

19 March 2021

Aditi Coomar
Senior Planning Officer | Social and Infrastructure Assessments
Infrastructure Assessments
GPO Box 39 Sydney NSW 2000

Dear Ms Coomar,

Re: SSD-8996 - Loreto Normanhurst - 91-93 Pennant Hills Road and 6-12 Mount Pleasant Avenue, Normanhurst

I refer to the above amended development proposal and provide the following comments from Council. Please note that these comments are provided by Council officers and are not a resolved position of Hornsby Council.

Planning

The proposal seeks approval for building envelopes up to a maximum building height of 20.6m and 5 storeys which exceeds the 8.5m height limit for the subject site and surrounding low density area. The proposed boarding school building would front onto low-density residential dwellings and would not provide an appropriate transition in scale of built form as minimal front setbacks are provided to Mount Pleasant Avenue.

The boarding school building would appear as an unbroken building with a building length of approximately 150 metres. This would result in a scale and character that is not typical of a low-density residential zone. Consideration should be given to breaking the building mass and/or setting the building back further into the site to provide greater opportunity for deep soil planting along the street frontage. It should be noted that where residential buildings of 5 storey are permitted in Hornsby Shire, they are restricted to a maximum building length of 35m with indentations to provide variation to the building facades. The proposal does not satisfy Council's controls for landscaping, setbacks or built form and articulation.

In the Department's assessment of the proposed breach in height, the Department should be satisfied that the scale and setbacks to boundaries proposed would cause negligible visual amenity impacts in relation to adjoining land uses and that the Clause 4.6 variation sought adequately addresses each prescribed element of Clause 4.6(3) and (4) of the *Hornsby Local Environmental Plan 2013*.

Heritage

The revised Concept Plan results in a substantial improvement in heritage terms from the original, primarily due to the general reduction in the number of proposed new buildings and overall reduction in building envelopes. In particular, the previously proposed building of up to six storeys on the Pennant Hills Road frontage has been removed as has the Theology Centre immediately to the west of the Chapel. It is acknowledged that works to existing buildings of significance have been revised to minimise adverse heritage impacts.

The proposed Stage 1 works are acceptable in heritage terms. Heritage impacts associated with works have been justified and overall, the Stage 1 works will not unacceptably compromise the significance of heritage buildings, landscape or site. Archival recording of significant fabric and spaces should be required as a condition of consent should the proposal be supported.

Neither the Concept Proposal nor Stage 1 works would impact the values of heritage items in the vicinity and the proposal includes measures to safeguard unexpected finds or sites of Aboriginal cultural heritage value and historical archaeological resources during works.

No heritage objections are raised to the revised proposal subject to any future Development Applications that include (or impact) heritage buildings, spaces and gardens being accompanied by detailed plans, full justification of any fabric to be modified or removed and a Schedule of Conservation Works for original fabric to be retained. The Development Applications should also specify heritage impact mitigation measures including archival recording and Interpretation plans where appropriate.

Note: A detailed table is attached that reiterates key heritage concerns raised in the assessment of the original SSD and provides comment regarding the proposed amendments.

In summary, no heritage objections are raised to the revised Concept Proposal or revised Stage 1 DA on heritage grounds subject to the following conditions should the Department recommend approval of the application:

1. An Interpretation Strategy to inform future DA specific interpretation plans should be submitted and agreed to by Council prior to the submission of any future Development Applications.
2. Archival recording of significant fabric and spaces is undertaken prior to works commencing in areas included in the Stage 1 works.
3. Undertaking archival recording of significant fabric and spaces is included as a consideration and where appropriate a recommendation in the heritage impact assessments of any further DAs.
4. Submission of a supplementary heritage impact assessment of heritage tree loss as a result of the Concept Proposal and the acceptability of specific mitigation strategies.
5. Construction management plans include measures as recommended in the submitted Aboriginal Cultural Heritage and Archaeological reports by Ecological to safeguard unexpected finds or sites of Aboriginal cultural heritage value and historical archaeological resources during works.
6. Future DAs that include (or impact) heritage buildings, spaces and gardens are to be accompanied by:
 - 6.1 detailed plans and elevations showing original fabric and building phases;
 - 6.2 full justification of any significant fabric to be modified or removed;
 - 6.3 Schedule of Conservation Works for original fabric to be retained and the timing of the conservation works relative to other construction;
 - 6.4 details of heritage impact mitigation measures including archival recording; and
 - 6.5 Interpretation plans based on the interpretation strategy (Condition 1) where appropriate.

