



DECISION STATEMENT – AMENDMENT 1

23 December 2020

Introduction

St Lucy’s school is the proponent for the proposed minor alterations and additions works to St Lucy’s School at 21-23 Cleveland Street, Wahroonga (the site). The proposed works are for the removal of existing concrete roof tiles and existing sheet metal cladding from an existing circa 1970s building. The works also entail the removal of an existing box gutter and associated flashings/roof plumbing fixtures. The roof cladding will be replaced with grey ‘Kliplok’ steel roofing with roof plumbing items in a matching grey colour.

The proposed activity has been classed as a Class 1 - Review of Environmental Factors (REF) in accordance with the NSW Code of Practice for Part 5 Activities for registered non-government schools (the Code). The works are proposed under Clause 36 of *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (Education SEPP).

A REF was prepared by DFP Planning Pty Ltd dated 16 November 2020 to assess the potential impacts of the proposed activity. The REF was prepared in accordance with Part 5 of the Environmental Planning and Assessment Act 1979 (EP&A Act), Clause 228 of the *Environmental Planning and Assessment Regulation 2000* and the Code.

In the design development phase of the project, it was discovered that the existing building’s roof structure requires additional ‘tie-downs’ to accommodate wind loading. Details of this work are discussed below.

In order for the proposed activity to proceed, St Lucy’s School must make a determination of the REF in accordance with Part 5 of the EP&A Act.

The objectives of the Decision Statement are to:

- Assess the environmental impacts of the proposed activity and determine the significance of those impacts;
- Document consultation with agencies and the public;
- Explain why the key conclusions in the REF were or were not accepted;
- Document the authorised person’s engagement with the REF; and
- Make a determination of the proposed activity, or make a decision that there is sufficient information to discharge the duty under Section 111 of the EP&A Act.

TRUTH | JOY | COURAGE | COMMUNITY



St Lucy's must also consider the additional tie-down works which are now required and be satisfied the works are of no greater environmental impact than what has been previously assessment for the project.



Description of Proposed Activity

The proposed works can be generally summarised as the removal of existing concrete roof tiles and existing sheet metal roof cladding from an existing circa 1970s building (see **Figure 1**) showing the location of the building the roof of which is proposed to be modified in relation to other existing buildings on the site). The works also entail the removal of an existing box gutter and associated flashings/roof plumbing fixtures.

