

UNE Wright College SSDA - Response to Submissions

Item	Response
Comments from NSW Department of Planning, Industry & Environment (DPIE)	
Comparison of feasible options considered as well as consideration of 'do nothing' option	Additional modern campus accommodation is required for the current and future students of UNE. A 'do nothing' option would result in UNE not being able to offer on-Campus accommodation of a required modern standard for students. The existing Wright College is nearing the end of its economic lifespan, having been constructed in the 1950s and requires renewal for UNE to provide modern campus accommodation facilities so as to be amenable to new potential students. The existing Wright Centre is considered to be well below contemporary expectations in terms of internal amenity. Similarly, its current configuration is not particularly suitable for activities now undertaken at the university. Due to its age and configuration, it is becoming increasingly difficult to satisfy relevant modern safety and amenity standards. The original design brief called for two (2) storeys, although three (3) storey envelopes were recommended in order to achieve the desired yield whilst limiting the building footprint. It was determined that a three (3) storey-built form achieves compatibility with existing development and the context generally. The proposed number of buildings was not considered to be out of character with the landscape character of the campus or the locality generally. Further, the preference was to make better use of the site, allowing for the demolition of the Wright Centre, and to use this additional space for residential buildings. This allows for the space to the north east of the site to remain as landscaped open space. Alternative designs with different building footprints and envelopes were considered in Section 3.5 of the EIS and in Section 5 of BLPs Architectural Design Report. These alternative schemes are extracted below:

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	Wright Site Planning Option 1.1 (3 Buildings @ 3 floors each, no parking indicated)  Legend - - Communal activities - Accommodation - Courtyards Opportunities - Communal courtyards orientated away from westerly winds toward northerly aspect - Reinforces 'goal track' - Communal rooms relate to communal courtyards - Leaves eastern part of green spaces undeveloped (pending carparking?) - Community hub serves as entrance Constraints - Community hub blocks view from Wright College Wright Site Planning Option 2.1 (3 Buildings @ 3 floors each, no parking indicated)  Legend - - Communal activities - Accommodation - Courtyards Opportunities - Communal courtyards orientated away from westerly winds and toward northerly aspect - Reinforces 'goal track' - Communal rooms relate to communal courtyards - Leaves eastern part of green spaces undeveloped (pending carparking?) - Community hub serves as entrance Constraints - Third (southern) Block very close to Wright Centre Wright Site Planning Option 3.1 (3 Buildings @ 3 floors each, no parking indicated)  Legend - - Communal activities - Accommodation - Courtyards Opportunities - Courtyards orientated away from westerly winds toward northerly aspect - Reinforces 'goal track' - Communal rooms relate to communal courtyards - Leaves eastern part of green spaces undeveloped (pending carparking?) - Communal hub has good outlook to north Constraints - Communal hub distant to Meredith Street Wright Site Planning Option 4.1 (3 Buildings @ 3 floors each, no parking indicated)  Legend - - Communal activities - Accommodation - Courtyards Opportunities - Building shape enhances 'community' - Building foot prints shaped to minimise loss of trees - Courtyards shielded from westerly winds, achieve northerly aspect - Reinforces 'goal track' - Communal rooms relate to communal courtyards - Communal hub serves as entrance Constraints - Forth (southern) Block requires demolition of Wright Centre - Develops eastern part of green spaces (carparking impact)

