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DARLING PARK, 201 SUSSEX ST
SYDNEY NSW 2000**

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31 August 2017

Ms Carolyn McNally
Secretary
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001
Attention: Peter McManus

Dear Peter,

S96 MODIFICATION OF SSD 6454 REDLANDS SENIOR SCHOOL CAMPUS CONCEPT PLAN & STAGE 1 WORKS 272 MILITARY ROAD, CREMORNE

1. INTRODUCTION

This Environmental Impact Statement (EIS) has been prepared by Urbis on behalf of SCECGS Redlands (the Proponent) to accompany a section 96(1A) modification of State Significant Development Approval SSD 6454 (the Approval).

The purpose of this submission is to provide an assessment of a proposed modification of the Approval pursuant to section 96(1A) of the Act. The proposed changes include:

- Relocation of mechanical plant;
- Extension of New Learning Hub roof overhang to provide weather protection;
- Replacement of glazing to the Interim Music Hub foyer with solid wall;
- Minor increase (100mm) of the basement window sill height;
- Reconfiguration of circulation and seating within landscaped areas.

The proposed modifications are minor in nature and do not result in any material change to the built form as approved under SSD 6454. The modifications are also of minimal environmental impact subject to the implementation of the recommended mitigation measures. The modifications, therefore, can be dealt with under section 96(1A) of the *Environmental Planning & Assessment Act 1979* (the Act).

2. SITE AND SURROUNDING CONTEXT

The SCECGS Redlands School Senior Campus (the site) is located at 272 Military Road, Cremorne on Sydney's lower north shore. The site is approximately 6 kilometres north of the Sydney CBD and 2.5 kilometres to the north east of North Sydney CBD. The school campus comprises a main school on the northern side of Military Road and the Adams Centre directly opposite the main school on the southern side of Military Road.

Figure 1 – Site Location Plan



2.1. SURROUNDING DEVELOPMENT

The school is at the interface of an established residential area, ranging from low-density detached dwellings to residential development of up to five storeys. The site adjoins several residential and mixed use properties, including:

- North: A range of residential and commercial / retail premises fronting Military Road;
- West: Bougainvillea Resort Seniors housing; and
- East & South: Low-medium density residential uses including recently completed four-storey residential flat building at 13-15 Gerard Street and apartment style housing at Monford Place.

3. PROJECT BACKGROUND

The Approval (SSD 6454), issued on 28 April 2016 granted development consent to a staged development application including a Concept Proposal and Stage 1 works for the SCECGS Redlands School Senior Campus.

3.1. CONCEPT PROPOSAL

The Concept Proposal broadly comprises the following key elements:

- Building envelopes and design parameters to guide future development of key teaching, learning and sporting facilities across the campus.
- Conceptual identification of:
 - Principal campus arrival points and access arrangements for pedestrians and vehicles.
 - Parking and servicing arrangements including the introduction of a new access driveway off Gerard Street and basement car park.
 - Bus pick up / drop zone.
- Parking provision for a total of 115 car parking spaces.

3.2. STAGE 1 WORKS

The Approval also granted consent for construction of Stage 1 works including:

- Demolition of existing buildings and structures;
- Refurbishment of Nos. 7 and 8 Monford Place for temporary use as an educational facility;
- Construction of a New Learning Hub (NLH) of four storeys with basement car parking and outdoor learning area at roof level;
- Temporary fit-out of a portion of the basement car park as an Interim Music Hub;
- Erection of temporary demountable classrooms;
- Creation of new vehicular access road off Gerard Street for the new basement car park;
- Creation of new internal vehicular access link facilitating ingress from Waters Road and egress onto Military Road.; and
- Associated landscaping improvements.

3.3. STAGE 1 PROGRAMME

Construction of Stage 1 commenced on site on with demolition of the 1-11 Gerard Street now completed. Site preparation works are now underway ahead of construction of the new open space with underground carpark and music facility, which is anticipated for completion in Q3 2019.