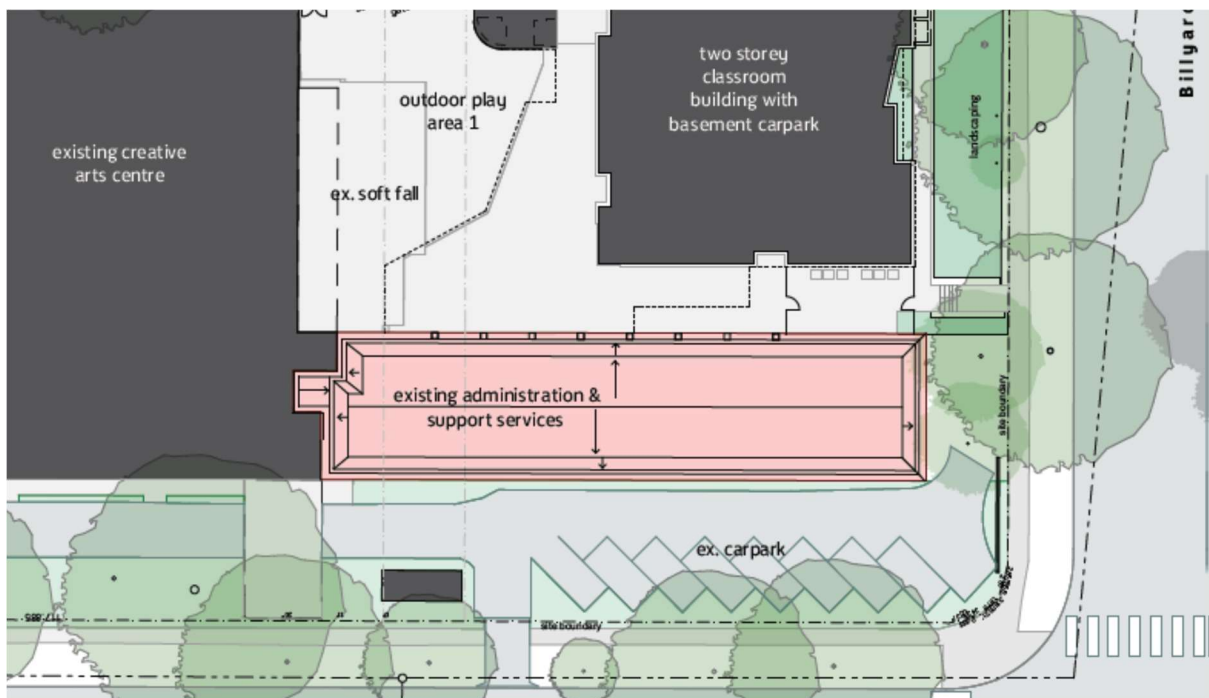


Figure 1 Excerpt of site plan showing existing school blocks/buildings in relation to the proposed development area.

The heritage impact assessment which accompanies the REF summaries the works proposed as follows:

'The low-rise Mansard roof clad in grey concrete tiles would be stripped of its tiles, and the low-pitched sheet metal would be removed from the central portion of the roof. The guttering and sarking would also be removed. The roof cladding would be replaced with grey Kliplok steel roofing with roof plumbing items in a matching grey colour of Colorbond.'

No alterations to existing stormwater drainage lines on the site, other than new 100mm downpipes which will connect to existing downpipes embedded within the columns of the existing building, is proposed. The proposal relates only to the roof cladding replacement and associated box gutter and flashing/roof plumbing fixtures.

TRUTH | JOY | COURAGE | COMMUNITY

ST LUCY'S SCHOOL In the Catholic Dominican tradition. A community enriched by difference; inspiring learning for a life of purpose.

21 Cleveland Street, Wahroonga NSW 2076 | Tel 02 9487 1277 | Fax 02 8889 8056 | ABN 60 085 372 863 | www.stlucys.nsw.edu.au



Amendment 1

The structural engineer has discovered that the existing building's roof structure requires additional tie-downs to accommodate wind loading. This will require a strengthening structure to tie the roofing down to the reinforced concrete slab of the first floor. The tie rods will be placed adjacent to the inside face of the outer walls. The tie rods will be covered by plasterboard, set on furring channels, for a total additional width to perimeter walls of 43mm.



Documents of this work have been reviewed by NBRHS Heritage, who has provided an addendum heritage statement (**Attachment 1**) which confirms that *"the internal tie-downs and plasterboard facing to conceal the tie-downs will not be seen from the public domain outside, and so will have no adverse heritage impact on the heritage item of the Wahroonga C1 Conservation Area or the heritage items in the vicinity"*.

In accordance with Section 4.2 of the Code of Practice, the above change to the proposed activity will not increase environmental impacts compared to the activity the subject of the original Decision Statement.

Consultation

In accordance with the provisions of the relevant Code, the project underwent scoping, assessment and consultation prior to the preparation of the REF.

Mandatory consultation with Ku-ring-gai Council was undertaken from 24 August 2020 for 21 days. Written notice was provided to Ku-ring-gai Council. No correspondence was subsequently received from Council.

Pursuant to Section 4.2 of the Code, additional consultation is not required for Amendment 1 (the tie-down works) as the proposal (as amended) has been determined to have environmental impacts no greater than the previously assessed roof replacement project. Specialist advice from NBRHS Heritage and Johnson Winter & Slattery has been considered in forming this opinion.

Consideration of Environmental Impacts

The REF details the proposed activity, assesses the potential impact of the proposed activity on the environment and provides management measures to avoid, manage and/or offset those impacts.

