



Cranbrook School Redevelopment

*State Significant
Development Assessment
(SSD 8812)
September 2019*



September 2019

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Cover photo

Aerial view of Hordern oval, AFC and New Centenary Building (Source: Applicant's RtS 2019).

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Glossary

Abbreviation	Definition
AHD	Australian Height Datum
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
CIV	Capital Investment Value
Consent	Development Consent
Council	Woollahra Municipal Council
Department	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
ESD	Ecologically Sustainable Development
GFA	Gross Floor Area
GTP	Green Travel Plan
Minister	Minister for Planning and Public Spaces
EESG	Environment, Energy and Science Group of the Department of Planning, Industry and Environment (former NSW Office of Environment and Heritage)
TfNSW(RMS)	Transport for NSW (Roads and Maritime Services)(former Roads and Maritime Services)
ROL	Road Occupancy License
RtS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
Secretary	Secretary of the Department of Planning and Environment
SEPP	State Environmental Planning Policy
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSD	State Significant Development
TfNSW	Transport for New South Wales
WLEP 2014	Woollahra Local Environmental Plan 2014
WSUD	Water Sensitive Urban Design



Executive Summary

This report provides an assessment of a State significant development (SSD) application for the alterations and additions of Cranbrook School (SSD 8812). The site is located at 5 Victoria Road, Bellevue Hill. The Applicant is Cranbrook School and the proposal is located within the Woollahra Municipal Local Government Area (LGA).

The Department considers the application is consistent with the objects of the *Environmental Planning and Assessment Act 1979* (EP&A Act), including Ecologically Sustainable Development (ESD) and the Greater Sydney Commission's Eastern City District Plan. The Department is satisfied the subject site is suitable for the proposal and would provide improved educational facilities for existing and future students of Cranbrook School.

The Department identified traffic and transport, heritage, built form and urban design, landscaping and public domain as well as residential amenity as the key issues for assessment. The Department has considered the merits of the proposal in accordance with relevant matters under section 4.15(1) and the objects of the EP&A Act, the principles of ESD, and issues raised in submissions as well as the Applicant's responses. The Department is satisfied that the key issues (including traffic, transport, heritage, built form and urban design, landscaping and residential amenity) were sufficiently considered by the Applicant and found to have minor impacts with the inclusion of mitigation measures and conditions of consent.

The proposal seeks approval for redevelopment of Cranbrook School through the demolition of the existing Mansfield Building and War Memorial Hall to facilitate the construction of the New Centenary Building and associated landscaping. The proposal also seeks to excavate Hordern Oval for the construction of the new aquatic and fitness centre with new public domain interface to New South Head Road, in addition to a 124 space subsurface carpark. No increase to student capacity is proposed.

The proposal has a Capital Investment Value (CIV) of \$ 125 million and would generate eight operational jobs and 296 construction jobs.

The application was publicly exhibited between 24 May 2018 until 22 June 2018 (30 days). The Department of Planning, Industry and Environment (the Department) received a total of eight submissions, including five from public authorities and three from the public (one in objection). An additional four submissions from public authorities were received in response to the Applicant's Response to Submissions (RtS).

The Applicant's RtS included further information and responses to the key issues raised in submissions. The RtS responded to issues regarding traffic, built form, urban design, landscaping, construction impacts, sustainability, view impacts, heritage, development contributions and stormwater management. The RtS was referred to public agencies including Council, who recommended relevant conditions of consent.



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1. Introduction

This report provides an assessment of a State Significant development (SSD) application that proposes the alterations and additions of Cranbrook School (SSD 8812) pursuant to Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (the EP&A Act). The site is located at 5 Victoria Road, Bellevue Hill on land currently occupied by the existing Cranbrook School, catering for the senior school (Years 7 to 12) with a total number of students limited to 1,115 students as per DA 88/280. There are currently 168 full time equivalent staff on site. The school also provides facilities for boarding. The proposal seeks approval for the following works across the site:

- demolition of the existing War Memorial Hall and Mansfield buildings to facilitate the construction of the New Centenary Building teaching facility and school chapel
- excavation of Hordern Oval to facilitate the construction of a subsurface car park and new aquatic and fitness centre
- new access driveway to the proposed car park, accessed off the northern arm of Rose Bay Avenue
- use of the internal driveway between Victoria Road and Rose Bay Avenue to accommodate an on campus 'kiss and ride' facility to reduce traffic congestion around the school
- construction of a new Hordern Oval Groundsman's facility
- reinstatement of the Hordern Oval as a playing field
- public domain, landscaping and general site improvements.

The site is located within the Woollahra Municipal Local Government Area (LGA).

1.1 Site description

The subject site is located at 5 Victoria Road, Bellevue Hill and is legally described as Lot 1 DP663630; Lots 9 – 18 DP9005; and Lots A – C DP186768. Cranbrook School is located to the south east of New South Head Road, with a 430 metre (m) frontage to New South Head Road, a 140m frontage to Victoria Road and a 370m frontage to Rose Bay Avenue, covering an area of 4.34 hectares (ha) as shown in **Figures 1** and **2**. The site is a prominent feature along New South Head Road due to the scale of the school buildings, the open space and fencing and landscaping associated with the Hordern Oval. The site is located approximately four kilometres (km) from the Sydney Central Business District (CBD).

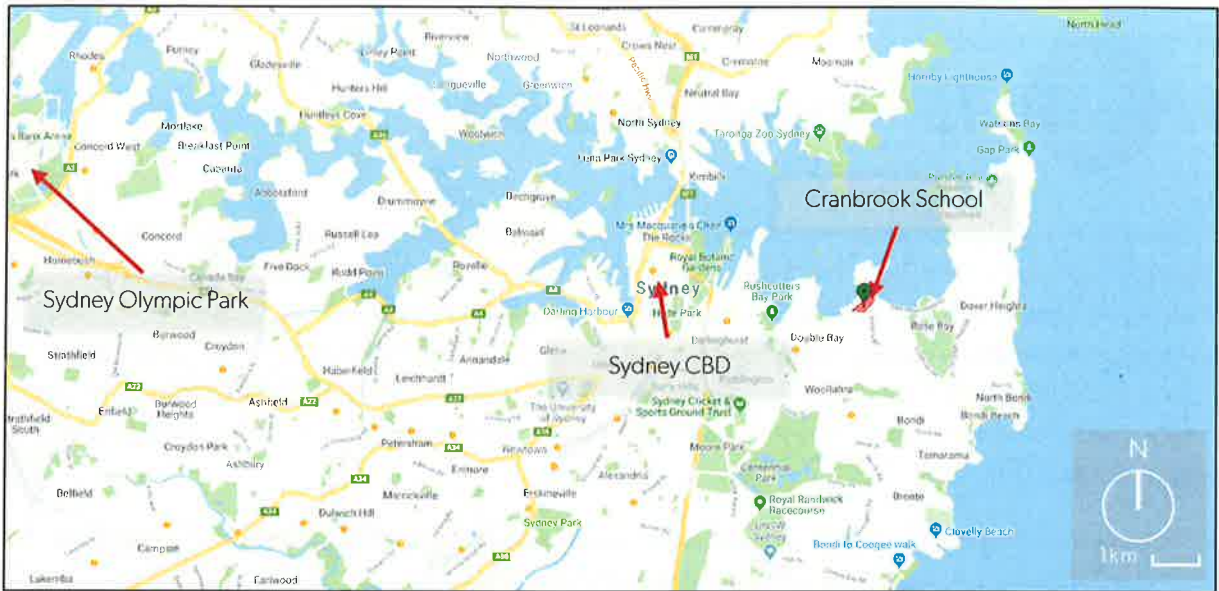


Figure 1 | Regional context of school site (Base Source: Nearmap 2019).

The site is situated on a hill that slopes downwards in a northerly direction. The surface levels vary between Reduced Level (RL) 40m Australian Height Datum (AHD) along the southern periphery of the site to 15m AHD on the northern side with an average slope of approximately seven percent. The current site consists of significant impervious surfaces including paved roads, bitumen driveways, paved footpaths and buildings.

The existing campus (**Figures 4 to 8**) is characterised by a range of heritage buildings and more recent development. The main vehicular and pedestrian access point to the campus is via Victoria Road, with car parking located along the internal driveway. Additional pedestrian entrances are located off Rose Bay Avenue and New South Head Road.



Figure 2 | Cranbrook School site (Base Source: Nearmap 2019).

The Cranbrook School Campus is a local heritage item (43 & 44) under the Woollahra Local Environmental Plan 2014 (WLEP 2014), as shown in **Figure 3**. The heritage listing for the main school campus includes the buildings, including their interiors, known as “Cranbrook”; “Harvey House”; “Perkins Building” (junior school); Sick Bay; Headmaster’s House; Rotunda (sports pavilion); the two storey sandstone building (formerly gatehouse); sandstone retaining wall with balustrade and stairway on northwest terrace of Cranbrook; gates, gateposts, bollards and stone retaining wall to Victoria Road; sandstone fence and retaining wall to New South Head Road; four sets of sandstone gateposts with iron gates to New South Head Road; two Hoop Pines, three Norfolk Island Pines, Kauri Pine, Black Booyong, Port Jackson Fig and Chilean Wine Palm.

Along Rose Bay Avenue properties 1A and 5 Rose Bay Avenue, seven Canary Island Date Palms and two Washington Palms are all heritage listed under WLEP 2014. Located adjacent to the western boundary of the school site on New South Head Road is also a heritage listed bus stop (former tram stop).

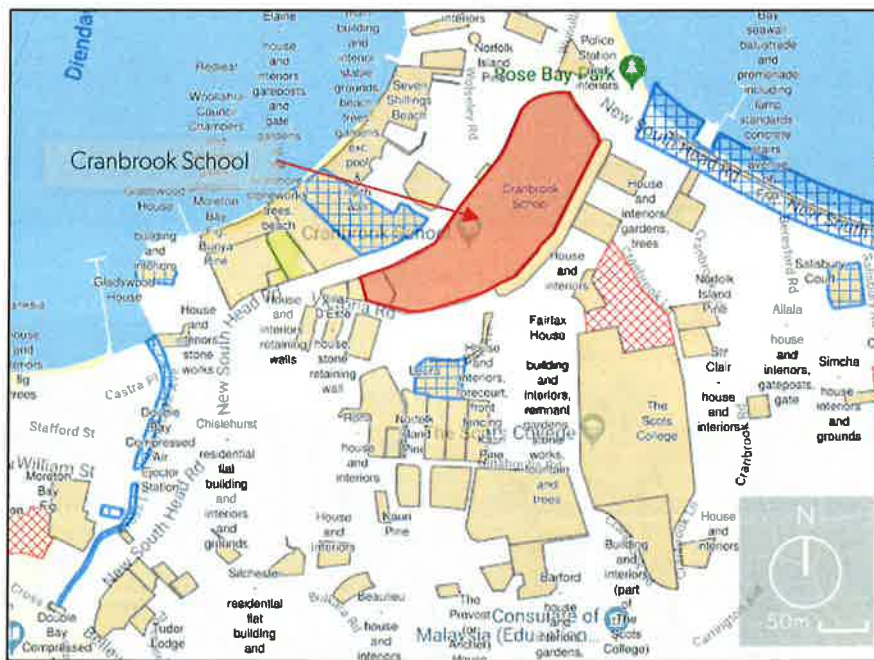


Figure 3 | Cranbrook School site (in red) and surrounding heritage listed properties (Base Source: Nearmap 2019).

The existing parking provisions for the site consists of a small number of allocated on-site spaces and usage of the unrestricted on street parking provision in the vicinity of the site. The site currently provides parking for 29 vehicles with the 'Porte Cochere' at the main school entrance. These spaces are allocated to senior staff members and employees. This area is accessed via the main school entrance off Victoria Road and the exit is via a driveway onto Rose Bay Avenue. There are also six maintenance vehicle access points to the school, three from New South Head Road and one from Victoria Road and two from Rose Bay Avenue. In addition to the vehicular access points, pedestrian access to the site is via the following locations:

- main gate, Victoria Road
- porte cochere exit driveway, Rose Bay Avenue
- pedestrian access gate, Rose Bay Avenue
- two pedestrian access gates, New South Head Road.



Figure 4 | Rose Bay vehicle entry to internal road (Source: DP&E 2018).

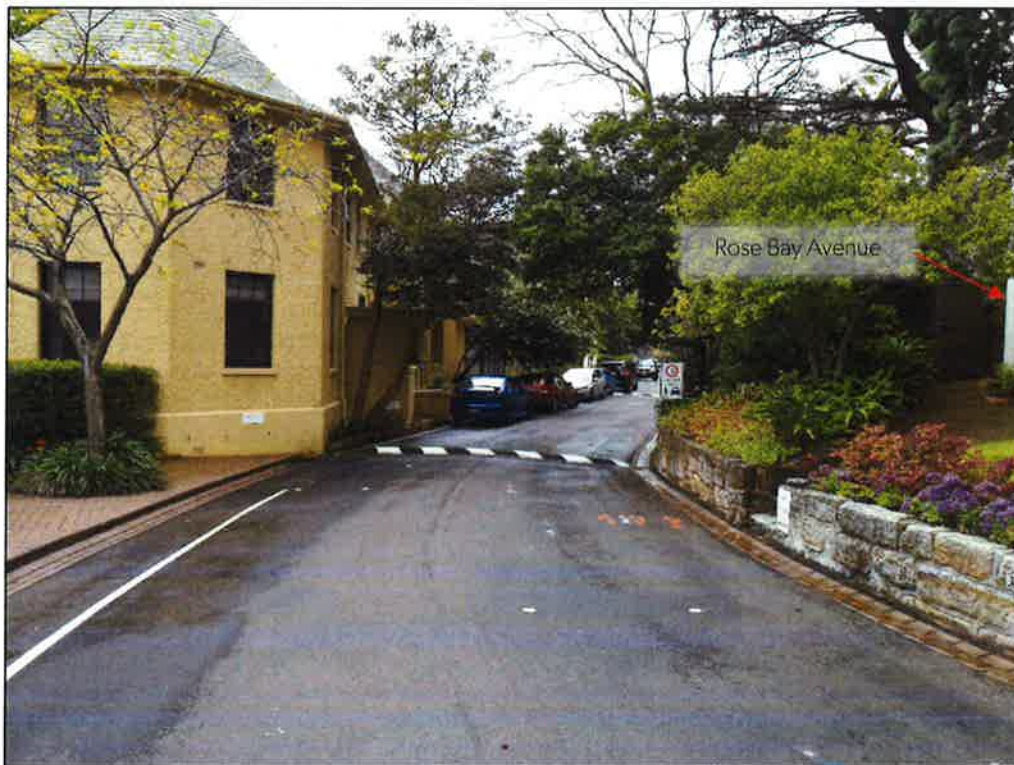


Figure 5 | View along internal road to the north (Source: DP&E 2018).



Figure 6 | Looking north over existing Mansfield Hall (Source: DP&E 2018).



Figure 7 | Looking southwest towards proposed New Centenary location (Source: DP&E 2018).

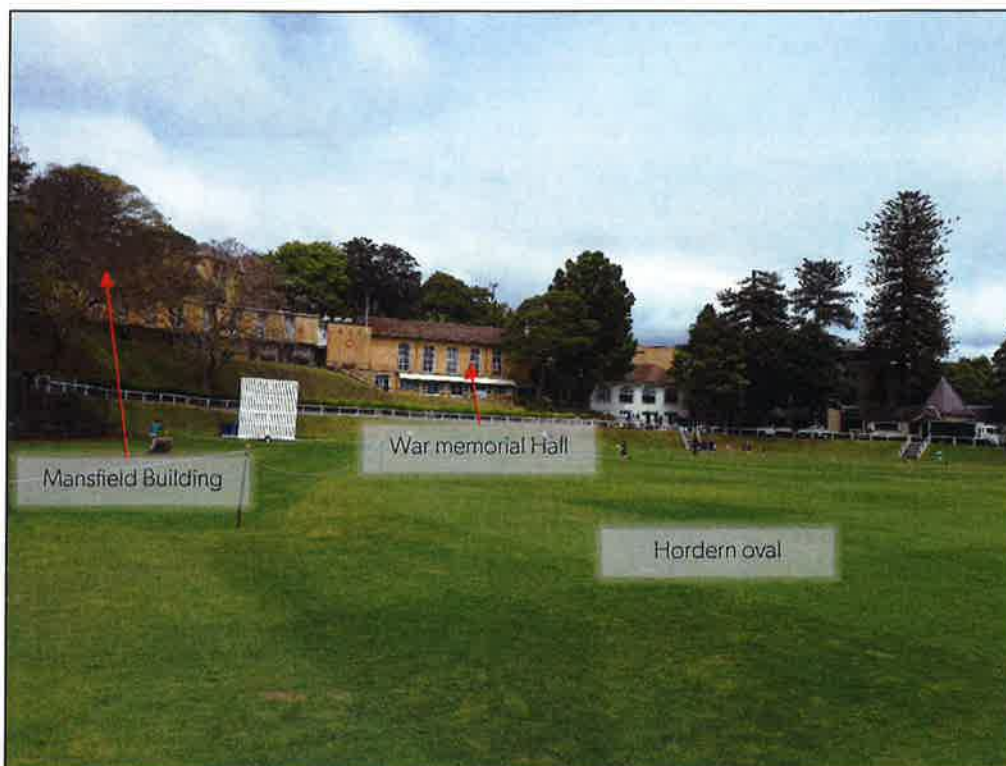


Figure 8 | Looking southwards towards school buildings from Hordern oval (Source: DP&E 2018).