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Further details to be provided regarding Abbott Rd widening.	The existing through carriageway of Abbott Road is not proposed to be widened. New angled parking spaces are proposed to be added on the outside of the existing carriageway. The existing carriageway width previously served Abbott Road as a two-way road prior to provision of the existing parallel parking, and this two-way function is being reinstated.
EIS refers to both 72 and 77 trees being removed.	72 trees are proposed to be removed. The reference to 77 trees is in error. 50 trees are required to be removed due to major Tree Protection Zone (TPZ) encroachment and a further 22 trees are recommended for removal as they are deemed to be in poor health or of an inappropriate species.
Inconsistent hours of construction stated in EIS and CMP.	The proposed construction hours are 7am to 6pm, Monday to Saturday, excluding public holidays.
Provide details of UNE's parking scheme, including costs/fees, and how additional spaces will be integrated.	Generally, five (5) parking permit types are currently provided for use of UNE parking spaces, as follows: - Blue - Annual Permit - \$92 - Blue - Trimester Permit - \$47 - Red - Annual Primary Reserve Permit - \$562 - Red - Trimester Primary Reserved Permit - \$226 - Green - Annual Contractor Permit - \$57 In addition to the abovementioned permits, hourly parking is available at a cost of \$1.00/hour, or up to \$8.00. Parking metres are installed throughout the campus for hourly parking purposes. It is expected that parking proposed as part of the proposal will be subject to a blue permit as well as hourly parking. Blue permits are commonly purchased by students. In addition, there will be two (2) service bays (green permits), one closer to the HUB building, the other adjacent to the chiller plant.
Confirm where the 44 car spaces proposed to be deleted is occurring and whether this forms part of existing 200 spaces. Then confirm how 388 spaces will be delivered.	The 44 car spaces in question are not being deleted. These spaces are currently provided as parallel parking along Abbott Rd. Rather than being deleted, they are being converted to 90-degree parking spaces, with the same area now being able to accommodate 83 spaces due to the reconfiguration of the parallel parking spaces. Therefore, 200 existing spaces + 188 additional spaces = 388 overall parking provision. This is being delivered through a combination of entirely new parking bays, as well as the reconfiguration and expansion of existing parking bays. An existing site plan, demonstrating all existing parking in the immediate vicinity of the proposal, is attached to this correspondence separately. It also demonstrates where the 44 parking spaces in question are located. In addition, a proposed site plan demonstrating where all proposed parking would be located, is also attached to this

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	correspondence separately (Appendix 3 and 4). These will assist with determining how the overall proposal of 388 spaces will be delivered.
Details of construction parking provisions and impact on parking supply during construction.	Construction parking will be provided as part of a detailed Construction Traffic Management Plan. The applicant would accept a consent condition requiring the delivery of such a plan prior to the issue of a Construction Certificate. In any case, the construction of parking is to be staged to minimise impacts on parking supply throughout the construction period. Traffic and parking impacts are considered to be short term, minor in nature and restricted to the site area only with minimal impact to surrounding areas outside of UNE. This aside, there is ample parking onsite to accommodate this temporary circumstance.
Comments from Biodiversity and Conservation Division (BCD)	
Condition of consent requiring retirement of biodiversity credits as calculated in BDAR.	This would be accepted by the applicant as a condition of consent.
Consent condition recommending inclusion of BDAR avoidance and mitigation measures.	This would be accepted by the applicant as a condition of consent.
Condition requiring planting of koala feed trees within eastern portion of site.	A number of koala feed trees are currently proposed to the western edge of the site to improve koala habitat. These include: ▪ <i>E. blakeli</i> ▪ <i>E. melliodora</i> ▪ <i>E. nicholii</i> ▪ <i>E. nova-anglica</i> The location of these trees is provided in the Landscape Plan as originally submitted. Additional feed trees to the east can be accommodated as a condition of consent with the location of these trees to be determined prior to the issue of an Occupation Certificate.
Recommendations in Aboriginal Cultural Heritage Assessment are accepted.	Noted. The proposed would agree to have the report's recommendations reflected in any consent.