Trees

Concerns are raised that 28 trees of medium to high retention value would be removed in the stage 1 development. These trees comprise native species including Spotted Gum, White Mahogany, Narrow-leaved Ironbark Grey Ironbark, Blackbutt, Swamp Mahogany, Sydney Blue Gum, Scribbly Gum, Paperbark and Turpentine.

The trees are of good health and condition and contribute to the amenity of the site and surrounding properties. Should the Department recommend approval of the development, consideration should be given to replacement planting with new trees as part of stage 1 development. Furthermore, a landscape plan should be submitted that clearly indicates the species, location and number of replacement trees to be planted on-site.

Traffic and Safety

Council has received representations from some members of the community concerning traffic, parking and drop-off/pick-up arrangements associated with the current operation of Loreto Normanhurst School. A number of residents comment that the proposal to significantly increase student numbers will exacerbate these existing problems. In the Department's assessment of the traffic and parking impacts associated with the proposed increase in student population, the Department should be satisfied the following has been adequately addressed:

Drop-off/Pick-up

- a) In the traffic report 6.1.2 it states that '*TTW has collected tube counts of the existing access and egress points into the School and conducted a site visit during a peak morning drop off period to observe current driver behaviour.*' The traffic analysis and queuing survey appears to be only conducted during the morning peak, not afternoon peak. It should be noted that drop off behaviour is different from pick up behaviour since in the pick-up, parents often come to the school site early and wait for the children to arrive. Queuing of vehicles on surrounding streets that adjoin the School is an existing issue shared by residents and Council and has been observed to last for a long period of time and is the primary reason for long queues back to Osborn Road during the afternoon peak. The traffic report does not identify or discuss the queueing situation during PM pick up time.
- b) In previous conversations with School representatives, it was established that the School does not currently open their access gate until the afternoon pick-up is about to begin. Prior to this, parents who arrive early sit idle in their vehicles on Osborn Road, queuing to access the School through the gates. This appears to start at least 30 minutes prior to pick-up. Currently the afternoon queuing travels down Osborn Road into the intersection with Pennant Hills Road. On Pennant Hills Road the queuing is in the northbound right turn lane (into Osborn Rd) and in the southbound lane three queuing to turn left into Osborn Road. The current allowance provided by the school is 4 pickup spaces and only 3 queuing spaces. The existing queue reaches far beyond this onto the State Road.
- c) The School proposes that as the development stages progress and the School population increases, so will the additional requirement for queuing spaces. However, it is evident from the current operation of the School that the number of vehicles queuing is closer to the proposed allowance of 15 to 16 vehicles as estimated for the Stage 4 of the development and the existing capacity is already insufficient for current demand. As the population of the junior school increases, so will the desire for

parents to have access to the School to pick-up primary aged children. The Department should consider bringing any proposal for works to reduce traffic queuing for drop off and pick up to Stage 1 or before any increase in student population is approved that would lead to an increase in vehicles to the School occur.

- d) The proposed future road link through the site has the potential to create other traffic and safety issues to the Mount Pleasant Avenue intersection which is not signalised. The through link would send traffic out to Mount Pleasant Avenue and the traffic would use the intersection of Mount Pleasant Avenue with Pennant Hills Road. This intersection is subject to many complaints regarding safety and delays and signalisation of the intersection at Mount Pleasant Avenue and Pennant Hills Road should be required should this application be approved as a condition of consent.
- e) Increasing or relocating the internal queuing area would not address all traffic issues on Osborn Road at present or in the future. It is recommended that Osborn Road be widened to accommodate two traffic lanes along the School side as well as the proposals from traffic report.

On Street Parking

The initial development plan states the School has approximately 300 members of staff, but only 179 car parking spaces on site. Council has observed that currently, a high proportion of the School staff and students park on the residential side of Osborn Road and Mount Pleasant Avenue. This observation is further confirmed by the Applicant in Section 4.3 Parking Supply document (page 12) whereby it is noted that the School currently has an existing shortfall in parking on campus. The Applicant proposes to manage this parking shortfall in the future through a proposed Green Travel Plan. While the Green Travel Plan is welcome, the proposal states that parking onsite will increase in stages in accordance with rising enrolments and staff numbers. In addition, the Staff Travel Surveys conducted for the initial development proposal in 2019, indicated that 89.1% of staff drive to the School, yet the current proposal does not come close to meeting the need for additional staff parking and would not address existing parking issues on surrounding roads as a result of the school enrolment and staff numbers. Additional parking provision to meet demand should be required prior to any increase in student and staff numbers.

