

Director General
NSW Department of Planning
PO Box 39
SYDNEY NSW 2001
Attention: Daniel Cavallo

10 December 2010

Dear Sir,

**Australian Catholic University Strathfield Campus
167–169 & 179 Albert Road Strathfield**

Request for Part 3A Declaration, Concept Plan Authorisation and Director General's Requirements

This submission is made by HASSELL on behalf of the Australian Catholic University (ACU) in relation to the ACU Strathfield Campus.

The Australian Catholic University operates six campuses across Eastern Australia including two within the Sydney metropolitan region at North Sydney and Strathfield. ACU anticipates continued growth of the two Sydney campuses into the future, which has given rise to the need to prepare a master plan for its Strathfield campus.

The proposed master plan seeks to establish a future development strategy for the Strathfield Campus which incorporates growth opportunities for the campus while improving parking and traffic functions and promoting the heritage significance of existing buildings.

The overall aims of the master plan are to:

- _ create a world class university precinct including modern teaching and learning facilities;
- _ rationalise existing teaching functions across the two Sydney campuses focusing specialised activities within each campus;
- _ establish additional floor space to increase availability and efficiency of teaching functions for the Strathfield Campus;
- _ improve site access, car parking and surrounding traffic functions in the precinct;
- _ upgrade the public domain to create visually interesting transitions through the campus, and promote the heritage elements of the campus; and
- _ strengthen pedestrian linkages through the campus.

This submission seeks a declaration from the Minister for Planning under clause 6 of *State Environmental Planning Policy (Major Development) 2005* ("Major Development SEPP") that Part 3A of the *Environmental Planning & Assessment Act 1979* ("EP&A Act") applies to the proposal. The justification for this is provided in Section 1 of this submission. It also seeks authorisation to proceed with preparation of a Concept Plan Application for the proposal under Section 75M (s 75M) of the EP&A Act.

The Director General's Environmental Assessment Requirements ("DGRs") for a Concept Plan Application are also being sought as part of this submission. To assist in the preparation of the DGRs, this submission comprises the following information:

- _ an outline of the proposal and description of the site;
- _ justification of application of Part 3A to the proposal;
- _ an overview of the relevant planning framework, and
- _ a preliminary assessment of the environmental issues associated with the proposal.

1___ Application of Part 3A

The proposed master plan sets out a future development framework for the Australian Catholic University Strathfield Campus. The master plan represents a substantial redevelopment of the campus, with an estimated total Capital Investment Value in excess of \$30 Million.

Clause 6 of the Major Development SEPP sets out those projects to which Part 3A of the Act applies. This clause states:

- (1) *Development that, in the opinion of the Minister, is development of a kind:*
- (a) *that is described in Schedule 1 or 2, or*
 - (b) *that is described in Schedule 3 as a project to which Part 3A of the Act applies, or*
 - (c) *to the extent that it is not otherwise described in Schedules 1–3, that is described in Schedule 5,*
- is declared to be a project to which Part 3A of the Act applies.*

Schedule 1, Group 7 Clause 20 of the State Environmental Planning Policy of the Major Development SEPP refers to educational facilities, and states the following:

Development for the purpose of teaching or research (including universities, TAFE or schools) that has a capital investment value of more than \$30 million.

In this instance, the proposal is estimated to have a Capital Investment Value in excess of \$30 Million. As a result, the proposal is considered to represent a kind described in Schedule 1, Group 7, Clause 20 of the Major Development SEPP.

The proposal is therefore considered to meet the requirements to be considered as a Part 3A project.

The proposal is also supported by the principles and objectives of the Sydney Metropolitan Strategy and the Inner West Subregional Strategy.

Further, given the preliminary nature of the proposal, the authorisation of the Minister is sought under s 75M of the EP&A Act to prepare a concept plan for approval.

