

11 February 2021

17074

## Loreto Normanhurt – Response to Submissions – Agency

Summary of issue raised	Comment
<b>Department of Planning, Industry and Environment</b>	
<b>Built form and heritage</b>	
<p>The provisions of the Education SEPP require that all development applications for school demonstrate compliance with the Design Quality Principles (Schedule 4). The Design Principle 1 strongly emphasises that schools should be designed to respond to and enhance the positive qualities of their setting, landscape and heritage. The proposed building envelopes do not demonstrate that they fit into the context of the site or the surroundings and are not considered to demonstrate compliance with the Principle.</p> <p>The EIS states that the proposed maximum height of buildings is based on the State Environmental Planning Policy (Educational Establishments and Child Care Centres) 2017 (Education SEPP), which permits a building height up to 22 metres (m), in case of complying developments for schools (Schedule 2). However, the site is heritage listed and as such the argument developed in the EIS that this height limit, by default, is also appropriate for this site is not reasonable and justified.</p> <p>The application justifies the proposed setback of future building envelopes based on the setback provisions of Hornsby Development Control Plan 2013 (DCP). It is noted that the DCP guides built form by controlling not only setback but also height and an upper limit on the maximum floor space. The argument that the permitted setbacks under the DCP are appropriate when partnered with the heights as proposed is not an acceptable argument.</p> <p>The Department has strong concerns with the justification provided in the application and with the current design outcome, in particular having regard to the design principles of the Education SEPP. The key concerns with regard to the built form and impacts on the existing heritage items and contributory elements are outlined below.</p>	<p>The amended Concept Plan and amended Stage 1 DA continues to propose built form that will exceed the 8.5 metres height control under Hornsby Local Environmental Plan. An amended Clause 4.6 Variation request is provided to reflect the amended development.</p> <p>Clause 42 of the Education SEPP permits that development consent may be granted for the purpose of a school that is State Significant Development despite the contravention of a development standard imposed by an Environmental Planning Instrument (EPI), in this case being the height of buildings standard imposed under the Hornsby LEP.</p> <p>The amended Concept Proposal and Stage 1 DA has been significantly revised with removal of envelopes, reduced envelope and building heights and increased envelope and building setbacks to ensure the bulk and scale is in keeping with the school context and relationship to its residential neighbours and heritage considerations. An assessment of environmental impacts of the building height including overshadowing and view and visual impacts is provided below that confirms the environmental impacts are acceptable.</p>
<b>Concept Proposal</b>	
<p>The maximum building envelopes are proposed with no variation to the building heights. The proposed envelopes, in particular Envelope 2 and 3, would dominate the significant heritage elements of the site, as well as the surrounding low-density developments.</p>	<p>In response to this, envelope 3 has been completely removed from the proposal, and envelope 2 has been significantly reduced and paired back to respond to the heritage more appropriately. The revised envelope 2 has a maximum of three storeys.</p>

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The scale of the envelopes proposed to be delivered raise significant concerns regarding the potential impact of the subsequent development on the significance of the heritage elements of the site. Whilst it is accepted that an application for concept development do not normally include architectural details, in this instance the absence of architectural details in relation to development proposed to be delivered within the building envelopes, in particular Envelopes 2 and 3, further exacerbates the Department's concerns regarding the impacts of future development within the building envelope will have on the existing heritage elements, heritage items and adjoining low-density residential environment.	<p>Envelopes 2, 7 and Campus Wide Changes - The originally proposed envelopes have been carefully, tightened up to respond to specific concerns of the DPE. The enveloped better reflect indicative built massing that ensures there remains sufficient development potential to achieve the ambitions of the Master Plan.</p> <p>Envelope 3 - Pennant Hills Road Facility - Deleted to reduce impact on heritage items and to maintain the overall scale of the campus. The school is confident that there remains sufficient development potential to achieve the ambitions of the Master Plan</p> <p>The updated Heritage Impact Statement confirms the proposal has an acceptable heritage impact.</p>
Additional concept design details including setback and height modulation, building articulation and variations to setbacks will be required to demonstrate how future development fits into the context of the locality and how it will complement the existing heritage items on the site.	All envelopes previously proposed on the site have been refined significantly. As per the Concept Plans at <b>Appendix C</b> , all envelopes are within the Hornsby DCP 6m setback, and the sections and elevations outline how these buildings are modulated. The Heritage Report at <b>Appendix H</b> outlines the acceptability of the proposal in respect to heritage considerations.
Overall, the proposal must demonstrate that the proposed building envelopes have a positive impact on the low-density residential environment and the heritage significance of the site, being Principle 1 of Schedule 4 of the Education SEPP. The application does not adequately demonstrate this requirement.	The revised Concept Plan has significantly reduced or removed bulky envelopes and improved setbacks to respond to surrounding low density and heritage character. The Concept Plain has been designed to restore buildings of heritage significance and improve the legibility of these buildings, respond to the natural features of the site and respond to surrounding low density.
No upper limit is proposed under the concept proposal to the proposed gross-floor area. While this is not required in the R2 zone (as stated in the EIS), the Hornsby Local Environmental Plan 2013 and the DCP include other development standards to control the building bulk, which you are seeking to significantly exceed. The proposal, in its current form seeks approval for a built form which does not comply with any local development controls. A future floor space yield in relation to each envelope should support the application	While there is no Floor Space Ratio control applies to the site under the Hornsby LEP, the amended Concept Proposal and Stage 1 DA has identified the maximum Gross Floor Area at Section 5.1 of the RTS.
The current Conservation Management Plan for the site (CMP 2008) discourages structures to the north and to the north east of the chapel. The concept proposal proposes a large six storey building envelope (envelope 3) in this part of the site, which is sited forward of the heritage listed buildings and within the curtilage of the heritage listed school gate. The Heritage report submitted with the states that the impacts are acceptable, subject to detailed design. The Department is concerned regarding the apparent inconsistency with the CMP. The Department is not supportive of the inconsistency with the CMP being justified on the basis that it can be dealt with by architectural detailing at a later development stage.	<p>Envelope 3 has been removed from the proposal.</p> <p>A new structure is proposed to the east of the Chapel, being a carpark with tennis courts on the roof. The impact is acceptable because there have been tennis courts in this location since at least 1943. They are an established element within the existing landscaping. Two courts are proposed; there were originally two courts in this location, the second court having be removed for the construction of the maintenance yard. The visual impact is acceptable because the structure is low lying and located within existing mature trees, which are retained. Additional landscaping is provided for.</p>
The Department is not satisfied that the information currently provided as part of the application is sufficient evidence to demonstrate that future development facilitated by the proposed envelopes not impact negatively on heritage significance of the existing buildings on the site.	<p>An amended HIS has been prepared and should be referred to.</p> <p>Envelope 3 has been removed from the proposal.</p>