Footpath capacity

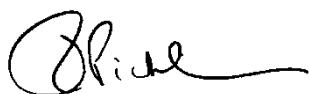
The increased pedestrian movements will create a situation where the existing 1.2m wide footpath cannot safely accommodate pedestrians. In the Department's Assessment, consideration should be given to upgrading the footpaths adjoining the site to 2m width along the pedestrian desired lines. It is acknowledged that a plan should be submitted to demonstrate how a widened footpath in addition to an extra lane along the Osborn Road frontage of the site could be accommodated within the building setbacks. A plan showing the dedication of part of the site for the purposes of road widening to accommodate the proposal may be required.

Public Interest

Council has received numerous representations from residents in the locality objecting to the proposed development. The areas of main concern include traffic safety and car parking concerns. These views of the local community are supported and it is respectfully submitted that issues of traffic, parking and drop-off/pick-up of students should be appropriately addressed prior to any approval being granted for intensification of the use of the School.

Please contact me on telephone 9847-6731 or email rpickles@hornsby.nsw.gov.au should you wish to discuss this matter further.

Yours sincerely



R PICKLES
Manager Assessments
Planning Division

TRIM Reference: P2017/00777

Attachment - (Detailed heritage assessment)

The following table reiterates key heritage concerns raised in the assessment of the original SSD and provides comment about the proposed amendments. It also includes comment about several wholly new components of the revised Concept Plan and Master Plan.

Table 1 – Concept Proposal – Loreto School Normanhurst		
2019 Proposal/Concept	Previous Heritage Comment	2021 Revised Concept Plan
Envelope 1. New Boarding house.	The Boarding House was included in the P/L Concept Proposal and Stage 1 works. The P/L provided comment on the Stage 1 works only. Concerns raised are summarised in Table 2 - Stage 1 Works, below.	See comment about Envelope 1 in Stage 1 DA in Table 2 below.
Envelope 5. Upgrade and upper floor addition to Mary Ward Wing.	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. Concern is raised to the addition of another level to this building as it would alter the original form of the building and appearance.	<u>Comment:</u> No heritage objection in principle. Additional floor level has been deleted and building envelope reduced. Attic ceiling and roof to be raised, clerestory windows provided, and balconies retained. Amendments retain existing overall building and roof form, external detail and appearance. Building height addition will be less than

		<p>previously proposed and is accepted.</p> <p>Heritage impacts of various internal external works subject to assessment of future DA.</p> <p>DA needs to be informed by further detailed examination of the fabric and full justification of any fabric to be modified or removed</p>
Envelope 4. New Primary School buildings	Could be considered on merits, subject to details of proposal, scale and assessment of impacts.	<p><u>Comment:</u> No heritage objection in principle.</p> <p>No discernible change from original Concept Proposal</p> <p>Heritage impacts to be determined in future DA.</p>
Envelope 8. All weather field, underground carpark & possible facilities management, located off Osborn Road.	Could be considered on merits, subject to details of proposal and assessment of impacts.	<p><u>Comment:</u> No heritage objection in principle.</p> <p>No discernible change from original Concept Proposal</p> <p>Heritage impacts to be determined in future DA..</p>
Envelope 9. Mount Pleasant Pavilion, Stadium, function centre possible facilitates management or ECO centre	Could be considered on merits, subject to details of proposal and assessment of impacts.	Deleted
Envelope 6. New 3 court gym & multi-use hall	Could be considered on merits, subject to details of proposal and assessment of impacts.	<p><u>Comment:</u> No heritage objection in principle</p> <p>Heritage impacts to be determined in future DA.</p>
Envelope 2. Secondary school expansion adjacent to the Chapel and relocation of main reception, staff and administration to eastern side of 1897 convent building. Removal of level 5 toilet block above 1897 convent building Projects: C – Arrival and Visitors D – Reception E – Learning Centre F – Diedre Rofe Extension G – Theology Centre	<p>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.</p> <p>The Convent and Angel wing building should not be further altered or lost without detailed assessment of remaining original fabric.</p> <p>Conservation works should include reinstatement of removed original elements and the original</p>	<p><u>Comment:</u> No heritage objection in principle.</p> <p>Deleting the Theology Centre and overall reduction in massing and scale and enhanced building separation has reduced previous adverse heritage impacts.</p> <p>Building envelopes reduced and setbacks increased to maintain prominence and significance of heritage buildings and views.</p> <p>Form of Holy Angels Wing to be retained in a recognisable form.</p> <p>WW2 toilet block identified as intrusive fabric and demolition accepted.</p>