4. PROPOSED MODIFICATIONS

4.1. DESIGN CHANGES

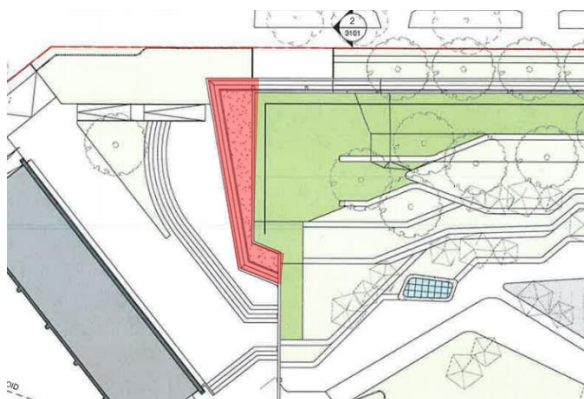
The proposed modifications relate to façade changes, mechanical plant relocation, and developed landscape design arising from the detailed design phase of the works.

- Relocation of mechanical plant previously located on the eastern side of the podium garden to the eastern edge of the podium;
- Modification of the extent, profile and depth and of the roof overhang to the west elevation of the New Learning Hub;
- Replacement of glazing to the west elevation of the Interim Music Hub at the basement level with solid wall;
- Minor increase (100mm) in the height of the window sill at basement level to the north elevation of the Interim Music Hub;
- Minor modifications to the entry forecourt including changes to the ramp and stair configuration;
- Minor modifications to circulation routes and seating configurations.

The nature and scale of the proposed modifications are illustrated by the architectural drawings prepared by TKD Architects and landscape drawings prepared by Silk Consulting Landscape Architects - **Appendix A** and **Appendix B** respectively.

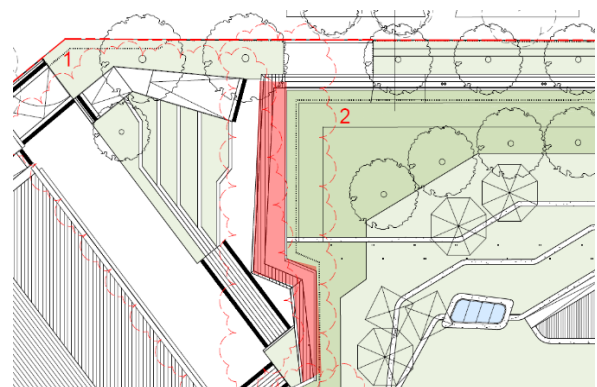
A BCA Capability Statement prepared by AED confirms that compliance with the National Construction Code (BCA) is readily achievable - refer **Appendix C**.