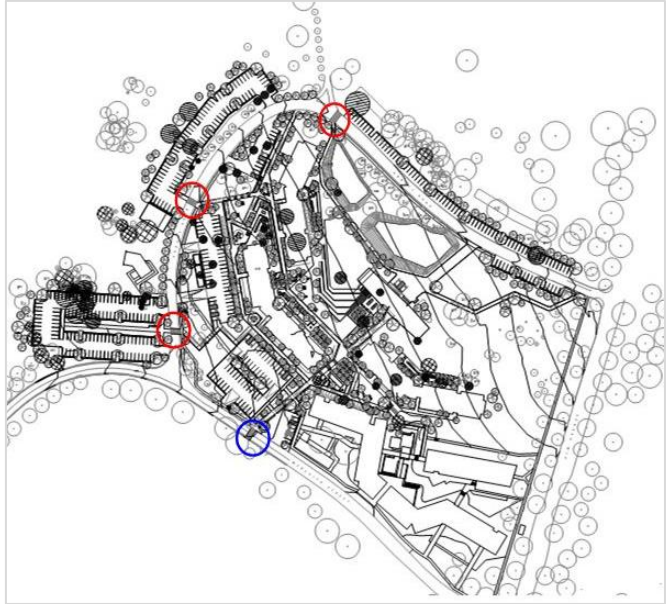
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Comments from NSW Environmental Protection Authority (EPA)	
Recommendation to liaise with ARC as capacity of Armidale Regional Waste Management Facility to deal with demolition waste is limited.	Liaison with Armidale Regional Council will be undertaken prior to tendering the works to determine local capacity for waste storage.
Recommendations within stormwater management report to be included within in any consent.	This would be accepted by the applicant as a condition of any consent.
Recommendation to avoid excessive dust generation	A generalised condition addressing dust generation would be accepted by the applicant as a condition of any consent.
Recommendation to minimise noise exceedances as much as possible, prepare a noise validation report prior to construction, and adopt all recommendations within acoustic assessment.	The applicant is to adopt all the recommendations of both the Construction Noise and Vibration Assessment and the Mechanical Noise Emission Assessment, prepared by Acoustic Logic and submitted as part of the original SSDA. The applicant would accept a consent condition which requires the application of recommendations in these reports. Construction hours are limited to 7am to 6pm Monday to Saturday (excluding public holidays). Further, the proposal is located a significant distance from other residential areas. In our view, this is sufficient to minimise noise impacts to nearby residential areas as well as occupants of the proposal itself.
Comments from NSW Rural Fire Service	
Site to be managed (regarding landscaping) as an Inner Protection Area	This would be accepted by the applicant as a condition of any consent.
Abbott Road upgraded to 2 way, with fire hydrants to Australian Standards	Existing hydrants are currently installed along Abbott Road with an average spacing of 45m. It is unknown, at this stage, if they meet the minimum flow and pressure requirement of AS2419.1 (10L/sec @ 150 kPa). A new water main is proposed for installation under Abbott Road, with allowance for the installation of in-ground street hydrants. The location of hydrants is yet to be confirmed, however they will be provided at minimum 90 metre intervals to comply with the requirements of AS2419.1-2005 and AS2419.1-2018. The proposed hydrants will meet minimum flow and pressure requirements of AS 2419.1.

