



14448
2 March 2015

Ms Carolyn McNally
Secretary
Department Planning and Environment
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Ben Lusher (Manager, Key Sites and Social Project)

Dear Ms McNally

**REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS
255 - 265 MILLER STREET AND 6 ELLIOTT STREET, NORTH SYDNEY
WENONA SCHOOL, PROJECT ARCHIMEDES**

We are writing on behalf of Wenona School, the proponent for Wenona School's Project Archimedes at 255 – 265 Miller Street and 6 Elliott Street, North Sydney. As the proposed development is for the purpose of an educational establishment and has a Capital Investment Value (CIV) in excess of \$30 million it would be State Significant Development (SSD) under the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The purpose of this letter is 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. Also enclosed is a Quantity Surveyors certificate confirming the CIV, together with preliminary architectural plans prepared by Tonkin Zulaikha Greer (TZG).

1.0 BACKGROUND

Established in North Sydney in 1886, Wenona is a non-selective, independent, non-denominational day and boarding school for girls from Kindergarten to Year 12. The School's vibrant learning environment includes a blend of heritage and new spaces. Wenona includes a Junior School, Middle School and Senior College, for age-appropriate learning experiences.

Wenona's Senior School is in need of redevelopment to remove inefficient and out-dated teaching spaces and replace them with modern learning spaces that reflect new models of teaching. The proposal will provide new learning and teaching facilities for Science, Technology, Engineering and Mathematics (STEM), as well as improved fitness facilities including a new 25m swimming pool and learn to swim pool to replace the existing pool on the School's Walker Street site.

It should be noted that the proposed development will not increase student or staff numbers. Project Archimedes is entirely focused on modernising the School's infrastructure and facilities to bring them in line with contemporary learning and teaching styles, and expectations around sporting facilities.

The proposal is further described below.

2.0 THE SITE

Wenona School is located in the North Sydney Local Government Area (LGA) on the northern edge of the North Sydney CBD. The site is located approximately 800m north of North Sydney Station as shown in the Context Plan at **Figure 1**.

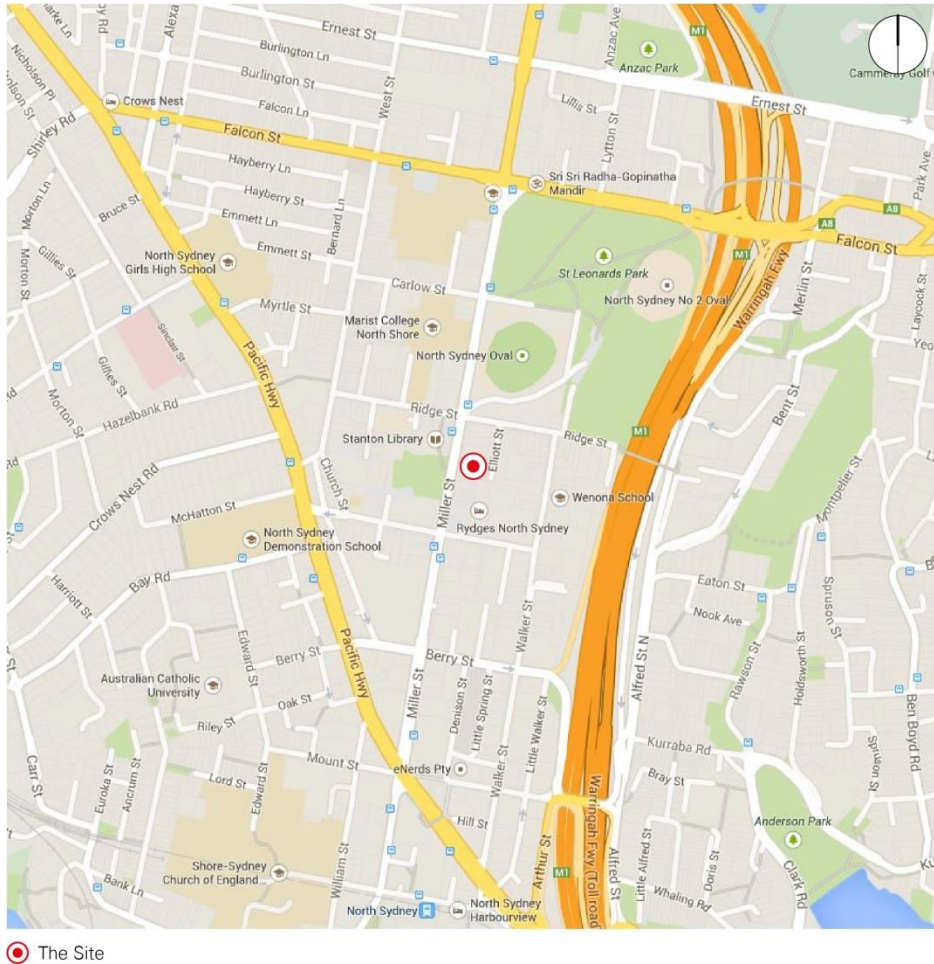


Figure 1 – Context Plan

Source: Nearmap and JBA

The School campus occupies a number of sites as shown in the plan at **Figure 2**. The School's separate landholdings have a combined area of approximately 1.7 hectares. The proposal only relates to the School's land at 255 – 265 Miller Street and 6 Elliott Street, North Sydney as highlighted in **Figure 2**. The development site comprises 14 lots, with a combined area of the approximately 3,337m². A legal description of the site and the existing use each building is provided in **Table 1**.