1.2 Surrounding development

The site is bounded to the north and northwest by New South Head Road and is generally characterised by low density residential development with small pockets of medium density residential development. The site is located in Bellevue Hill opposite Point Piper as shown in **Figures 9 to 12** below. The surrounding context of the site is characterised as follows:

- north - the site is bounded to the north and north-east by New South Head Road, beyond which is medium and low-density residential development and Sydney Harbour.
- east - the site is bordered by Rose Bay Avenue, beyond which is low density residential development, and pockets of medium density residential development. Further east of the site is The Scots College, an independent boy's school.
- south - the site is bounded by Victoria Road, beyond which is low density residential development.
- west - the site is bordered to the west by low density residential development comprising of three adjoining houses to the south west. The Woollahra Council Chambers and Woollahra Library are located further west of the site on the opposite side of New South Head Road.



Figure 9 | Cranbrook School site and surrounding development (Base Source: Nearmap 2019)

The key main roads that provide access to and from the site are New South Head Road (State road) in addition to Victoria Road and Rose Bay Avenue (Local roads).

New South Head Road is a State road with a four-lane undivided carriageway that runs in an east to west alignment with a speed limit of 60km/h outside of school zone times and has various parking restrictions. Victoria Road is a local road with a two-lane undivided carriageway that runs in an east to west alignment with a speed limit of 50km/h outside of school zone times and has unrestricted parking on each side. Rose Bay Avenue is a local road with a two-lane undivided carriageway that runs in a north to south alignment with a speed limit of 50km/h outside of school zone times and has unrestricted parking on each side with a small designated school drop off zone at peak times.



Figure 10 | Looking north along Rose Bay Avenue (Source: DP&E 2018).



Figure 11 | View south along Rose Bay Avenue (Source: DP&E 2018).



Figure 12 | View towards Rose Bay Avenue and New South Head Road intersection (Source: DP&E 2018).



2. Project

The proposal would provide for the alterations and additions of Cranbrook School and includes site preparation works involving demolition of buildings and structures, tree removal and site remediation, excavation of Hordern Oval. Construction works include a new four storey New Centenary Building and Aquatic and Fitness Centre (AFC) including assembly hall, multifunction spaces, theatre dining and kitchen facilities, learning spaces, chapel, pool facilities, multifunction sports courts, 124 space subsurface car park, gym area and reinstatement of Hordern Oval surface.

The proposed redevelopment to Cranbrook School would provide an additional 6,710sqm for the New Centenary Building and 4,728sqm for the AFC (net increase of 9,938sqm) Gross Floor Area (GFA). The key components and features of the proposal, as refined in the Applicant's Response to Submissions (RtS), are provided in **Table 1** and are shown in **Figures 13 to 21**.

Table 1 | Main Components of the Project

Aspect	Description
Project Summary	The proposal would provide for the redevelopment of Cranbrook School and includes site preparation works involving demolition of buildings and structures, tree removal and site remediation, excavation of Hordern oval; construction of a new four storey New Centenary Building, new AFC and 124 space subsurface car park.
Site preparation	<ul style="list-style-type: none">• Demolition of existing War Memorial Hall and Mansfield buildings.• Excavation of Hordern Oval to facilitate construction of subsurface carpark and AFC.
Built form	<ul style="list-style-type: none">• Construction of the new four storey New Centenary Building that includes:<ul style="list-style-type: none">○ multifunction assembly hall.○ tiered performance space.○ dining commons.○ informal learning and house areas.○ adaptable teaching spaces.○ staff offices.○ orchestral rehearsal area and flat floor performance space.○ War Memorial Chapel and Centenary Lawn.○ loading bay.• Construction of new AFC:<ul style="list-style-type: none">○ main entry and foyer off Rose Bay Avenue/New South Head Road with landscaped entry plaza at the site's frontage to these public roads.○ tiered seating.○ bicycle store, canteen, store rooms, plant rooms and offices.○ subsurface car parking for 124 cars.

- new driveway crossing onto Rose Bay Avenue, with access control within the site.
- 50m swimming pool and pool concourse.
- separate Learn to Swim pool.
- multifunction court.
- fitness gym.
- shower and change rooms for school and public use.
- offices, plant and storage rooms.

New Centenary Building

- turfed Centenary Lawn on roof of Centenary Building.
- intimate Memorial Garden to the east of the Chapel including turfed lawn, open pergola and water body.
- sandstone surfacing for hardstand areas.
- feature trees in raised planters.
- fixed bench seating.

Camelia Court to west of New Centenary Building improvement including

- expanded Camellia Court area and building entry.
- central walkway access.
- new garden beds and garden wall application.
- preservation of existing sandstone rock faces.
- new raised level courtyard space.

Public domain and landscaping

AFC

- provision of a granite paved shared forecourt between the AFC entrance and New South Head Road.
- planting of sculptural vegetation buffer between the plaza and New South Head Road.
- native tree planting along the site boundary.

Hordern Oval

- low level planting with integrated security fencing to northern boundary of the oval.
- reinstate turfed oval surface.

Vegetation works

- removal of 43 trees (5 recognised as high value).
- planting of 36 new trees and over 3,000 additional shrubs and accent plantings.

Site area ● 43,200sqm.

Uses ● Educational establishment.

Access	<ul style="list-style-type: none"> • Pedestrian access to be retained from Victoria Road and provided from New South Head Road to Aquatic Centre.
Car parking	<ul style="list-style-type: none"> • Provision of 124 space subsurface car parking spaces beneath oval.
Bicycle parking	<ul style="list-style-type: none"> • Provision of an additional 21 bike parking spaces to result in a total of 121 spaces on the site.
Hours of operation	<p>No changes proposed to existing hours of school operation as follows:</p> <ul style="list-style-type: none"> • senior School hours for students: Monday to Friday - 8:20am to 3:20pm. • school reception operating hours: Monday to Friday - 8:00am to 6:00pm. • Core teaching staff hours Monday to Friday – 8:00am – 4:00pm. • sports training: Monday to Friday – 6:30am to 8:00pm. • Saturday Sports: Saturday – 8:00am to 3:00pm. • extracurricular activities occur outside core school hours on weekdays, weekends and public holidays. Extra-curricular activities commence at approximately 6:30am and conclude by 6:30pm. <p><u>Aquatic and Fitness Centre hours</u></p> <ul style="list-style-type: none"> • Monday to Saturday: 6:00am to 9:00pm. • Sundays: 6:00am to 6:00pm. <p><u>Community Use hours (learn to swim)</u></p> <ul style="list-style-type: none"> • Mondays to Fridays: 7:30am to 7:30pm. • Saturdays: 7:30am to 5:00pm. • Sundays: 7:30am to 12:30pm.
Signage	<ul style="list-style-type: none"> • Two wall-mounted business identification signs with the school name 'Cranbrook School' located at the Victoria and New South Head Road frontages.
Jobs	<ul style="list-style-type: none"> • Up to 296 construction jobs. • Eight additional operational jobs.
CIV	<ul style="list-style-type: none"> • \$125,000,000.

2.1 Related Approvals

The enrolment capacity of the subject Cranbrook School campus is limited to 1115 students due to a cap imposed on the School by Woollahra Council based on enrolment figures from May 1990 (DA 88/280).

2.2 Site Preparation Works

The proposal involves demolition and site preparation works, comprising site establishment, demolition, tree removal and earthworks.

It is estimated that approximately 86,000 cubic metres (cbm) of material is expected to be excavated from site. **Figures 13** and **14** below depict the ways in which piling and platform creation is to occur. It is expected that 8,000cbm of material would be retained for use as the temporary access ramp to and from Rose Bay Avenue for an approximate duration of 18 months. It is expected that upon completion of the proposal, all materials excavated would be exported from the site.



Figure 13 | Proposed piling platform during excavation (Source: Applicant's RtS 2019).

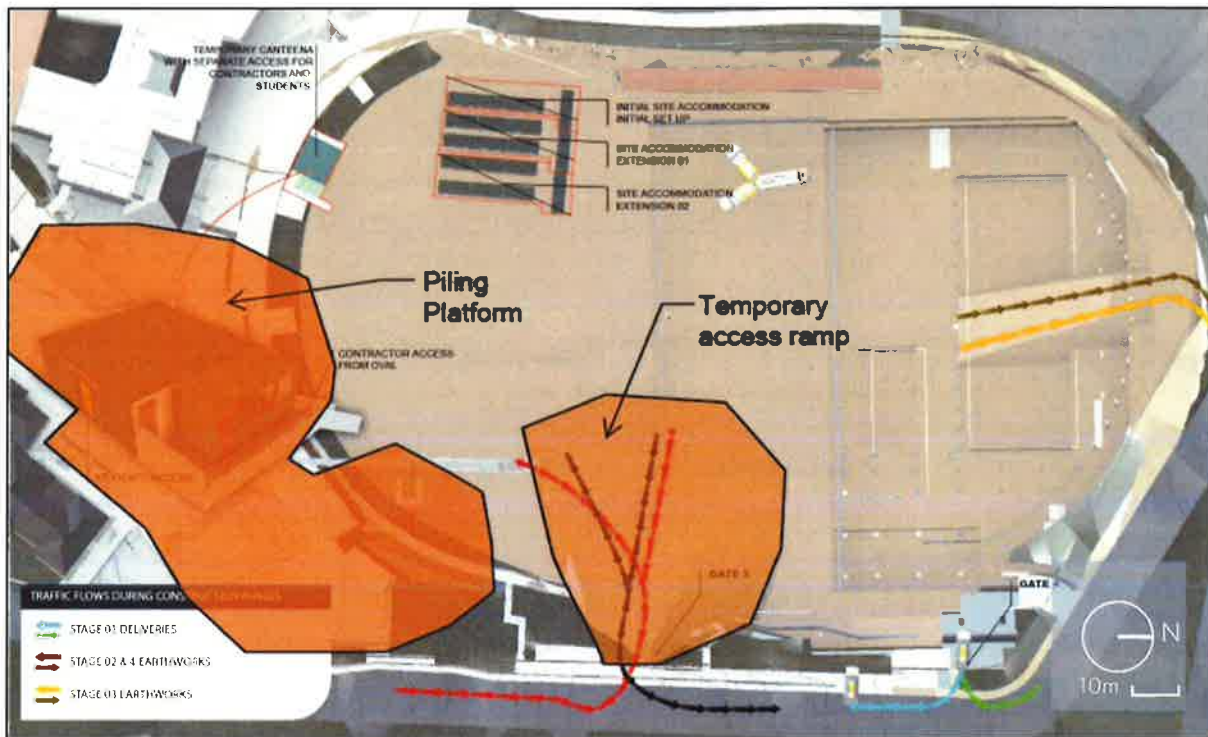


Figure 14 | Site plan during excavation and shoring works (Source: Applicant's RtS 2019).

2.3 Physical layout and design

The proposed development comprises of three main built form elements characterised by the New Centenary Building, the AFC and the subsurface carpark. The proposal also includes management and operational interventions to the internal school road (located in the southern section of the site between Victoria Road and Rose Bay Avenue) relating to kiss and drop arrangements.

The proposed buildings are of a contemporary design as well as containing a material colour palette sympathetic to the existing heritage built form characteristics on the site. The proposed built form also varies in bulk and mass through façade stepping, recessed entries, protruding window bays, louvres and landscaping that provide suitable fine grain architectural characteristics to the site. The physical layout of the proposed built form along with photomontages are shown in **Figures 15 to 21**.



Figure 15 | Axonometric view of proposed area of works (Source: Applicant's EIS 2018).

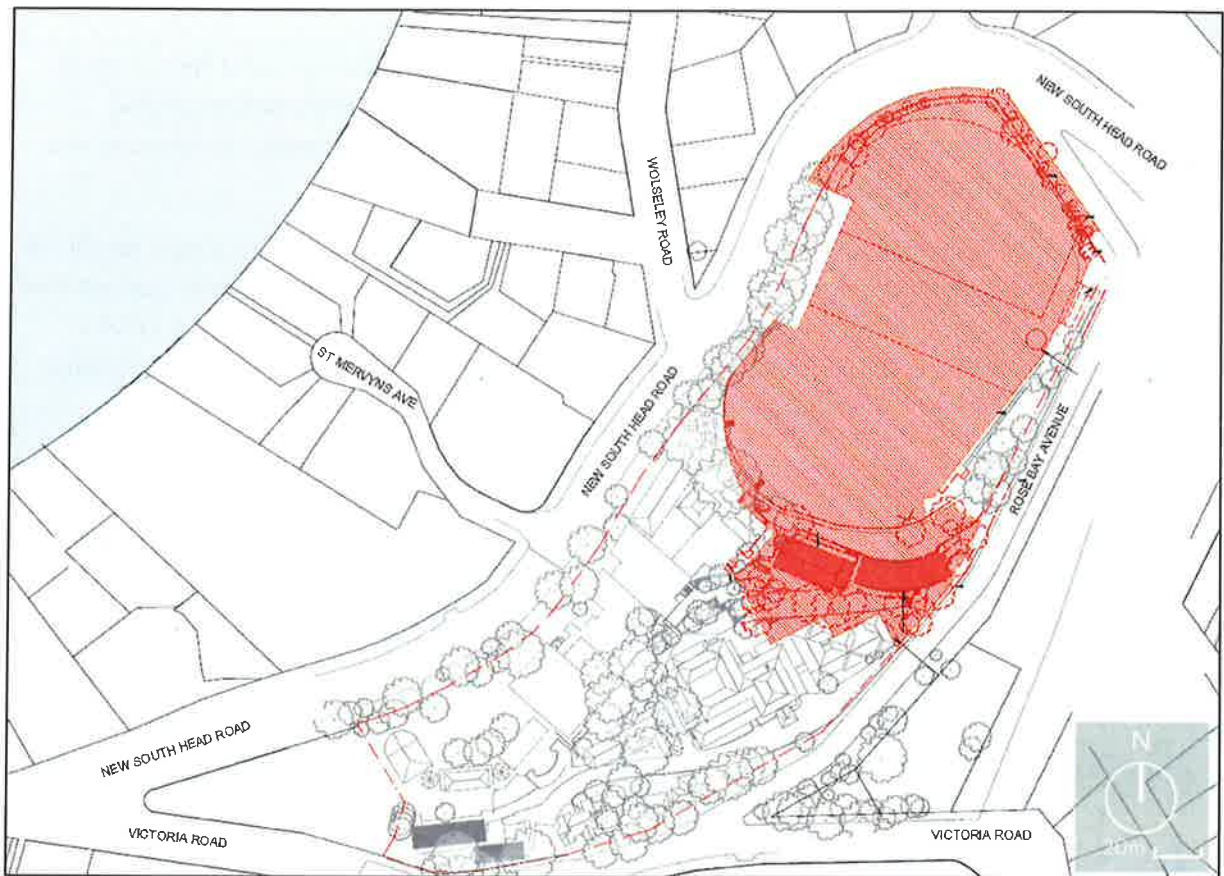


Figure 16 | Scope of demolition works (in red) (Source: Applicant's EIS 2018).