2___ Site Description

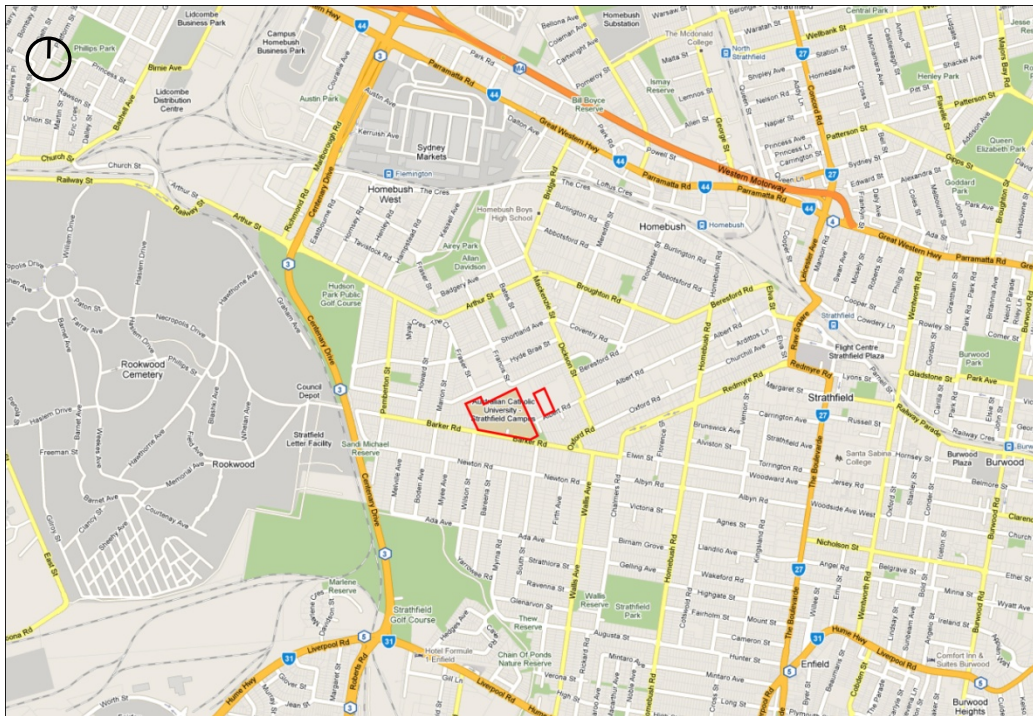
The site is located in Strathfield, within the inner west of metropolitan Sydney. The campus is approximately 1.6 kilometres from the Strathfield town centre within an established residential area. The campus is described as Lot 11 DP869042 (179 Albert Road) and Lot 12 DP1058289 (167-169 Albert Road).

The campus occupies approximately 5 hectares across a number of land parcels. Several residential and education properties separate the main/western part of the campus from a small section to the north east, which is improved by a single building.