The main issues raised in the REF and the submissions related to:

- Legislative planning requirements of Commonwealth, State and Local planning policies and legislation, specifically the Education SEPP and school planning principles;
- Key triggers of environmental impact and consideration, specifically in relation to heritage issues.

TRUTH | JOY | COURAGE | COMMUNITY

ST LUCY'S SCHOOL In the Catholic Dominican tradition. A community enriched by difference; inspiring learning for a life of purpose.

21 Cleveland Street, Wahroonga NSW 2076 | Tel 02 9487 1277 | Fax 02 8889 8056 | ABN 60 085 372 863 | www.stlucys.nsw.edu.au



- Environmental, economic and social impacts and in particular the need to provide for the efficient maintenance and operation of low impact educational infrastructure to meet the needs of the population in the surrounding region.



The REF addresses the requirements of Section 111 of the EP&A Act by considering, to the fullest extent possible, all matters affecting or likely to affect the environment arising from the proposed activity. The REF also considers factors prescribed under Clause 228 of the *Environmental Planning and Assessment Regulation 2000*.

The REF assesses and considers the likely significance of the environmental impacts of the proposed activity under Clause 112 of the EP&A Act.

Mitigation measures are provided in the REF for implementation during the demolition and construction process.

As discussed above, the additional tie-down works have been found to have environmental impacts no greater than the previously assessed roof replacement project.

Conclusion

The REF report concludes that the proposed activity is not likely to significantly affect the environment or threatened species, populations or ecological communities, or their habitats.

The REF also considers that the proposed activity is not likely to have a significant impact on matters of National Environmental Significance (NES) or Commonwealth land, and therefore does not require a referral under the Commonwealth EPBC Act.

Having regard to the environmental impacts (including those associated with Amendment 1) detailed in the REF, the key conclusions are accepted for the following reasons:

- The REF has been prepared by persons appropriately qualified and trained to consider and assess the impacts of the proposed activity;
- It is considered that the REF provides a true and fair review of the proposed activity in relation to its potential effects on the environment;
- The REF is comprehensive and examines and takes into account, to the fullest extent possible, all matters affecting or likely to affect the environment as a result of the proposed activity; and
- The additional required works have been found to have an environmental impact no greater than the previously assessed roof replacement project

Determination

I, David Raphael as an authorised person on behalf of St Lucy's School, have examined and considered the REF prepared by DFP Planning Pty Ltd for the proposed roof cladding replacement development in accordance with section 111 of the *Environmental Planning*

TRUTH | JOY | COURAGE | COMMUNITY



and Assessment Act 1979.

I have been provided a detailed briefing of the REF and have gained an understanding of the impacts of the proposed activity.

As per the requirements of the relevant Code, I have not been involved in conducting the assessment of the proposed activity.

The proposed activity (as amended by Amendment 1 described in this statement) is not likely to significantly affect the environment, and is not likely to significantly affect threatened species, populations, ecological communities or their habitats.

I determine that neither an Environmental Impact Statement nor a Species Impact Statement are required in respect to the proposed activity. The proposed activity may now proceed subject to the implementation of the mitigation measures stipulated in the REF.

This is not a conditional decision and no further conditions are required (other than the mitigation measures stipulated in the REF).



On Behalf of St. Lucy's School

Date: 23 December 2020

Attachment 1 – Addendum Heritage Statement re: Amendment 1 works



TRUTH | JOY | COURAGE | COMMUNITY

ST LUCY'S SCHOOL In the Catholic Dominican tradition. A community enriched by difference; inspiring learning for a life of purpose.