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	<p>Envelope 2 has been reduced in massing and scale, the proposed upper level setbacks increased and variation in heights provided. The plans have been amended to show the retention of the Holy Angels Wing. Envelope 2 lies to the west (or rear) of the significant buildings, away from their garden setting to the east and north. The setting of these buildings to the west is already one of two - three storey buildings. When standing to the east of the significant buildings, their massing and scale is such that the viewing angle is acute. This will conceal the greater part of the proposed additional massing. The theological centre (Component G) proposed to the west of the Chapel has been removed, enabling the apse of the Chapel to remain clearly distinguishable within the north western corner of the site..</p> <p>The amended documentation provides 3D analysis from varying viewpoints to show the existing building forms, the originally proposed building forms and the current proposed building forms. These images, together with the site elevations provided, show how the envelopes of the proposed massing and scale can be accommodated within the immediate setting of the heritage significant elements on the site. As set out above, the massing and scale of the proposed envelopes has been reduced from the initial submission.</p>
<p>Building envelope 3 would have an unreasonable visual impact on the adjoining residences fronting Mount Pleasant Avenue, due to its bulk and height. Further details of this building envelope are required to assess its impacts on the site and the surroundings and demonstrate that this location is suitable for the development.</p>	<p>Building 3 has been deleted.</p>
<p>The EIS states that demolition of sections of the heritage listed buildings (the Angel's wing etc.) would increase the legibility of the heritage items due to relocation of the current residential functions elsewhere. It is unclear how this argument demonstrates that the demolition of these elements and replacement by a large building envelope 2 (including component G in front of the chapel) would increase the legibility of the heritage items (except the functional justification). The heritage significance is not only dependent on the functionality, but also on the architectural appearance. The elements of the building proposed to be removed are neither neutral or detracting elements and their removal is seen to detrimentally impact on the significance of the contributory building.</p>	<p>The amended plans more clearly demonstrate the retention of the Holy Angels Wing within Envelope 2. The other buildings within Envelope 2 are not considered to be 'heritage items.' The CMP permits alterations to the later buildings on the site provided that the overall significance of the site is retained. Alteration to further educational objectives supports the core significance of the site.</p> <p>Component G has been removed from the proposal.</p> <p>No works will be carried out to the link section between the Convent and Givendale Wing without a DA. A detailed assessment will accompany a DA, including detailed plans and full justification for any fabric removed. The purpose of the Concept Proposal is to establish that change can be supported. Conservation works and interpretation works will form part of these later packages.</p> <p>The removal of the Post World War II addition above the link between the Convent Building and the Givendale Wing will have a positive impact. This element is intrusive; its removal will improve the legibility of both buildings.</p>

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	<p>As set out in the amended HIS, the remainder of the link comprises fabric belonging to the Convent Building and the Givendale Wing. These sections are not part of the principal building form of either buildings, do not contain significant interiors and have been altered by past works, particularly internally. Figure 5.1 in the CMP 2008 identifies this link section as having little significance. The amended HIS assesses these elements as having little- moderate significance. The controls for elements of moderate significance were cited above</p> <p>The CMP 2008 provides the following controls for elements of little significance:</p> <p>‘Buildings and elements of Little significance are generally not regarded as essential to the major aspects of significance of a building or a place, often fulfilling a functional and/or are in poor condition. Both retention and adaptation (WP Heritage emphasis) are acceptable options depending on the element. Any major interventions to the item should be confined to areas where the fabric is of little significance.’</p> <p>Sufficient information is provided by the Concept Proposal and the amended HIS to establish that this section is of secondary significance and that alterations to it will not reduce the ability to understand the significance of either building. No removal of fabric will take place without the submission of a DA containing a detailed fabric analysis, with reference to plans, and full justification for any proposed changes.</p>
<p>The setback of building envelope 2 from Osborne Road, in addition to the proposed maximum height, would have a detrimental impact on the low-density residences on this road, as well as the buildings within the site.</p>	<p>The Concept Proposal has reduced the bulk and scale of envelopes across the campus, particularly those on Osborn Road. Envelope 2 has been revised to present a two to three storey envelope facing Osborne Road that responds to the adjoining reception and senior school buildings, in a scale that is appropriate for an educational establishment. An updated assessment of overshadowing and view and visual impacts is provided at Section 5.2 and Appendix C of the RTS.</p>
<p>Where it is intended that basements be developed as part of the future development of proposed envelopes, extent of basement excavations must be provided as part of the future building envelopes.</p>	<p>Envelope 6 – New Gymnasium. The existing gym is currently excavated into the embankment between the upper campus and playing fields. The New Gym will have additional excavation in roughly the same location to the north of the site.</p> <p>Envelope 7 – Performing Arts Centre, Gonzaga Barry Extension. The building will be excavated by less than a storey into the embankment between the upper campus and playing fields. The anticipated auditorium on the ground floor level will rake with the fall of the embankment.</p> <p>Envelope 8 - All-weather field with underground car park. The all-weather playing field will be at or below the level of Osbourn Rd and will be excavated to an average depth of 3m.</p>
<p>The Department strongly recommends that the concept proposal be amended to include the following:</p>	<p>The proposal has been significantly amended to address the concerns and issues raised.</p>

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<ul style="list-style-type: none"> <li>Detailed design of the envelopes to some extent, especially when adjoining heritage items to justify the height exceedance and the bulk; or</li> <li>The envelopes be significantly reduced in size so that they do not dominate the streetscape or the heritage items in any form, as is currently the case.</li> </ul>	
<b><u>Stage 1 Boarding House</u></b>	
<p>The submitted architectural plans do not include details of the setbacks to Mount Pleasant Avenue or dimensions of the rooms / building heights. Notwithstanding, the Department considers that the boarding house has a significant and elongated footprint without breaks, monotonous materials and finishes, and insufficient setback (minimum 6m) to Mount Pleasant Avenue.</p>	<p>The setback to Mount Pleasant Ave is a minimum of 6m as now noted on the plans.</p> <p>The height of the building has been substantially reduced by the removal of Level 5 and additionally one floor of carparking has been removed.</p> <p>The form and façade of the development has been refined introducing glazed ‘knuckles’ at the points where the geometries change. The glazed zones represent communal facilities and therefore have a different external expression to the bedroom zones.</p> <p>The building mass utilises the substantial change in level from Mount Pleasant Avenue to the Oval to reduce the perceived height as viewed from Mount Pleasant Avenue – Refer to 3D views. The building is only two to three storeys visible at street level meaning the form is low scale and appropriate in the context of the school.</p>
<p>The building is proposed in close proximity to two heritage listed dwellings and insufficient assessment has been provided to address the impacts of this building on these contributory items. This consideration must form part of the heritage impact assessment accompanying the application.</p>	<p>One of these heritage items, No. 4 Mount Pleasant Avenue, is now part of the school site. The boarding house will be separated from this item by the approved two storey ELC, the existing Junior School and the slight bend in Mount Pleasant Avenue. It is considered to be located outside of the immediate setting of this item and outside of significant view corridors to/from it. It is noted, however, that the proposed boarding house has been reduced in height from the original submission.</p> <p>It is unclear what other heritage listed dwelling lies in close proximity to the boarding house site. It is physically well removed from No. 82 Pennant Hills Road, around a slight bend in the road, and separated from it by intervening buildings and Pennant Hills Road.</p>
<p>The building design must be amended to incorporate breaks in between the wings, further building modulation through lowering of height in sections, variation to setbacks, variation to materials etc., to ensure that it can blend with the surroundings.</p>	<p>The form and façade of the development has been refined introducing glazed ‘knuckles’ at the points where the geometries change. The glazed zones represent communal facilities and therefore have a different external expression to the bedroom zones.</p> <p>The colour palette has been selected to compliment the landscape context and the ‘zig-zag’ design of the building allows it to weave around the exiting trees which create a landscape buffer to Mount Pleasant Avenue.</p>
<p>It is necessary that a streetscape analysis be submitted to demonstrate that the proposed boarding house enhances and results in a positive impact on the streetscape of Mount Pleasant Avenue. Overall, the proposal must demonstrate that the building will have a positive impact on the low-density residential environment and the heritage significance of the site, being Principle 1 of</p>	<p>A streetscape analysis has been provided in the form of a comparison between existing and proposed views along Mount Pleasant Avenue.</p>