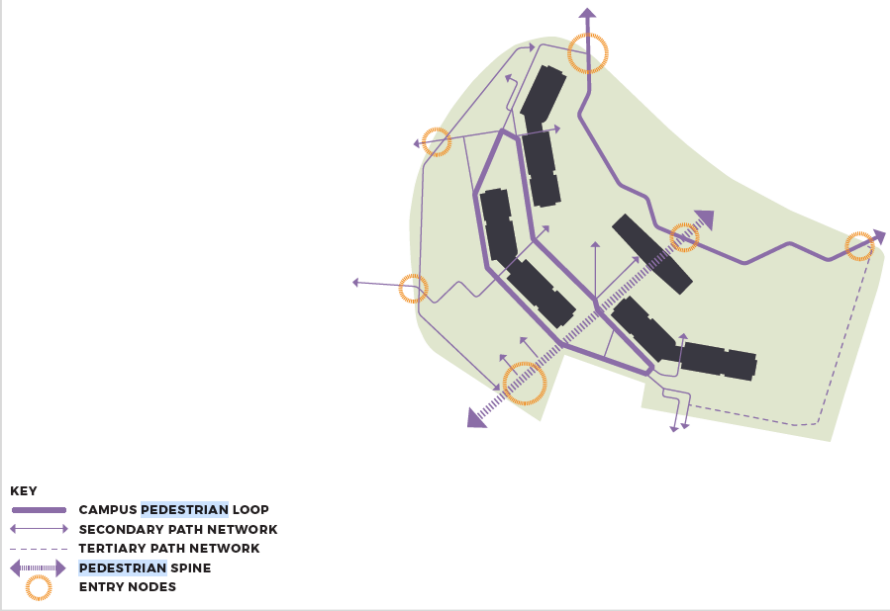
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	Alternatively, the applicant will accept a condition requiring that the fire hydrants in question achieve compliance with the relevant Australian Standards.
Comments from Armidale Regional Council (ARC)	
Traffic impact assessment to confirm whether on street parking (i.e. Handel St) has been considered. Council has ongoing issues with Handel St.	The correspondence by TTW at Appendix 1 addresses this matter in detail. In summary, however, the Transport and Accessibility Impact Assessment (TAIA) accompanying the SSDA accounts for all parking impacts. The proposed parking exceeds Council's Development Control Plan (DCP) requirements for 'student colleges/ halls of residence'. The proposal provides a net increase of 194 spaces compared to existing. Council's parking requirements for 'student colleges / halls of residence' are as follows: ▪ 1 space per 2 students; ▪ 1 per resident staff; and, ▪ 1 per 2 full time equivalent non-resident staff. As the proposal accommodates a maximum of 342 students and seven (7) non-resident staff, the proposal would require 175 onsite parking spaces. The supply of 188 additional onsite parking space will address the DCP's parking requirements. Therefore, traffic and parking impacts to the wider road network are anticipated to be minimal. Handel Street is also located approximately 500m away from the site and any parking impacts on this street are also likely to be associated with the University as a whole rather than the Wright College proposal in particular. Council may wish to consider implementing additional parking restrictions to Handel Street to mitigate parking impacts.
Parking demands of existing development has been underestimated resulting in underestimation of parking supply for proposal.	The correspondence by TTW at Appendix 1 addresses this matter in detail. ARC has provided a highly specific parking rate, within its Development Control Plan, for 'student colleges / halls of residence' at 1 space per 2 resident students (plus extra for staff). This proposal meets and exceeds that rate by providing approximately 1.1 spaces per 2 resident students. In other words, the proposal complies with the DCP with regard to parking. Furthermore, on completion of the proposed development, the UNE residential precinct would provide approximately 1.8 spaces per 2 resident students (or 0.9 spaces per resident) (388 spaces), which is significantly higher than Council's requirements and would suit a 90% private vehicle usage rate. The net parking increase of 188 spaces exceeds the DCP 2012 parking requirements of 175 spaces, which will assist in ensuring parking availability and alleviating parking congestion in local streets.

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Not supportive of increasing prices for onsite parking for the purpose of increasing public transport usage.	Prices for onsite parking will not be increased as a result of this proposal. UNE has not provided any indication that it intends to increase parking fees.
Confirmation as to whether planting species, particularly within bio retention systems, are suited to the current and/or potential climate.	The project's landscape consultants, Arcadia, has confirmed that the species identified within the bio retention systems have been closely evaluated with the UNE Horticultural Advisory Committee in order to achieve a high success rate. Therefore, these planting species are suited to the climate.
Recommendation for HDPE liner within basin C261 to be sealed so as to be watertight.	The applicant would accept this as a condition of any consent.
Stormwater and potential flooding seem to have been considered in relation to the proposal and its immediate context. Confirmation that surrounding land won't be affected should also be provided.	The project's civil engineer, Bonacci, has confirmed that the on-site detention (OSD) tanks limit the post-development peak stormwater runoff to pre-development levels in accordance with SEARs requirements. Stormwater will be retained on-site and discharged off-site at discharge rates which are equal to or less than pre-development rates. Therefore, surrounding land will not be adversely affected as pre-development levels are maintained. This aside, it is considered that the related SEARs have been addressed.
Assessment to determine whether mitigation measures are required for frequent storm events and 1 in 100 event.	Bonacci has confirmed that the site is not affected by the 1:100-year flooding event. Therefore, the tailwater level is assumed to freely discharge to the atmosphere. The OSD layout has taken existing levels into consideration as overland discharge is proposed. In scenarios greater than the 1 in 100-year event, ground levels have been designed to cater for emergency overland flow paths.
Consider implementing stormwater capture and reuse provisions as part of civil design (e.g. stormwater reuse tanks for use as part of landscaping, toilets etc...).	Stormwater capture and reuse provisions for the purposes of landscaping have been implemented such as bio-retention areas.
Typical utility water service charges will apply given increase in demand.	Noted.

