished classrooms
  - Internal refurbishment and fit-out of existing building
- **Bureau of Meteorology Building (3 storeys)**
  - Refurbishment, fit out and use as school building
- **Messenger's Cottage (1 storey)**
  - Continuation of existing use as school administration building
- **New buildings (1-3 storeys)**
  - Construction of a series of new buildings to the south and west of the Bureau of Meteorology Building and Messenger's Cottage, including:
    - a new Environmental Education Centre building
    - a new school building, incorporating administration and staff facilities, classrooms, and a rooftop recreational area
    - a new canteen building
- **Outdoor areas**
  - General upgrades and works to the outdoor areas to formalise and link open spaces between buildings
  - Retention of the large Moreton Bay Fig on the eastern side of the site
  - Realignment of access road to create new area for turnaround and kiss and ride, and to align with the proposed new Sydney Harbour Bridge cycleway (not part of this application), which would double as a forecourt for recreational use during school hours
- **Land use**
  - Use of all buildings for the purpose of a school
  - Increase in student capacity from 219 (existing) to 600 (proposed core capacity)
  - Potential community use of school facilities

Draft Architectural Drawings prepared by FJMT have been provided for information purposes (see **Attachment B**).

The scheme presented in this SEARs request allows a modified Core 21 design to be accommodated within the existing boundaries of the school. The scheme proposes new low-scale buildings in the southern portion of the site to interact appropriately with the existing Bureau of Meteorology Building and Messenger's Cottage. A potential link-bridge connection between the Bureau of Meteorology Building and the new buildings to the south is proposed.

The existing school building will be sensitively expanded, with additions to the rear and the east and a new level added within the existing hall space. The top level will extend above the existing height of the building but will be pulled back from the existing facades.

**Figure 8** below shows an indicative site plan for the scheme.



**Figure 8**      **Site plan with lot boundaries**  
Source: *FJMT*

## 2.1 Cost of works

A cost estimate has been prepared by MBM Quantity Surveyors, and is included at **Attachment A**.

It is estimated that the Capital Investment Value of the proposed development will be over \$20 million.



## 3.0 Planning context

### 3.1 Environmental Planning and Assessment Act 1979

The Act establishes the assessment framework for SSD. Under Section 4.38 of the Act the Minister for Planning is the consent authority for SSD. Section 4.12(8) requires that a development application for SSD is to be accompanied by an Environmental Impact Statement (EIS) in the form prescribed by the Regulations.

### 3.2 Eastern City District Plan

The Eastern City District Plan sets out the strategic direction for the District, and reflects the priorities outlined in *A Metropolis of Three Cities*. Several planning priorities in the District Plan are relevant to the proposed development:

- **Planning Priority E3: Providing services and social infrastructure to meet people's changing needs:** As noted in the District Plan, "the NSW Department of Education estimates that an extra 42,850 students will need to be accommodated in government and non-government schools in the District by 2036". The proposed development will assist in meeting this demand by providing additional primary school places to cater to growing demand within the catchment. The proposed development will also assist in meeting social infrastructure requirements by potentially providing shared facilities that can be used by the local community outside of school hours.
- **Planning Priority E4: Fostering healthy, creative, culturally rich and socially connected communities:** The proposed development will assist in community-building efforts by expanding a key social connector that will provide opportunities for people to connect with each other. Further, as noted above, the school will potentially provide shared facilities that will allow the community to congregate and connect.
- **Planning Priority E5: Providing housing supply, choice and affordability, with access to jobs, services and public transport:** Although the proposed development does not provide additional housing, it does provide additional school places, which will assist in allowing more families in the catchment to access a school within 30 minutes of their home.
- **Planning Priority E6: Creating and renewing great places and local centres, and respecting the District's heritage:** The proposed development will sensitively retain and refurbish the existing heritage buildings on the site, increasing their fit-for-purpose while ensuring that their lifespan is extended. The proposed built form also responds to the important heritage context of Millers Point and the surrounding area.
- **Planning Priority E16: Protecting and enhancing scenic and cultural landscapes:** The proposed development has been designed to respond to the important scenic landscape catchment of Millers Point and Observatory Hill. A Visual Impact Assessment will be prepared as part of the EIS, which will assess how the proposed development integrates with the view catchment of the area.