Figure 2 – Stage 1 Works as Approved / Modified



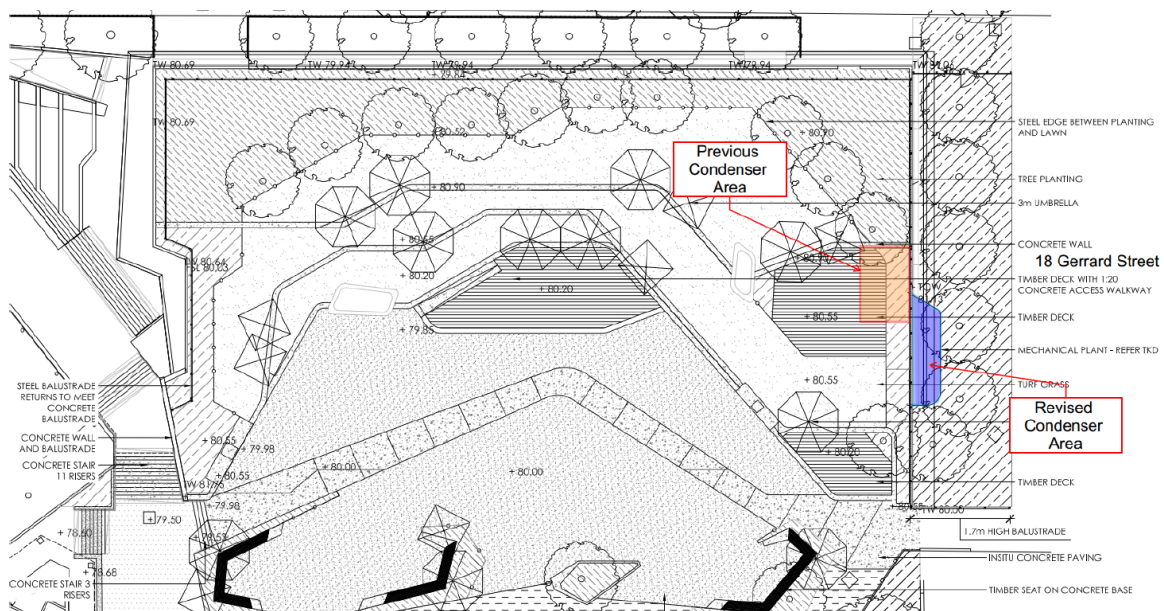
Picture 1 – Roof overhang as approved

Source: TKD Architects



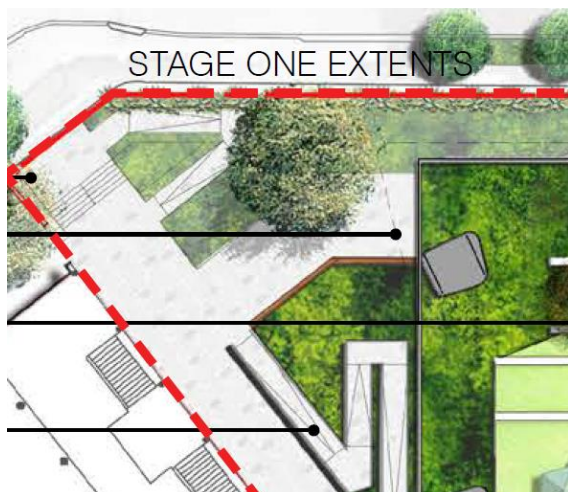
Picture 2 – Roof overhang as modified

Source: TKD Architects



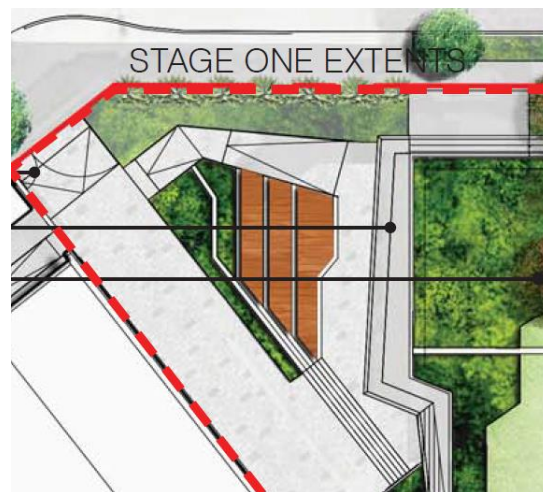
Picture 3 – Location of Mechanical Plant as approved and modified

Source: Wilkinson Murray



Picture 4 – Entry forecourt design as approved

Source: Silk Consulting Landscape Architects



Picture 5 – Entry forecourt design as modified

Source: Silk Consulting Landscape Architects

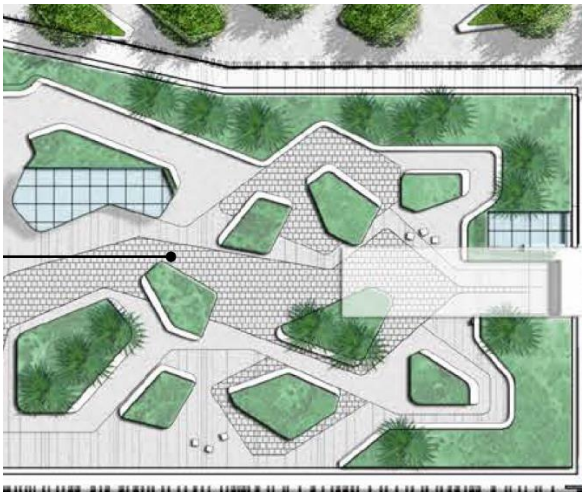
Figure 3 – Modifications to Landscape Design



Picture 6 – Podium landscape design as approved
Source: Silk Consulting Landscape Architects



Picture 7 – Podium landscape design as modified
Source: Silk Consulting Landscape Architects



Picture 8 – Rooftop landscape design as approved
Source: Silk Consulting Landscape Architects



Picture 9 – Rooftop landscape design as modified
Source: Silk Consulting Landscape Architects

4.2. PROJECT RATIONALE

A summary of the purpose of the proposed design changes identified during the detailed design phase is provided in Table 1 below.