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Schedule 4 of the Education SEPP. The application does not adequately demonstrate this requirement.	<p>The analysis clearly demonstrates the perceived low scale of the proposal from Mount Pleasant as the proposal steps down the site with the lower levels below the street level of Mount Pleasant Ave.</p> <p>The 'zig-zag' design of the building allows it to weave around the exiting trees which create a landscape buffer to Mount Pleasant Avenue.</p>
<p><u>Options Analysis</u></p> <ul style="list-style-type: none"> <li>The Design report indicates that the alternative design options are based on population growth in the area, the site axis, the pedestrian access and circulation. However, the alternative design options do not consider the significance of the heritage items on the site (except restricting the built-up area to the north)</li> <li>The alternative design options should demonstrate how the building envelopes and the site masterplan respect the heritage items, as well as the low-density residential environment through the proposed heights, building setbacks and design.</li> </ul>	<p>The amended Concept Proposal and Stage 1 DA has been significantly revised with removal of envelopes, reduced envelope and building heights and increased envelope and building setbacks to ensure the bulk and scale is in keeping with the school context and relationship to its residential neighbours and heritage considerations. An assessment of environmental impacts of the building height including overshadowing and view and visual impacts is provided below that confirms the environmental impacts are acceptable.</p>
<b><u>Landscape Plan</u></b>	
<p><u>Concept Plan</u></p> <p>The open space masterplan considers Building envelope 8 to be an all-weather green space. This is not consistent with the concept proposal site plan which indicates that a 3m high envelope with an underground car park is proposed at this location. Please clarify the nature of this space with a 3m height (whether an enclosure is proposed with a basement car park entry). The depth of the envelope below ground should also be addressed if a basement is proposed.</p>	<p>Under the Concept Proposal Envelope 8 is proposed to be an all-weather playing field above an underground car park. The car park would support up to 200 car parking spaces on a single level and would replace the existing Osborn Road car park. The playing field is generally level with Osborn Road(to the west) and the school (to the north) and the structure would not be visible from the public domain. The topography falls to the south-east, and would result in the envelope being 2 metres above existing ground at that location in a lower part of the playing field. See commentary at <b>Section 3.1</b> of the RTS.</p>
<p><u>Stage 1 Boarding House</u></p> <p>The landscape plan indicates that a large number of trees would be removed from the Mount Pleasant Avenue frontage to accommodate the boarding house. While the replacement planting plan includes a few large trees in the schedule (35m high), it does not specify the location of the planting (except a reference to broad zone 1).</p>	<p>A tree planting plan has been included in the boarding house report which allocates the tree species and locations with a commitment by the school to plant any additional trees required elsewhere around the campus. Tree species have been chosen to align with the Arborist report recommendations.</p>
<p>The front setback of this building is a minimum of 6m and no evidence is provided to demonstrate that this setback can accommodate the proposed tree canopies of species such as Spotted gum or Blackbutt. The planting plan must be revised to show the location of the plant species and the quantity that are proposed at each location. Screen planting must be an essential element to assist in reducing the impact on the adjoining residences of any development along this frontage. Consideration should be given to the adequacy of the building setback</p>	<p>A section has been included in the report to indicate the tree protection zone for the high significance tree in the setback. An updated Arborist report should be provided with regards to the architectural update to the building.</p>
<p>The loading dock should be removed from the front setback and relocated to the basement, so that landscaping opportunities within the front setback can be increased.</p>	<p>The loading dock is located below Mt Pleasant Avenue and is angled so that it is screened from view from the public domain. Further, the dock is screened from the streetscape by tree planting.</p>
<b><u>Noise Assessment</u></b>	

Summary of issue raised	Comment
<p><u>Concept Proposal</u></p> <p>The Noise Report is inconsistent with the EIS and relies on a site plan with functional parameters, which are not fully consistent with the parameters in the EIS (especially in relation Building Envelope 9 or Site Area G).</p>	<p>Figures and naming conventions previously inconsistent with EIS have been updated in revised report.</p>
<p>No noise logger has been placed at Osborn Road for noise measurement. Therefore, the application has not established the Noise Management Levels (NMLs) for sensitive receivers at this location. However, the Noise report concludes that Building N (located along the Osborne Road frontage and likely accommodating the auditorium in the future) can comply with the NMLs. This conclusion cannot be supported without additional noise measurements and these must be provided with the application.</p>	<p>Additional noise logging was conducted on Osborn Road in December to address issue. Results of monitoring incorporated into an amended Noise Assessment report at <b>Appendix J</b>.</p>
<p>Building envelopes 7 and 9 are likely to include two auditoriums (as a minimum as per the EIS) and other function/concert halls. However, these buildings adjoin low density residences. The Noise report establishes that the proposed building envelopes would comply with the project noise trigger levels at the nearest sensitive receivers (with minor exceedances in the evening). However, it is unclear how the levels can be achieved without any details of the design or the functional noise parameters of uses within the buildings or the construction of the buildings.</p>	<p>Envelope 9 has been removed.</p> <p>Envelope 7 has been assessed in the Noise Impact Assessment as including (indicatively) a performance space with a seating capacity of 300+.</p>
<p>The Department considers that these noise generating elements should be relocated so that they are located away from the external boundaries of the site and more toward the center of the site, to avoid detrimental impacts on residential amenity due to use during extended hours and cars accessing the site in the evening or early nights.</p>	<p>Adoption of noise control methods in the design and operation of Envelope 7 (Gonzaga Barry) will ensure compliance with the site-specific criteria for all time periods, ensuring all reasonable impacts are appropriately managed. See assessment at <b>Appendix J</b></p> <p>All-weather playing fields have been assessed at this preliminary design stage. The assessment shows that noise mitigation is capable of being addressed as part of a detailed development application. See assessment at <b>Appendix J</b></p>
<p><u>Stage 1 Works</u></p> <p>The application establishes NMLs for construction works in two areas of Mount Pleasant Avenue (A and B). However, the Tables 4-9 and 4-10 of the Noise report (providing a comparison of the project noise level against the NML) do not tabulate the results against Areas A and B. The format of this table should be consistent with the NML table indicating the location and extent of the noise exceedance.</p>	<p>Table updated for consistency.</p>
<p>Please note that proposed extended construction hours (beyond the standard hours in the Interim Construction Noise Guidelines) cannot be supported due to predicted noise exceedances beyond 6pm.</p>	<p>Noted. Extended hours are not sought.</p>
<p>The internal NML for classrooms within the site is 45dBA. The Noise report identifies that during the construction works there would be significant noise exceedances and provides measures to reduce noise impacts to users of the school. However, it does not identify how much of a reduction of noise is expected after implementation of the measures within the site.</p>	<p>Noise from construction is likely to be similar to the levels predicted for receivers immediately surrounding the site and management of these levels will be carried out in accordance with recommended management measures.</p>
<p>The construction vibration impacts do not consider the impacts on the Aquatic Centre which would adjoin the boarding house. The vibration criteria for this building should be provided.</p>	<p>The Aquatic Centre building is located 9 meters from the proposed activity and falls outside of the minimum working distance for cosmetic damage.</p>
<p><u>Car Parking and drop off/pick up</u></p>	