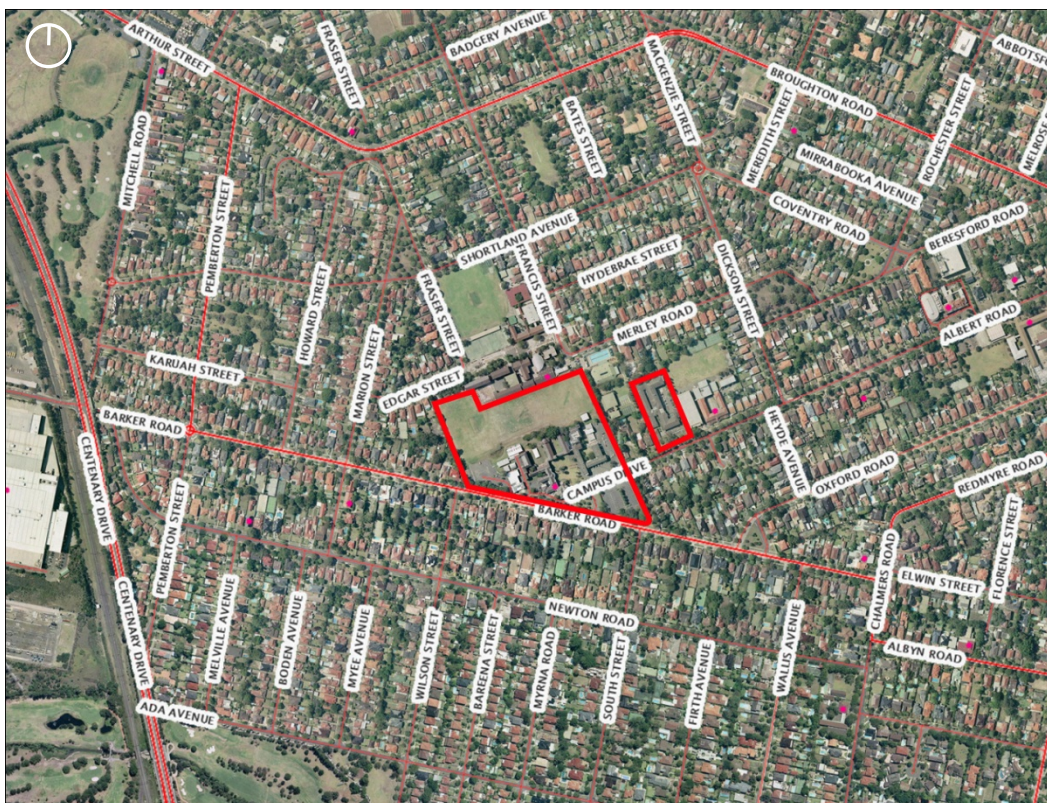
Barker Road is the primary street frontage to the main part of Strathfield Campus. Albert Road is the primary frontage to the north eastern portion and also provides a secondary egress point from the main/western campus.

Surface parking currently surrounds campus buildings. The primary parking area lies along the eastern extent of the site adjacent to the Albert Road access point, with access and egress to Barker Road and secondary egress to Albert Road. Additional parking areas are located in the western corner of the main/western campus and within the north eastern portion of the campus.

A large open space area is located in the north western portion of the site between the campus buildings and the adjacent school. This open space area allows use of three small ovals for organised sports activities.



2.1_ACU Strathfield Campus in a regional context (site shown in red)



2.2_ACU Strathfield Campus in a local context (site shown in red)