### 3.3 State Environmental Planning Policy (State and Regional Development) 2011

*State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) identifies development types that are of State significance, or infrastructure types that are of State or critical significance. Clause 15 of Schedule 1 of the policy provides that the proposed development is SSD, as follows (our emphasis):

15 *Educational establishments*

- (1) *Development for the purpose of a new school (regardless of the capital investment value).*
- (2) ***Development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school.***
- (3) *Development for the purpose of a tertiary institution (within the meaning of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017), including associated research facilities, that has a capital investment value of more than \$30 million.*

As the proposal is for the purposes of alterations and additions to an existing school and has an estimated Capital Investment Value of over \$20 million, the development can be declared to be State significant development (see cost estimate prepared by MBM Quantity Surveyors at **Attachment A**).



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

Under Schedule 4 of *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (Education SEPP), proposals for schools need to address Schools-design quality principles. There are seven principles that 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.

### 3.5 Sydney Local Environmental Plan 2012

The site is subject to the provisions SLEP 2012. The key provisions of the LEP are discussed below in **Table 2**.

**Table 2 Summary of relevant provisions in SLEP 2012**

Item	Control	Comment
<b>Zone</b>	B8 – Metropolitan Centre	The development is permitted with consent under the B8 Metropolitan Centre zone.
<b>Height of buildings</b>	No maximum height control applies	-
<b>Floor space ratio</b>	No maximum floor space control applies	-
<b>Heritage conservation</b>	<p>The site is located within the State heritage curtilage of the Millers Point/Dawes Point Heritage Conservation Area (C35). The site also includes the following items of local heritage significance:</p> <ul style="list-style-type: none"> <li>• 1936 – Bureau of Meteorology including interior;</li> <li>• 1937 – Messenger's Cottage for Sydney Observatory including interior; and</li> <li>• 1938 – Fort Street Primary School site including buildings and their interiors, fig trees and grounds.</li> </ul>	<p>As the site is part of the State heritage curtilage of the Millers Point/Dawes Point Heritage Conservation Area, the application will be referred to the Office of Environment and Heritage for comment.</p> <p>Consultation with OEH has already occurred and will be ongoing.</p>
<b>Development requiring or authorising preparation of a development control plan</b>	<p>Development consent must not be granted to development on the following land unless a development control plan has been prepared for the land:</p> <p><i>land (other than land in Central Sydney, in Zone B6 Enterprise Corridor or in Zone IN1 General Industrial), if the site area for the development is more than 5,000 square metres or if the development will result in a building with a height greater than 25 metres above ground level (existing),</i></p>	<p>As per cl. 8(2)(i) of the Education SEPP, cl. 7.20 of Sydney LEP 2012 does not apply to development to which the Education SEPP applies.</p> <p>As such, the preparation of a development control plan unnecessary in the circumstances.</p> <p>The requirement for a development control plan is discussed further in <b>Section 4.1.1</b>.</p>

Item	Control	Comment
<b>Design excellence</b>	<p>Development consent must not be granted to the following development unless a competitive design process has been held in relation to the proposed development:</p> <p><i>(a) development in respect of a building that has, or will have, a height above ground level (existing) greater than:</i></p> <p><i>(i) 55 metres on land in Central Sydney, or</i></p> <p><i>(ii) 25 metres on any other land,</i></p> <p><i>(b) development having a capital investment value of more than \$100,000,000,</i></p> <p><i>(c) development in respect of which a development control plan is required to be prepared under clause 7.20,</i></p> <p><i>(d) development for which the applicant has chosen such a process.</i></p>	<p>A competitive design process is not required, as:</p> <ul style="list-style-type: none"> <li>• a development control plan is not required under cl. 7.20;</li> <li>• the development has a CIV of less than \$100 million; and</li> <li>• the development will have a height of less than 25 metres (noting the site is not within Central Sydney).</li> </ul> <p>Design excellence and the requirement for a competitive design process is discussed further in <b>Section 4.1.2</b>.</p>

### 3.6 Other planning policies

In addition to the above, the following policies apply to the site and will need to be considered as part of the SSD application:

- *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55).
- *State Environmental Planning Policy (Infrastructure) 2007* (Infrastructure SEPP).