Summary of issue raised	Comment
<p><u>Concept Proposal</u></p> <p>The Department notes that a significant number of additional cars would require the drop-off / pick-up zone access in the future. It will be necessary for the concept proposal to demonstrate that the capacity of the existing drop-off / pick-up zone within the site can accommodate additional cars.</p>	<p>To address the pick up and drop off issues and future demands Loreto has proposed a relocation of the existing facility and an additional through site link to further increase on site capacity.</p> <p>The relocated Osborn Road pick up and drop off and proposed additional through site link facility will increase the queuing capacity on site by five times what it is currently.</p> <p>Shifting the Osborn Road facility further south will also provide greater departure length from the Osborn Road/Pennant Hills Road intersection which will prevent queues from blocking vehicles entering Osborn Road.</p> <p>These works have been proposed as part of Stage 1 to help ameliorate existing impacts that are experienced by the residents of Osborn Road.</p>
<p>Alternatively, additional drop-off / pick-up zones within the site are to be provided and details submitted for assessment by the Department as part of the concept proposal. This should include clear details of staging of the future works, comprising the staging of the building envelopes as well as the increase in the student capacity, so that the future delivery of additional drop-off / pick-up provisions align with the proposed future increase in student numbers</p>	<p>See the above response.</p> <p>The improved pick up and drop off facilities have been proposed to occur as part of Stage 1 to assist in ameliorating existing impacts of the School on Osborn Road.</p> <p>Capacity for drop off and pick up demand will therefore be provided for the complete master plan from Stage 1.</p>
<p><u>Future Works Plan (Concept Proposal)</u></p> <p>The Design report includes a future works plan with a tentative schedule for delivery of all the works detailed in the concept proposal. This future works plan is not included in the concept proposal drawings, nor is it consistent with the submitted site masterplan.</p> <p>The proposed concept proposal site plan should be refined to incorporate details of the future works in the concept and also include a concept staging plan to outline how the masterplan for 2047 is proposed to be delivered in stages.</p>	<p>It is not possible to nominate a schedule or staging to deliver the Concept Proposal at this time. The Concept Proposal establishes a long-term framework for growth only.</p> <p>However, the Stage 1 DA has been revised to address infrastructure requirements to support the school population growth up-front that addresses this concern. A staging plan for infrastructure delivery and population growth is identified at <b>Section 5.4.3</b> of the RTS.</p> <p>The staging plan also identifies the infrastructure required under the Concept Plan (envelope 8 – underground car park) and sets out the requirements of future detailed DA's under the Concept Plan to confirm the need for the additional parking based on the implementation and success of the Green Travel Plan.</p> <p>A condition is proposed to link infrastructure delivery with population growth.</p>
<p>The Department considers that detailed functional parameters of the buildings, as well as the maximum number of car parking spaces for the site cannot be approved at the concept proposal stage without outline design of the buildings as a minimum (not just the envelopes with no height variation as proposed). The concept proposal should be revised to address this issue.</p>	<p>The Concept Proposal has been revised to address this issue by proposing envelopes that reflect indicative built form. Maximum GFA details for each envelope is provided within the RTS. Maximum car parking is also identified.</p>
<p>A parking strategy must be submitted to support the concept proposal and delineate how the car parking spaces as well as additional drop-off / pick-up areas would be provided on the site in phases to cater for the student increase as well as the building envelope functions, including the construction phase for each of these stages. This needs to form part of the staging plan for the</p>	<p>A staged car parking approach has been proposed that responds to increasing enrolments and staff.</p> <p>Stage 1 car parking improvements intend to address the current parking shortfall on site. The master plan has provision for providing for all car parking demands on site.</p>



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future works and include details of access to the site at each phase, and how each of these car parking and drop-off / pick-up areas would be accessed from the surrounding roads.	While provision has been made in the master plan to fully account for car parking on site, Green Travel Plan initiatives will be put in place to aim to reduce single occupancy vehicle use to alleviate impacts to surrounding streets. In future stages, travel patterns at Loreto will be reassessed and provision of additional parking will be proposed to meet the demand requirements based on travel mode surveys.
<p><u>Existing site plan</u></p> <p>The existing site plan does not identify the various components of the existing buildings that are heritage significant (currently provided in the CMP 2008 only). The individual heritage listed components of the existing buildings should be identified in the site plan / Heritage Report and the components proposed for demolition should be marked.</p>	
<p><u>Alterations to the heritage items (Concept Proposal)</u></p> <p>Alterations to the heritage items (such as C and D) are proposed as part of the concept proposal and consent has not been sort for these works. These are detailed as part of the concept proposal, but the application does not include adequate details to allow assessment of the proposed elements. Detailed design of these works would be needed prior to any further assessment or approval.</p>	It is confirmed that the various project descriptions outlined by AJ+C in the Design Report at <b>Appendix C</b> (for example Project C or Project D) are indicative only to provide the Department with an indication of the potential works that may occur in the location of an envelope that is sought for approval under the Concept Proposal. At this early stage, the school is not seeking approval for any detailed works and the Concept Proposal seeks approval for maximum envelopes and GFA distribution only. A detailed DA would be required to undertake works within the Concept Proposal envelopes at the appropriate time that would need to justify and assess any relevant impacts.
<p><u>Building Envelope 8 (Concept Proposal)</u></p> <p>The Building Envelope 8 is proposed to be an all-weather playing field with a height of 3m. The Department considers this to be unrealistic, given the nominated height, unless a component of this building is proposed underground (with the carpark). You are requested to address this issue.</p>	The original SSDA indicates an above ground component that has been deleted. The all-weather playing field will be at or below the level of Osbourn Rd and will be excavated to an average depth of 3m. See further detail at Section 3.1 of the RTS.
<p><u>Staff Accommodation (Stage 1)</u></p> <ul style="list-style-type: none"> <li>Please confirm if the three apartments within the boarding house are proposed for use by staff (as noted in the floor plan).</li> <li>Any proposal for more than four self-contained staff accommodation within a three-storey flat building will require assessment against State Environmental Planning Policy 65 (residential flat buildings). Details of consistency with this SEPP is required, if more than four apartments are proposed.</li> </ul>	The number of apartments has been reduced to 2. These apartments will be used by staff and their families.
<p><u>Early Learning Centre</u></p> <p>DA/1277/2018 for the Early Learning centre (local development) relies on the existing car parking spaces within the site. Please clarify how this development would integrate with the masterplan in the future and where would the parking for the child care centre be accommodated and maintained, when the future works are delivered as per the concept proposal.</p>	As part of the Operational Traffic Management Plan, allocation of parking spaces is proposed throughout the site to reduce recirculation of vehicles and ensure parking space allocation to the Early Learning Centre is maintained.
If car spaces are proposed to be allocated specifically to the early learning centre as part of DA/1277/2018, the details of available parking for the school must be updated in this application and justification given to the adequacy of the remaining parking to service the development proposal.	The parking projections within this report have included the demands by the Early Learning Centre. Additional parking has been proposed as part of the revised master plan to cater for the current and future parking demands.

