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18 December 2019

Mr Jason Maslen

NSW Department of Planning, Industry and Environment  
320 Pitt Street  
Sydney NSW 2000

Dear Jason,

## **SANTA SOPHIA CATHOLIC COLLEGE (NEW SCHOOL) (SSD-9772)**

### **RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

This letter has been prepared on behalf of Catholic Education Diocese of Parramatta (CEDP) in response to NSW Department of Planning, Industry and Environment's (DPIE) request for additional information of 5 December 2019. This letter includes a response to the matters raised and the supporting documentation requested by the DPIE, as follows:

- Copies of the Remediation Action Plan to support the position concluded by JBS&G set out in the letter included in the Environmental Impact Statement (EIS) – refer to Attachment A.
- Copies of the previous Aboriginal cultural heritage assessment reports by Kelleher referenced in the EIS and Response to Submissions Report (RtS) – refer to Attachment B.
- Confirmation from BCA Logic that the conclusions provided in the Access Report submitted with the EIS remain relevant in respect of the updated architectural package and are not required to be updated – refer to Attachment C.
- A Technical Note prepared by Ason Group responding to traffic and parking matters – refer to Attachment D.

The following sections of the letter respond to the other matters contained in RFI including those noted as being key issues raised by the public.

#### **1. DRAFT BOX HILL NORTH DEVELOPMENT CONTROL PLAN**

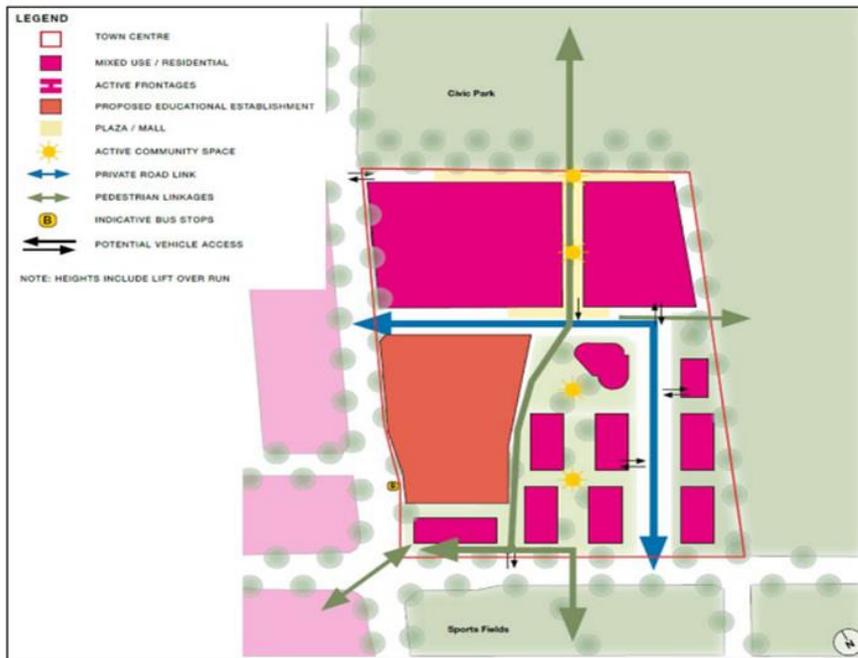
DPIE has requested an assessment of the proposal against the provisions of the Draft Box Hill North Development Control Plan (DCP).

Amendments to the Box Hill North DCP (as it relates to the Box Hill North Town Centre) are foreshadowed in planning proposal 2/2019/PLP that seeks to increase the maximum floor space ratio from 1:1 to a range of 1:1 to 2:1, and increase the maximum height of buildings from 16m (approximately 4-5 storeys) to a range of 16m to 27m (up to 8 storeys) across the town centre.

The proposed draft DCP was exhibited with the planning proposal and will come into force when the planning proposal is gazetted.

The Draft DCP includes an amended Indicative Layout Plan (ILP) as shown in Figure 1 below. The amended ILP includes an educational establishment within the town centre. The Santa Sophia school proposal is consistent with the amended ILP.

Figure 1 – Amended ILP, Box Hill North DCP



Source: Rothelowman 2018

Urbis has considered the key relevant provisions in the Box Hill North DCP and this assessment is provided in Table 1 below. Only the relevant provisions have been considered. The remainder relate to large format retail and are not considered.