	<p>spatial relationship with the 1897 convent building.</p> <p>Subject to detailed information being provided the removal of unsympathetic elements would be considered.</p> <p>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.</p>	<p>Project G – Theology Centre deleted removing adverse envelope, proximity and setback issues</p> <p>Heritage impacts to spaces and fabric subject to future DAs</p> <p>DAs need to be informed by detailed examination of the fabric and full justification of any fabric to be modified or removed and accompanied by a Schedule of Conservation Works for retained fabric and spaces. DAs to specify heritage impact mitigation measures including archival recording and should include an interpretation strategy.</p> <p>Historic building connections should be retained wherever possible</p>
Envelope 3. Future development (adjacent Pennant Hills Road; north east of the convent and chapel) to be determined; underground carpark	<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 – issues: views, landscape setting. Relocate.</p> <p>The redevelopment proposed would have an adverse impact and is not supported in heritage terms.</p>	Deleted
Envelope 7. Gonzaga Barry Centre auditorium, amphitheatre; possible ECO centre	<p>To be considered on merit subject to details of proposal and impact assessment.</p>	<p><u>Comment:</u> No heritage objection in principle</p> <p>The proposed upper levels have been re-aligned. The current proposal is for two storeys of teaching spaces over an auditorium</p> <p>Heritage impacts to be determined in future DA.</p>
Envelope 10. Bush Chapel & bush recreational facilities	<p>The CMP 2008 policy states “<i>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</i></p>	Deleted

	<i>permissible.</i> ” 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.	
Landscaping, roadways, new paths and landscaping.	Could be considered on merits subject to detailed landscape heritage report and assessment to the heritage listed Loreto College grounds.	<u>Comment:</u> No heritage objection in principle. The revised SSD includes an amended landscape plan. The significant main driveway and gardens around heritage buildings are retained Heritage impacts to be determined in future DAs
Envelope 12. Pedestrian Bridge Link between Mary Ward Building and Resource Centre	Comment not provided	Details not provide in HIS or, Design Report. Architectural Plans indicate location which suggests minimal heritage fabric impact but design and form of structure unknown. Detailed plans required for heritage assessment. Heritage impacts to be determined in future DAs
Envelope 13. – New Proposal Sport Courts and underground car park at Mount Pleasant Ave	N/A	See comment under Stage 1 DA in Table 2
Envelope 14 – New Proposal Tennis courts and underground car park Pennant Hills Road	N/A	See comment under Stage 1 DA in Table 2
Project H. – New Proposal Osborn Road to Mt. Pleasant Avenue Link Road	N/A	See comment under Stage 1 DA in Table 2
Project J. – New Proposal Osborn Road Surface Carpark	N/A	See comment under Stage 1 DA in Table 2

Stage 1 Works DA

The following table reiterates key heritage concerns raised in the assessment of the original Stage 1 Works and provides comment about the proposed amendments. It also includes comment about new Stage 1 works within proximity to the main heritage elements on the site.

Table 2 – Stage 1 Works DA – Loreto School Normanhurst		
2019 Stage 1 Works	Previous Heritage Comment	2021 Revised Stage 1 Works

Envelope 1. New Boarding house. Demolition of the Loreto Community House and construction of a 3 to 6 storey boarding house for 216 students, with underground car park and new landscaping.	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. A revised form, height and scale should be considered to complement the scale and style of the earliest buildings on the site	<u>Comment:</u> No heritage objection The building envelope of the proposed boarding house has been reduced and better building articulation provided. Boarding house is not near significant buildings and separated by the fall of the land and by existing buildings and vegetation While remaining a large complex of modern design the building would be oriented towards Mount Pleasant Avenue, outside main view corridors and separated from No. 4 Mount Pleasant Avenue by distance and intervening structures.
Project B 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.	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.	<u>Comment:</u> No heritage objection. No discernible additional heritage impacts from original Stage 1 Proposal Archival photographic recording of all affected areas (internally and externally) required prior to any demolition or removal structures on the site.
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.	The HIS did not include a detailed heritage impact assessment of heritage tree loss as a result of the Concept Proposal and the acceptability of specific mitigation strategies. Further documentation required to provide heritage comment. See Stage 1 DA comment about Project H below for specific comment about heritage trees in those Stage 1 works.
New Stage 1 Works	March 2021 Assessment	
Envelope 13.	<u>Comment:</u> No heritage objection.	