21 Cleveland Street, Wahroonga NSW 2076 | Tel 02 9487 1277 | Fax 02 8889 8056 | ABN 60 085 372 863 | www.stlucys.nsw.edu.au



15 January 2021

The General Manager
Ku-ring-gai Council
Locked Bag 1056
Pymble NSW 2073

Dear Sir,

RE: St Lucy's School —Replacement of low Roofing on the 1970s Administration and Support Services Building

The Trustees of the Sisters of Saint Dominic seek to replace the concrete tiled and sheet metal roofing over the 1970s administration and support services building at St Lucy's School. The roof has leaked for some years. The roof structure would be strengthened by steel tie-downs linking the roof to the reinforce concrete first floor. This building is close to the corner of Cleveland Street and Billyard Avenue, Wahroonga.

1.1 SITE LOCATION

The St Lucy's School Campus is located at the corner of Cleveland Street and Billyard Avenue Wahroonga and includes Lot 100 in DP 125504 that contains the Federation period convent building. This allotment includes 21–23 Cleveland Street and 2–10 Billyard Avenue.



Figure 1 — The lands owned by St Lucy's School are outlined in blue, and the subject building is circled in orange.
(NearMap and annotations by DFP Planning)

The subject administration and support services building at St Lucy's School is on land that is shaded as a heritage item in the Ku-ring-gai LEP 2015. The School is currently in the process of preparing a planning proposal to amend the heritage mapping of the *Ku-ring-gai LEP 2015* to redefine the heritage significance of the site to the curtilage around Prouille Convent at the north of the site. The subject building has little heritage significance, and so it would assist the resource allocations of Ku-ring-gai Council and the School if this building remains in the Wahroonga Conservation Area, but not as a heritage item.

1.2 HERITAGE MANAGEMENT FRAMEWORK

The Ku-ring-gai LEP 2015 listing includes the Convent Building, 'Prouille' at 23 Cleveland Street, the hardstand playground area and most of the 1970s Administration Building further south on the corner of Billyard Avenue. See figure 4 below. These site features have no apparent heritage value apart from the convent building and its landscaped setting.

The subject property is located within the Conservation Area C1 and in the vicinity of other listed items, including:

- 10 Cleveland Street, Wahroonga (Dwelling house) – Item No: I878; and
- 1–3 Billyard Avenue, Wahroonga ("Ewan House") – Item No: I831; and
- 26 Cleveland Street, Wahroonga (Dwelling house) – Item No: I881; and
- 67 Cleveland Street, Wahroonga ("Rose House", dwelling house) – Item No: I887.

Other heritage listed items in the vicinity of the subject site are visually and physically separated from the site by intervening development and distance, and so they do not warrant assessment as part of this report.

The administration and support services building at St Lucy's School appears to have been identified as a heritage item in error. The building has little heritage significance.

1.3 HISTORICAL BACKGROUND OF THE SUBJECT BUILDING

The Trustees of the Sisters of Saint Dominic purchased the subject land in 1949. The Sisters initially set up St Lucy's School in the cottage on the corner of Billyard Avenue and Cleveland Street. This cottage was demolished before 1970.

In 1970, Pope Paul VI blessed the foundation stone of a new school complex on the Cleveland Street site and in September 1973, the new facilities including an auditorium, gymnasium and library were opened by the Prime Minister E.G. Whitlam and dedicated by Cardinal Freeman. These buildings were altered and extended in 2007.



Figure 2: north-east view showing the 1970s building whose roof would be replaced in these works. The roof cannot be seen from this angle.



Figure 3: south-easterly view showing the parking areas and fence along Cleveland Street, looking towards the subject 1970s building, centre-right.

The Works and Documentation Reviewed

The low-rise Mansard roof clad in grey concrete tiles would be stripped of its tiles, and the low-pitched sheet metal would be removed from the central portion of the roof. The guttering and sarking would also be removed. The roof cladding would be replaced with grey Kliplok steel roofing with roof plumbing items in a matching grey colour of Colorbond.

Calibre Professional Services has designed a strengthening structure to tie the roofing down to the reinforced concrete slab of the first floor. The tie rods will be placed adjacent to the inside face of the outer walls. Trinity Quality interiors confirm that the tie rods will be covered by plasterboard, set on furring channels, for a total additional width to perimeter walls of 43mm. The writer has reviewed documentation by these firms as part of the preparation of this report.