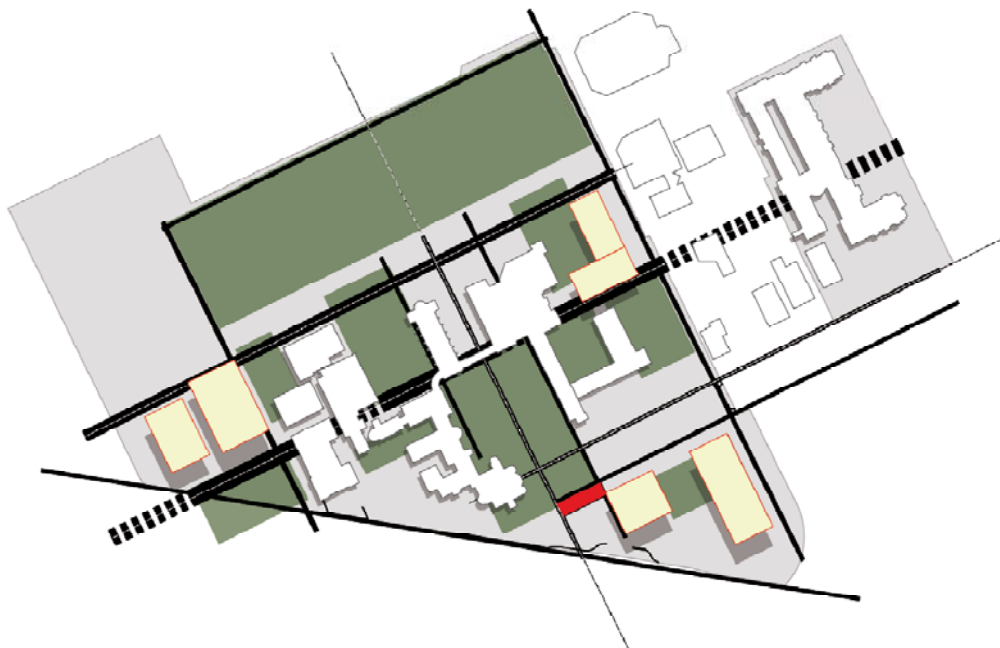
3__ Proposal Outline

Australian Catholic University have been investigating opportunities to consolidate activities between its two Sydney campuses at Strathfield and North Sydney. This process has involved consideration of projected student numbers and distribution of activities between the two campuses.

Part of this process has involved preparation of a master plan for the Strathfield campus based on projected growth rates. This master plan provides a conceptual framework for the Strathfield campus, including rationalised built form, parking and access arrangements within an improved and integrated public domain structure.

The key features of the master plan are summarised below.

- _ Consolidation of parking opportunities in the western portion of the campus. This includes a new surface parking area across the western part of the existing open space area and removal of existing surface parking area within the eastern part of the campus.
- _ Consolidation of campus access and traffic movements from Barker Road. The master plan retains two access/egress points from Barker Road, with an internal circulation area providing service vehicle access, administration parking, short term parking and set-down locations.
- _ Five new teaching buildings within the core teaching area of the campus for additional space and consolidation of teaching and learning activities generally. These new buildings will also allow greater flexibility in timetabling arrangements.
- _ Public domain improvements including new through site links, pedestrian corridors, public space improvements and landscape improvements. The intent of these works is to improve pedestrian movement and safety and contribute to amenity improvements within the campus.
- _ New pedestrian links to improve through site linkages to the north eastern campus and preserve opportunities for further consolidation of the campus in the future.



3.1_Proposed Public Domain Structure



3.2_Proposed Primary Car Parking Areas (shown in red)



3.3_Proposed Illustrative Master Plan

4___ Planning Controls

The following planning instruments are applicable to the subject site:

- _ State Environmental Planning Policy (Major Development) 2005
- _ State Environmental Planning Policy (Infrastructure) 2007
- _ Strathfield Planning Scheme Ordinance 1969
- _ Strathfield Development Control Plan 2005
- _ Strathfield Council Stormwater Management Code

Strathfield Planning Scheme Ordinance 1969 (SPSO) represents the primary planning instrument applicable to the site. The SPSO identifies 179 Albert Road as being zoned No. 5(a) Special Uses (Ecclesiastical) and 167–169 Albert Road as being zoned No. 5(a) Special Uses (School) and part No. 2 Residential 'A'.

Strathfield Council are currently preparing a new comprehensive Local Environmental Plan consistent with the NSW Government's *Standard Instrument – Principal Local Environmental Plan*. The *draft Strathfield Local Environmental Plan 2008* ("draft LEP") will supersede the existing SPSO once gazetted. The proposal will be considered against the draft LEP, subject to public exhibition under Section 57 of the EP&A Act.

Strathfield Development Control Plan 2005 ("DCP 2005") includes detailed controls specifically for educational establishments.

The table below summarises the key planning controls applicable to the campus.