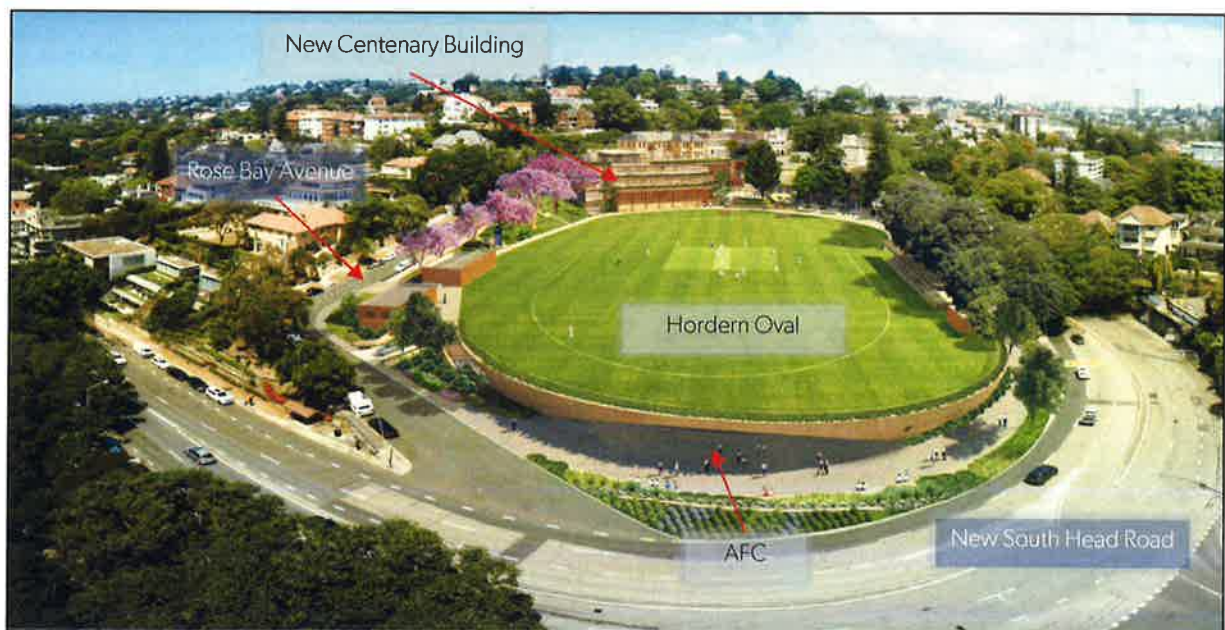


Figure 17 | View southwards over school site (Source: Applicant's RtS 2019).



Figure 18 | Looking towards entrance to AFC from New South Head Road (Source: Applicant's RtS 2019)



Figure 19 | View of New Centenary Building from Hordern Oval (Source: Applicant's RtS 2019).



Figure 20 | Looking eastwards towards the New Centenary Building (Source: Applicant's RtS 2018).



Figure 21 | View of chapel and grassed roof level of New Centenary Building (Source: Applicant's EIS 2018).

2.4 Uses and activities

The key land uses on the site are not proposed to be significantly altered, the proposal would be able to provide additional spaces and uses ancillary to the school use in a manner to aid the educational objectives of the school. Pedestrian and staff movements are proposed to be modified with the additional pedestrian interfaces between the AFC and New South Head Road and the subsurface carpark entry from the northern end of Rose Bay Avenue.

2.5 Timing

The project is to be developed in the following staged manner:

- **demolition** – demolition of existing War Memorial Hall and Mansfield Buildings.

- materials for recycling and separation would be identified and managed under a Waste Management Plan.
- access during demolition would be via Rose Bay Avenue/gate two.
- It is anticipated that works would take up to 6 weeks with 10 - 15 truck movements per day.
- **shoring** - shoring would be required to stabilise the existing sand to the north of the Perkins Building to allow construction of the New Centenary Building (which is approximately 18m above the level of Hordern Oval).
 - for shoring work constructions, it is anticipated that approximately 10 trucks are required each day.
 - the shoring works would have a duration of approximately 20 weeks for the three buildings.
- **excavation/site preparation** - access for most of the bulk excavation would be via Rose Bay Ave/gate three and one.
- The duration of these works would be approximately 28 weeks. This would result in a truck movements of approximately 30 trucks per day:
 - oval clearance / spoil separation top layer.
 - excavation of Carpark 14,000cbm.
 - creation of piling platform for Centenary Building.
 - excavation of Centenary Building (after piled shoring complete) 27,000cbm.
 - AFC approximately 45,000cbm.
- **foundations** - piling, capping beams, and structural footings would be engineered and constructed in such a way as to mitigate the risk of noise and vibration where possible.
 - during these works it is anticipated that there would be approximately 10 truck movements per day. This would include removal of spoil, concrete trucks, and reinforcement supply.
 - the works for the three buildings would be staggered, with the overall duration taking approximately 20 weeks in total.
- **structure** - during the construction of the structure deliveries of materials would consist mainly of formwork, reinforcement and concrete for the Carpark, ARC and Centenary Building.
 - general movement of deliveries would be in the range of 10 -15 deliveries.
 - pouring of larger areas may result in 20 – 40 concrete trucks. The structure works for the project would have duration of approximately 50 weeks for the three buildings, which would be staggered.
- **façade** - the façade systems are likely to combine a mixture of structural steel framing, cladding, curtain wall, glazing, and precast elements.
 - deliveries for these works would result in approximately two to five delivery movements per day, much of which would be smaller trucks and utes.
 - precast elements to buildings would result in semitrailer deliveries of approximately three to four per day, for approximately 16 weeks.
- **internal finishes** - the internal finishes and fitout would commence once the façade is installed and the buildings are directly water-tight. For the AFC and the New Centenary Building most of the fitout would be carried out from the adjacent Work Zones on Rose Bay Avenue straight into the relevant floor levels.
 - vertical movement of workers and materials would also occur for the New Centenary Building with a man materials hoist located on the oval and servicing each floor of the building.
 - this would result in deliveries of approximately 20 - 30 per day, predominantly smaller trucks and utes, for approximately 20 weeks.
- **connection of services** - the services engineers are yet to determine specific locations for mains supply connections (water, gas, electricity and sewer).



3. Strategic Context

The Department considers that the proposal is appropriate for the site given:

- it is consistent with the Greater Sydney Regional Plan, A metropolis of three cities, as it provide new and expanded school facilities to meet the growing needs of Sydney
- it is consistent with the NSW Future Transport Strategy 2056, as it would provide an improved educational facility in an accessible location and provide access to additional new employment opportunities close to existing and future public transport
- it is consistent with the vision outlined in the Greater Sydney Commission's Eastern City District Plan, as it would support the provision of services and social infrastructure to meet the changing needs of the school
- it is consistent with State Infrastructure Strategy 2018 – 2038 Building the Momentum, as it proposes:
 - an expansion to the existing school capacity and function
 - facilities to support the growth in demand for secondary student enrolments
 - a school designed to accommodate infrastructure and facilities sharing with communities
- it would provide direct investment in the region of approximately \$125,000,000, which would support up to 296 construction jobs and 8 new operational jobs.



4. Statutory Context

4.1 State significant development

The proposal is SSD under section 4.36 (development declared SSD) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as the development has a CIV in excess of \$20 million and is for the purpose of alterations or additions to an existing school under clause 15 of Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011.

The Minister is the consent authority under section 4.5 of the EP&A Act.

In accordance with the then Minister for Planning and Public Spaces' delegation to determine SSD applications, signed on 11 October 2017, the Executive Director, Infrastructure Assessments may determine this application as:

- the relevant Council has not made an objection.
- there are less than 25 public submissions in the nature of objection.
- a political disclosure statement has not been made.

4.2 Permissibility

The site is zoned SP2 Infrastructure – Educational Establishment under Woollahra Local Environmental Plan 2014 (WLEP 2014). The proposed redevelopment of an existing educational establishment is permissible with consent. The proposal also includes the redevelopment of the existing ancillary aquatic and fitness centre and creation of subsurface carpark which would operate in an integrated manner as part of the larger educational establishment facilities and are also permissible with consent.

Therefore, the Minister for Planning and Public Spaces or delegate may determine the carrying out of the development.

4.3 Other approvals

Under section 4.41 of the EP&A Act, a number of other approvals are integrated into the State significant development approval process, and consequently are not required to be separately obtained for the proposal.

Under section 4.42 of the EP&A Act, a number of further approvals are required, but must be substantially consistent with any development consent for the proposal (e.g. approvals for any works under the *Roads Act 1993*).

The Department has consulted with the relevant public authorities responsible for integrated and other approvals, considered their advice in its assessment of the project, and included suitable conditions in the recommended conditions of consent (see **Appendix C**).

4.4 Mandatory matters for consideration

Objects of the EP&A Act

The objects of the EP&A Act are the underpinning principles upon which the assessment is conducted. The statutory powers in the EP&A Act (such as the power to grant consent/ approval) are to be understood as powers to advance the objects of the legislation, and limits on those powers are set by reference to those

objects. Therefore, in making an assessment, the objects should be considered to the extent they are relevant. A response to the objects of the EP&A Act is provided at **Table 3**.

Table 3 | Response to the objects of section 1.3 of the EP&A Act

Objects of the EP&A Act	Consideration
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State’s natural and other resources	The proposal would ensure the proper management and development of suitably zoned land that would promote the social welfare of the community and State. In addition, the proposal would provide new employment opportunities close to homes and public transport.
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal includes measures to deliver Ecologically Sustainable Development (ESD) principles (see Section 4.4.1).
(c) to promote the orderly and economic use and development of land,	The proposal is considered to be an orderly and economic use and development of the land as it is consistent with the site’s land use zoning and historical use as an educational establishment.
(d) to promote the delivery and maintenance of affordable housing,	Not applicable.
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The proposal does not detrimentally impact upon threatened species, vulnerable species, significant habitats, populations or ecological communities. The proposal includes new landscaping works that would provide for new habitat opportunities.
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	<p>The proposal would not impact on the significance of the adjoining heritage items, or on the heritage significance on the site.</p> <p>The built form of the proposal has been setback appropriately from heritage items and is sited in a manner that respects the heritage characteristics of the school site and surrounds. The New Centenary Building is sited along the site’s eastern boundary and set within the hill, minimising detrimental bulk and scale impacts on Rose Bay Avenue and the school site.</p> <p>The proposal does not modify the historical educational land use of the site and would strengthen the north to south relationship across site through the</p>

proposed built form. The AFC is a recessive design that ensures that the heritage characteristics of the existing site and surrounds are not impacted upon.

The Aboriginal cultural heritage assessment prepared for the proposal concludes that the site's redevelopment is unlikely to have any impacts on Aboriginal cultural heritage.

(g) to promote good design and amenity of the built environment,

The proposal has been designed to minimise potential amenity impacts while maximising its internal amenity and to ensure a development with good design is achieved (**Section 6**).

(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,

The proposal involves the construction of a new, modern education building and associated recreational infrastructure. The design of the proposal incorporates energy and water efficient design initiatives that would minimise the consumption and use of natural resources. The proposal has also been designed to ensure compliance with minimum building standards required to ensure the health and safety of primary, secondary students and other children under care on-site is maximised at all times.

(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,

The Department publicly exhibited the proposal (**Section 5.1**), which included consultation with Council and other public authorities and consideration of their responses (**Section 5**).

(j) to provide increased opportunity for community participation in environmental planning and assessment.

The Department publicly exhibited the proposal as outlined in **Section 5.1**, which included notifying adjoining landowners, placing a notice in newspapers and displaying the proposal on the Department's website and at Council during the exhibition period.

4.4.1 Ecologically sustainable development

The EP&A Act adopts the definition of ESD found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle
- inter-generational equity
- conservation of biological diversity and ecological integrity
- improved valuation, pricing and incentive mechanisms.

The Applicant has also identified a range of ESD initiatives within the design of the project to enable the proposal to achieve a minimum five Green Star rating, based on the following core principles:

- comfort and wellbeing
 - air conditioning designed to exceed Australian Standards.
 - installation of acoustic treatment measures.
 - efficient lighting.
 - management of natural lighting levels.
 - glare reduction.
 - improved air quality.
 - promoting high levels of thermal comfort through building design.
- energy and carbon
 - improved thermal, solar and ventilation fabric performance in the buildings design.
 - promoting mixed modes of operation.
 - use of high efficiency lighting, energy efficient appliances.
 - green roofs on the AFC and New Centenary Building.
 - continuous metering/monitoring of energy sources.
- materials
 - minimise use of Polyvinyl Chloride (PVC), use of sustainable timber, reduction of non-reused or recycled content in concrete mixes.
 - maximise recycling of structural materials, use of high competency materials for paint/adhesives/sealants.
 - reduction in construction waste going to landfill.
 - waste management during construction would ensure an 80% recycling rate during demolition and construction phases.
- water
 - reducing potable water through efficient fixtures/monitoring use.
 - minimising negative surrounding habitat impacts from stormwater runoff.
 - rainwater harvesting and reuse within a site wide strategy for a centralised tank to source non-potable water for irrigation of Hordern Oval (to be supplemented by bore water).
- management
 - building to undergo high level of commissioning/testing and tuning upon completion to ensure the building services operate efficiently and to their full ESD potential.
 - implementation of proactive formal environmental management plan to improve ESD performance.
 - implement best practice waste management systems.
- transport
 - promoting use of non-private vehicle transport trips to the school.
 - provision of bicycle facilities for staff and students; including end of trip facilities.

The Department has recommended a condition that the details of the final ESD initiatives implemented be submitted to the satisfaction of the Certifying Authority prior to commencement of works.

The Department has considered the proposed development in relation to the ESD principles. The precautionary and inter-generational equity principles have been applied in the decision making process via a thorough and rigorous assessment of the environmental impacts of the proposed development. The proposed development is consistent with ESD principles as described in **Section 6.6** and **Appendix B** of the Applicant's EIS, which has

been prepared in accordance with the requirements of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation).

Overall, the proposal is consistent with ESD principles and the Department is satisfied the proposed sustainability initiatives would encourage ESD, in accordance with the objects of the EP&A Act.

4.4.2 Environmental Planning and Assessment Regulation 2000

Subject to any other references to compliance with the EP&A Regulation cited in this report, the requirements for Notification (Part 6, Division 6) and Fees (Part 15, Division 1AA) have been complied with.

4.4.3 Planning Secretary's Environmental Assessment Requirements

The EIS is compliant with the Planning Secretary's Environmental Assessment Requirements (SEARs) and is sufficient to enable an adequate consideration and assessment of the proposal for determination purposes.

4.4.4 Section 4.15(1) matters for consideration

Table 4 identifies the matters for consideration under section 4.15 of the EP&A Act that apply to SSD, in accordance with section 4.40 of the EP&A Act. The table represents a summary for which additional information and consideration is provided for in **Section 6** (Assessment) and relevant appendices or other sections of this report and EIS, referenced in the table.

Table 4 | Section 4.15(1) matters for consideration

Section 4.15(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Satisfactorily complies. The Department's consideration of the relevant EPIs is provided in Appendix B of this report.
(a)(ii) any proposed instrument	The Department's consideration of the draft EPIs is provided in Appendix B of this report.
(a)(iii) any development control plan (DCP)	Under clause 11 of the SRD SEPP, DCPs do not apply to SSD. Notwithstanding, consideration has been given to relevant DCPs at Appendix B .
(a)(iia) any planning agreement	Not applicable.
(a)(iv) the regulations <i>Refer Division 8 of the EP&A Regulation</i>	The application satisfactorily meets the relevant requirements of the EP&A Regulation, including the procedures relating to applications (Part 6 of the EP&A Regulation), public participation procedures for SSD and Schedule 2 of the EP&A Regulation relating to EIS.
(b) the likely impacts of that development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	Appropriately mitigated or conditioned - refer to Section 5 of this report.
(c) the suitability of the site for the development	The site is suitable for the development as discussed in Sections 3 and 5 of this report.

(d) any submissions

Consideration has been given to the submissions received during the exhibition period. See **Sections 4** and **5** of this report.

(e) the public interest

Refer to **Section 5** of this report.

4.4.5 Environmental planning instruments

Under section 4.15 of the EP&A Act, the consent authority is required to take into consideration any environmental planning instrument (EPI) that is of relevance to the development the subject of the development application. Therefore, the assessment report must include a copy of, or reference to, the provisions of any EPIs that substantially govern the project and that have been taken into account in the assessment of the project.

The Department has undertaken a detailed assessment of these EPIs in **Appendix B** and is satisfied the application is consistent with the requirements of the EPIs.

4.4.6 Biodiversity Conservation Act 2016

Under section 7.9(2) of the *Biodiversity Conservation Act 2016* (BC Act), SSD applications are "to be accompanied by a biodiversity development assessment report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values".