Conclusion

The 1970s classrooms at St Lucy's School have little heritage significance and are the subject of an application by the School to revise the heritage curtilage of the School site to exclude the 1970s classrooms from being part of a heritage item. These buildings will continue to be managed by Kuring-gai Council within the Wahroonga C1 Conservation Area regardless.

The replacement of the roofing material on the 1970s administration building with light grey metal sheet products will be unobtrusive and sit as a neutral background among the more significant heritage items nearby that have grey slate roofs or terra cotta roofs. The internal tie-downs and plasterboard facing to conceal the tie-downs will not be seen from the public domain outside, and so will have no adverse heritage impact on the heritage item of the Wahroonga C1 Conservation Area or the heritage items in the vicinity.

Yours Faithfully,
NBRSARCHITECTURE.



Brad Vale
Senior Heritage Consultant

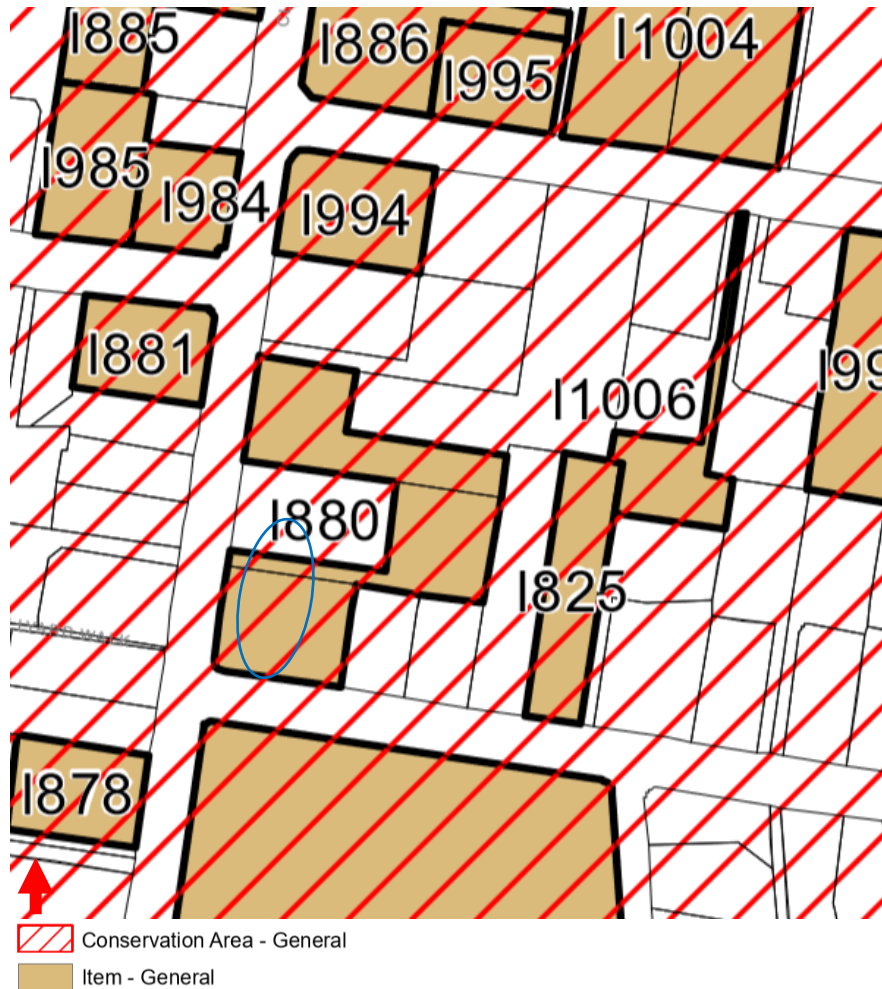


Figure 4: Excerpt from the Ku-ring-gai LEP 2015 heritage map. The subject site is circled blue. (Source: Ku-ring-gai LEP 2015, Heritage Map HER_006)