Table 1 – Draft Box Hill North DCP 2012

Section	Control	Proposed	Complies
Section 2.3 Town Centre	Street level activation is required in the core of the Town Centre, in particular, fronting the main street and open space.	The school incorporates a ground level plaza which will provide engagement and activation of the public domain.	Yes

Section	Control	Proposed	Complies
	A range of building heights (up to 8 storeys, or 27m) with a transition to surrounding residential areas.	The proposal is 5-6 storeys and is an appropriate height in the context of the surrounding town centre, with a Planning Proposal currently being considered to amend the maximum building heights in the Town Centre.	Yes
	A new K-12 school, occupying approximately 10,000m <sup>2</sup> of the Town Centre and providing approximately 20,000m <sup>2</sup> of educational gross floor area	The Santa Sophia site is 10,132m <sup>2</sup> and the proposal provides approximately 15,000m <sup>2</sup> of floor space and is therefore consistent with these controls.	Yes
	Within the new school, a minimum of 45% of the site area shall be provided for the purpose of ground level play space. The use of roof top space for additional play area shall be maximised.	The proposal provides approximately 5,102.5m <sup>2</sup> of ground level play space which equates to 50% of the site area.  Roof space is allocated for recreational uses in accordance with this control.	Yes
	Bicycle parking shall be provided in accordance with Council's requirements as set out in Part C Section 1 - Parking of The Hills Shire Council Development Control Plan.	The DCP requirement is for 1 bicycle space per 5 students over Year 4. This is a requirement of 252 spaces for 1,260 students at full development. The proposal provides 252 bicycle spaces.	yes
2.4 Street network	a) Street Network is generally to be in accordance with Figure 5.  b) Street design is to be in accordance with the indicative street cross sections at Figure 5 and Table 1. Alternative street designs may be permitted on a case by case basis if they	The proposal is consistent with the street layout identified in the ILP.	Yes

Section	Control	Proposed	Complies
2.9 Public Domain	<p>preserve the functional objectives and requirements of the design standards.</p> <p>(a) Link the open spaces using streets, riparian corridors, pedestrian paths and cycle ways.</p> <p>(b) Orient development surrounding open space towards the public domain to maximise opportunities for casual surveillance</p> <p>(c) Provide perimeter streets to all parks on at least three sides. Where a street frontage is not provided the development must front the park to provide casual surveillance.</p> <p>(d) Public domain elements such as street trees, paving, street furniture, lighting and signage are to be consistent and create local character.</p> <p>(e) Incorporate public art in open space areas. Where appropriate artwork should serve a dual role (e.g. as play equipment for children, informal seating or a marker for a meeting place).</p>	<p>The school incorporates a significant plaza at ground level which addresses the town centre and enhances the public domain.</p> <p>The town centre includes a network of walking paths that link the different areas of open space, and the school can be accessed using these walkways.</p>	Yes

## 2. SITE SELECTION

Community submissions on the EIS raised concerns about the capability of the site and the school building design to accommodate any growth or expansion. This was considered by the submissions as a limitation of the site when compared to the Terry Road location that was originally considered as the location for the Santa Sophia College.

The college has been designed and planned for a maximum of 1,920 students. Although expansion beyond this number will not be possible in this location, as a non-government school, CEDP are able to control enrolments and will manage the number of students to this capacity.

CEDP has identified the need for new education infrastructure within the Box Hill area to meet the needs of families in this growing locality. As such, a second Catholic school in the vicinity of Box Hill South will be required in the long term and this is being planned for by CEDP. The development of Santa Sophia College within the Gables does not preclude the future development of a school on the Terry Road site.

## 3. COMMUNITY USES

DPIE has requested further information about the proposed community uses and activities that will take place at the school. An estimation of the types, scale and frequency of events has been made based on similar Catholic schools operated by CEDP. This information is indicative only.

- Larger events may include Grandparents Day, Mothers' Day, and Easter and Christmas mass services. These will be held in the hall and will attract a maximum of 500 guests. These would be day-time events.
- Other uses would be school information nights, performances, or presentation days. These would attract a maximum of 300 guests. These would be week-day evening events.
- Over a year, it is anticipated that there would be on average one event per month attracting a maximum of 300-500 guests.