The proposed works are not likely to have a significant impact on biodiversity values. Environment, Energy and Science Group of the Department of Planning, Industry and Environment (former NSW Office of Environment and Heritage) (EESG) and the Department have determined that the redevelopment of the Cranbrook School is not required to be accompanied by a BDAR and as such a biodiversity waiver was issued on 17 December 2018.



5. Engagement

5.1 Department's engagement

In accordance with Schedule 1 of the EP&A Act, the Department publicly exhibited the application from Thursday, 24 May 2018 until Friday 22 June 2018 (30 days). The application was exhibited at the Department and on its website and at Woollahra Municipal Council's office.

The Department placed a public exhibition notice in the Sydney Morning Herald on Thursday, 24 May 2018 until Friday 22 June 2018 (30 days), and notified adjoining landholders and relevant State and local government authorities in writing. The Department representatives visited the site to provide an informed assessment of the development.

The Department has considered the comments raised in the public authority and public submissions during the assessment of the application (**Section 6**) and/or by way of recommended conditions in the instrument of consent at **Appendix C**.

5.2 Summary of submissions

The Department received a total of eight submissions, comprising five submissions from public authorities and three submissions (one submission in objection) from the general public. A summary of the issues raised in the submissions is provided at **Tables 5** and **6** below.

5.3 Public authority submissions

A summary of the issues raised in the public authority submissions is provided at **Table 5** below and copies of the submissions may be viewed at **Appendix A**.

Table 5 | Summary of public authority submissions to the EIS exhibition

Woollahra Municipal Council (Council)

Council does not object to the proposal, however, comments were provided regarding:

- the payment of section 7.11 contributions (formerly known as section 94A) is required totaling to \$1,250,000.
- to cater for the increased traffic demand from the proposal, a Green Travel Plan (GTP), adequate bicycle storage and facilities are to be provided.
- the preparation of a Construction Management Plan should be prepared detailing how impacts to the surrounding network are mitigated in addition to truck movements being identified during the significant excavation stage.
- additional information should be provided relating to detailed plans in the Tree Strategy (submitted as part of the EIS), a comprehensive assessment on the impact in trees in accordance with *AS4970-2009 Protection of Trees on Development Sites*, analysis of encroachment into the *Tree Protection Zones and Structural Root Zones* and clarification of inconsistencies in submitted documents (relating to identification trees).
- expansions to the college should comply with any current conditions of consent restricting student and/or staff numbers.

-
- the proposal lacks Water Sensitive Urban Design Features (WSUD) and conditions/considerations are recommended to reduce any negative impacts on Council Infrastructure.
 - recommendations and conditions were provided to ensure no detrimental impacts occur from acoustic environmental health related impacts.
 - no objection or significant concern was raised in regards to urban design, contamination, European or Aboriginal heritage, flora and fauna, energy and sustainability matters subject to recommended conditions.

Sydney Water

Sydney Water advised that adequate capacity for water and wastewater systems exists and provided standard conditions regarding the arrangement of future utilities.

Transport for NSW (TfNSW)

TfNSW reviewed the EIS and recommended conditions of consent relating to the following matters:

- implementation and annual update of a GTP.
- the preparation of a traffic and parking management plan and a signage and linemarking plan.
- undertaking of a Road Safety Evaluation (RSE) and for appropriate road safety measures and/or traffic measures being implemented based on the outcomes of the RSE.

Transport for NSW (Roads and Maritime Services)(former Roads and Maritime Services) TfNSW(RMS)

TfNSW(RMS) recommended the following conditions:

- all buildings and structures (other than pedestrian footpath awnings), together with any improvements integral to the future use of the site should be wholly within the freehold property along the New South Head Road boundary.
- a Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council prior to the issue of a Construction Certificate.

EESG

EESG provided a number of comments specifically related to Aboriginal cultural heritage and the requirement for the preparation of an Aboriginal Cultural Heritage Assessment Report (ACHAR) to accompany the development. EESG stated that the requirement to prepare an ACHAR are justified as follows:

- the scope of excavation works is significantly greater than understood at the time when SEARs were requested for the proposed development.
- EESG considers that the excavation works extend far beyond the oval's original fill area and given that there are two known Aboriginal sites within 1 km of the site, EESG recommended that the ACHAR be required.
- EESG also considered that there is likely to be significant cultural heritage values and Aboriginal peoples associations with this site given its proximity to Sydney Harbour which need to be explored in consultation with the Aboriginal community.

- EESG recommended that the Response to Submissions (RtS) identify and describe the Aboriginal cultural heritage values that exist across the whole area that would be affected by the development. This may include the need for surface survey and test excavation.
- EESG also recommended that consultation is undertaken in accordance with Aboriginal cultural heritage consultation requirements for proponents 2010 DECCW) and documented in the ACHAR.

5.4 Public submissions

A summary of the issues raised in the one public objection is provided at **Table 6** below.

Table 6 | Summary of the public submissions to the proposal

Issue
<ul style="list-style-type: none"> • The proposal has not considered the additional impact that the proposal has in respect of the future residences located a 9 and 11 Rose Bay Avenue. • Issues raised in regard to the negative impacts from the operation of the proposed student drop-off/collection scheme as there has been a failure to undertake a proper assessment of the operational method of the drop-off/collection formula. • The location of the carpark entry and exit should be relocated to the north western part of the site so that cars would enter through the left-hand parking lane on New South Head Road (not to impede on any traffic onto New South Head Road). • There should be no loading zones on Rose Bay Avenue and no details have been given regarding the size/length of the buses that are contemplated to be driving along Rose Bay Avenue (which is assumed to be a short time bus zone). • Installation of restrictive residential parking along the eastern side of Rose Bay Avenue is strongly supported to limit daytime use by school students and teachers. • Restrictive parking on Rose Bay Avenue should include parking rights to residents with parking permits or other limited hours parking uses during weekdays.

5.5 Response to Submissions

Following the exhibition of the application the Department placed copies of all submissions received on its website and requested the Applicant provide a response to the issues raised in the submissions. On 20 February 2019, the Applicant provided a RtS (**Appendix A**) on the issues raised during the exhibition of the proposal.

The RtS was made publicly available on the Department website and was referred to the relevant public authorities. An additional four submissions were received from public authorities, including Council, TfNSW(RMS), TfNSW and EESG. A summary of the issues raised in the submissions is provided at **Table 7** and copies of the submissions may be viewed at **Appendix A**.

Table 7 | Summary of public authority submissions to the RtS

Council
<p>Council confirmed the RtS had addressed some aspects of their original submission and was generally supportive of the proposal subject to updated recommended conditions should the application be approved relating to:</p> <ul style="list-style-type: none"> • section 7.11 contributions and security payment required. • traffic and parking.

-
- student and staff numbers.
 - site drainage.
 - impacts on Council infrastructure.
 - environmental health.
 - heritage.
 - environment and sustainability.

TfNSW(RMS)

TfNSW(RMS) reviewed the RtS and provided recommended concurrent conditions of consent to works affecting New South Head Road as well conditions of consent relating to Road Occupancy Licenses (ROLs), demolition, construction works and construction traffic management.

Furthermore, RMS provided comments towards Council's suggestion that pedestrian connectivity adjacent to New South Head Road could be provided on private land subject to an easement for access and associated registration of a Public Positive Covenant. TfNSW(RMS) raised concerns with this approach and requested that the area to be used as a public footpath be provided as part of the road reserve and as such be dedicated to Council as public road reserve as part of any approval issued.

TfNSW

TfNSW provided comments on the RtS regarding the survey methodology and recommended improvements to the GTP and/or School Travel Plan (STP).

EESG

EESG commented on the RtS by recommending conditions of consent relating to Aboriginal cultural heritage, biodiversity and flooding, should the application be supported.



6. Assessment

The Department has considered the EIS, the issues raised in submissions and the Applicant's RtS in its assessment of the proposal. The Department considers the key issues associated with the proposal are:

- traffic and transport.
- heritage, built form and urban design.
- landscaping and public domain.
- residential amenity.

Each of these issues is discussed in the following sections of this report. Other issues were taken into consideration during the assessment of the application and are discussed at **Section 6.5**.

6.1 Traffic and Transport

The Application was supported by a traffic and parking plan (TPP) and Construction Traffic Management Plan (CTMP) (updated by the RtS), which provides an assessment of the proposal's potential traffic, transport and parking related impacts. The Application also included a GTP that proposes a range of initiatives to increase the share of alternate modes of transport.

6.1.1 Construction traffic and parking

The scale of demolition and excavation works required for the proposal increases the potential for construction vehicle related impacts. The CTMP considers the site preparation and construction traffic associated with the proposed development and in consideration to the proposal that the school would remain open during construction works. As shown in **Figure 22** below, construction vehicle access and egress from the site would be achieved from Rose Bay Avenue.



Figure 22 | Primary access routes to site during construction (Source: Applicant's RtS 2019).

The CTMP also identifies the potential for a secondary construction vehicle access route should a site at the Royal Sydney Golf Club become available for the disposal of soil. The access and egress would be the same as the primary construction vehicle route (i.e. Rose Bay Avenue) as shown in **Figure 23** below.

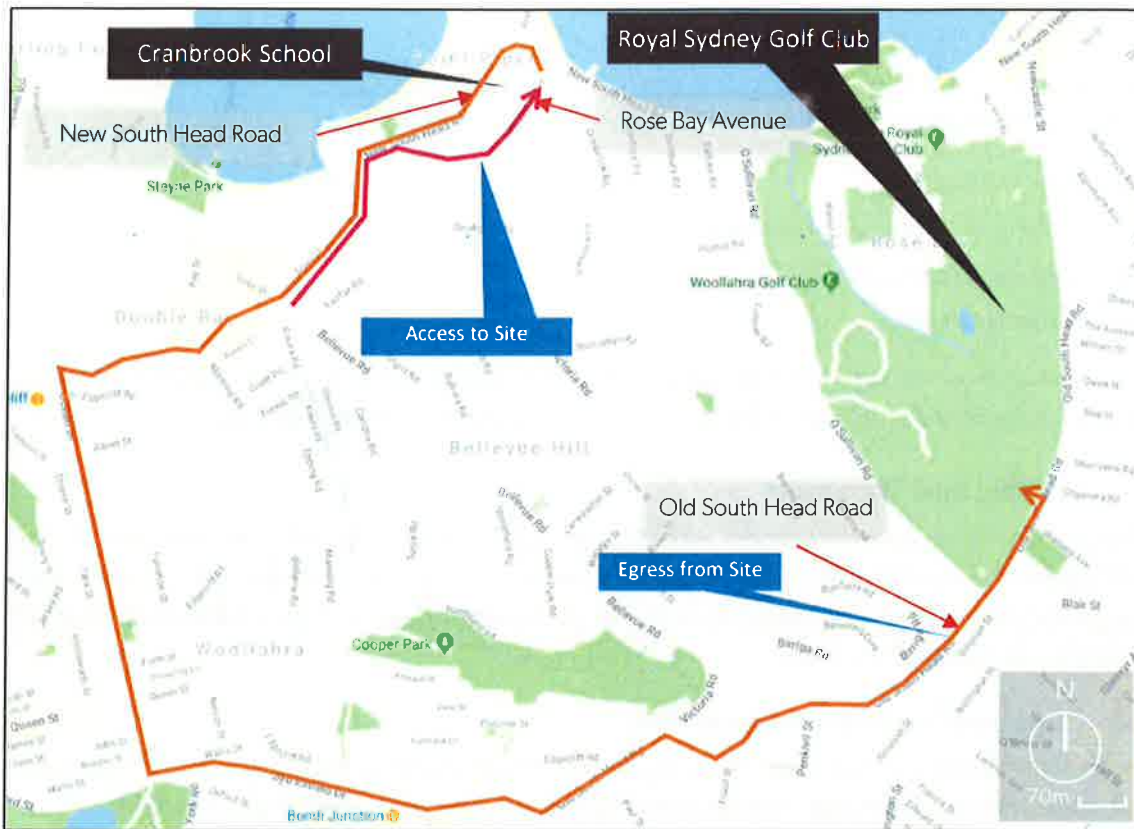


Figure 23 | Alternate soil disposal site access routes during construction (Source: Applicant's RtS 2019).

The CTMP identifies that the primary vehicles used during the construction phases would be the following:

- 19m articulated truck – delivery of heavy plant and materials.
- truck and dog – removal of excavated and demolished material.
- rigid trucks (up to 12.5m) – delivery of plant and material.
- concrete agitators – concrete delivery.
- small rigid vehicles and utes/vans – delivery of small plant and material.
- private vehicles (construction and public) – construction, management and school staff.

The CTMP identifies that there would be up to between 30 - 40 vehicle movements a day, approximately three to four vehicles an hour. No changes to external roads are proposed, and a works zone would be established on site to allow for the safe entry and exit of construction vehicles in a forward and efficient manner. Temporary no stopping zones will be implemented on the northern section of Rose Bay Avenue (on the school boundary side) towards the New South Head Road intersection, to ensure that construction vehicles entering and leaving the site from the gates have sufficient clearance. The implementation of the no stopping zone will result in the temporary loss of 12 carparking spaces along the subject site of Rose Bay Avenue. The no stopping zones will be removed upon the conclusion of construction activities. A management system would be implemented to ensure that the inclusion staggering of deliveries, provision of standing times, traffic control measures at entry and exit points, sequencing work activities and prefabrication of materials off site where possible.

In regards to construction traffic generation, Council, TfNSW(RMS) or TfNSW did not object, subject to implementing appropriate construction traffic management protocols, preparation of dilapidation reports for public infrastructure work, maintaining pedestrian and vehicular access and applying for construction work zones where necessary.

The Department concludes that subject to the recommended conditions managing construction traffic impacts, and preparation and implementation of relevant construction traffic management plans, ensures that there would be no detrimental impacts to the locality, or school users on the site during the construction phases.

6.1.2 Operational traffic and parking

Traffic Generation

The proposed development would not result in an increase in total student numbers however, would result in additional traffic generation impacts through the increase in 8 FTE staff as well as the provision of 124 on site car parking spaces as part of the subsurface carpark accessed from Rose Bay Avenue. The expansion of the AFC facility and the facilities provided in the New Centenary Building may also create additional load on the surrounding road network and subsequent detrimental impacts.

The Applicant submitted a Green Travel Plan (GTP) as part of the TPP (in addition to providing an additional 20 bicycle parking spaces) to influence a shift in the mode share to reduce reliance on private vehicular trips to and from the school. The site and surrounds have excellent public transport and pedestrian connectivity through regular bus services, the school provides a bus service to be used by students.

The Applicant's RtS prepared additional traffic modelling as well as a road safety audit (for the internal roadway) of the site. The road safety audit determined that the proposal would not result in any detrimental safety impacts from the use of the pick-up and drop-off facilities (as shown in **Figure 24**) on the existing internal road, subject to the implementation of management and protocol measures.

In response to the Applicant's RtS, TfNSW and TfNSW(RMS) raised no specific concerns relating to the performance of intersections and traffic generated by the proposal.

In response to the Department's request for further intersection analysis, traffic modelling was undertaken on the two key intersections that would be impacted upon by the proposed development. The existing intersection performance is outlined in **Table 8** below.

Table 8 | Traffic modelling results (Source: Applicant's RtS 2019).

Scenario	Intersection	Period	Overall Level of Service	Average delay (sec)	Degree of saturation	Average Length of Queue (m)
Existing	New South Head Road & Rose Bay Avenue	AM Peak	A	0.3	0.460	1.0
		PM Peak	A	0.2	0.454	0.6
Existing	New South Road & Victoria Road	AM Peak	B	20.8	0.858	181.9
		PM Peak	B	15.8	0.764	134.9

The Department notes that the development does not propose any significant increases in FTE staff and there would be no increase in the student population (beyond the existing enrolment cap). The changes in traffic generation and patterns of movement on account of the proposed pick-up and drop-off facilities and parking

provisions on and off site, should not change the origin and destination of staff and students in how they enter or exit the site during peak AM or PM peak periods. Therefore, the Department considers that on this basis the proposed development would not affect the peak hour traffic movements on the external road network, notably the two intersections modelled in **Table 8** above.

The Department considers that the traffic generation related impacts from the proposed development would not have significant detrimental impacts to the surrounding road network and the proposal is acceptable in this regard.