Table 1 – Summary of proposed modifications and rationale

MODIFICATION	COMMENT
Relocation of mechanical plant	The proposed modifications will improve the acoustic and visual amenity of the trafficable Music Hub rooftop while relocating the plant to a services area where it will have minimal impact.
Modification of the extent, profile and depth and of the roof overhang	The proposed modifications will provide a clearly defined entry point, improved weather protection as well as a more cohesive presentation integrated with the landscape form above.
Replacement of foyer glazing to with solid wall	<p>The proposed modifications will provide an improved transition along the adjoining stair in response to landscape changes.</p> <p>The modification will improve building performance in terms of thermal efficiency with minimal impact to natural solar access due to the location of the glazing alongside corridor space.</p>
Minor increase in basement level window sill height	The proposed modifications will raise the sill height by 100mm to reflect the raised level of the front setback that has, in turn, been raised to alleviate flood risk.
Minor modifications to the entry forecourt	The proposed modifications will improve circulation and provide informal bleacher style seating for staff and students through the incorporation of terracing.
Reconfiguration of podium and rooftop landscaped areas	<p>Changes are proposed to rationalise circulation routes and create greater flexibility and variety of open spaces. The modifications will also achieve a modest increase in deep soil area.</p> <p>Although modifications are proposed to the location of new and replacement tree plantings, the number of new trees proposed for the site is unchanged.</p>

4.3. PROPOSED MODIFICATION TO CONSENT CONDITIONS

A summary of proposed modifications to consent conditions issued under SSD 6454 is provided in below.

PART A ADMINISTRATIVE CONDITIONS

Development Description

A1. Consent is granted to the 'Stage 1 works' as described in Schedule 1 and the Environmental Impact Statement, as amended by the Response to Submissions, *the s96 Environmental Impact Statement, prepared by Urbis dated August 2017*; and the conditions contained in this development consent.

Development in Accordance with Plans and Documents

A2. The Applicant shall carry out the development generally in accordance with the:

- a) Environmental Impact Statement Concept Proposal and Stage 1 Development Application SCECGS Redlands Cremorne, prepared by Urbis dated June 2015, as amended by the Response to Submissions, prepared by Urbis dated November 2015; *the s96 Environmental Impact Statement, prepared by Urbis dated August 2017*; and
- b) following drawings, except for:
 - i) any modifications which are 'Exempt' or 'Complying Development'; and
 - ii) otherwise provided by the conditions of this consent.

ARCHITECTURAL DESIGN DRAWINGS TITLED PREPARED BY TKD ARCHITECTS			
DRAWING NO.	REV.	NAME OF PLAN	DATE
AR.DA. 0000	E F	Cover Sheet and Site Plan	05/02/16 31/08/2017
AR.DA. 1001	E	Level 1 Demolition Plan North	05/02/16
AR.DA. 1002	E	Level 1 Demolition Plan South	05/02/16
AR.DA. 1003	E	Level 2 Demolition Plan North	05/02/16
AR.DA. 1004	E	Level 2 Demolition Plan South	05/02/16
AR.DA. 1005	E	Roof Demolition Plan	05/02/16

ARCHITECTURAL DESIGN DRAWINGS TITLED PREPARED BY TKD ARCHITECTS			
DRAWING NO.	REV.	NAME OF PLAN	DATE
AR.DA.1101	E	Stage 1 Sub Staging Diagrams 1	05/02/16
AR.DA.1102	E	Stage 1 Sub Staging Diagrams 2	05/02/16
AR.DA.2001	E F	Basement Level Plan	05/02/16 31/08/2017
AR.DA.2002	E F	Level I Floor Plan North	05/02/16 31/08/2017
AR.DA.2003	E	Level 1 Floor Plan South	05/02/16
AR.DA.2004	E F	Level 2 Floor Plan	05/02/16 31/08/2017
AR.DA.2005	E F	Level 3 Floor Plan	05/02/16 31/08/2017
AR.DA.2006	E F	Level 4 Floor Plan	05/02/16 31/08/2017
AR.DA.2007	E F	Accessible Roof Plan	05/02/16 31/08/2017
AR.DA.2008	E F	Roof Level Plan	05/02/16 31/08/2017
AR.DA.2031	E	Existing & demolition in 7 & 8 Monford Place	05/02/16
AR.DA.2032	E	Interim works in 7 & 8 Monford Place	05/02/16
AR.DA.2041	E	Temporary Classrooms - Stage 1a to 1b	05/02/16
AR.DA.2042	E F	Temporary Classrooms - Stage 1C	05/02/16 31/08/2017
AR.DA.2051	E F	Basement level Plan - Interim Music Stage 1B	05/02/16 31/08/2017
AR.DA.3001	E F	Elevations sheet 01	05/02/16 31/08/2017
AR.DA.3002	E F	Elevations sheet 02	05/02/16 31/08/2017
AR.DA.3003	E F	Elevations sheet 03	05/02/16 31/08/2017
AR.DA.3004	E F	Elevations sheet 04	05/02/16 31/08/2017
AR.DA.3005	E	Elevations sheet 05	05/02/16