The site is bound by Elliott Street to the east and Miller Street to the west. To the north the site is bounded by a residential flat building, to the south the site adjoins an existing medical practice and car parking area. It is noted that the proposed works to the School's existing Miller Street building (255 Miller Street) are largely internal, and so will not have any impact on development to the south. Those works that are external are limited to the northern part of the existing building.



Figure 2 – Wenona School campus landholdings (development site identified in blue)

Source: BVN

Table 1 – Legal Description

Address	Legal Description	Current Use
263 Miller Street and 6 Elliott Street	SP 21394	Former commercial building now used by Wenona School for administrative purposes
Existing Footbridge	Lot 2 and Part Lot 3 in DP 1064209	Existing pedestrian bridge
249 – 261 Miller Street	Lots A and B in DP 173234 Lots 10, 11, 12 and 13 in DP 979505 Lots 8 and 9 in DP 996381	Existing Miller Street campus
265 Miller Street	SP 21394	Former commercial building now used by Wenona School for administrative purposes
263 Miller Street	Lot 1 in DP 997232 Lots 16 and 17 in DP 2798	Childcare centre (former house). The childcare centre has capacity for 50 children.

3.0 THE PROJECT

3.1 Objectives of the Proposed Development

Wenona School has identified the need to redevelop their existing senior school facilities in order to reduce the usage of inefficient and old teaching spaces, and replace them with modern learning spaces compatible with new models of teaching.

The key objectives of the proposed scheme are to:

- Create a building of outstanding architectural merit that meets the School's aspirational objectives and functional requirements;
- Design a building that articulates Wenona's core priorities and values of providing smaller communities within the School;
- Provide a 'greener' campus both in terms of landscape and ESD; and
- Create an environment that is peaceful, calm and reflective.

As noted previously, the proposal will not increase the School's staff or student population.

3.2 Proposed Development

A summary of the key elements of the project is provided below. Preliminary plans prepared by TZG are attached.

The proposed development, including all landscaping works, will be carried out in one single stage. The proposal comprises:

- Demolition of:
 - the existing childcare centre (former house) at 263 Miller Street; and
 - the existing office building at 265 Miller Street and 6 Elliott Street.
- Construction of a new 6 storey (3 storeys above Miller Street) education establishment containing:
 - a 25 metre swimming pool;
 - a separate learn to swim pool; and
 - teaching spaces and staff areas for STEM.
- Minor alterations and additions to the existing Miller Street campus building at 255 Miller Street, including new connections, change rooms, plant and a new lift;
- Construction of a new pedestrian overpass crossing Elliott Street providing an improved link into the main senior campus between Elliott Street and Walker Street;
- Landscaping, including new tree plantings; and
- Removal of 9 trees.

The development will provide approximately 6,950m² of gross floor area (GFA).

4.0 PERMISSIBILITY AND STRATEGIC PLANNING

The following strategic plan is relevant to the proposal:

- A Plan for Growing Sydney.

The following legislation and environmental planning instruments are relevant to the proposed development:

- *Environmental Planning and Assessment Act 1979*;
- *State Environmental Planning Policy (Infrastructure) 2007*;
- *State Environmental Planning Policy No. 55 – Remediation of Land*;
- *State Environmental Planning Policy (State and Regional Development) 2011*;
- North Sydney Local Environmental Plan 2013; and
- North Sydney Development Control Plan 2013.

4.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the assessment framework for State Significant Development (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).

4.2 State Environmental Planning Policy (Infrastructure) 2007

Under Clause 32 of *State Environmental Planning Policy (Infrastructure) 2007* (Infrastructure SEPP), proposals for new school buildings need to address the School Facilities Standards State Government publications, including:

- a) *School Facilities Standards—Landscape Standard—Version 22* (March 2002);
- b) *Schools Facilities Standards—Design Standard* (Version 1/09/2006); and
- c) *Schools Facilities Standards—Specification Standard* (Version 01/11/2008).

These standards provide a guide for the development of new schools, new facilities at existing schools and the refurbishment of existing facilities to ensure the creation of an environment which is conducive to learning whilst being safe and robust in a school environment.

These standards will be considered in the detailed design of the development.

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

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) 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.

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

The State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) 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 for the purpose of educational establishments (including associated research facilities) that has a capital investment value of more than \$30 million.

As the proposal is for the purposes of an educational establishment and has a total estimated CIV of over \$30 million, it would be considered SSD.