## 4.0 Overview of likely environmental and planning issues

Based on our preliminary environmental assessment, the following are the key environmental assessment issues that will need to be considered as part of the future DA.

### 4.1.1 Requirement for a development control plan

Under cl. 7.20 of SLEP 2012, a development control plan is required to be prepared if the site area is more than 5,000 m<sup>2</sup>, or if the development will result in a building with a height greater than 25 m above ground level.

It is first noted that under cl. 8(2)(i) of the Education SEPP, cl. 7.20 of SLEP 2012 does not apply to development to which the Education SEPP applies. As the development is for the purpose of a school, cl. 7.20 of SLEP 2012 would not apply, and a development control plan would therefore not be required.

It is further noted that the height of the proposed development is not expected to exceed 25 m. Although the site area exceeds 5,000 m<sup>2</sup>, the consent authority can also determine that a development control plan is not required to be prepared if such a plan would be “unreasonable or unnecessary in the circumstances”.

The preparation of a development control plan is considered to be unreasonable and unnecessary in this instance for the following reasons.

#### 1. The site is highly constrained by a range of factors that, when combined, result in the actual developable area of the site being significantly smaller than 5,000 m<sup>2</sup>.

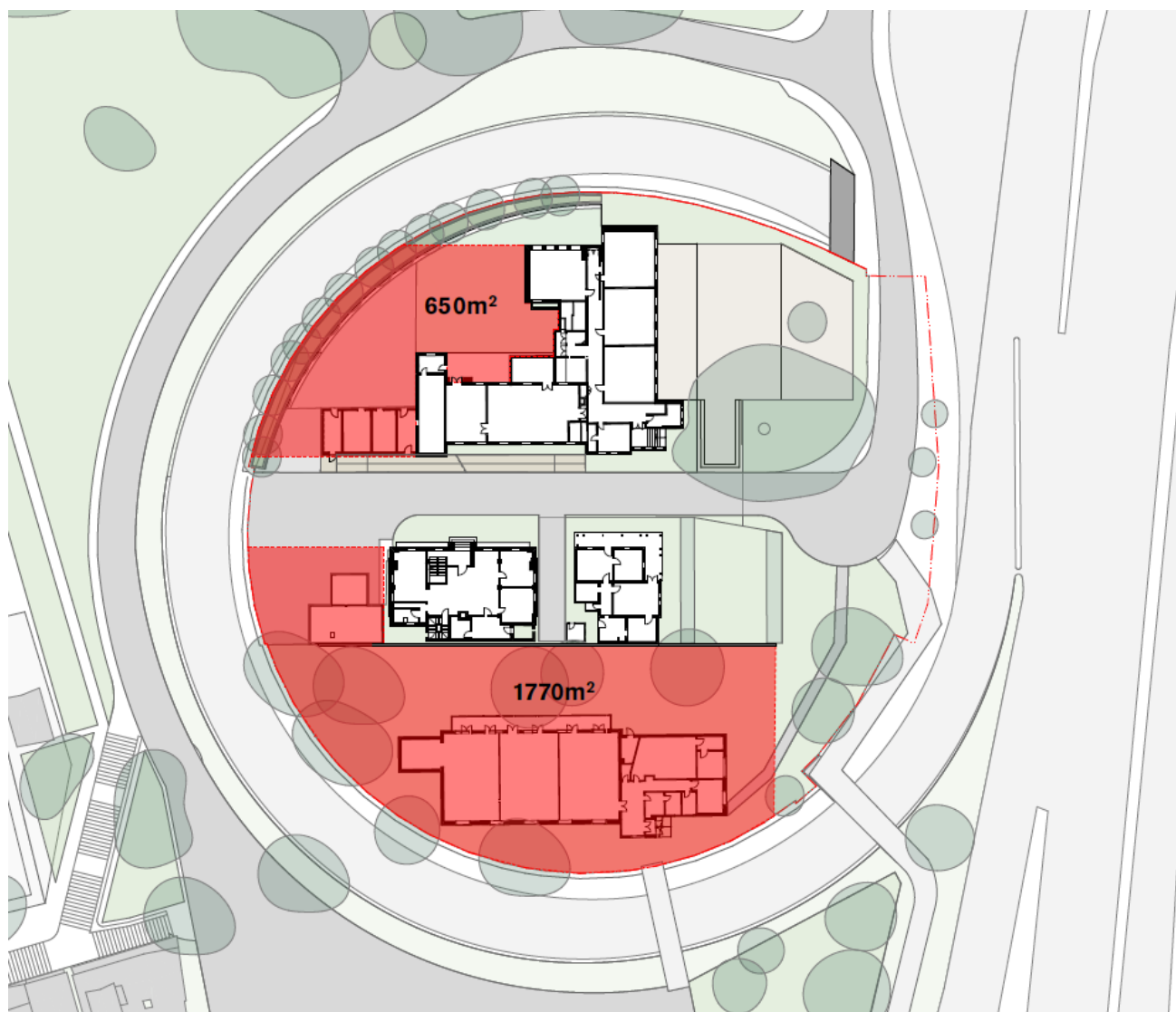
The site contains a number of heritage-listed buildings. These include:

- 1936 – Bureau of Meteorology including interior;
- 1937 – Messenger’s Cottage for Sydney Observatory including interior; and
- 1938 – Fort Street Primary School site including buildings and their interiors, fig trees and grounds.

Although some alterations to these buildings may be possible, they ultimately must remain largely as is with their curtilage protected, with limited scope to add additional school capacity via vertical additions to these buildings.

Feedback from the State Design Review Panel has informed the design response, including both the opportunities and limitations of the site, and in this respect, has recommended that the eastern part of the site remain free of buildings in order to maintain sightlines to the Messenger’s Cottage. The eastern part of the site must also accommodate vehicular access, and therefore cannot accommodate any significant development.

The end result of these constraints is that the actual developable area of the site (i.e. the area of the site that can accommodate new buildings) is closer to 2,240 m<sup>2</sup>. This area is shown in **Figure 9**.



**Figure 9** Developable area of Fort Street Public School site

Source: FJMT

The developable area of the site is therefore significantly below the 5,000 m<sup>2</sup> trigger for a development control plan under SLEP 2012, due to the location of the existing heritage buildings. The implication of this is that the heritage buildings define the extent to which the site can be redeveloped, which is much of the function of a development control plan. For this reason, a development control plan is not necessary and would not add any value.

## **2. The relative scale and impact of new development on the site is limited.**

The existing buildings on the site have a maximum height of three storeys, or approximately 12.1-12.7m. Although located in a prominent position, the new buildings on site are of a similar scale to the existing buildings. In the context of the surrounding city, the overall scale of development is limited. **Figure 10** shows the general scale of the proposed development.





**Figure 10 View of proposed development from Bradfield Highway**

Source: FJMT

One of the key functions of a development control plan in the City of Sydney is to control tower placement in terms of achieving proper separation, setbacks, amenity and urban form. The proposed development does not include any significant towers. Due to the isolated nature of the site, the proposed buildings will not have any significant impacts on surrounding buildings that would normally be associated with the dense, built-up context of the Sydney CBD.

### **3. The specialist use of the site is not well-suited to a staged DA approach.**

SINSW has assembled a specialist design team, consisting of FJMT as lead architect, and SHAC as education architect. The complex spatial requirements of the school have been extensively workshopped and tested as part of the design process, and the buildings have been specially designed to accommodate the final configuration of uses. It is considered that proceeding to a detailed DA is the most appropriate pathway for the Fort Street Public School project, given the complex, specialist requirements of the school.

#### **4.1.2 Design excellence**

A design excellence process is not required under SLEP 2012, as:

- a development control plan is not required;
- the development has a CIV of less than \$100 million; and
- the development will have a height of less than 25 metres (noting the site is not within Central Sydney).