ARCHITECTURAL DESIGN DRAWINGS TITLED PREPARED BY TKD ARCHITECTS			
DRAWING NO.	REV.	NAME OF PLAN	DATE
AR.DA.3031	E	Elevations sheet 06 - 7 & B Monford Place	05/02/16
AR.DA.3101	E	Sections Sheet 01	05/02/16
AR.DA.3102	E	Sections Sheet 02	05/02/16
4R.D4.3131	E	Sections Sheet 03-T & 8 Monford Place	05/02/16
LANDSCAPE PLANS PREPARED BY SILK CONSULTING LANDSCAPE ARCHITECTS			
DRAWING NO.	REV.	NAME OF PLAN	DATE
DA.L100	D E	Stage 1 Overall Plan	08/10/15 29/08/2017
DA.L101	D E	Stage 1 Main Open Space indicative Plan	08/10/15 29/08/2017
DA.L102	D E	Stage I Hub Building Roof indicative Plan	08/10/15 29/08/2017
DA.L200	D	Stage I indicative Landscape Sections	08/10/15
DA.L400	D E	Stage 1 indicative Planting	08/10/15 29/08/2017

Noise Attenuation Measures

B.2. Prior to the issue of a Construction Certificate, the Applicant shall demonstrate to the Certifying Authority that the design of the plant, the basement car park and the New Learning Hub building meet the Site Specific Noise Criteria identified in the Construction & Operational Noise Report prepared by Wilkinson Murray dated May 2015 (Version B) and letter of advice prepared by Wilkinson Murray dated May 2017.

5. SECTION 96(1A) ASSESSMENT

5.1. MINIMAL ENVIRONMENTAL IMPACT

The proposed modification is for minor changes to the Concept Proposal and Stage 1 works which do not alter the context, scale, or built form of the approved development. The works are façade works, basement and landscaping changes that do not have any built form impacts.

The proposed modification will have minimal additional environmental impacts over and above that which has already been assessed as acceptable in the original development application and subsequent modifications.

Potential impacts in terms of acoustic privacy, heritage values, and contamination are addressed in detail in Section 6.4 of this submission.

5.2. SUBSTANTIALLY THE SAME DEVELOPMENT

The proposed development, as modified, will be substantially the same development as that originally approved in SSD 6454 as there are no changes to:

- Approved use or operational parameters of the school. Staff/ student numbers, school opening hours or other management processes is proposed;
- Approved site layout, building envelopes, or gross floor area;
- Parking numbers, vehicular circulation and access remain the unchanged; or
- The level of environmental impact.

6. SECTION 79C ASSESSMENT

The following environmental assessment addresses the relevant matters pursuant to Section 79C of the Environmental Planning and Assessment Act 1979.

6.1. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

Division 3 to *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) provides that development for the purpose of an educational establishment is permitted on land within a prescribed zone. The R4 High Density Residential zone is a prescribed zone for the purpose of Clause 28. The proposal is, therefore, permitted on the site with consent.

Clause 104 and Schedule 3 of the ISEPP specifies development that qualifies as traffic generating development that must be referred to the Roads and Maritime Services (RMS). Although the proposal relates an existing educational establishment, it will not result in an increase in the number of students or staff. The proposal, therefore, does not qualify as 'traffic generating development' under the ISEPP and is not required to be referred to the RMS for comment.

6.2. STATE ENVIRONMENTAL PLANNING POLICY NO. 55 REMEDIATION

The requirements of *State Planning Policy No. 55 – Remediation of Land* (SEPP55) apply to the subject site. SEPP55 requires the consent authority to consider whether the land is contaminated.

A Preliminary Stage 1 and a Detailed Stage 2 Environmental Site Assessment were prepared in relation to the site as part of SSD 6454. A Remediation Action Plan has also been development and

associated remediation works are underway. Upon completion of these works, a site audit report and site audit statement will be prepared in accordance with the conditions of Approval.

The proposed modification works are minor in nature and do not materially change the findings of the ESAs or require amendment of the RAP / validation plan. The proposal as modified will continue to satisfy the requirements of SEPP55 subject to compliance with the existing conditions of consent.