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<b>Environment, Energy and Science Group</b>	
<p><u>Assessment of Impacts</u></p> <p>The SEARs for the proposal issued 12 January 2018 require that the biodiversity impacts of the Concept Plan including Stage 1 works are considered in a BDAR. Whilst the BDAR assesses the biodiversity impacts of Stage 1, it does not assess the impacts of the Concept Plan works with respect to Building Envelope 10.</p> <p>The EIS (page 33) proposes the following in Building Envelope 10: reinstatement of the creek and construction of a bridge, elevated walkways, adventure sports facilities, and repurposing of the Principal's residence. However, the BDAR only assesses impacts of the installation of an outdoor seating area in Building Envelope 10 (i.e. the 'bush chapel'). In addition, the Concept Proposal (Figure 13 in the EIS) shows pathways through the vegetation to the chapel and it is unclear whether these are existing. The direct and indirect impacts from the full list of works associated with Building Envelope 10 have not been considered in the BDAR.</p> <p>EES recommends that the BDAR be revised to include impacts from the Building Envelope 10 works as described on page 33 of the EIS.</p>	<p>Building Envelope 10 and paths have been removed from the updated SSD resubmission. Therefore, this comment does not apply.</p>
<p><u>Assessment of planted threatened species</u></p> <p>The BDAR states that three threatened species were located on the site (<i>Grevillea juniperina</i>, <i>Eucalyptus scoparia</i> and <i>Syzygium paniculatum</i>). The BDAR also states that because these species are outside of their natural range of distribution and/or outside of their natural habitat and the fact that these species have been planted due to the landscaped setting, no additional considerations are required for these three species under the <i>Biodiversity Conservation Act 2016</i> (BC Act). However, this is incorrect, as threatened species are protected under the BC Act, whether they are planted or not. As such, the assessment of impacts on biodiversity values in the BDAR should be amended to include an assessment of the proposed impacts on these three species.</p>	<p>ELA has conducted a review of the revised Arboricultural assessment by Earthscapes (2020) and can verify that these specimens will not be directly impacted. In accordance with the amended BAM 2020, an assessment was conducted to determine if additional assessments under the BC Act are required.</p> <p>ELA has amended version 6 of the BDAR to include EPBC Assessment of Significance to <i>Eucalyptus scoparia</i> and <i>Syzygium paniculatum</i> which are listed under the EPBC Act.</p>
<p><u>Floristic Analysis</u></p> <p>Section 2.4.2.1 of the BDAR states that floristic analysis was undertaken to confirm the plant community types on the site. The BDAR should be amended to include a copy of this analysis.</p>	<p>The results of the floristic analysis were conducted for Vegetation zone 4 and are provided in Appendix E of the updated BDAR version 6 at Appendix N of this RTS.</p>
<p><u>Credits classes and credit profile</u></p> <p>The BDAR does not include a table of credit classes and matching credit profile, as is required by Table 26 of the Biodiversity Assessment Method. The BDAR should be amended to include this information.</p>	<p>ELA has amended Table 35 in version 6 of the BDAR to include credit classes and like for like.</p>
<b>Hornsby Shire Council</b>	
<p><u>Planning</u></p> <p>The proposed development is inconsistent with DA/1227/2018 for an 80 place child care centre on the school site which relies on existing car parking within the Loreto School site. Details of the proposed child care centre needs to be considered with the proposed SSD application.</p>	<p>An Operational Traffic Management Plan has been prepared that includes the operation of the ELC, in particular car parking requirements.</p> <p>Car parking demand projections have accounted for demands generated by the ELC and future staff at Loreto.</p>
<p>The proposed boarding house building would result in excessive height, bulk and scale when viewed from adjacent properties in Mount Pleasant Avenue.</p>	<p>The boarding house has been reduced in height from 6 to 5 storeys. A visual impacts assessment is provided at <b>Section 5.2</b> of the RTS and due to the topography and</p>

Summary of issue raised	Comment
	setback of the building the bulk and scale is considered appropriate given the building presents as a two to three storey building, which is appropriate for an educational building.
<p><u>Heritage</u> The Loreto Convent Group at 91-93 Pennant Hills Road and 16-22 Mount Pleasant Avenue, Normanhurst is included as a local heritage item (Built, Archaeological and Landscape Item No. 607) in Part 1 - Heritage Items and in Part 3 – Archaeological Sites, in Schedule 5 of the Hornsby Local Environmental Plan 2013 (HLEP). The site is not located within the vicinity of heritage properties, including No.82 Pennant Hills Road (Item 606) and No.4 Mount Pleasant Avenue (Item 603), Normanhurst listed under Schedule 5 of HLEP.</p> <p>The Conservation Management Plan (CMP) prepared by Perumal Murphy Alessi dated July 2008 and Heritage Impact Statement (HIS) prepared by Weir Phillips Heritage January 2019 submitted with the documentation has been reviewed and heritage comment is provided in the tables below.</p>	A review of the plans by Weir Phillips and ACJ has been carried out as part of the amended package.
<p><u>Heritage (Concept Master Plan)</u> New boarding house: concerns raised over Stage 1 comment below.</p>	
<ul style="list-style-type: none"> <li>• Upgrade Mary Ward Wing building to accommodate year 12 boarders. Addition of another level above existing building:</li> <li>• The limited information provided does not clearly detail the impact of the proposed changes to the fabric to enable assessment. Change should be limited, reversible and include reinstatement of former floor plan wherever possible and include interpretation. Existing floor plans and elevations to scale should be provided.</li> <li>• Concern is raised to the addition of another level to this building as it would alter the original form of the building and appearance.</li> </ul>	<p>Additional information, including photographs of the interior of the Mary Ward Building, has been provided in the amended HIS.</p> <p>No works will be carried out to this building without a DA. A detailed assessment will accompany a DA. The purpose of the Concept Proposal is to establish that change can be supported. The amended HIS establishes that this building has varying levels of significance. It has moderate historic and social significance, but lesser architectural significance. The envelope has been revised to retain the hipped roof form of the building and open verandahs on the eastern side. The building will remain clearly identifiable as the Mary Ward Building and its visual relationships to the landscaping to the east are retained.</p> <p>As set out further in the amended HIS, is not possible to retain the entire floor plates of small rooms off long narrow hallways and find a new use for the building. The CMP 2008 allows for change to buildings of moderate significance if it furthers the significance of the item. The CMP 2008 allows for further alterations to fabric of this type. The CMP 2008 states for elements of moderate significance:</p> <p>‘Buildings and elements of Moderate significance a <u>greater level of intervention</u> (WP Heritage emphasis) is permissible. Adaptation and relocation to components of these elements and spaces is acceptable provided that it protect the overall cultural significance of the item.’</p> <p>Supporting education uses supports the core significance of the site. Mitigation measures, such as archival recording, interpretation and retention of some part of the layout can be developed as part of a detailed DA.</p>

Summary of issue raised	Comment
<ul style="list-style-type: none"> <li>Relocate main reception, staff and administration to eastern side of 1897 convent building, Removal of level 5 toilet block above 1897 convent building.</li> <li>Insufficient detail is provided to enable assessment of impact of proposed changes to the original 1897 convent building and Angel wing building.</li> <li>These works do not appear to be consistent with the CMP policies for conservation of the highly significant fabric of the convent. There is also limited proposed conservation works, maintenance, interpretation plans detailed in the Master plan.</li> <li>The Convent and Angel wing building should not be further altered or lost without detailed assessment of remaining original fabric. Conservation works should include reinstatement of removed original elements and the original spatial relationship with the 1897 convent building.</li> <li>Subject to detailed information being provided the removal of unsympathetic elements would be considered.</li> <li>These works should not be supported without adequate detailed plans and fabric analysis. No works should occur that are not consistent with the CMP policies or Burra Charter principles.</li> </ul>	<p>The envelopes have been revised to show the retention of the Holy Angel Wing.</p> <p>As set out above, no works will be carried out to any of these buildings without a DA. A detailed assessment will accompany a DA, including plans and full justification for any fabric removed. The purpose of the Concept Proposal is to establish that change can be supported. Conservation works and interpretation works will form part of these later packages.</p> <p>The removal of the Post World War II addition above the link between the Convent Building and the Givendale Wing will have a positive impact. This element is intrusive; its removal will improve the legibility of both buildings.</p> <p>As set out in the amended HIS, the remainder of the link comprises fabric belonging to the Convent Building and the Givendale Wing. These sections are not part of the principal building form of either buildings, do not contain significant interiors and have been altered by past works, particularly internally. Figure 5.1 in the CMP 2008 identifies this link section as having little significance. The amended HIS assesses these elements as having little- moderate significance. The controls for elements of moderate significance were cited above.</p> <p>The CMP 2008 provides the following controls for elements of little significance:</p> <p>‘Buildings and elements of Little significance are generally not regarded as essential to the major aspects of significance of a building or a place, often fulfilling a functional and/or are in poor condition. Both retention <u>and adaptation</u> (WP Heritage emphasis) are acceptable options depending on the element. Any major interventions to the item should be confined to areas where the fabric is of little significance.’</p> <p>Sufficient information is provided by the Concept Proposal and the amended HIS to establish that this section is of secondary significance and that alterations to it will not reduce the ability to understand the significance of either building. No removal of fabric will take place without the submission of a DA containing a detailed fabric analysis, with reference to plans, and full justification for any proposed changes.</p>
<p>Works to reduce roadways within campus, new paths and landscaping could be considered on merits subject to detailed landscape heritage report and assessment to the heritage listed Loretto College grounds.</p>	<p>The CMP 2008 acknowledges that, with the exception of the original driveway into the site of Penannt Hills Road, pathways and landscaping elements within the site have changed over time. An assessment of the proposed new link road (not part of the original submission) is included in the amended HIS.</p> <p>The care with which the Stage 1 works have been located to retain trees and view corridors demonstrates how the detailed design phases will be guided by heritage significance.</p>
<p>Secondary school expansion adjacent to the Chapel building</p>	<p>Component G has been removed from the proposal. This has a positive impact because it allows the retention of the visual relationships between the rear (aspe) of the</p>