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Council encourages the retention of the existing building as part of ESD principles.	The existing building cannot be reused as it is no longer fit for purpose. Materials resulting from demolition are most likely to be recycled.
Booloominbah is acknowledged as a historically important item but its state significance is not acknowledged in the EIS.	Booloominbah is correctly identified as a heritage item of local and state significance in the SSDA Heritage Report. The EIS erroneously acknowledges Booloominbah as an item of local significance only. This correspondence now recognises its state historical significance.
Clause 5.9 of Armidale LEP has been recently repealed.	This is acknowledged.
Recommendation for any construction site visitors be inducted to be cautious of koalas.	This would be accepted by the applicant as a condition of any consent.
Recommendation for preparation and implementation of a pre-clearing plan to ensure native fauna is not present during clearing. Plan should also allow for an onsite ecologist during clearing phase in the event fauna is on site.	A pre-clearing plan is to be implemented prior to the commencement of construction works. This can be adopted as a condition of consent.
A 1% cost of works levy will apply in accordance with council's Developer Contributions policy.	We note that the application is for Crown development and under 4.33(1)(b) of the EP&A Act. In such cases, and if the consent authority was not the Minister, it could not include a condition on any consent without the approval of the applicant or the Minister. The applicant would not have provided its approval to the imposition of the 1% levy if Council was the consent authority and we request that the Minister does not impose the Council's levy in the circumstances. We note that Council did not impose a contribution on DA 54/2019 late last year for the redevelopment of the adjacent Robb College, which it recognised as Crown development. As such, we believe the approach towards developer contributions should be the same for the subject proposal. In addition to the above, we consider that the proposal would not generate significant demand for public facilities and services in the Council area, of the type levied under Council's Contributions Plan. As such, we do not believe developer contributions are applicable to the application. Specifically, the Contributions Plan's works program

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	specifies upgrades to Council open space and recreation facilities, libraries and access and parking facilities. The subject proposal and the UNE Armidale Campus in general, is largely 'self-sufficient' in meeting its own demands for such facilities and services. For example, the campus has extensive formal and informal recreation facilities, community and support facilities, including various library facilities, pedestrian paths, places of worship and car parking. Similarly, the TAIA originally submitted with the EIS and the traffic related commentary attached to this correspondence, confirms that the proposal would not generate the need for any traffic upgrades in the immediate vicinity of the subject site. Finally, as is outlined in Appendix 4, UNE is a significant direct contributor to both the local and regional community economically as well as socially. These contributions are often provided free of charge to community stakeholders, and certainly mostly free of charge to ARC. Importantly, these contributions have wide ranging, and arguably positive multiplier effects to both the local and regional community.
Separate applications will be required for trade waste and plumbing and drainage.	The applicant would accept this as a condition of any consent.
Comments from Transport for NSW (TNSW)	
Safety of left and right turns and key intersections needs to be considered and whether upgrades are required.	The correspondence by TTW at Appendix 1 addresses this matter in detail. In summary, TTW concludes that all intersections in the vicinity of the subject site are significantly below capacity. As such, the proposal will not unreasonably affect their operation and nor does it warrant any upgrades of intersection.
Confirm whether adequate sight distances at relevant intersections and access points is available.	The correspondence by TTW at Appendix 1 addresses this matter in detail. In summary, TTW has analysed sight distances relative to the intersections or access points and confirm that they are adequate.
Car parking to be designed in accordance with Australian Standards.	Car parking is designed in accordance with AS2890.1 Off-street Car Parking. Prior to the commencement of construction works, DPIE may include a condition requiring the car parking area to be compliant with AS2890.1 Off-street Car Parking.
Driveways to be sufficiently offset from intersections and each other.	The correspondence by TTW at Appendix 1 addresses this matter in detail. In summary, they confirm that sufficient offsets are provided.