6.3. NORTH SYDNEY LOCAL ENVIRONMENTAL PLAN 2013

The site is located within North Sydney Local Government Area and is subject to *North Sydney Local Environmental Plan 2013* (NLEP 2013). The relevant provisions of NLEP 2013 are identified in Table 2 below.

Table 2 – Summary of NLEP 2013 Compliance

PROVISION	PROPOSAL	COMPLIANCE
Part 2 Land Use Zone SP2 School / R4 High Density Residential	Proposal relates to an educational establishment, which is permissible in the SP2 zone (pursuant to NLEP 2013) and the R4 zone (pursuant to the ISEPP).	Complies
Clause 4.3 Maximum Building Height 12 metres	No change	No change
Clause 5.10 Heritage Conservation Site contains heritage items SCECGS Redlands (I0065) and Cremorne Post Office / Telephone Exchange (I0064).	The Statement of Heritage Impact prepared by TKD architects (Appendix D) concludes: <i>Overall, the proposed modification works to the Learning Hub are minor in extent and nature and are sympathetically considered, and will not result in any additional adverse impacts on the heritage values of the campus.</i>	Complies

6.4. POTENTIAL IMPACTS OF THE DEVELOPMENT

6.4.1. Acoustic Privacy

An assessment of the revised mechanical plant location within the podium structure has been prepared by Wilkinson Murray regarding the site-specific noise criteria specified by the Approval.

The assessment comprises a review of selected plant and site specific noise criteria to ensure the acoustic amenity of the nearest residential receiver at 13 Gerrard Street is not compromised. The assessment considers the following noise control measures that are proposed to achieve compliance with the site-specific noise criteria:

- The condenser plant is in a plant area that is contained in the new facility carpark below ground level. Noise from the condenser intakes will be contained to the inside of the carpark.
- The outlets of the condensers have 2D circular silencer installed on top of the units.
- Internal walls are to be lined with acoustic absorption material
- The condenser units that may operate in the evening are to be set on night mode to further reduce noise generated by the units.

Noise measures have been included into the design of the plant area to ensure the proposal, as modified, remains consistent with the project application report and the conditions of consent and that the acoustic amenity of residences to the east at 18 Gerrard Street is protected.

The assessment concludes that:

Noise measures have been included into the design of the plant area to ensure that the acoustic amenity of residences to the east at 18 Gerrard Street is protected. Accordingly, from an acoustic perspective, the change in the location of the plant area will be acceptable.

The complete assessment prepared by Wilkinson Murray can be found at **Appendix E** to this SEE.

6.5. SUITABILITY OF THE SITE

Further, site suitability was considered in detail during the assessment of SSD 6454. The proposed modifications are of a minor nature that does not materially affect the suitability of the site to continue in its current use as an educational establishment. The site remains suited to the proposed use.

6.6. PUBLIC INTEREST

The assessment has demonstrated that the proposed modifications are minor in nature and will result in improvements to the appearance and functioning of an important element of social infrastructure within the locality. These improvements are achieved with no significant adverse impacts to the surrounding area. The proposal is, therefore, in the public interest.

7. CONCLUSION

This section 96(1A) application seeks consent for modifications to the Concept Plan and Stage 1 works approved in SSDA 6454. The proposal will continue to support the delivery of essential social infrastructure within the locality with improved function and amenity outcomes arising minor design changes identified during the detailed design phase.

The proposed modifications are façade changes, mechanical plant relocation, and developed landscape design only and will not have any built form impacts.

The works are very minor and do not directly affect the identified heritage fabric within the Redlands Senior School campus. The works, therefore, will have negligible impact on the heritage values of the school and surrounding heritage items.

Acoustic attenuation measures are proposed to ensure mechanical plant remains consistent with site-specific noise criteria. The acoustic amenity of residences at 13-15 Gerard Street will not be significantly impacted.

The modifications will have minimal environmental impact and the proposal is worthy of approval.

Please do not hesitate to contact me or Elaine Roff (Associate Director) on 8233 9900.

Yours sincerely,



Stacey McMasters
Consultant Planner

Enclosed:

Appendix A – Architectural Drawing Set prepared by TKD Architects

Appendix B – Landscape Drawing Set prepared by Silk Consulting Landscape Architects

Appendix C – BCA Capability Statement prepared by AED

Appendix D – Addendum Statement of Heritage Impact prepared by TKD Architects

Appendix E – Letter of advice prepared by Wilkinson Murray