However, SINSW continues to be committed to achieving design excellence through the design review process established by the Office of the Government Architect. The proposal has already been reviewed by the State Design Review Panel on two occasions, with further presentations scheduled as the design progresses.

During the first meeting on 12 March 2019, the Panel provided specific feedback on a range of matters, including the location of built form, visual impact, landscape outcomes, access and amenity. The design team presented a revised scheme to the SDRP on 17 April 2019, which received positive feedback, having addressed many of the key issues raised in the first SDRP review. Further SDRP consultation will continue throughout the SSD assessment process.

SINSW has established an expert team to guide the development through the design development phase, with FJMT as lead architect, and SHAC as education architect. The design team has embarked on a robust master planning process, having prepared myriad options exploring a range of possible built form outcomes. The option presented in this Request is known internally as Option 16.

SINSW will continue to liaise with the Office of the Government Architect, the State Design Review Panel, the City of Sydney and the Heritage Branch to ensure that the proposal achieves true design excellence and addresses the numerous constraints and challenges that are unique to the Fort Street Public School site. The project team will also continue to engage with other key stakeholders during design refinement, including TfNSW, Museum of Applied Sciences and Arts (Sydney Observatory), the National Trust and other stakeholders.

## 4.2 Built form

The site is highly constrained and has limited opportunities to accommodate new buildings. The size and location of any new development on the site, and how the site will interface with the existing heritage buildings, is expected to be a key issue during assessment.

As part of the design development process, a range of options have been explored, which have been guided by a series of design principles. These include:

1. **Place and identity:** Creating a strong identity and address for Fort Street Public School.
2. **Campus heart:** Creating a clear campus centre.
3. **Heritage and archaeology:** Achieving sensitive and appropriate design outcomes.
4. **Flexibility and evolution:** Encouraging innovative, contemporary spaces.
5. **Amenity and wellbeing:** Creating a welcoming, amiable, healthy campus.
6. **Transparency and showcase:** Creating an engaging, welcoming and vibrant school.
7. **Protection and enclosure:** Creating a nurturing and safe campus.
8. **Orientation and wayfinding:** Creating a collective and connected campus.
9. **Safety and security:** Prioritising pedestrian and bike priority.
10. **Community engagement:** Connecting the campus and the community.
11. **Flexibility and multipurpose:** Embed potential for reconfigurability, multi-purpose use over time.
12. **Buildability and economy:** Sensible and considered development.

A range of built form options have been explored, including:

- a single low building to the southern end of the site, with an east-west orientation;
- a series of buildings with terraced landscapes, built to the boundary of the site; and
- a series of buildings with a north-south orientation, resulting in a campus of smaller buildings.

The latter option was favourably received by the SDRP, and was the preferred option due to the low scale, the ability to achieve solar access to the spaces between the buildings, and the appropriateness of the campus-style approach to the built form. This option was taken forward and forms the basis of the design submitted with this Request.

A complete Design Report, documenting contextual information, design principles, options and the final built form response will be submitted with the EIS.

## 4.3 Visual impact

The site is visually prominent and is located at the northern road entrance to the Sydney CBD. It sits within a landscape unit that is dominated by a complex, layered and varied topography and built form, with a strong presence of trees.

Close range views are possible, although when viewed from all locations except the south, the CBD skyline is a prominent background feature. Heritage values are the primary consideration in short range views, and vegetation plays a prominent visual role – in particular, the row of fig trees along the Western Distributor.

The complex, layered and varied nature of the visual catchment effectively precludes many expansive longer range views to the site. Where the site is visible from long range, it has a backdrop of tall buildings, which mitigates its prominence. The exception to this is the view from the Bradfield Highway, heading southbound into the CBD, where the primary visible element is the main school building.

Although the proposed built form is relatively low-scale in the context of the broader CBD, due to the prominent location of the site, a Visual Impact Assessment will be prepared and submitted with the EIS. The Visual Impact Assessment will assess the visual catchment of the development and its impact on any significant landscape views.

Due to the low scale of development on the site, it is unlikely that the proposed development will obstruct any significant views from private residences. As such, it is not proposed to undertake an analysis of private views from surrounding buildings.