Control	Comment
State Environmental Planning Policy (Major Development) 2005	
Identification of Major Projects	Clause 6 sets out the framework to identify projects to which Part 3A applies. The proposal is considered to represent a kind described in Schedule 1, Group 7, Clause 20.
State Environmental Planning Policy (Infrastructure) 2007	
Traffic Generating Development	The proposal is classified as traffic generating development pursuant to Schedule 1 of the Infrastructure SEPP. Consequently, the proposal must be referred to the RTA.
Strathfield Planning Scheme Ordinance 1969	
Zoning and Land Use	Under the SPSO, the land at 179 Albert Road is zoned <i>5(a) Special Uses (Ecclesiastical)</i> with land at 167–169 Albert Road zoned part <i>5(a) Special Uses (School)</i> and part <i>2 Residential A</i> . Permissible uses under the 5(a) zone are identified as: <i>The particular purpose indicated by scarlet lettering on the scheme map.</i> Permissible uses under the 2 Residential A zone are identified as: <i>Attached dual occupancies which are not subdivided; bed and breakfast establishments; child care centres; churches; detached dual occupancies which are not subdivided; educational establishments; home industries; home occupations; open space; places of public worship; professional consulting rooms; roads; single dwellings; utility installations other than gas holders or generating works.</i>
Heritage	The SPSO requires consent for any alterations, demolition or development involving a heritage item. In addition, the consent authority is required to consider the extent to which the carrying out of the proposed development would affect the heritage significance of the item and any stylistic or horticultural features of its setting. The campus includes the following heritage considerations: _Local heritage item. _Victorian Mansion formerly Mount Royal now Australian Catholic University. _Aesthetic, historical and social heritage value. Development within the vicinity of a heritage item also requires consideration by the consent authority.
Strathfield Development Control Plan 2005	
Design Provisions	The DCP specifies a number of design requirements for educational establishments. These include site context, bulk, scale, height, site coverage and setbacks. The proposed concept plan will have regard to the design requirements set out within the DCP.
Visual and Acoustic Privacy and Views	The DCP requires development to ensure visual security and privacy of adjoining and surrounding development and minimise noise impacts. The concept plan will consider the overall amenity of surrounding land.

Control	Comment
Overshadowing	The concept plan will have regard to minimising overshadowing impacts to surrounding properties in the design of future building bulk.
Heritage	The campus includes a number of prominent heritage elements. The DCP supports the controls of the SPSO in seeking to ensure protection of these heritage elements.
Safety by Design	The DCP promotes controls to increase safety and security of staff, students and visitors through design elements.
Traffic, Parking and Access	The DCP sets out requirements for parking, adequate levels of access and adequate function of these services. The concept plan will seek to improve access arrangement for the campus and consolidate parking areas. The DCP does not provide specific standards for a 'university', and requires a merit based assessment of parking provisions. A traffic and parking assessment will address this issue as part of the Environmental Assessment.
Outdoor Areas	Provision of outdoor areas are encouraged by the DCP, subject to ensuring appropriate amenity considerations. The concept plan will seek to improve the outdoor spaces of the campus and have regard for the relevant controls.
Landscaping	Landscaping is recognised as an important element in improving visual integrity and amenity of educational establishments. This principle is a key element of the proposed concept plan.
Hours of Operation	Hours of operation of educational precincts are important to reduce potential amenity impacts to surrounding land. The concept plan will include consideration of hours of operation and use to ensure residential amenity.

5 Preliminary Assessment

Preliminary review of the proposal has been undertaken to assist with the formation of the Director General's Requirements for the Environmental Assessment. The issues identified are summarised as follows:

- _ Statutory Planning
- _ Access, Traffic and Parking
- _ Heritage
- _ Operation and Amenity
- _ Crime Prevention Through Environmental Design
- _ Built Form
- _ Landscaping
- _ Infrastructure
- _ Waste
- _ Sustainability
- _ Stormwater Management
- _ Contamination & Geotechnical

Statutory Planning

The Environmental Assessment will assess the proposal against the statutory requirements and adequately justify any non-compliances supported, where appropriate by specialist studies and analysis.

Access, Traffic and Parking

The Strathfield Campus is located within an established residential area. Several other educational establishments (schools) are also located within close proximity to the site. The scale of the precinct, the distance from public transport in the Strathfield town centre is such that it generates significant private vehicle traffic movements.