<p>Sport Courts and underground car park 4A at Mount Pleasant Ave</p>	<p><u>Summary:</u> There have been sports courts in this location since at least the 1940s. The proposed works maintain this use and new design preserves significant trees and settings of and views to, heritage buildings.</p> <p>Trees to be removed between the courts and the Mount Pleasant Avenue fence are not of individual heritage value and loss would not impact heritage values of the site as a whole.</p> <p>The complex would not impact the nearby heritage item at No. 4 Mount Pleasant Avenue as they are separated by the approved Early Learning Centre and its associated landscaping.</p>
<p>Envelope 14. Tennis courts and underground car park 1A Pennant Hills Road</p>	<p><u>Comment:</u> No heritage objection</p> <p>There have been tennis courts in this location since at least the 1940s. Two courts are now proposed. The HIS concludes that the fabric of the existing court and the maintenance sheds is not significant and the stone from the retaining wall below the tennis court will be re-used on the site.</p> <p>Due to minimal height, and the lightweight construction and open nature of the courts above the carpark, the structure they would not block significant view corridors to/from significant buildings or detract from the significance of nearby garden. Significant trees and views will be retained.</p>
<p>Project H. Osborn Road to Mt. Pleasant Avenue Link Road and associated garden works</p>	<p><u>Comment:</u> No heritage objection</p> <p>New through east-west though road is proposed between Osborn Road at the north-western corner of the site and Mount Pleasant Avenue, exiting along the current southern boundary of No. 4 Mount Pleasant Avenue.</p> <p>The CMP 2008 acknowledges that accessways through the site have changed over time and that the gates, the line of the driveway off Pennant Hills Road and the trees along it are significant but its fabric is not.</p> <p>Similarly, the CMP identifies that some adaptation, removal and replacement of plantings and landscape features such as the stone flagging paving and edging is permissible given that the area and garden have been modified and have evolved, provided that there is no adverse visual or physical impact to the original entry gates and 1897 building</p> <p>The HIS concludes that the new road and associated works would not adversely impact the formal garden settings to the immediate north and north east of the 1897 Convent Building and would not physically impact significant features such as the entry gates or major built landscape elements, such as the grotto or statutory</p> <p>All the historically significant trees and those significant to the setting of the heritage buildings are to be retained. The Landscape plan indicates that planting enhancement is appropriate.</p> <p>Shade shelters are to be constructed at the new pick up/drop off zone forward of the new tennis courts and underground carpark 1A. They are lightweight and located outside significant view corridors and obscured by new and existing plantings and unlikely to adversely impact the heritage values of the place .</p> <p>Similarly, removing the garage attached to the side of No. 4 Mount Pleasant Avenue for the eastern entrance would adversely not affect the property's heritage values.</p>

Project J. Osborn Road Surface Carpark 3A	The proposed works in this area will have no heritage impact. This is not a significant area of the site and is removed from significant buildings and significant view corridors.
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Aboriginal Cultural Heritage

The Aboriginal Cultural Heritage Assessment by Ecological identified significant disturbance across the study area in the form of tree clearance, construction of school facilities and infrastructure, and landscaping and has low Aboriginal archaeological sensitivity. The survey identified the southern woodlands area of the campus as a landscape which could be considered as low to moderate in archaeological potential.

The assessment includes recommendations to ensure unexpected finds of Aboriginal archaeological sites or objects are not harmed during works.

Historical Archaeology - Stage 1 Works

The Historical Archaeological Assessment of the Stage 1 Works by Ecological identified that the Stage 1 study area is highly unlikely to contain any archaeological material with research potential that could contribute knowledge that no other site or resource can. Apart from the cemetery, the remainder of the Loreto Normanhurst property is considered to have low archaeological potential and no archaeological significance. It recommends further assessment for any additional works outside the scope of the current proposal.