#### 4.4 Landscape design

Although the site features relatively little vegetation, the site's landscape response is important, in terms of how it is read in the context of Observatory Hill to the north, and the National Trust site to the south. Landscaping within the site is also critical to creating spaces that cater to the open space needs of the students, and provide an appropriate and contextual response to the site's unique location. Landscape plans and a Landscape Design Report will therefore be submitted as part of the EIS.

#### 4.5 Heritage and archaeology

A number of significant heritage items are located on the site, and the site is positioned in a prominent area with views to and from various heritage items and conservation areas. There is also potential for European and Aboriginal archaeology on the site. As such, several studies have already been initiated and have informed the early stages of design development.

##### Built heritage

The site is located within the State heritage-listed Millers Point and Dawes Point Village Conservation Area.

Taken from the State Heritage Register:

*Millers Point & Dawes Point Village Precinct is of state significance for its ability to demonstrate, in its physical forms, historical layering, documentary and archaeological records and social composition, the development of colonial and post-colonial settlement in Sydney and New South Wales.*

...

*Millers Point & Dawes Point Village Precinct has evolved in response to both the physical characteristics of its peninsular location, and to the broader historical patterns and processes that have shaped the development of New South Wales since the 1780s, including the British invasion of the continent; cross-cultural relations; convictism; the defence of Sydney; the spread of maritime industries such as fishing and boat building; transporting and storing goods for export and import; immigration and emigration; astronomical and scientific achievements; small scale manufacturing; wind and gas generated energy production; the growth of controlled and market economies; contested waterfront work practises; the growth of trade unionism; the development of the state's oldest local government authority the City of Sydney; the development of public health, town planning and heritage conservation as roles for colonial and state government; the provision of religious and spiritual guidance; as inspiration for creative and artistic endeavour; and the evolution and regeneration of locally-distinctive and self-sustaining communities.*

*The whole place remains a living cultural landscape greatly valued by both its local residents and the people of New South Wales.*

The site also contains a number of locally-listed heritage items, as listed in the following table.

**Table 3 Heritage items located on site**

Item	Statement of significance (from State Heritage Register)
1936 – Bureau of Meteorology including interior	The Bureau of Meteorology Building is significant as one of the first purpose built building for Meteorology in NSW in 1922. The building is associated with the Bureau of Meteorology which is an Executive Agency of the Australian Government responsible for providing weather services to Australia and surrounding area which was established in 1906 under the Meteorology Act, and brought together the state meteorological services that existed before then. The buildings dominant location beside and above City of Sydney, made it an appropriate site for meteorological observations. The building is significant for its operation as a Weather Bureau for over 70 years from 1922 until 1992. The buildings' size, colour, massing and position render it a dominant physical element in its immediate setting. Designed by the Commonwealth Department of Works and Railways, it is part of a fine tradition of well designed Commonwealth buildings in a prominent location within the centre of a very significant historic precinct. The building is a rare example of a mid war georgian revival style building purposefully designed for meteorological observations and reflects the economic constraints of the period in which it was built with only minor changes since construction.
1937 – Messenger's Cottage for Sydney Observatory including interior	Messenger's Cottage for Sydney Observatory (c.1862) is aesthetically significant as a fine and largely intact single storied rendered brick cottage with hipped corrugated iron roof and timber framed verandah in the simple asymmetrical Victorian cottage style. It was built in its current location far from the Observatory on the suggestion of Government Astronomer William Scott in order to reduce expense by allowing a brick building to be constructed. The building is significant for its association with architect Alexander Graham.
1938 – Fort Street Primary School site including buildings and their interiors, fig trees and grounds	Fort Street School is significant in providing evidence of educational use at Observatory Hill from the 1850s to the present day. The current school building is significant as a good example of post war modernism in a complete building complex with only minor changes since construction. Designed by the Government Architects office, it is part of a fine tradition of well designed school buildings in contemporary styles located in a prominent location within the centre of a very significant historic precinct. The building is a rare example of a modernist school.