Summary of issue raised	Comment
<p>The development of this area in proximity to the heritage listed chapel would have an adverse impact on the setting of the chapel and the relationship with the original convent and Angel wing building. The development of this area would have an adverse cumulative impact, in addition to the current unsympathetic impact of the circa 1980/90s administration wing. No further development should occur in this area to maintain the significance of the built items and the landscaped grounds. Overall, the front of the school should remain undeveloped and landscaped. This component of the master plan should not be supported in heritage terms.</p>	<p>Chapel, the Holy Angels Wing and the Convent.</p> <p>The massing and scale of Envelope 2 has been reduced and greater variation provided in heights and setbacks.</p> <p>It is noted that this is not the original frontage of the site. The Convent was clearly built to address the east (not the west), as is the existing Chapel.</p>
<p>Envelope 3 – Future development (adjacent Pennant Hills Road; north east of the convent and chapel) to be determined; underground carpark</p> <p>The proposed concept development is of a height and scale that would be out of character with the scale of the heritage items on the site. The structure would adversely impact the landscaped setting of the convent and chapel on the northern and eastern sections of the site. The listed grounds would also be adversely impacted, as well as the original setting of the listed entry and gates. Development in this section should remain largely landscaped as a link to the original setting and understanding of the site. This development could also irreversibly remove potential for historic views of the convent to be revealed. In addition, views internally from the Convent and chapel area out of the site would be adversely impacted, by the proposed building.</p> <p>It is suggested that proposed future buildings for this area be located elsewhere. For example, in Mount Pleasant Avenue adjacent the new ELC, and the current sports courts in Mount Pleasant Avenue relocated to Envelope 3 and landscaped. Alternatively, locate new buildings to Envelope 9, 7 or 6.</p> <p>The redevelopment proposed would have an adverse impact and is not supported in heritage terms.</p>	<p>Envelope 3 has been removed from the proposal. See the comments with regard to the proposed tennis court with carparking beneath above..</p>
<p>Bush Chapel &amp; bush recreational facilities:</p> <p>The CMP 2008 policy states “no new buildings or built elements are permissible within the existing bushland located in the southern portion of the site. No additions or alterations to the cemetery, its size or perimeter walls are permissible.” Development of the bushland for a new chapel and the like should not be supported. The addition of further structures would have an adverse impact on the natural heritage values of the bushland and the ‘isolated’ setting of the listed cemetery.</p>	<p>The Bush Chapel has been removed from the proposal.</p>
<p><u>Heritage (Stage 1 Application)</u></p> <p>Demolition of the Loreto Community House and construction of a 3 to 6 story boarding house for 216 students, with underground car park and new landscaping.</p> <p>The buildings to be demolished are documented as having no heritage value. The new boarding house building is of a significantly larger scale than the original heritage buildings on the site and appear to be inconsistent with the form and appearance of the original buildings.</p> <p>A revised form, height and scale should be considered to complement the scale and style of the earliest buildings on the site.</p>	<p>The building envelope of the proposed boarding house has been reduced and better articulation has been provided.</p> <p>The boarding house is being built for a different purpose than the original buildings on the site and in a different era. It is appropriate that it develop its own form. It is also appropriate that it has its own architectural expression, in the same way that other post 1990s buildings on the site do. The proposed building is larger in massing and scale than any one of the heritage significant buildings. These buildings, however, do not read as separate element, but as part of a large group of related buildings. In any event, the site of the boarding house is well removed from the heritage significant buildings by distance, by the fall of the land and by existing buildings and vegetation. More</p>

Summary of issue raised	Comment
	<p>importantly, the significant view corridors out of the heritage significant buildings are to the north east and east, away from the boarding house site.</p> <p>These factors and the revisions made mean that the boarding house will not impact upon the ability to understand the historic and aesthetic significance of these buildings, on significant view corridors to/from them or the character of their setting. A boarding house of this massing and scale and this far removed from the group of heritage significant buildings will not overwhelm them.</p>
<p>New Garden area – Removal of buildings between Mary Ward Wing and existing dining room building (Givendale wing) and associated works to make good the existing.</p> <p>The buildings to be demolished are documented as having little heritage significance due to past alterations and additions. No heritage issues are raised to their removal or new garden area, subject to archival photographic recording of all affected areas (internally and externally) prior to any demolition or removal of all structures on the site. This would enable the evolution of the site to be documented.</p>	Agreed.
<p>New landscaping located in the current primary school carpark, designed to allow for outdoor assembly of the whole school population.</p> <p>No heritage concerns raised with the circa 1990s primary school car park landscaping.</p>	Agreed.
<p>Removal and replacement of approximately 50 trees of varying significance. Tree removal should be limited wherever possible and replacement of trees removed is supported. No significant trees should be removed, and the heritage listed grounds as listed on the heritage inventory sheet for the grounds should be retained. Comment from Council's Tree Management team should be sought.</p>	<p>No historically significant trees will be removed. Tree removal has been limited to the minimum and new works carefully designed to retain the health of existing trees. Replacement planting is proposed for removed trees to maintain the overall tree cover.</p>
<p>Augmentation of connection of services and utilities infrastructure Should occur only in accordance with the CMP policy for services.</p>	Agreed. Connection of services will be subject to detailed DA and will follow the policies of the CMP 2008.
<p><u>Heritage in the vicinity</u> The scale of future development in the Master concept plan (Envelope 3) has the potential to adversely alter the residential low scaled setting of the heritage item in the vicinity at No. 4 Mount Pleasant Avenue, Normanhurst.</p>	Envelope 3 has been removed from the proposal. The impact of new proposed works on No. 4 Mount Pleasant Avenue (the tennis court/car park and access way) is assessed in the amended HIS.
<p><u>Heritage Summary</u> Heritage concerns are raised to several proposed works within the State Significant Development application (Stage 1) and concept master plan which would have an adverse impact on the significance and setting of the item. Concern is raised to the form and scale of the boarding house; additional structures within the remnant bushland; redevelopment of the original Covent building, and circa 1920s/1950s buildings on the site. The development of the site to the north and north east of the convent and chapel buildings and area north west of the chapel is not supported due to the adverse impact on the listed grounds and setting of the significant buildings on the site. The</p>	<p>See above. In summary :</p> <p>Envelope 3 has been removed.</p> <p>The massing and scale of Envelope 2 has been significantly reduced. Varied setbacks and heights are provided to further reduce the impact. The diagrams have been amended to show the retention of the Holy Angels Wing within Envelope 2.</p> <p>Component G adjacent to the Chapel has been removed.</p>