For larger scale events an event management plan including measures to manage traffic and parking will be prepared if necessary.

## 4. TRAFFIC

Ason Group have prepared a Technical Note in response to the parking and transport matters:

- cumulative impact of drop-off/pick-up facilities on the local road network -
- consideration of potential of incidents of queuing back into intersections during AM/PM peak demand periods).
- sensitivity analysis of adopted '1 minute' turnover rate for the drop-off/pick-up operations in the context of managing young children.

- consideration of parking impacts associated with 'events' and 'community use' of the school's facilities and how these will be met.

## **5. STATE ENVIRONMENTAL PLANNING POLICY NO 65 DESIGN QUALITY OF RESIDENTIAL FLAT DEVELOPMENT.**

DPIE have requested additional consideration of the six-metre southern boundary setback between Building South and future Residential Apartment Building 4F (identified to be eight storeys under the Gables Town Centre Planning Proposal). For a building of five to eight storeys (approximately 25m) the separation requirements under the ADG are:

- 18m between habitable rooms/balconies.
- 12m between habitable and non-habitable rooms.
- 9m between non-habitable rooms.

Assuming Building F is a residential building, the relevant separation distance is 12m.

Future Building 4F will be required to share the necessary setback requirements with the Santa Sophia site to achieve ADG compliance. The ADG advises that when applying separation to buildings on adjoining sites, half the minimum separation distance should be provided to the boundary. The proposed 6m setback within the Santa Sophia site follows this approach and equitably shares the separation requirements. There is therefore no impediment to Building F achieving compliance with SEPP 65 and the ADG.

Furthermore, in relation to privacy we note:

- Building South and future Building 4F are also separated by play space and landscaping.
- The windows to the southern façade comprise multiple narrow openings, avoiding large expanses of glazing that would increase opportunities for overlooking. The internal school spaces are primarily oriented to the north, away from future Building F, further reducing the likelihood of privacy impacts.

Although the building has not been designed, BVN worked with Celestino on an indicative concept. Analysis was undertaken of the indicative concept against the key controls in the ADG. This exercise demonstrated that a future residential building could achieve ADG compliance in relation to separation distances, solar access and privacy.

## **6. SITE SUITABILITY AND THE PUBLIC INTEREST**

The proposal is appropriate for the location for the following reasons:

- The building design and height is appropriate and in keeping with the scale of development envisaged within Gables Town Centre.
- The design and the building height deliver a multi-level school that maximises opportunities for outdoor learning and play space in courtyards, covered decks and shared spaces;

- The landscape design provides spaces for unstructured and free play, to encourage creativity, chance encounter and exploration among the students. In addition to the open space provided on the site, Santa Sophia intends to use the adjacent hockey fields for PDHPE purposes. Council have advised that they are supportive of a shared use arrangement and this agreement is progressing between Council/Hockey NSW and CEDP.
- The multi-level design encourages the permeability of indoor/outdoor spaces and the movement between the two encourages connections between education and socialisation; which supports contemporary Catholic teaching pedagogy;
- The stacked building form frees up space at ground level allowing for the creation of a significant open plaza space. This open plaza invites the surrounding development and town centre to feel part of the school community;
- The design enables achievement of SEPP 65 design criteria on the neighbouring site to the south and has been sensitively designed to reduce privacy impacts;
- The location within the Gables Town Centre will encourage pedestrian movement and walking. The school will be accessible from the surrounding community by a network of paths and bikeways; and
- Public submissions concerning the provision of parking, open space, overshadowing and the appropriateness of the building in its context have been considered and addressed where required by further specialist assessments.

The proposal is in the public interest as it will:

- Provide a high-quality Catholic educational establishment to meet the needs of the future population of the Gables and ensure educational choice for families;
- Enhance the architectural character of the town centre and will be a dynamic and outward looking presence in the Box Hill North Town Centre,
- Provide space for community events by the CEDP and a focus point for the community.

We trust this information satisfies DPIE's request and the assessment of SSD 9772 can be finalised.

Yours sincerely,

A handwritten signature in blue ink that reads "Alaine Roff".

Alaine Roff

Associate Director



## APPENDIX A



## **APPENDIX B**



## APPENDIX C



## APPENDIX D