A Heritage Impact Statement will be submitted with the EIS, and will consider the impact of the proposed development on the heritage significance of the site and any surrounding heritage items or views to and from significant heritage items or areas.

### Historical archaeology

There is potential for historical archaeology to be present within the site. Curio Projects has prepared an Historical Archaeology Research Design and Test Excavation Methodology, in order to guide test excavation of the site to determine the extent, nature and integrity of any Stage significant archaeological resources that may be present.

An Archaeological Assessment will be prepared and submitted as part of the EIS, and will document any archaeological findings and recommended management measures.

### Aboriginal archaeology

Preliminary investigation has shown that there is some potential remnant natural soil profile in the southern part of the site, which may have some potential for Aboriginal archaeology. An Aboriginal Cultural Heritage Assessment Report will be prepared and submitted as part of the EIS, and Aboriginal community consultation in accordance with Office of Environment and Heritage statutory guidelines will be undertaken.



#### **4.6 Traffic and transport**

Vehicular access to the site consists of a single local access road, known as Upper Fort Street. Upper Fort Street services Fort Street Public School, as well as Sydney Observatory and the National Trust.

ARUP has been engaged to investigate the impacts of additional traffic generated by an expanded school. In particular, access improvements to facilitate pickup and drop-off periods are being investigated, including a new forecourt that is capable of doubling as a kiss and ride area. ARUP's recommendations have informed the design submitted with this Request.

Consultation with RMS has also been undertaken on several occasions (see **Section 5.0**).

A full Traffic and Transport Assessment will be submitted as part of the EIS, and will assess:

- existing road, cycling, pedestrian and public transport networks as they relate to the proposed development;
- the adequacy of existing networks to accommodate trips generated by the proposed development;
- any required infrastructure upgrades to mitigate the impacts of the proposed development;
- access arrangements, including any upgrades to Upper Fort Street that might be required;
- car and bicycle parking provision;
- emergency and service vehicle access; and
- other related traffic and transport issues.

#### **4.7 Operation of school**

An Operations Report will be submitted with the EIS, and will detail existing and proposed school operations, including hours of operation, staff and student numbers, any before or after care school services, and any proposed community use of school facilities, amongst other things.

#### **4.8 Environmentally sustainable development**

An ESD Report will be submitted with the EIS, and will outline how ESD principles will be incorporated into the design and ongoing operation of the development.

#### **4.9 Social impact**

A Social Impact Assessment will be submitted with the EIS, and will assess the development's impact on the local community and any existing local social infrastructure. The SIA will also assess the social consequences of the proposed development, and the impact of any decanting activities.

#### **4.10 Noise and vibration**

Noise and vibration are expected to occur throughout construction, to varying degrees. Operational noise will also be present once the school opens (i.e. bells, PA announcements, etc.). These issues will be addressed in a Noise and Vibration Assessment, to be submitted with the EIS.

#### **4.11 Acoustic amenity**

Given the school's location adjacent to a major arterial road, acoustic amenity is expected to be an assessment issue. An Acoustic Report (which will potentially be combined with the Noise and Vibration Assessment) will be submitted and will assess the internal acoustic amenity of classrooms during school hours, and will suggest mitigation measures (if required).

#### **4.12 Air quality**

Air quality is expected to be an assessment issue due to the volume of traffic in proximity to the school. An Air Quality Assessment will be submitted with the EIS and will assess the expected air quality, both internally and externally, and will suggest mitigation measures (if required).

#### **4.13 Contamination**

A Phase 1 Site Assessment will be prepared and submitted with the EIS. The assessment will undertake a desktop study of the site and the expected potential for contamination, given past uses. The assessment will also suggest whether a Phase 2 Site Assessment and Remediation Action Plan should be prepared subsequently.

#### **4.14 Geotechnical conditions**

A Geotechnical Assessment will be prepared and submitted with the EIS. The assessment will identify existing ground conditions and the implications for construction of the proposed development.

#### **4.15 Utilities and infrastructure**

An Infrastructure Management Plan will be prepared in consultation with the relevant agencies, identifying the existing capacity of the infrastructure currently servicing the site, and any augmentation, service relocations or easements that may be required to service the proposed development.