Pick-up/drop-off facilities

A component of the proposed development is a restructuring and formalisation of the internal road that is accessed from Victoria Road (as shown in **Figure 24** below). The Applicant's EIS determined that based on a demand assessment, 16 formalised/dedicated spaces are required during the afternoon pick-up. The formalisation of these spaces would alter vehicle movements (noting that there is no additional demand), to within the Victoria Road gate (off site). The worst-case scenario of the morning peak period was assessed via SIDRA modelling at this gate/intersection in which it was confirmed that the intersection would continue to operate at Level of Service (LOS) A, which indicates good operation with spare capacity.

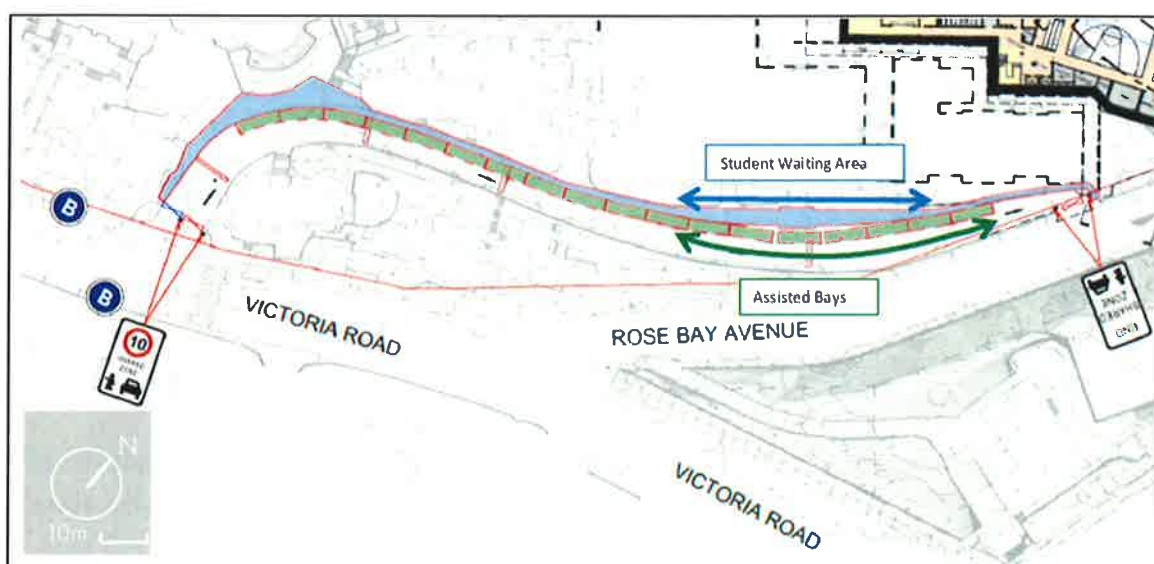


Figure 24 | Formalised drop-off and pick-up provisions (Source: Applicant's RtS 2019).

Council provided no comments on the operation or use of the internal road for pick-up and drop-off facilities. In relation to the pick-up and drop-off use, TfNSW recommended conditions of consent for the preparation and implementation of a traffic and parking and a signage and linemarking plan. These conditions seek to safely manage the high volume of traffic (vehicular and pedestrian) movements, which generally occur within a concentrated timeframe before and after school hours.

TfNSW's submission also requested that a road safety evaluation be conducted that included the pick-up and drop-off operation. The Applicant's RtS included the traffic and parking and a signage and linemarking plan as well as a completed road safety evaluation, to which TfNSW provided no additional specific comments.

One public submission received in objection raised concerns about the operation, use and location of the pick-up and drop-off facilities. However, the Department considers that the provision of the pick-up and drop-off spaces would ensure that the surrounding network operates in a more efficient manner during the morning and afternoon peak periods, and that the formalisation of these spaces on the internal road within the site, means that facilities are present to ensure student and staff safety is not detrimentally affected.

The Department considers that the Applicant's EIS, TPP, traffic and parking and signage and linemarking plan as well as the safety management measures in the road safety evaluation appropriately address performance and safety concerns associated with the operation of the pick-up and drop-off facilities. A condition of consent has been recommended for the implementation and subsequent management of the pick-up and drop-off area in accordance with these plans.

Parking facilities

The school currently has provisions for 29 car parking spaces (to be relocated once the subsurface carpark is completed) on site accessed from Victoria Road. The proposal seeks to provide a total of 124 car parking spaces (**Figure 25** below) within a subsurface level accessed and exited from Rose Bay Avenue. The overall net increase of car parking spaces on site is 95 spaces. The Woollahra Development Control Plan (DCP) 2015 requires the minimum provision of one space per 100 sqm of GFA, equating for a need of 100 spaces (including 3 accessible spaces) when accounting for the total GFA proposed as part of this development. The car park would also be utilised for out of hours and community uses such as the learn to swim classes. These activities would generally occur outside of peak AM and PM school times.

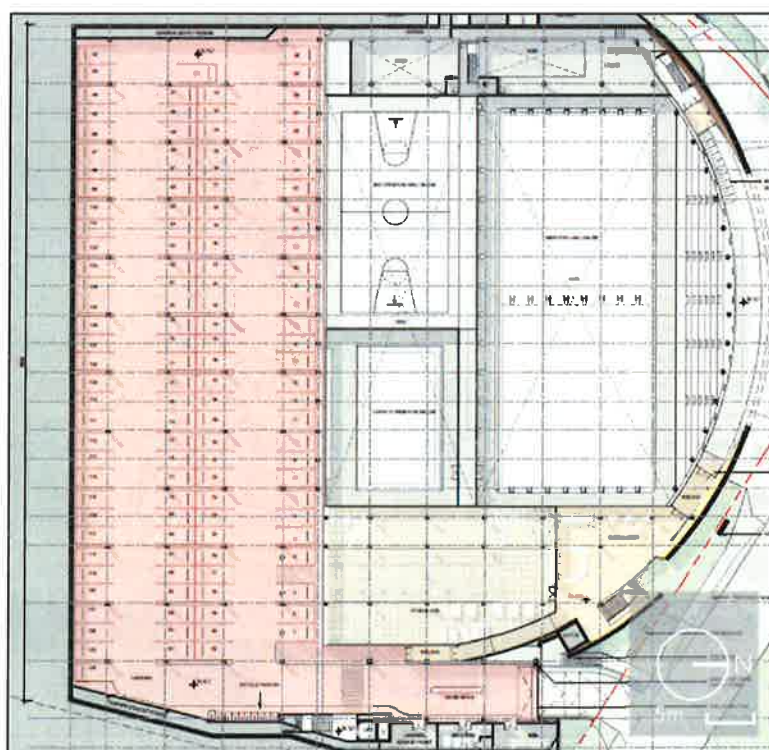


Figure 25 | Subsurface car park as shaded in red (Source: Applicant's RtS 2019).

In regard to the proposed underground parking facilities no agencies or Council raised specific concerns about the provisions for on-site parking. The one public submission received raised concerns about street parking along Rose Bay Avenue and subsequently requested additional restrictions being placed.

The Department notes that there is a minor shortfall in the required additional total spaces (5 spaces), however, it is still considered that the car parking provisions as proposed are suitable as it would result in a significant reduction in the demand for on street parking (notably on Rose Bay Avenue), caters for a multitude of school and community uses and that the overall impacts of internalising these car parking spaces would be substantive as it would be able to provide for greater efficiency on the surrounding road network. The Applicant's RtS also included a GTP that targets a mode share shift towards non-private vehicle use, thereby reducing overall demand for on-site car parking spaces. Furthermore, the Department has recommended conditions of consent relating to

the implementation of a traffic & parking and signage & linemarking plan to ensure that the change in on street parking conditions would be safely managed to avoid pedestrian vehicle conflicts.

As discussed previously, the proposal will add 21 additional bicycle parking spaces across five locations on the site, to result in a total of 121 bicycle parking spaces (as shown in **Figure 26** below). The Woollahra DCP 2015 requires that one space is to be provided for 5% members of staff and one space for 10% of all students. Based on these rates, the site would have to provide a total of 118 spaces, thereby meaning the proposed facilities comply.

The Department considers that given there is no substantial increase in staff or student numbers as part of the development, the provision of 21 additional spaces and the formalisation of the existing provisions, are deemed suitable and in conjunction with the application of the GTP requirements, promotes a healthier and an alternative mode of transport for both staff and students.



Figure 26 | Location of bicycle facilities (Source: Applicant's RtS 2019).

6.1.3 Active Transport

Existing pedestrian footpaths and the internal pedestrian routes provide sufficient access for users and access is also provided along all road frontages through existing pedestrian access gates. The site is accessible for students and staff relying on bicycles to travel to and from the site and the existing bicycle storage space is to be increased in capacity by 20 spaces to a total of 80 spaces. Additionally, the Applicant provided a GTP that provides measures for staff and students to encourage more active modes of transport and is characterised by the following objectives:

- constant review of policies and planning documents.
- identify the role of a travel plan coordinator/committee.
- establish benchmarks for future analysis.

- specified five-year targets for improved sustainable mode share.
- implementing staging and hierarchical approach to action items (walking, cycling, public transport/private bus service, car pooling, kiss and ride and private vehicles).
- implementation of promotion and marketing strategy.
- ensuring that a monitoring and review strategy is implemented.

In response to the RtS, Council and TfNSW had no other recommendations or requirements to be implemented within the GTP and recommended that the implementation and annual review of the GTP be a condition of consent.

The Department considers that the existing non-vehicular provisions in and around the site would be sufficient in combination with the implementation of the GTP. The improved ability to walk and ride to school would encourage students and staff to choose active transport modes for their journey. The Department has recommended a condition requiring the GTP to be implemented as well as being reviewed and updated annually.

6.2 Heritage, built form and urban design

The proposal comprises the alterations and additions to the campus through the demolition of the existing War Memorial Hall, Mansfield building and the excavation of Hordern Oval.

The Department considers the key heritage, built form and urban design issues relating to the proposal to be demolition of existing buildings, bulk and scale, overshadowing and amenity impacts, view impacts and landscaping and urban design, which are addressed in further detail below.

6.2.1 Demolition and Heritage

The Applicant proposes to demolish the existing Mansfield Hall and War Memorial buildings to facilitate the construction of the New Centenary Building. It is noted that while the site as a whole is listed as a local heritage item under the WLEP 2014, the two subject buildings to be demolished are not listed as heritage items in Schedule 5 of the WLEP 2014.

Furthermore, the excavation of Hordern Oval is not considered to result in detrimental impacts towards any heritage characteristics of the site as the oval itself is also not listed and would be reinstated upon the completion of construction of the AFC and subsurface carpark.

The Applicant's EIS was supported by a Heritage Impact Statement (HIS) and heritage demolition report. The HIS concluded that the War Memorial hall and Mansfield building do not meet the criteria for heritage significance for a local or state item. However, the Department notes that the conservation management plan prepared for the school site placed moderate significance for the buildings. The significance, however is attributed to the fact that rather than having individual merit (regarding heritage significance), the buildings have a sympathetic contribution collectively. The Applicant's heritage demolition report concluded that the demolition of the War Memorial Hall and Mansfield buildings to cater for the similarly sympathetic New Centenary Building would not have an unacceptable impact on the heritage significance of the school site.

The Applicant's RtS included a moveable heritage schedule that identified 53 items within the War Memorial Hall and Mansfield buildings that are considered to have specific cultural heritage to the school and are to be salvaged prior to the demolition of the buildings.

The application was referred to Council and no objection was made in regard to the demolition on the site, subject to recommended conditions ensuring that heritage values on site are not detrimentally impacted upon. Council stated that while the AFC has considerable heritage significance by being located opposite the original

ferry location (the now location of the heritage listed Rose Bay Police station), the AFC is considered to create positive visual impact and provide an improvement on the existing frontage on New South Head Road.

Council also stated that the New Centenary Building has been designed in a sympathetic manner to the historic buildings on site and that the overall open space qualities of the northern section of the site are retained by the proposed development. Council provided no specific objections to the proposal subject to recommended conditions maintaining and preserving heritage characteristics on the site.

The Department considers that the proposal would not have any significant or detrimental impacts towards any heritage values of the site or on any surrounding heritage values and characteristics in the area. The Department has recommended conditions relating to the adoption of the recommendations in the HIS, implementation of a heritage interpretation strategy, photographic archival recording, finalising a inventory of moveable heritage and ensuring that mitigation measures are in place to ensure that there are no detrimental impacts to the heritage listed Sport Pavilion (Rotunda) located nearby to the works zone.

6.2.2 Building Height

Under clause 4.3 of the WLEP 2014, the site is subject to a 9.5m building height control as shown in **Figure 27**. The proposal would have a maximum building height of 16.72m and would result in a non compliance of 7.22m.



Figure 27 | WLEP 2014 building height map (Source: DP&E 2019).

The site is characterised by a range of built form and building heights, many of which exceed the 9.5m height limit. This is partly due to the undulating nature of the site as well as progressive development types since the school's inception. The New Centenary Building (**Figures 28** and **29**) has the greatest building height. The maximum height non-compliance of 4.82m which is just over one storey greater than the existing built form of the Mansfield Hall and War Memorial Building.

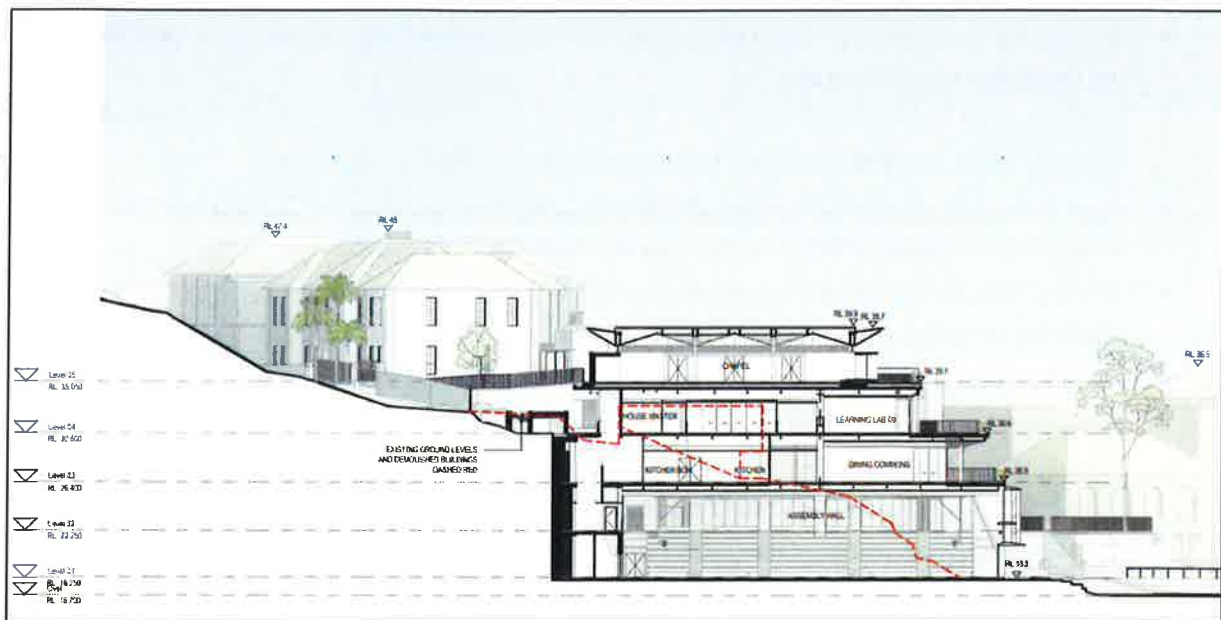


Figure 28 | Cross sectional view of New Centenary Building from Rose Bay Avenue (Source: Applicant's RtS 2019).

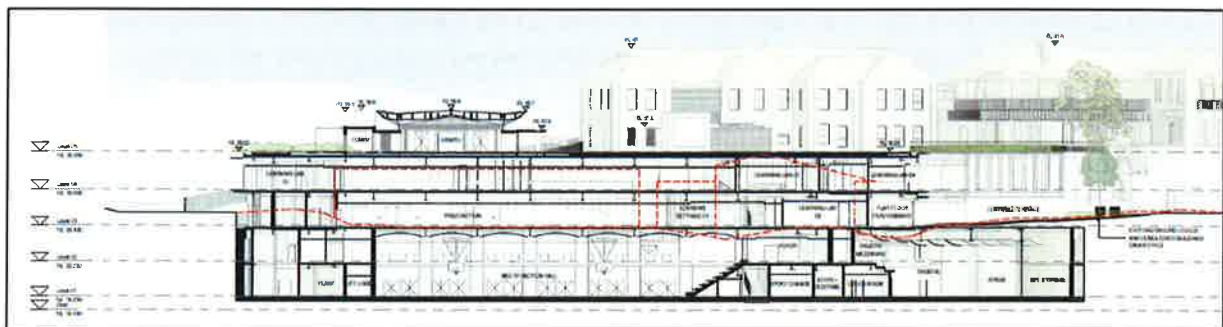


Figure 29 | Cross sectional looking southwards from Hordern Oval (Source: Applicant's RtS 2019).