4.5 Current Zoning and Development Controls

North Sydney Local Environmental Plan 2013

North Sydney 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 B4 Mixed Use zone.
- The proposal is consistent with the zone objectives as it will contribute to a vibrant mix of compatible uses in the mixed use zone.
- LEP 2013 sets a maximum height of 10m. The highest point of the new building is approximately 13.4m, where the proposed staff room protrudes above the 12m height plane. The lift overrun for the new lift on the existing building has a maximum height of 14m. A request will be made to vary the height development standard in accordance with Clause 4.6 of LEP 2013.
- Whilst there is no maximum FSR applying to the site, there is a maximum non-residential FSR control of 1:1. The proposed development is for a non-residential use, and has a FSR of 2.08:1. However it is noted that the majority of the works are to be located on 263 – 265 Miller Street and 6 Elliott Street, with a FSR of 2.84:1 when the FSR is calculated on these sites only. A request will be made to vary the FSR development standard in accordance with Clause 4.6 of LEP 2013.

North Sydney Development Control Plan 2013

North Sydney 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 relating to schools, the proposal will have regard to the requirements applying to permitted development in the B4 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 PRELIMINARY IMPACT IDENTIFICATION AND RISK ASSESSMENT

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 Built Form and Impacts on Adjoining Residents

The proposed building is the result of a design excellence competition undertaken by Wenona School, and will contribute to the Miller Street streetscape. The LEP 2013 controls applying to the site are inconsistent with surrounding development, and existing development on the School campus.

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

In summary, the preliminary scheme is considered consistent with the existing development on the School campus and the character of the area for the following reasons:

- The proposed building, with the variation in building height, will be compatible with adjoining buildings on Miller and Elliott Streets which have a parapet height of approximately 12m. The proposed new building has a maximum height of 12m at the Miller Street frontage, and will step down with the topography from Miller Street towards Elliott Street to follow the natural gradient. Two elements of the proposed building protrude above this 12m height plane, being the proposed staff room and the green roof. Neither of these elements will have any adverse amenity impacts and will significantly contribute the functionality of the new building. The lift overrun on the existing building will have a maximum height of 14m, however this is within the maximum height of the existing building.
- The proposed building is of a scale and density of development that is consistent with the character of the area.
- The proposed development will maintain privacy for residents of existing dwellings to the north through appropriate design measures. The proposed building is an educational establishment and will therefore not house any residents.
- The proposed development will not overshadow any existing dwellings, public reserves or streets, nor compromise solar access for future development. The adjoining residential flat building is to the north of the site and will not be affected in this regard.
- Uses materials and finishes which respond to the materials of the School's existing buildings, respect the architecture of surrounding buildings, and enhance the architectural features of the new buildings.

5.2 Traffic and Parking

As there will be no increase to student or staff numbers as a result of this project, it is not anticipated that there will be any increase in traffic or additional demand for parking. Further, the proposed development is replacing an existing childcare centre with capacity for 50 children, and so represents a deintensification of the site. There are currently 11 parking spaces for staff on the subject site, however there is no parking for students or visitors, and no new parking is proposed as a result of this redevelopment. Notwithstanding this, it is acknowledged that the development may have the potential to alter traffic movements in the area and so a traffic and parking study will accompany the EIS.

5.3 Tree Removal and Landscaping

The proposal requires the removal of 9 trees from the site. The trees are not required as native fauna habitat and need to be removed as they are located within the footprint of the proposed new buildings.

To compensate for this loss, new landscaping, including new tree plantings along Miller Street, will be accommodated on the site.

The EIS will be accompanied by a Landscape Concept Plan.

5.4 Heritage

Part of the existing building at 255 Miller Street (i.e. land within Lots 12 and 13 in DP 979505) is identified as a local heritage item under LEP 2013. It is noted that the building was significantly modified when this site was redeveloped for the School's Miller Street campus. The alterations and additions to the existing building are outside of the heritage listed lots.

5.5 Sustainability

Opportunities to incorporate ESD measures within the project will be detailed within the EIS. Potential opportunities include incorporating natural ventilation where feasible and using measures to reduce artificial lighting.

5.6 Construction and Operational Impacts

The EIS will address and consider the construction and operation impacts of, or on:

- Noise and vibration;
- Staging / decanting;
- Construction traffic; and
- Dust.

6.0 CONSULTATION

Wenona School and its representatives have met (in November 2014) with North Sydney Council in relation to the proposal. The feedback from Council has been considered during development of the preliminary scheme.

Following declaration of the project as a SSD, and as part of the preparation of the EIS, Wenona School will undertake consultation in accordance with the SEARs.

7.0 CONCLUSION

The CIV of the project is approximately \$40 Million and is in excess of the requisite SSD threshold of \$30 Million for educational establishment projects. A Quantity Surveyors Report prepared by MDA Australia is attached for reference.

On the basis that the project falls within the requirements of Clause 15 of Schedule 1 of the SRD SEPP being *development for the purpose of educational establishments (including associated research facilities) that has a capital investment value of more than \$30 million*, Wenona School formally requests that the Secretary of the Department of Planning and Environment issue the SEARs for the project to facilitate the preparation of the EIS to accompany the DA for the project.

Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or via email on ktudehope@jbaurban.com.au.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'K. Tudehope'.

Kate Tudehope
Senior Planner

Encl:
Quantity Surveyors Report prepared by MDA
Preliminary plans prepared by TZG