#### **4.16 Drainage and stormwater**

An assessment of stormwater and drainage will be prepared and submitted with the EIS. The assessment will detail measures to minimise any impacts on water quality, and will detail proposed drainage with respect to downstream properties.

#### **4.17 Biodiversity**

It is noted that a BDAR Waiver accompanies this Request (**Attachment C**). It is considered that preparation of a BDAR is unnecessary in this instance, given the limited vegetation and biodiversity value present on the site. However, a Biodiversity Report will be prepared as part of the EIS, and will address the flora and fauna impacts of the proposed development.

#### **4.18 Tree retention and removal**

A Preliminary Aboricultural Assessment Report has been prepared and has informed the design to date (**Attachment D**). The report has identified 36 individual trees of varying size and significance. One tree on site, being the Moreton Bay Fig (*Ficus macrophylla*) on the eastern side of the site, is identified on the City of Sydney's Significant Tree Register.

It is expected that the proposed development will require the removal of some trees, although the eastern Moreton Bay Fig is proposed to be retained. An Aboricultural Assessment Report will be submitted with the EIS, and will assess the significance and health of each tree to be removed.

#### **4.19 Waste management**

A Waste Management Plan will be submitted with the EIS, and will assess the likely waste streams to be generated during both construction and operation, and will identify measures to manage this waste.

#### **4.20 Construction management**

Construction management is expected to be complex, given the site's location and the constrained access. A Construction Management Plan will be prepared and submitted with the EIS. The Plan will identify the proposed construction hours and any management measures required to mitigate impacts during construction.

#### **4.21 Accessibility**

An Access Report will be prepared and submitted with the EIS. The report will identify any accessibility requirements to comply with the relevant legislation and guidelines.

#### **4.22 Crime Prevention Through Environmental Design**

A CPTED Report will be prepared and submitted with the EIS. The report will undertake a CPTED assessment of the site and will recommend suitable design changes.

### **5.0 Consultation**

Significant consultation has already been undertaken with the following bodies:

- City of Sydney Council
  - 14 December 2018: Project overview and potential site expansion
  - 18 February 2019: Proposed planning pathway
  - 18 March 2019: Presentation to Director of Planning and COO
  - 23 April 2019: Site access and request for SEARs
- State Design Review Panel
  - 12 March 2019: Master Plan options review no. 1
  - 17 April 2019: Master Plan options review no. 2
- Roads and Maritime Services
  - 3 December 2018: Cahill capping review
  - 25 February 2019: Site access opportunities and constraints
  - 19 March 2019: Traffic and access
  - 15 April 2019: Project overview
  - 23 April 2019: Traffic and transport review
  - 29 April 2019: On-site review of road widening
- Office of Environment and Heritage
  - 18 February 2019: Initial heritage design response
  - 5 April 2019: Presentation of Master Plan options
- Department of Planning and Environment
  - 29 November 2018: Initial project review (SINSW)
  - 5 February 2019: Project overview, program and planning pathway
  - 5 March 2019: Project briefing and panel review (SINSW)

Stakeholder Working Group (Invitees: RMS, TfNSW, DP&E, OEH, CoS, Property NSW, MAAS, National Trust, OGA)

- 23 November 2018: Project introduction and opportunities for collaboration
- 11 December 2018: Project update
- 26 February 2019: Project overview
- 19 March 2019: Master Plan options

- 9 April 2019: Master Plan options
- National Trust
  - 17 April 2019: Presentation of Master Plan options

Further consultation with these and other authorities, as well as the community and Aboriginal groups will be undertaken as part of the SSD process.

## 6.0 Conclusion

The purpose of this letter is to request the SEARs for the preparation of an EIS for the expansion of Fort Street Public School. The expansion of the school is critical to ensuring the long-term primary school capacity within the catchment, and will result in significantly improved teaching and learning facilities and open space.

Further, the project will facilitate the refurbishment of several important heritage items, including the Fort Street Public School building itself, the Bureau of Meteorology Building, and the Messenger's Cottage.

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

Yours sincerely,



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