Summary of issue raised	Comment
<p>proposal should be amended to remove the adverse heritage impacts the proposed redevelopment would have on the listed site as follows:</p> <ul style="list-style-type: none"> <li>• The Master plan and stage 1 proposal should be amended to address the heritage concerns raised.</li> <li>• Archival photographic recording in accordance with Office and Environment and Heritage (OEH) guidelines should be required prior to any demolition works (internal and externally) to any structure on the listed site.</li> <li>• Augmentation of connection of services and utilities infrastructure is to occur only in accordance with the Conservation Management Plan 2008 (CMP) policy for services.</li> </ul>	<p>The proposed bushland chapel has been removed.</p> <p>The proposed works to the Mary Ward Wing have been reduced to enable the original building character to be more readily understood. The amended HIS shows that the works can be carried out 'in principal' and that they will be subject to a detailed DA.</p> <p>The proposed works to the 'link' section between the Givendale Wing and the original Convent Building have been further explored. The amended HIS shows that the works can be carried out 'in principal' and that they will be subject to a detailed DA.</p> <p>Archival recording can be carried out.</p> <p>Connection of services will be subject to detailed DA and will follow the policies of the CMP 2008.</p>
<p><u>Trees</u></p> <p>Council raises concerns with the loss of high retention value trees on the site.</p>	<p>The proposed development will necessitate the removal of ten (10) trees of high retention value. These trees have no special ecological or heritage significance, but are in good health and condition and make a positive contribution to the amenity of the site and streetscape. The building has been placed as best as possible to minimise loss of trees. There are no feasible options that can be recommended to preserve these trees in this instance given the extent of site development and the position of these trees within the site. In order to compensate for loss of amenity resulting from the removal of these trees to accommodate the proposed development, the school has committed to the replacement planting with new trees elsewhere within the site as a condition of consent.</p>
<p>The Traffic Assessment report (TAR) prepared by Asongroup needs to be updated to include the following: Existing pick up operation is to be reviewed and improved.</p>	<p>Since the original Transport Assessment Report, the existing pick up and drop off arrangement at Osborn Road has been reviewed in its current operation and for its adequacy for the future operations at the School. To address the pick up and drop off issues and future demands Loreto has proposed a relocation of the existing facility and an additional through site link to further increase on site capacity.</p>
<p>With a 42.5% increase in students it can be argued that there will be a significant increase in queue length, this is not acceptable to the Branch as it would result in the pickup queue extending onto Osborn Road. Council has received many complaints from local residents regarding queuing onto Osborn Road issue during pickup time..</p>	<p>The relocated Osborn Road pick up and drop off and proposed additional through site link facility will increase the queuing capacity on site by five times what it is currently.</p> <p>Shifting the Osborn Road facility further south will also provide greater departure length from the Osborn Road/Pennant Hills Road intersection which will prevent queues from blocking vehicles entering Osborn Road.</p> <p>These works have been proposed as part of Stage 1 to help ameliorate existing impacts that are experienced by the residents of Osborn Road.</p>
<p>ELC Operational Traffic Management Plan will be impacted by the Master Plan of Loreto. Although the Master Plan excludes the DA of ELC, staff of ELC will rely on car parking areas in Loreto. The TAR needs to have a discussion regarding the future impact to ELC staff parking.</p>	<p>An Operational Traffic Management Plan has been prepared that includes the operation of the ELC, in particular car parking requirements. Car parking demand projections have accounted for demands generated by the ELC and future staff at Loreto.</p>



Summary of issue raised	Comment
Will there be dedicated bus services for Loreto Normanhurst students? If so how are the buses to be catered for?	Loreto currently operates 6 bus services and will include additional services as required as stages of the master plan are constructed. By relocating the Osborn Road pick up and drop off, additional capacity for these bus services will be provided at the Osborn Road slip road.
Date of traffic counts has not been provided and is required	Updated SIDRA models have been prepared with traffic volumes from the Ason report. The volumes within this report have been reviewed against SCATS volumes from Thursday the 7th of November 2019 to ensure they reflect the school during normal operations.
<b>Office of Environment and Heritage</b>	
<p>The Concept proposal identifies the introduction of Building Envelope 10 into the site which includes a Bush chapel and other associated elements linked to environmental aspects of the site. The cemetery is not in the immediate vicinity of the chapel (Refer to Figure 13 from the EIS) and will be separated by bushland. However, this aspect of the proposal (i.e. visual impacts) is not discussed in the EIS or archaeological assessments supporting the project. It would be appropriate for the future detailed design of the Chapel in the landscape to address the question of any potential visual impacts to the Cemetery. Advice is provided in this letter to the Applicant below. The proposed Stage 1 works are not located near the cemetery and are otherwise unlikely to disturb archaeological relics. Ecological Australia has recommended site protection mechanisms for this stage of site work under the SSD, if approved.</p> <p>Recommended condition: Nothing in this approval allows the removal of, or damage to, the Loreto Normanhurst Cemetery.</p> <p>Advice for the future design of building Envelope 10 (the Chapel): The chapel should be appropriately placed in the landscape to reduce any visual impact to the cemetery. This may be achieved in materials, scale and positioning of the future building design.</p>	Envelope 10 has been removed from the proposal.
<b>Transport for NSW Roads and Maritime Service</b>	
<p>Roads and Maritime has previously resumed and dedicated a strip of land as road along the Pennant Hills Road frontage of the subject property, as shown by grey colour on the attached Aerial - "X".</p> <p>The sub surface beneath part of the subject property was compulsory acquired by Roads and Maritime for the NorthConnex Project on Government Gazette No 67 of 26 August 2016; Folio 2303. The acquired land is described as Lots 15-19 &amp; 29-33 DP1218765 &amp; Lots 6 &amp; 9 DP 1217496.</p> <p>Roads and Maritime has no proposal that would require any part of Lots 1-5 DP1218765 &amp; Lot 3 DP 1217496. Further information in regard to the proposed tunnel and NorthConnex Project can be obtained by contacting NorthConnex - E mail: <a href="mailto:enquiries@northconnex.com.au">enquiries@northconnex.com.au</a> or by calling 1800 997 057 or by visiting the web site <a href="http://www.northconnex.com.au">www.northconnex.com.au</a>.</p>	Noted. The proposal is wholly contained within the site.