The concept plan proposes to increase floor space and consolidate car parking areas. It will also seek to reduce the potential for traffic conflicts and demand for on-street parking by adding on-site set down areas and improving the utilisation of existing and proposed floor space through the

reallocation of classes.

A traffic report will be prepared for the proposed concept plan which will assess the traffic and parking implications of the proposal. More detailed discussion will be provided within the traffic report.

Heritage

The campus includes a number of heritage listed buildings and spaces and represents an important cultural precinct within the Strathfield LGA. In particular, the Mount Royal building stands as one of the best surviving examples of early mansion development within Strathfield.

The concept plan has been formulated with regard to the important heritage themes of the precinct and seeks to retain and promote these themes. A heritage assessment will be provided as part of the Environmental Assessment, and will consider the heritage aspects of the campus.

Operation and Amenity

The campus exists within an existing residential area, and therefore has the potential for operational aspects to conflict with residential amenity. These will be addressed as part of the Environmental Assessment.

Crime Prevention Through Environmental Design (CPTED)

The location of the campus within a residential area has the potential to increase crime and safety risks. Staff and student access to the campus facilities during late night periods and pedestrian movements between the site and public transport services can increase the risk of crime within the locality.

Key issues to be considered in the Environmental Assessment will include measures to improve public safety of students, staff and surrounding residents through the future design of the campus precinct.

Built Form

The campus is located within the established residential area of Strathfield. A key issue for consideration in the Environmental Assessment will be the future built form of the campus. This will include information on the proposed heights, floor areas and setbacks from the street and any adjoining properties.

Landscaping

The proposed concept plan will include a substantial upgrade to the public domain of the campus, including landscaping works. A landscape strategy will be provided as part of the Environmental Assessment. This will include details of proposed landscaping within key public spaces and the heritage curtilage of the campus, such as the row of Canary Island Palms leading from the Alfred Road gates to the Mount Royal building.

In addition, the proposal may require the removal of several existing trees. Where appropriate, this will be addressed by an arborist's assessment.

Infrastructure

The campus is currently serviced by water, stormwater, electricity, gas and telecommunications infrastructure. As part of the Environmental Assessment, the adequacy of this infrastructure will be assessed, and any likely upgrades identified.

Waste

Future development proposed in the concept plan will increase the total floor area of the campus. This is likely to lead to an increased generation of domestic waste. It is not anticipated that the uses of an expanded Strathfield Campus would generate any hazardous waste. An assessment of waste management facilities and operations will be undertaken as part of an Environmental Assessment for the proposal.

Sustainability

Future development for the Strathfield Campus will be encouraged to promote building with high Green Star ratings. Measures to increase the sustainable use of the existing campus buildings

and facilities will also be investigated. An ESD report and assessment of the future concept plan will be prepared as part of an Environmental Assessment.

Stormwater Management

Additional development proposed by the concept plan represents potential to increase stormwater flows to the surrounding drainage infrastructure. The Environmental Assessment will include a stormwater strategy to consider infrastructure provision, stormwater drainage, on-site detention opportunities and implementation of water sensitive urban design features.

Contamination and Geotechnical

A Phase 1 contamination investigation will be prepared to determine the existence of any contaminants within the site and whether remediation is required prior to any development. Geotechnical investigations will also be undertaken to determine existing groundwater conditions.

6___ Conclusion

This submission requests declaration of the project under clause 6 of the Major Development SEPP and authorisation to proceed with a concept plan pursuant to Part 3A of the EP&A Act for the Strathfield Campus of the Australian Catholic University. This submission also provides detail to assist with preparation of the DGRs for the project. The issues identified in this report are considered to represent the key environmental considerations for the project.

Should you have any queries in relation to this matter or wish to discuss further, please do not hesitate to contact David Hunter on 9101 2000.

Regards,



Silvija Smits

Principal

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