Clause 42 of the Education SEPP provides that development consent may be granted for the purpose of a school that is SSD, even though that development would contravene a development standard imposed by the Education SEPP or any other EPI.

The Department notes that no objections to the proposed building height were raised by Council, the Government Architect NSW (GANSW), or the general public. The proposal underwent several reviews through the Design Review Panels convened by GANSW, where it was concluded that the proposal could achieve design excellence.

Notwithstanding, the Department has considered the provisions under clause 4.6 of the WLEP 2014 as a guide in its assessment of the proposed building height. It has also considered the merits of the proposal and the impacts of the height variation on surrounding areas in assessing whether to support the contravention to the building height control.

The Applicant did not submit a clause 4.6 variation request as clause 42 of the Education SEPP applies, however, the EIS provides justification for the proposed variation. The Applicant argues that strict compliance with the development standard is unreasonable and unnecessary as:

- the proposal is largely consistent with the existing building envelope of the site.
- the New Centenary Building sits below the height of the heritage building immediately to the south.
- the building would be constructed into a steep hillside, and would terrace down that slope minimising the perception of bulk and scale.
- there would be minimal impact on views to the harbour or any significant vista from the public domain; presently, views over War Memorial Hall are to trees beyond the site to the west.
- views from private residential dwellings fronting Rose Bay Avenue across the Cranbrook School site would not be materially affected by the proposed building height exceedance.
- dwellings across Rose Bay avenue are elevated above the height of the proposed building and any significant views to the harbour or city would be maintained above the proposed Centenary Building.
- the building height exceedance would not impact privacy to neighbouring residential dwellings.
- trafficable terraces are oriented to the north west, away from neighbouring residences.
- shadow diagrams demonstrate that no shadows would be cast on neighbouring properties. The part of the building which exceeds the height standard is located to the north-west face of the building. Any shadow cast by that element of the built form would fall within the shadow cast by a complying height in the afternoon.
- the proposed building height exceedance would not create any material impacts to the privacy or view amenity of neighbouring properties or from the public domain.

The Applicant responded further in its assessment of view impacts that the proposal's non-compliance with the 9.5m building height control did not result in significant view loss to any private or public domain views currently experienced by properties along Rose Bay Avenue.

The Department has assessed the proposed height variation and has considered the Applicant's proposal and its justification for the proposed building height variation having regard to the established principles in *Four2Five Pty Ltd v Ashfield Council* [2015] NSWLEC 1009. Consistent with this decision, sufficient environmental planning grounds, unique to a site, must be demonstrated by the Applicant to justify the proposed variation to the development standard.

The Department notes that the site and surrounds are characterised by single to multiple storey buildings and along Rose Bay Avenue adjacent to the New Centenary Building, the residential properties opposite have large separation distances from the school site. Furthermore, the Department notes that the proposal is set into in the hill leading up from Hordern Oval, southwards into the school campus, and that the New Centenary Building would therefore read as a single storey from this elevated section of the campus, which is not dissimilar to the existing context.

The Department has also considered the proposed height non-compliance, with regard to the objectives outlined in clause 4.3 of the WLEP 2014 and is satisfied that the Applicant has demonstrated that compliance with the building height development standard is unnecessary under the circumstances, having regard to the following:

- the built form of the New Centenary Building is sited in a manner that transitions down the slope, thereby providing an appropriate transition in built form along Rose Bay Avenue in a manner that can be similarly interpreted to the existing War Memorial Hall and Mansfield Buildings.

- the available developable area on the school campus site is highly constrained and the proposal aims to maximise the reasonable developable potential available.
- the height of the proposal provides a contextual response to the surrounding built environment and sites the largest built form component to the bottom of the slope to minimise potential off-site amenity impacts.
- the height non-compliance would not result in unreasonable or detrimental height, scale or bulk impacts to the existing school site, heritage considerations or on the surrounds.

The Department is satisfied that the bulk and scale of the proposal has been appropriately arranged on the site to ensure that off-site amenity bulk and scale impact are minimised to a satisfactory level, while providing a balanced response to the need to provide for the demand for additional and improved education facilities.

6.2.3 Built form and urban design

The proposal seeks to have a material and colour palette that is sympathetic with the existing campus and surrounding streetscape. The materials and finishes used include timber battens; ceramic cladding; aluminium window frames; sandstone cladding; and Copper edge detailing. The proposal is characterised predominately by light, sandy and earthy colours.

The proposal was reviewed by GANSW who were supportive of the design process and approach undertaken. GANSW also stated that the new works have been carefully considered and are contextually appropriate with the new landscape works.

The Department considers that the materials, colour palette and design of the proposal are considered to be contextually appropriate to the existing site and surrounds and can be viewed as a natural progression in the Cranbrook School development and history. The use of colours and materials are considered to be sympathetic to the heritage characteristics on the school site in addition to that of the surrounding streetscape. Furthermore, the Department considers that the proposed New Centenary Building provides a more positive aesthetic contribution to the school campus and streetscape, than the existing War Memorial Hall and Mansfield building.

The predominately rectangular form of the New Centenary Building is considered to be consistent with the overall design narrative of building on the school site and the proposed finishes and façade treatment are considered to maintain a common language across the site and surrounds.

The creation of the AFC would result in a new public domain interface for the school along New South Head Road. This would be undertaken through the provision of an entry point characterised by a single storey glazed façade and cantilevered awning that forms part of the Hordern Oval Surface. The entry point would also be setback from the road alignment to create a new open space what would provide greater separation between the school and the road in addition to additional amenity improvements through landscaping.

The Department considers that this public domain interface would provide a positive contribution to the built form and urban design of the school site and to the streetscape. The curved nature of the frontage is mimicked by the AFC entry and the materials used on the façade are sympathetic to the heritage characteristics of the site and surrounds. The Department considers that the creation of this new active frontage on New South Head provides a significant positive contribution over the existing context of a blank retaining wall characterised by unkept vegetation.

6.3 Landscape and public domain works

The alterations and additions to Cranbrook School incorporates an extensive landscape and urban design scheme for the site. The landscaping approach to the site is proposed to be undertaken through a targeted zonal approach and is subsequently characterised by the following four zones (and shown in **Figure 30** below):

1. Zone one – Drive.
2. Zone two – New Centenary Building.
3. Zone three – Terrace.
4. Zone four – Arc.



Figure 30 | Landscaping works zones (Source: Applicant’s RtS 2019).

The landscaping and public domain works are guided by an analysis of the historical, ecological and built form context of the site and surrounding locality. The choice in landscaping and public domain materials, flora and interface relationship is furthermore guided by the following principles:

1. improve access and circulation.
2. manage well-being.
3. create sense of place.
4. effectively respond to built form.
5. facilitate social integration and engagement.
6. create flexible spaces.
7. inspire new ways of learning.
8. utilise the maximum area.
9. achieve environmentally sensitive design targets.
10. expose natural processes.

Works to Zone 1

As part of the formalisation of the pick-up and drop-off areas, landscaping in targeted areas are proposed through the introduction of vegetated buffers typified by grass cover and low ground shrubbery. No submissions were received regarding this component of landscaping to the site.

The Department considers that this intervention results in a positive contribution to the school campus, reduces the ratio of impervious surfaces in this zone and provides a improved transition between soft and hard surfaces.

Works to Zone 2 and 3

New Centenary Building

Landscaping works as part of the New Centenary Building include:

- turfed Centenary Lawn on roof of Centenary Building.

- intimate Memorial Garden to the east of the Chapel including turfed lawn, open pergola and water body.
- sandstone surfacing for hardstand areas.
- feature trees in raised planters.
- fixed bench seating.

Camellia Court to west of New Centenary Building

- expanded Camellia Court area and building entry.
- central walkway access.
- new garden beds and garden wall application.
- preservation of existing sandstone rock faces.
- new raised level courtyard space.

In regard to these landscaping works, no agency, Council or public submissions were received. The works, notably to the Chapel floor level, ensure that there is an increase in pervious surfaces resulting in a softening at grade level.

The Department considers that the landscaping proposed as part of the New Centenary Building effectively formalises the existing space and ensure that there is a sufficient buffer between the proposed built form, existing heritage buildings on campus and the streetscape. The proposed landscaping treatment also ensures that there would be a suitable transition between the New Centenary Building and Hordern Oval.

Works to Zone 4

AFC

- provision of a granite paved shared forecourt between the AFC entrance and the kerb line of New South Head Road.
- planting of sculptural vegetation buffer between the plaza and the kerb line of New South Head Road.
- native tree planting along the site boundary.

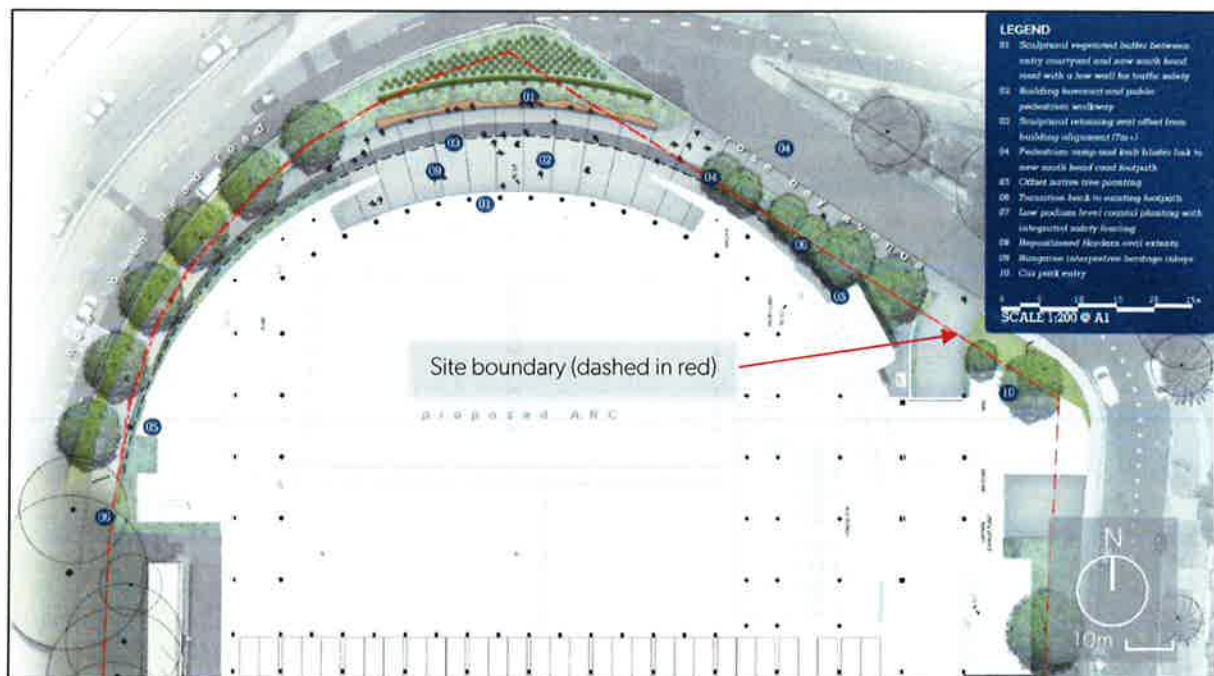


Figure 31 | AFC public domain interface (Source: Applicant's Rts 2019).

Hordern Oval

- low level planting with integrated security fencing to northern boundary of the oval.
- reinstate turfed oval surface.

The proposed new AFC public domain interface celebrates the entry to the new publicly available recreational facility and creates a sense of arrival for students and visitors alike. Furthermore, the new public domain interface to New South Head Road would be a considerable improvement to the existing context (a plain wall and fence with sporadic medium height flora), by replacing it with an orderly and managed landscape scheme that would provide an appropriate buffer between the school boundary and New South Head Road. In addition to new vegetation, the landscape scheme also integrates passive and active recreation spaces that would allow this new space to be flexible in its use a primary entry point and gathering location.

Landowners consent has been sought by the Applicant and subsequently provided by Woollahra Council for the public domain works that are not located within the school boundaries on New South Head Road.

The works to Hordern Oval and primarily related to the reinstatement of the surface so that it can be used in the same manner as existing. The fencing component (to the northern section) to this area ensures that appropriate security and safety is achieved in a manner similar to existing.

The Department is satisfied that the proposed fencing strategy and built form design would sufficiently control access and positively promotes the territorial reinforcement of the school grounds, without creating a dominant fortress like environment. The fencing typology is in keeping with the context of the school site and surrounding streetscape.

The proposed landscaping and public domain works appropriately responds to the environmental and historical context of the surrounds through targeted material and flora use in addition to ensuring that the design as a whole responds to the historical development of the school site.

Vegetation works

In order to facilitate the development of the proposal, tree removal is required in addition to replanting in accordance with the proposed landscaping works as shown in **Figure 32**.

- removal of 43 trees (five recognised as high value).
- planting of 36 new trees and over 3,000 additional shrubs and accent plantings.

Of the proposed tree removal, the following high value trees would be removed:

- four Brush Box trees (Trees 16, 17, 18 and 19) are required for removal to allow vehicular access.
- one Brush Box (Tree 38) is required for removal to allow an alternative fire exit and pedestrian access.
- the Port Jackson Fig (Tree 26) is required for removal to allow adjacent ground level changes to occur.

Three high value trees being retained would require ongoing arboricultural monitoring and management as they are located adjacent to the region of excavation works. Overall, the proposal includes a number of mitigation strategies to maximise tree retention on the site and are guided by the arborist report, Australian Standards and industry best practice.



Figure 32 Tree removal and planting on as part of proposal (Source: Applicant's RtS 2019).

In response to the proposal, Council requested that a comprehensive assessment of impact on the trees in accordance with industry and arboricultural best practice is undertaken to justify tree removal. Furthermore, Council requested that an analysis of encroachment into Tree Protection Zones (TPZ) and Structural Root Zones (SRZ) is to be undertaken in pertinent reference to Tree 39 (Kauri Pine) that is listed as a heritage item under the WLEP 2014. Council identified that the submitted tree protection plan contains no specific measures for protection of this subject tree.

The Applicant's RtS (including arborist report) responded to the above concerns raised by Council. Subsequently, Council reviewed the RtS and was satisfied, subject to the implementation of conditions requiring that matters relating to the comprehensive assessment on the impact on trees, as well as tree and site-specific tree protection strategies be included within the CEMP.

The Department acknowledges that the proposal requires tree removal and would have potential impacts on existing significant high value retention trees. The Department has recommended conditions of consent ensuring that development be undertaken in accordance with tree protection strategies as outlined within the Applicant's RtS and that construction management plans are developed with tree protection and retention in mind. The Department notes that the proposal includes significant planting and vegetation ground cover to be provided on site in a cohesive and ordered manner. The species and types of vegetation used is considered to be contextually appropriate (of a native and endemic manner) and ensures that the tree removal is appropriately offset.

Furthermore, the Department acknowledges the response provided by the Applicant and concludes that in order to ensure that the loss of 43 trees is appropriately offset (and there is no net loss) a condition has been recommended requiring the planting of an additional seven locally indigenous mature shade providing canopy trees on the site.

6.4 Residential Amenity

6.4.1 Overshadowing and amenity impacts

The proposed siting of the built form along the eastern boundary of the subject site that would result in additional off-site overshadowing impacts during the winter solstice, as a result of the height of the New Centenary Building which would be greater than existing buildings by approximately 6.9m. Based on the orientation of the site and building and the level of Rose Bay Avenue, the majority of shadows generated would fall on Rose Bay Avenue, existing shadows or within dense vegetation bordering private open space of the residential properties to the east of the site boundary (as shown in **Figure 33** below).