Summary of issue raised	Comment
All buildings and structures, together with any improvements integral to the future use of the site, are to be wholly within the freehold property (partly limited in depth).	
The existing access on Pennant Hills Road shall be removed and replaced with kerb and gutter to match existing. The design and construction of the kerb and gutter on Pennant Hills Road shall be in accordance with Roads and Maritime requirements. Details of these requirements should be obtained by email to <a href="mailto:DeveloperWorks.Sydney@rms.nsw.gov.au">DeveloperWorks.Sydney@rms.nsw.gov.au</a> .	Loreto notes the safety concerns regarding the existing access point from Pennant Hills Road. During the consultation process, it was discussed that this access point could be maintained for occasional ceremonial use and when a traffic management plan is in place. This was agreed with RMS in principle.
Detailed design plans of the proposed kerb and gutter are to be submitted to Roads and Maritime for approval prior to the issue of a Construction Certificate and commencement of any road works. Please send all documentation to <a href="mailto:development.sydney@rms.nsw.gov.au">development.sydney@rms.nsw.gov.au</a>	To close the access driveway to general vehicular movements, removable bollards will be installed to prevent access when ceremonial events are not occurring.
A plan checking fee and lodgement of a performance bond is required from the applicant prior to the release of the approved road design plans by Roads and Maritime.	
The developer is to submit design drawings and documents relating to the excavation of the site and support structures to Roads and Maritime for assessment, in accordance with Technical Direction GTD2012/001.	Due to the above, no changes are proposed to RMS assets on Pennant Hills Road and therefore design documentation is not required.
The developer is to submit all documentation at least six (6) weeks prior to commencement of construction and is to meet the full cost of the assessment by Roads and Maritime. Please send all documentation to <a href="mailto:development.sydney@rms.nsw.gov.au">development.sydney@rms.nsw.gov.au</a>	
If it is necessary to excavate below the level of the base of the footings of the adjoining roadways, the person acting on the consent shall ensure that the owner/s of the roadway is/are given at least seven (7) day notice of the intention to excavate below the base of the footings. The notice is to include complete details of the work	
Detailed design plans and hydraulic calculations of any changes to the Roads and Maritime's stormwater drainage system are to be submitted to Roads and Maritime for approval, prior to the commencement of any works. Please send all documentation to <a href="mailto:development.sydney@rms.nsw.gov.au">development.sydney@rms.nsw.gov.au</a>	Due to the above, no changes are proposed to RMS assets on Pennant Hills Road and therefore design documentation is not required.
A plan checking fee will be payable and a performance bond may be required before Roads and Maritime approval is issued.	
School Zones must be installed along all roads with a direct access point (either pedestrian or vehicular) from the school. School Zones must not be provided along roads adjacent to the school without a direct access point	School zones are currently in place on roads with a direct access point.
There should be suitable pedestrian paths/facilities within the vehicle accessible areas to corral pedestrians to appropriate crossing locations	Where pedestrian movements are encouraged, pedestrian pathways and crossings have been provided. In the Operational Traffic Management Plan, it has been specified that the main pedestrian crossing areas are marshalled within the site.
All vehicles are to enter and exit the site in a forward direction. Provision for vehicles to turn around must be provided within the property boundary.	All vehicles are able to enter and exit the site in a forward direction. This has been shown in the swept path analysis attached to the Traffic Response to Submissions Report.

Summary of issue raised	Comment
All works/regulatory signposting associated with the proposed development are to be at no cost to Roads and Maritime.	No additional signposting is proposed external to the site.
<b>Transport for NSW</b>	
<b>Trip distribution and assignment of additional traffic</b> The Applicant should consider the existing travel preferences and availability of on-street parking, pick-up or drop-off in the surrounding local road network to estimate trip assignment. Intersection analysis of all impacted intersections should be revised or undertaken accordingly.	Traffic distribution has been revised to address the various vehicular access points around the site, with trips proportioned to available parking spaces. Increase provision of pick up and drop off will reduce the incidence of pick up and drop off occurring on local roads.
<b>Managing school traffic volumes at Pennant Hills Road with Mount Pleasant Avenue</b> DPIE should consider requesting an investigation into traffic management measures or development design to mitigate potential increases in the occurrence of crashes due to existing and additional pick-up/drop-off movements and onstreet parking on Mount Pleasant Avenue associated with the school.	The Operational Traffic Management Plan submitted with this proposal indicates that those traveling via Mount Pleasant Avenue will be restricted to left out movements only. Future signalisation of this intersection would be of benefit for the community and Loreto, however with the current use of Pennant Hills Road and proximity of the Osborn Road signalised intersection, it is not desirable from Roads and Maritime Services.
<b>Pick up and drop off analysis required</b> The TA should include analysis to determine the suitability of the existing pick-up/drop-off facility to accommodate the future school population. Should it be determined that the existing facility is deemed inadequate to manage the incoming demand, the Applicant should consider provisions to redesign the facility in future stages of the development.	Since the original Transport Impact Assessment, the existing pick up and drop off arrangement at Osborn Road has been reviewed in its current operation and for its adequacy for the future operations at the School. To address the pick up and drop off issues and future demands Loreto has proposed a relocation of the existing facility and proposed an additional through site link to further increase on site capacity. These works have been proposed as part of Stage 1 to help ameliorate existing impacts that are experienced by the residents of Osborn Road.
The existing access on Pennant Hills Road shall be removed and replaced with kerb and gutter to match existing.	Loreto notes the safety concerns regarding the existing access point from Pennant Hills Road. During the consultation process, it was discussed that this access point could be maintained for occasional ceremonial use and when a traffic management plan is in place. This was agreed with RMS in principle. To close the access driveway to general vehicular movements, removable bollards will be installed to prevent access when ceremonial events are not occurring.
School Zones must be installed along all roads with a direct access point (either pedestrian or vehicular) from the school. School Zones must not be provided along roads adjacent to the school without a direct access point.	School zones are currently in place on roads with a direct access point.
There should be suitable pedestrian paths/facilities within the vehicle accessible areas to corral pedestrians to appropriate crossing locations.	Where pedestrian movements are encouraged, pedestrian pathways and crossings have been provided. In the Operational Traffic Management Plan, it has been specified that the main pedestrian crossing areas are marshalled within the site.
All vehicles are to enter and exit the site in a forward direction. Provision for vehicles to turn around must be provided within the property boundary.	All vehicles are able to enter and exit the site in a forward direction. This has been shown in the attached swept path analysis.
<b>Sydney Water</b>	

Summary of issue raised	Comment
<p><u>Water Servicing</u></p> <p>Sydney Water has no objection to the proposed buildings being served by the site's existing five drinking water connections.</p> <p>The proponent's hydraulic consultant can confirm if these existing drinking water connections are adequate to serve the proposed buildings.</p>	<p>The proposal is capable for being serviced. Some amplification is required. Refer to the Infrastructure Management Plan prepared by Harris Page at <b>Appendix V</b>.</p>
<p><u>Wastewater Servicing</u></p> <p>The site is currently being serviced by one sewer connection along Osborn Road. Amplification of this sewer network would be required depending on the stage of the development. The proponent may consider utilising the sewer connection within the southwest corner of the property.</p> <p>Alternatively, it may also be possible to serve the new Boarding House with an extension from the existing sewer within the rear of properties on the eastern side of Mount Pleasant Avenue.</p>	<p>The boarding house will require a new sewer pump in the basement that will discharge to the internal school system. The estimated size of a new sewer pumping station is approximately 20,000L. Refer to the Infrastructure Management Plan prepared by Harris Page at <b>Appendix V</b>.</p>
<b>Ausgrid</b>	
Ausgrid has reviewed the EIS and in particular Appendix Y and has no further submission.	Noted.
<b>NSW Rural Fire Service</b>	
The provision of water, electricity and gas associated with the proposed works are to comply with sections 4.1.3 and 4.2.7 of 'Planning for Bush Fire Protection 2006'.	Noted. This may form a condition of consent.
Emergency vehicle access should continue to be provided onto the sports fields from Mount Pleasant Avenue and/or Osborn Road	Emergency vehicle access to the sports field at the south of the site will be provided via the Osborne Street carpark in Stage 1. Ongoing stages of the development will continue to provide access to the sports oval, the access of which will be considered during later design development following concept approval.
A Bush Fire Emergency Management and Evacuation Plan shall be prepared consistent with 'Development Planning- A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan December 2014	This is a recommended mitigation measure at Section 6.0 of the RTS.
Construction of the proposed Gonzaga Barry Centre Extension, and the Mount Pleasant Pavilion, shall comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2009 'Construction of buildings in bush fire-prone areas' or NASH Standard (1.7.14 updated) 'National Standard Steel Framed Construction in Bushfire Areas – 2014' as appropriate and section A3.7 Addendum Appendix 3 of 'Planning for Bush Fire Protection 2006'.	Noted. This may form a condition of consent.
Landscaping to the site is to comply with the principles of Appendix 5 of 'Planning for Bush Fire Protection 2006'.	Noted. This may form a condition of consent.