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No details of pedestrian connections across roads are provided.	The Transport and Accessibility Impact Assessment (TAIA) original submitted with the application demonstrated that traffic volumes throughout the site will be low. As such, we do not anticipate high risks for pedestrians traversing through or to the subject site. For information, however, the following site plan demonstrates that four (4) particular areas will be provided as crossings for pedestrians. The existing crossing at the site, shown blue, will be retained, whilst three (3) new crossings, shown red, are proposed. Given the size of the site, it is likely that pedestrians will, however, cross in various locations. Given the low volumes of traffic and ample sight lines throughout the site, this is not considered to be unreasonable.  In addition to the above, it is worth noting that general accessibility throughout the proposal and connectivity with its surrounds was considered in the original submission to DPIE. This is demonstrated in the following extract from the Architectural Design Statement originally submitted. This plan demonstrates the principles of permeability throughout the proposal as well as connectivity with surrounding development or open space.

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	 KEY - CAMPUS PEDESTRIAN LOOP - SECONDARY PATH NETWORK - TERTIARY PATH NETWORK - PEDESTRIAN SPINE - ENTRY NODES
Prepare a traffic management plan and traffic control plan.	A TAIA has been provided as part of the original SSDA. The TAIA assessed parking and transport provision and conducted a traffic analysis on future traffic conditions to local roads. No infrastructure upgrades and mitigation measures were identified to be required. A separate Preliminary Construction Traffic and Pedestrian Management Plan was also undertaken and provided as part of the submitted SSDA, with associated impacts found to be limited and full access to be retained for all vehicles to the wider university campus. Further detail in relation to the provision of a traffic management plan and traffic control plan may be provided as a condition of consent, to be made available before the commencement of construction.
Prepare a wayfinding plan to be incorporated with green Travel Plan.	Wayfinding elements have already been incorporated into the design of the proposal. UNE is currently undertaking a campus wide wayfinding plan, consisting of strategically placed orientation pillars throughout the campus which show items such as walking paths and building locations. The applicant would accept a condition requiring the provision of a wayfinding plan to DPIE's satisfaction prior to issue of an Occupation Certificate.

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Public Submissions	
Koala habitat will be affected	The Biodiversity Development Assessment Report (BDAR) prepared by EcoLogical and submitted as part of the original SSDA confirms that no koalas have been recorded within the subject development area and that field assessments did not identify any recent evidence of kkoala occupation. In particular, the BDAR states that "...Given the limited extent of impacts, and lack of evidence of breeding female Koalas, the redevelopment of New Wright Block is unlikely to impact Core Koala Habitat". Regardless, a number of trees are proposed to the western edge of the site to improve koala habitat. These include: ▪ <i>E. blakeli</i> ▪ <i>E. melliodora</i> ▪ <i>E. nicholii</i> ▪ <i>E. nova-anglica</i> The location of these trees is provided in the Landscape Plan as originally submitted.
Any new landscaping should comprise native species.	Native species have been provided in the landscape design of the proposal. Refer to the Landscape Plan prepared by Arcadia for further information.
Economic impact to existing rental market.	UNE is currently undertaking an ongoing review of its facilities and buildings. As buildings near the end of the lifecycle they are deemed to be no longer viable to refurbish and so need to be replaced. This project is to be considered as part of the renewal process for those Colleges. The Wright College, as part of the wider university, provides a residential service for students wishing to live on-campus. The 'On-Campus College experience' is unique from what is offered elsewhere and provides opportunities for social connectivity, facilities and close access to teaching facilities. The proposal also offers dormitory style housing which is specific to the university. As such, the proposal does not compete with the existing private rental market as the product offer by the proposed Wright College differs significantly.
Comments from Water NSW	
Water NSW had no comments in relation to the proposal.	n/a



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Comments from Essential Energy	
No objection subject to separate application being submitted to Essential Energy.	This is acknowledged. No action is required.