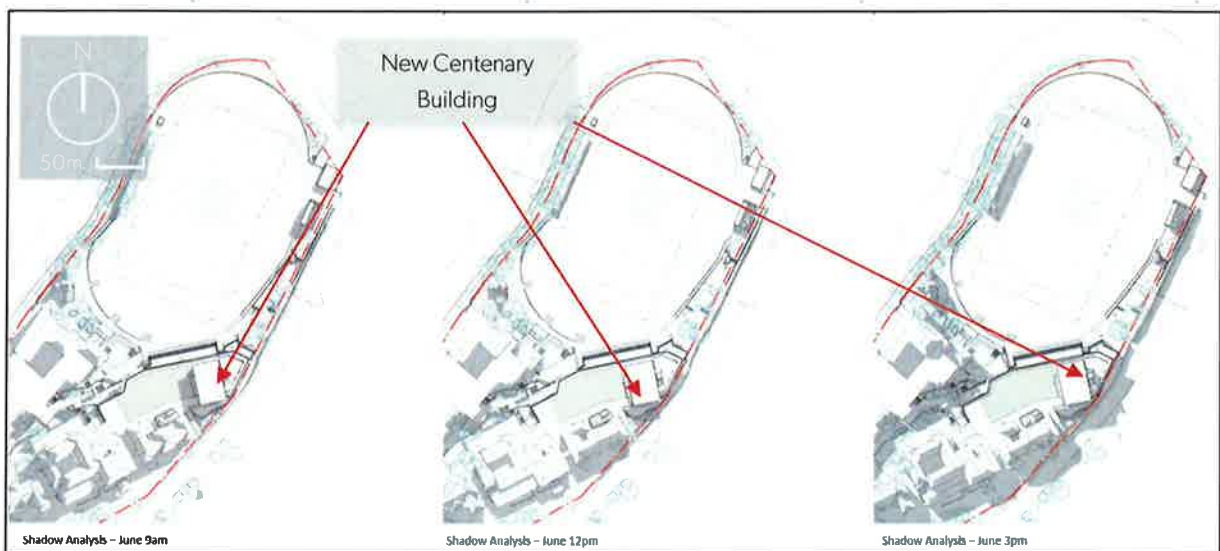


Figure 33 | Proposed overshadowing impacts (Source: Applicant's EIS 2018).

The Department notes that no submissions were received regarding overshadowing impacts from Council, agencies or the general public.

Based on an analysis of shadows generated the Department considers that shadows generated by the development would not have detrimental or unreasonable impacts to neighbouring properties as a minimum three hours of solar access to more than 50% of private open space would still be achieved between 9.00am to 3.00pm on June 21.

6.4.2 View impacts

The proposal has the potential to generate additional view impacts, due to the changed arrangements to built form within the Hordern Precinct of the site. The potential view impacts from the proposed development to and from public and private domains has been considered in the design of the proposal site in accordance with the view sharing planning principles established in *Tenacity v Warringah Council* (2004) NSWLEC 140 (Tenacity).

The Applicant concludes that the view impacts generated by the proposal would be acceptable given:

- application of the Tenacity view sharing planning principle would describe the impacts as negligible, as there is no loss of water or iconic views.
- the view impact is assessed as being minor, consisting of a minor loss of sky views for some properties on the western side of Rose Bay Avenue.
- compliance with the maximum 9.5m building height would have a similar impact to that proposed.

The proposed development has been considered in relation to the planning principles (*Rose Bay Marina Pty Limited v Woollahra Municipal Council and Anor* (2013) NSWLEC 1046 (Rose Bay Marina) for view loss in the public domain. It is considered that based on the bulk and scale of the proposed development, the proposal would not cause significant loss of views from the public domain in addition to the fact that there are no key public domain views available in a view sharing scenario (from Rose Bay Avenue).

The potential impact of the proposed development on private domain views has also been considered and assessed. It is considered that for properties on Rose Bay Avenue that the existing view sharing conditions of obstructed and unobstructed views (from existing built form, trees and topography) would not be impacted upon by the proposal in a detrimental manner or cause significant view loss.

The Department did not receive any submissions regarding potential view loss impacts to the public or private domain.

Therefore, the Department considers that the proposed development would not result in detrimental view loss or view amenity impacts, notably from residential properties with north/western views from Rose Bay Avenue.

6.5 Other Issues

The Department’s consideration of other issues is provided in **Table 9** below.

Table 9 | Department’s assessment of other issues

Issue	Findings	Recommended Condition
Acoustic Impacts	<p><u>Construction</u></p> <ul style="list-style-type: none"> The Applicant’s RtS included a Construction Noise and Vibration Management Plan (CNVMP). The Interim Construction Noise Guideline (DECCW, 2009)(ICNG) outlines the process of establishing noise management levels (NMLs) to minimise construction noise impacts on sensitive receivers. The CNVMP outlines the maximum noise and vibration levels that should occur during construction during recommended standard hours and outside the recommended standard hours. The Department did not receive any public submissions in regards to construction noise and Council did not raise any concerns with the CNVMP as was submitted as part of the RtS. The CNVMP identified that based on background noise levels, the NML is 54dB(A) $L_{eq(15min)}$ (daytime background noise level + 10 db(A)). The CNVMP recommends good practice mitigation measures and noise mitigation 	<ul style="list-style-type: none"> The Department is satisfied that the CNVMP contains appropriate ameliorative, management and mitigation measures to address noise and vibration from the construction phase. Furthermore, the Department notes that the construction noise levels would have impact on nearby residential properties. Accordingly, the Department recommends that: <ul style="list-style-type: none"> standard construction hours as per the ICNG be adhered to. the Applicant ensure that the management strategies to reduce noise and vibration impacts to sensitive receivers as detailed in CNVMP and subsequently submit a copy of the CNVMP to the certifying authority prior to the commencement of any works on the site.

requirements to ensure that surrounding properties are not detrimentally impacted upon by intrusive noise or vibration.

- The CNVMP identified that activities such as demolition, excavation and the use of the concrete pump during construction of the New Centenary Building would result in minor exceedances to the NML.
- The CNVMP identified that subject to the measures detailed above, the minor exceedances can be appropriately managed to ensure that there are no detrimental noise or vibration impacts as a result of the demolition, excavation and construction works.
- subject to the implementation of measures in the CNVMP, the Department considers that the construction works would not have unreasonable or detrimental impacts on surrounding residents, existing buildings on the site or students and staff.
- The Department also notes that the site is an existing school with a large established population. The proposed development area focuses on the northern section of the site and on areas that have already been developed or modified from its natural condition. Therefore, there are no previously unaffected sections of the site that would detrimentally impacted upon.

Operational

- The proposed development has the potential to have additional acoustic or noise generating impacts, greater than existing. The potential new areas for noise generating impacts would be from the new public domain access to the AFC along New South Head Road and from the New Centenary Building.
- The proposal included an assessment on potential acoustic impacts and detailed that it was not considered to be greater than existing on account of the fact that the uses and types of activities remain in the same locations on the site and that the student population is not proposed to be increased.
- The Department did not receive any objections or submissions from the public regarding operational acoustic impacts in addition to the fact that Council nor any other agency made any comments on this matter.
- The Department notes that the entry to the AFC would be considered a substantial change in regards to activity on that portion of New South Head Road, as the existing frontage is unused.
- The Department considers that the acoustic impacts from the road itself would be greater than any noise generated from this entry point. Furthermore, noise generated from the AFC use itself is not considered to have detrimental impacts on account of the fact that the AFC and all related activities are located within a subterranean level. Additionally, the primary entrance is located away from sensitive uses.
- Noise impacts from the car park entry and exit along Rose Bay Avenue is not considered to result in detrimental noise impacts due to the fact that the level of traffic

expected to use Rose Bay Avenue is substantially the same as existing. Furthermore, no objections were raised by any properties on Rose Bay Avenue in regard to potential noise impacts.

- The Department considers that the continued operation of the school in conjunction with the realised proposal would not result in detrimental operational acoustic impacts to nearby surrounding sensitive receivers on account of the fact that the perceived impacts would not be substantially greater than existing.

Out of Hours Use

- The Applicant submitted a community use management plan for proposed community use and out of school hours use of the New Centenary Building (Chapel, theatre and multi-purpose hall) and AFC. The community use management plan proposed the following out of school hours and community uses for the New Centenary building and AFC:
 - extracurricular activities occur outside core school hours on weekdays, weekends and public holidays. Generally, extra-curricular activities commence at approximately 6:30am and conclude by 6:30pm.

Aquatic and Fitness Centre hours:

- Monday to Saturday: 6:00am to 9:00pm.
- Sundays: 6:00am to 6:00pm.

Community Use hours (learn to swim):

- Mondays to Fridays: 7:30am to 7:30pm.
- Saturdays: 7:30am to 5:00pm.
- Sundays: 7:30am to 12:30pm.

- The Department notes that no submissions were received from the Council, agencies or the general public regarding the proposed out of hours uses. Furthermore, the out of school hours uses (hours and types) proposed for the AFC and New Centenary Building are as existing and therefore, would not result in detrimental additional impacts.
- Additionally, the Department has recommended a condition of consent for the preparation of an out of hours event management plan in instance where greater than 100 occupants are expected, to ensure that there are no detrimental amenity impacts to the surrounds.

Site contamination

- The EIS included a phase one preliminary site investigation in addition to a hazardous materials survey.
- The Department considers that sufficient information has been provided to account for the expected range of excavated fill

- The assessment identified that potential risks associated with unidentified occurrence of asbestos or other sources of contamination can be managed by the implementation of an unexpected finds protocol.
 - The investigation concluded that further investigation was not considered to be required and that the investigation areas/locations of proposed works can be made suitable for the intended use.
 - The assessment did not identify any significant contamination concerns regarding chemicals, hard metals or substances and determined that the contamination risk is low.
 - The Department did not receive comments from the EPA or any objection from Council in regards to the assessment of site contamination on site. Council stated that the information provided is satisfactory in determining that the underlying soils are not contaminated.
 - Council also stated that no concerns are raised in regards to the hazardous material survey or in regards to Acid Sulfate Soils.
 - Council requested that an unexpected finds conditions be implemented as a condition for site contamination.
- material to be disposed off-site to landfill, the management of asbestos and any importation of soils.
- The Department considers that the proposal would not have detrimental impacts relating to site contamination and has recommended conditions of consent requiring:
 - the preparation of an Asbestos Management Plan, for the Applicant to undertake works in accordance with the Protection of Environment Operations (Waste) Regulation 2014, and to consult with Safework NSW if any asbestos waste is to be handled and/or disposed of.
 - engagement of a site auditor, site contamination assessment post demolition and, an unexpected finds protocol to be prepared and implemented during the demolition and construction phases.
 - the Department recommends the above conditions of consent in line with the precautionary approach to ensure that the site and proposed works are undertaken in a careful manner, when considering the continued operation of the school during construction works.
 - detailed consideration of the proposal against SEPP 55 is provided in **Appendix B**, where the Department has concluded that it is satisfied that the Applicant has adequately addressed clause 7 of SEPP 55 and that the site can

be made suitable for its intended use.

Aboriginal Cultural Heritage

- In response to EESG's comments to the EIS, the Applicant submitted an Aboriginal Cultural Heritage Assessment Report (ACHAR) report with its RtS, which concludes that the site's redevelopment is unlikely to have any impacts on Aboriginal cultural heritage, given previous disturbances across the site.
- Based on the recommendations made within the ACHAR, the school would undertake:
 - ongoing consultation with the Registered Aboriginal Parties (RAPs).
 - a two stage program of archaeological test and salvage in the areas of impact associated with the proposed works. Archaeological testing would be undertaken in areas of proposed excavation to determine appropriate artefact management based on the results of excavations.
 - discussions with the RAPs during and at the completion of the program of archaeological test and salvage excavations, to determine appropriate artefact management based on the results of the excavations.
 - if any skeletal remains are uncovered during the archaeological test and salvage, all work would cease, and the relevant authorities would be contacted.
- EESG supports the recommendations contained in the ACHAR and requested that they be imposed as conditions of consent.
- The Department has recommended a condition of consent requiring the recommendations of the ACHAR be imposed in full.

Flooding

- The site is impacted by existing overland flood flow routes along New South Head Road and Rose Bay Avenue. These routes carry significant upstream catchment in flood events.
- The Department notes that the levels and grading design have ensured the natural overflow point occurs toward the street and not back towards the building.

- In response to the Applicant's EIS, EESG requested that modelling be undertaken of the proposal against the Probable Maximum Flood (PMF) storm event level.
- As part of the RtS, the Applicant undertook post-development DRAINS modelling which identified the following:
 - overland flow along New South Head Road would largely remain within the channel formed by the roadway (kerb to kerb) to the west of the site.
 - towards the north, the overland flow would likely overtop the kerb and convey flow across the adjacent footpath at a level that is deemed unsafe, producing a flow path which may enter the area outside of the aquatic and fitness centre.
 - the overland flow path along Rose Bay Avenue may experience unsafe flows with potential overtopping of kerbs during the PMF event.
- In response to the DRAINS modelling results the following recommendations were made in the Applicant's RtS:
 - the levels of the proposed new driveway should take into account modelled PMF flood depths.
 - a number of safety and evacuation strategies should be included in the Emergency Response Plan.
 - the proposed raised landscaping along the frontage would offer some flood protection to prevent overland flow entering the AFC frontage footway
- Implementation of the DRAINS modelling recommendations would ensure that safety of school occupants would not be put at risk.
- The Department has recommended conditions of consent relating to the preparation and implementation of an Emergency Response Plan and for the DRAINS modelling recommendations to be implemented prior to issue of a construction certificate.

Signage

- The proposal includes one wall mounted business identification sign affixed above the cantilevered AFC entry on New South Head Road and the replacement of the existing Hordern Oval scoreboard with a new internally illuminated digital sign on the Maintenance building.
- No agency comments were made in regard to the proposed signs.
- The Department has conducted an assessment of the sign against the principles against State Environmental Planning Policy No.64 Advertising and Signage in **Appendix B**.
- The colour, font, and sizing is considered to be in keeping with the contemporary aesthetic typified by the proposed buildings on the site, is sympathetic to site

		<p>and local heritage characteristics and is indicative of the school's progression in built form typology.</p> <ul style="list-style-type: none"> • The Department is satisfied that the proposed building identification sign would be appropriate for the school site, denoting a new primary frontage, assisting in way finding and signposting the school site. • The Department considers that the new scoreboard sign would not have detrimental illumination impacts and is appropriate, given the upgrade occurring to the Hordern Oval precinct.
<p>Development Contributions</p>	<ul style="list-style-type: none"> • The proposal is a development type that is subject to development contributions. • Council in response to the EIS, stated that in accordance with Schedule 1 of the Woollahra 94A Development Contributions Plan, a 1% levy applies. • the 1% of the CIV equates to \$1.25 million. In addition to the 94A levy, Council stated that the proposed development will also be required to pay the property damage security bond and infrastructure works bond. The total contributions required by Council would be \$1,931,460. • The Applicant's RtS responded by stating that the school intend on negotiating a Voluntary Planning Agreement (VPA) with Council to offset the development contribution required. • In response to the Applicant's RtS, Council confirmed that development contributions are still to be payable and that the contribution would be used to fund projects as per Schedule 2 of the contributions policy. • Council also stated that the Applicant's request for a VPA in the RtS would not be supported. • The Applicant responded by providing legal advice analysing a number of previous SSD determinations from 2013 to 2016 in 	<ul style="list-style-type: none"> • The Department has reviewed the information provided by both Council and the Applicant in regards to the reasonableness of applying development contributions for the subject development. • The Department considers that as there is an applicable contributions plan, development contributions are payable in this instance. • In review of the information and the public domain works proposed, the Department, considers that the footpath, kerb and gutter works along Rose Bay Avenue would be to public benefit. • The remainder of the works are considered to have an incidental public benefit (primarily benefit the school) and as such, the Department considers the payment of development contributions (as required by the Woollahra Section 94A Development Contributions Plan 2011) would be appropriate as it would fund a variety of projects for

LGAs with development contributions plans, where they were not applied to certain projects.

- The Applicant also stated that the development contributions should not be applied on account of the fact that significant public domain works are proposed as part of the application.
 - In response to the Department's request, the Applicant provided a public domain works schedule outlining the total cost of works and was prepared by an appropriately qualified Quantity Surveyor.
 - The Department further sought further advice from Council, about what works would be considered to be above and beyond replacement and repair to public benefit. Council stated that the footpath works totaling \$41,360 would fall into this category.
- public facilities that would achieve greater public benefits.
 - Therefore, from the total \$1.25 million development contribution value payable, the Department has subtracted \$143,510 to result in a total amount of \$1,106,490 payable development contribution.
 - The Department has recommended a condition of consent for the payment of contributions totaling \$1,106,490 and for the payment of the property damage and security bond.

6.6 Public Interest

On balance the Department is satisfied that the proposal would be in the public interest. The proposal would deliver additional and enhanced teaching facilities and would provide improved amenities for the school and public use. The redeveloped school would provide new facilities which would result in improved educational outcomes for the region. It would also provide direct investment in the region of \$125 million, which would support up to 296 construction jobs and an additional 8 FTE operational jobs. The proposal while involving minor tree removal, would also result in significant planting of native endemic trees and landscaping in addition to a significantly improved public domain interface to New South Head Road and ensure that impacts are relatively low.



7. Evaluation

The Department has reviewed the EIS, RtS and assessed the merits of the proposal, taking into consideration advice from the public authorities, including Council, and all environmental issues associated with the proposal have been thoroughly addressed.

The proposal is consistent with the objects of the *Environmental Planning and Assessment Act 1979* (including ecologically sustainable development) and is consistent with the State's strategic planning objectives for the site as set out in the Greater Sydney Commission's Eastern District Plan, as it would create jobs and provide for better access to improved education facilities.

The alterations and additions to Cranbrook School would provide significant public benefit to the immediate local and surrounding district through the provision of new and improved education facilities in addition to publicly available facilities in the Aquatic and Fitness Centre.

The proposal is suitable for the site and the identified heritage, built form and urban design, noise and amenity and traffic impacts are considered satisfactory on balance, in the context of the benefit the proposal would provide for the school and general community. The Department has recommended conditions to manage the impacts in relation to potential construction and operational impacts on the surrounding land uses.

The proposal is considered to be in the public interest as it would provide public benefits including:

- delivering increased new and improved education and recreational facilities to cater for increased demand in the Woollahra Municipal LGA.
- consolidating and providing further investment in infrastructure in an established centre, well connected to existing public transport facilities.
- a capital investment value of approximately \$125 million that will deliver approximately 296 new construction jobs proposal and 8 additional full-time equivalent operational jobs.

The Department concludes the impacts of the proposal are acceptable and can be appropriately mitigated through the implementation of the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved subject to conditions.



8. Recommendation

It is recommended that the Executive Director, Infrastructure Assessments, as delegate of the Minister for Planning and Public Spaces:

- **considers** the findings and recommendations of this report.
- **accepts and adopts** all of the findings and recommendations in this report as the reasons for making the decision to grant consent to the application.
- **agrees** with the key reasons for approval listed in the notice of decision.
- **grants consent** for the application in respect of the redevelopment of Cranbrook School Redevelopment (SSD 8812).
- **signs** the attached development consent and recommended conditions of consent (**Appendix C**).

Recommended by:

Recommended by:

Navdeep Shergill

A/Senior Planner

Social and Infrastructure Assessments

Andrew Beattie

Team Leader

Social and Infrastructure Assessments



9. Determination

The recommendation is: **Adopted** / Not adopted by:

David Gainsford

Executive Director

Infrastructure Assessments

13/9/19



Appendices

Appendix A - List of Documents

The following supporting documents and supporting information to this assessment report can be found on the Department of Planning and Environment's website as follows.

1. Environmental Impact Statement
<https://www.planningportal.nsw.gov.au/major-projects/project/10711>
2. Submissions
<https://www.planningportal.nsw.gov.au/major-projects/project/10711>
3. Applicant's Response to Submissions
<https://www.planningportal.nsw.gov.au/major-projects/project/10711>

Appendix B - Statutory Considerations

ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report includes references to the provisions of the EPIs that govern the carrying out of the project and have been taken into consideration in the Department’s environmental assessment.

Controls considered as part of the assessment of the proposal are:

- State Environmental Planning Policy (State & Regional Development) 2011 (SRD SEPP)
- State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP)
- State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)
- State Environmental Planning Policy No. 64 – Advertising Structures and Signage (SEPP 64)
- Draft State Environmental Planning Policy (Remediation of Land) (Draft Remediation SEPP)
- Draft State Environmental Planning Policy (Environment) (Draft Environment SEPP)
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005 (SHC SREP)
- Woollahra Local Environmental Plan (WLEP) 2014.

COMPLIANCE WITH CONTROLS

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

Table 10 | SRD SEPP compliance table

Relevant Sections	Consideration and Comments	Complies
<p>3 Aims of Policy The aims of this Policy are as follows:</p> <p>(a) to identify development that is State significant development</p>	The proposed development is identified as SSD.	Yes
<p>8 Declaration of State significant development: section 4.36</p> <p>(1) Development is declared to be State significant development for the purposes of the Act if:</p> <p>(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and</p> <p>(b) the development is specified in Schedule 1 or 2.</p>	The proposed development is permissible with consent. The proposal is for alterations and additions to an existing school with a CIV in excess of \$20 million, under clause 15 (Educational Establishments) of Schedule 1.	Yes

State Environmental Planning Policy (Infrastructure) 2007

The Infrastructure SEPP aims to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency, identifying matters to be considered in the assessment of development



adjacent to particular types of infrastructure development, and providing for consultation with relevant public authorities about certain development during the assessment process.

The Department has consulted and considered the comments from the relevant public authorities (**Section 5** and **6** of the report). The Department has included suitable conditions in the recommended conditions of consent (see **Appendix C**).

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

The Education SEPP commenced on 1 September 2017 and aims to simplify and standardise the approval process for child care centres, schools, TAFEs and universities while minimising impacts on surrounding areas and improving the quality of the facilities. The Education SEPP includes planning rules for where these developments can be built, which development standards can apply and constructions requirements. The application has been assessed against the relevant provisions of the Education SEPP.

Clause 42 of the Education SEPP states that Development consent may be granted for development for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted.

Clause 35(6)(a) requires that the design quality of the development should be evaluated in accordance with the design quality principles set out in Schedule 4. An assessment of the development against the design principles is provided in **Table 11** below.

Table 11 | Consideration of the Design Quality Principles

Design Principles	Response
Context, built form and landscape	<p>The site planning provides good aspect for the classrooms and for maximising light recreation and breakout spaces in addition to the public domain entrance to the AFC. The proposed height limit of the New Centenary Building is greater than built form surrounding the site. However, due to nature of the community land use which requires level access across all the floors, the falling topography of the site among other spatial site constraints, the additional height is unavoidable.</p> <p>The alterations and additions to the school has been designed to fit into the surrounding built form, heritage considerations and the existing school.</p>
Sustainable, efficient and durable	<p>The proposal includes ESD elements sufficient to achieve 4 star Green Star rating. The materials chosen are durable and require low maintenance.</p> <p>Bicycle parking is provided within the school site and a GTP submitted which encourages sustainable travel modes.</p>
Accessible and inclusive	<p>Accessible travel paths are provided where required on the site and lifts included in every connector within the proposed development.</p> <p>The school hall and playing fields are to be utilised for community activities after school and during the weekends.</p>

Amenity	The proposal creates a variety of interesting and useable playground spaces and enhances the amenity of the internal spaces by guaranteeing light and winter sun access. The proposal also creates a new significant public domain interface along New South Head Road to the AFC that contributes positively to the amenity for the site and streetscape.
Health and Safety	With the exception of the new public domain interface to the AFC along New South Head Road and underground carpark there are no substantial changes to the existing access to the site. The proposal would increase the amount of open space and active areas on the site and therefore, promote health by providing additional active areas on the site. The Department considers that the proposal would no detrimentally impact upon health and safety.
Whole of life, flexible, adaptable	The proposed learning areas are flexible and provide adaptable presentation areas throughout the learning hub building.
Aesthetics	The proposal evokes design enhancement by proposing appropriate articulation of buildings and integration with existing heritage buildings.

State Environmental Planning Policy No. 55 - Remediation of Land

SEPP 55 aims to provide a state-wide approach to the remediation of contaminated land. SEPP 55 aims to promote the remediation of contaminated land to reduce the risk of harm to human health and the environment by specifying under what circumstances consent is required, specifying certain considerations for consent to carry out remediation work and requiring that remediation works undertaken meet certain standards.

The Applicant submitted a phase one preliminary site investigation in addition to a hazardous material survey. The assessment did not identify any significant contamination concerns regarding chemicals, hard metals or substances on the site and concluded that the risk for contamination is low.

The Department considers in accordance with clause 7 of SEPP 55, the investigations undertaken of the subject site demonstrate that the site can be made suitable for the continued use. The Department has recommended a condition requiring compliance with the recommendations of the phase one preliminary site investigation assessment in addition to conditions related to an unexpected finds protocol, site contamination, asbestos management and need for a site auditor should the need arise.

State Environmental Planning Policy No. 64 – Advertising and Signage

SEPP 64 applies to all signage that under an EPI can be displayed with or without development consent and is visible from any public place or public reserve.

The development includes one building identification sign and the replacement of the existing Hordern Oval scoreboard with an integrated digital sign on the maintenance store. Under clause 8 of SEPP 64, consent must not be granted for any signage application unless the proposal is consistent with the objectives of the SEPP and with the assessment criteria which are contained in **Schedule 1. Table 12** demonstrates the consistency of the proposed signage with these assessment criteria.

Table 12 | SEPP 64 compliance table

Assessment Criteria	Comments	Compliance
1 Character of the area		
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	Complies the proposed signage is compatible with the existing and desired future character of the area as it identifies the already existing school, but on a new public domain interface. The materials and design of the sign is considered to be in keeping with the locality.	Yes
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	Complies, the proposed signage is consistent with the existing advertising and signage theme for the school site.	Yes
2 Special areas		
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	The proposed signage complies in this regard as it does not detract from the visual quality of any component of the surrounding context as required by this control.	Yes
3 Views and vistas		
Does the proposal obscure or compromise important views?	The proposed signage would not obscure or compromise important views.	Yes
Does the proposal dominate the skyline and reduce the quality of vistas?	The proposed signage would not dominate the skyline no reduce the quality of any vistas.	Yes
Does the proposal respect the viewing rights of other advertisers?	The proposed signage complies in this regard.	Yes
4 Streetscape, setting or landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The proposed signage would be proportionally appropriate for the streetscape and landscape that it is located in.	Yes

Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	Complies, the proposed signage would not detract from the visual interest of the surround streetscape and landscape.	Yes
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	N/A.	N/A
Does the proposal screen unsightliness?	N/A.	Yes
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The proposed signage complies as it would not protrude above the AFC entrance, maintenance shed, the Hordern oval playing surface or significant tree canopies.	Yes
Does the proposal require ongoing vegetation management?	No.	Yes

5 Site and building

Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The proposed signage is in keeping with the overall proportions of the site and the building to which it is affixed to.	Yes
Does the proposal respect important features of the site or building, or both?	The proposed signage complies in this regard.	Yes
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The proposed signage complies in this regard as it is sited in a location that makes best use of the new activated frontage and is integrated within built form.	Yes

6 Associated devices and logos with advertisements and advertising structures

Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	No.	Yes
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7 Illumination

Would illumination result in unacceptable glare? Would illumination affect safety for pedestrians, vehicles or aircraft?	Illuminated signage would be done in an internal manner and is inward facing to the school site. No unacceptable glare or safety impacts would arise from illumination of the scoreboard.	Yes
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Would illumination detract from the amenity of any residence or other form of accommodation?	There is no residential accommodation immediately facing the proposed internally illuminated scoreboard.	Yes
Can the intensity of the illumination be adjusted, if necessary?	The intensity of the illumination can be adjusted, if deemed necessary.	Yes
Is the illumination subject to a curfew?		

8 Safety

Would the proposal reduce safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The proposed signage would not reduce the safety for any public road.	Yes
Would the proposal reduce safety for any public road?	The proposed signage would not reduce the safety for pedestrians or bicyclists.	Yes
Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?	The proposed signage would not obscure any sightlines, and therefore is not considered to reduce the safety of pedestrians.	Yes

Draft State Environmental Planning Policy (Remediation of Land)

The Draft Remediation SEPP would retain the overarching objective of SEPP 55 promoting the remediation of contaminated land to reduce the risk of potential harm to human health or the environment.

Additionally, the provisions of the Draft Remediation SEPP would require all remediation work that is to be carried out without development consent, to be reviewed and certified by a certified contaminated land consultant, categorise remediation work based on the scale, risk and complexity of the work and require environmental management plans relating to post-remediation management of sites or ongoing operation, maintenance and management of on-site remediation measures (such as a containment cell) to be provided to council.

The Department is satisfied that the proposal would be consistent with the objectives of the Draft Remediation SEPP.

Draft State Environmental Planning Policy (Environment)

The Draft Environment SEPP is a consolidated SEPP which proposes to simplify the planning rules for a number of water catchments, waterways, urban bushland, and Wollandra Lakes World Heritage Property. Once adopted, the Draft Environment SEPP would replace seven existing SEPPs. The proposed SEPP would provide a consistent level of environmental protection to that which is currently delivered under the existing SEPPs. Where existing provisions are outdated, no longer relevant or duplicated by other parts of the planning system, they would be repealed.

Given that the proposal is consistent with the provisions of the existing SEPPs that are applicable, the Department concludes that the proposed development would generally be consistent with the provisions of the Draft Environment SEPP.

Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005

SHC SREP provides planning principles for development within the Sydney Harbour catchment. The site is located within the Sydney Harbour Catchment area.

The proposal is consistent with the relevant Planning Principles of the SHC SREP and would not have any significant adverse impact on the Sydney Harbour Catchment as the relevant mitigation measures have been implemented or stormwater discharge from the site.

Woollahra Local Environmental Plan (WLEP) 2014

The WLEP 2014 aims to encourage the development of housing, employment, infrastructure and community services to meet the needs of the existing and future residents of the Woollahra Municipal LGA. The WLEP 2014 also aims to conserve and protect natural resources and foster economic, environmental and social well-being.

The Department has consulted with Council throughout the assessment process and has considered all relevant provisions of the WLEP 2014 and those matters raised by Council in its assessment of the development (refer to **Section 5**). The Department concludes the development is consistent with the relevant provisions of the WLEP 2014. Consideration of the relevant clauses of the WLEP 2014 is provided in **Table 13** below.

Table 13 | Consideration of the WLEP 2014

WLEP 2014	Department Comment/Assessment
Clause 2.7 Demolition	Approval is being sought for the demolition of the War Memorial hall, Mansfield Building, existing groundskeeper shed and Hordern Oval surface. The proposed development complies with requirements of this clause of WLEP 2014.
Clause 4.3 Building height	The maximum building height permitted on the site under WLEP 2014 is 9.5m. The objectives of this control relate to ensuring that buildings are compatible with the bulk, scale and character of the locality, as well as minimising adverse amenity impacts to surrounding development. The proposed works have a maximum height from existing ground levels of 16.72m, and therefore contravene this development standard. The Department has considered the proposed variation in Section 6 of this report.
Clause 4.6 Exception to Development Standards	<p>The proposal includes a variation to clause 4.3 height of buildings. The maximum height of buildings allowed on the subject site is 9.5m. The proposal includes a building envelope with a height of 16.72m, which proposes a variation to maximum height control of 7.22m.</p> <p>An assessment of the variation to the building height control was undertaken in Section 6 of this report.</p>
Clause 5.10 Heritage conservation	The site is a local heritage item (Item 44) under the WLEP 2014. There are a number of locally listed heritage items on the site, and immediately surrounding it. As discussed in Section 6 of this report, the Department considers that the proposed built form and urban design of the project is undertaken in a sympathetic manner and would not have detrimental impacts upon heritage

consideration of the site and surrounds.

Clause 6.1 Acid Sulfate Soils The development works are not expected to lower the groundwater on any adjacent sites. As such, the water level would not be lowered below RL 1m AHD on adjacent Class 1, 2, 3 or 4 land.

Clause 7.2 Earthworks As per WLEP 2014, development consent is required for earthworks. The proposal complies with the provisions of this clause.

Clause 7.15 Flood Planning The site is located within an overland flood path. The Department has considered potential flooding impacts and management measures guided by DRAINS modelling and subsequently recommended a condition for the preparation and implementation of an emergency flood response plan in the event of PMF storm event to ensure student, staff and visitor safety is not unreasonably impacted upon.

Other policies

In accordance with Clause 11 of the SRD SEPP, Development Control Plans do not apply to State significant development. Notwithstanding, the objectives of relevant controls under the Woollahra Development Control Plan 2015, where relevant, have been considered in **Section 6** of this report.

Appendix C - Recommended Instrument of Consent/Approval