

Your Ref: SSD-42425537
Our Ref: DA-278/2024

13 December 2024

Infrastructure Assessments
Department of Planning, Housing and Infrastructure
Locked Bag 5022,
PARRAMATTA NSW 2124



Attention: Director - Transport and Water Assessments
C/- Mr Sam Kelly, Senior Planning Officer

Dear Director - Transport and Water Assessments,

State Significant Development Application (SSD-42425537)
WAVERLEY COLLEGE, 137-139 BIRRELL STREET, WAVERLEY NSW 2024
(Waverley Council Ref.: DA-278/2024)

Thank you for the opportunity to make a submission following the closing date of the exhibition period of the State Significant Development Application (SSDA) known as SSD-42425537 for staged alterations and additions to Waverley College Senior Campus at 137-139 Birrell Street, Waverley.

This submission seeks to convey Council's review and objection to the application.

Council's primary objection to this application relates to increased student and staff population and subsequent increased vehicular and pedestrian traffic impacts on surrounding road networks, and the bulk and scale impact of proposed building works on the amenity of the public domain, surrounding properties and the character of the locality.

Specifically, concern is raised that the net increase of student enrolments by 266 students and 30 staff members will increase demand for drop off and pick up activities, increase traffic generation and demand for car parking within the immediately surrounding road network. Council is concerned that the submitted Traffic Impact Assessment Report prepared by Frank Turquiose contains high level information and does not enable proper consideration of increased traffic movements and constraints of the existing roads in the vicinity of the site over the course of the proposed stages of development for the College.

In regard to the proposed building works, concern is raised that the new additions to the Centenary Building and construction of a new 6 storey building identified as Building 1 both exceed the maximum height of buildings development standard under Clause 4.3 of the Waverley Local Environmental Plan 2012 (LEP) and will result in an excessive building bulk and scale that does not complement the character of the surrounding locality. In addition, insufficient information has been submitted to enable proper consideration of the surrounding urban context and environmental amenity impacts on adjoining properties.

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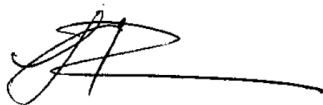
This submission is organised based on the following issues and matters arising from Council's review of the proposal and incorporates referral comments from technical officers in various departments of Council.

The contents of this submission follow this covering letter.

Whilst this submission objects to the proposal, should the Department resolve to support the application, Officers have prepared draft conditions of consent that are recommended to be imposed on any development consent granted to the SSDA. These conditions are available upon request.

If you have any questions, require assistance or further information about the matter, please contact Peggy Wong, Senior Development Assessment Planner during business hours on 02 9083 8074 or by email peggy.wong@waverley.nsw.gov.au.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Fletcher Rayner', with a long horizontal stroke extending to the right.

Fletcher Rayner
Director Planning, Sustainability and Compliance

SUMMARY OF ISSUES

1. Traffic and transport

Concern is raised that the proposal to increase student and staff population and a net reduction in car parking spaces for staff in the final stage of the development are not adequately supported by a detailed rationale or mitigating measures that demonstrate the proposal will not result in any significant increase to traffic volumes, demand for car parking and impacts on surrounding road networks and amenity for pedestrians.

In particular, the applicant has not provided clear strategies to monitor and manage modal shifts in students and staff travelling to and from the college. Further, the impact or rationale of providing additional on-site car parking spaces during initial stages of the development (Stages 1, 2 and 3 will comprise a up to 136 car spaces) then a reduction to 73 spaces in the final stage of development whilst steadily increasing staff population from 190 to 220 staff members has not been provided. It is unclear how the college will successfully alter and manage the travel behaviour of its staff members so as to minimise additional traffic and demand for car parking within surrounding streets.

In addition, the 2034 horizon year analysed has not factored in the background traffic or final school development traffic demand which is proposed to be at capacity during Stage 4 (2039-2040). As identified by the SIDRA analysis, there will be additional pressures on the surrounding road network particularly turning movements for the south and west approaches that will require future adjustments to signalised intersections. However, the proposal has not clarified whether potential phasing configurations at intersections have been explored to determine if such strategies would be feasible or identified if any public domain upgrade works in consultation with Council are to be incorporated into the staged development to improve pedestrian pathways or cycleways in the vicinity of the site.

In regards to the proposed increase in student population, the proposal has not provided any analysis of drop off and pick up areas, or addressed whether these areas can sufficiently accommodate the additional student population, private vehicle usage and how traffic impacts on the surrounding road network would be managed or mitigated during morning and afternoon bell times.

Concern is raised that the proposal has not adequately considered the increased student and staff population on the amenity and safety for pedestrians, cyclists and traffic flow in the vicinity of the site during each stage of the development. In particular, the proposal has not sufficiently demonstrated how modal shift targets for students and staff will be audited and demonstrating successful implementation of the Green Travel Plan, prior to commencement of the next stage of increasing the school population.

Further assessment and identification of road safety issues particularly at key intersections adjacent to the site, or any potential public domain upgrades or

improvements that would improve traffic flow and pedestrian safety in surrounding streets are required.

Council's Assets and Infrastructure Team strongly recommend further analysis and investigations for potential public domain upgrades be carried out as part of this proposal and the proponent engage with Council to identify enhancements that would improve pedestrian safety and amenity including but not limited to widening of the footpath along Henrietta Street to reduce instances of students crowding and spilling onto the road carriageway, contribution to and enhance bicycle pathways in the locality and upgrades to intersections to improve traffic flow.

Whilst the proposed location of new bicycle racks and shower amenities is supported in principle, the proposal has not clearly addressed the current provisions for bicycle parking to meet the needs of existing student and staff population and the number and location of additional bicycle parking facilities to meet the demand of increased student and staff population.

Council requests that additional information be provided to clarify and enable a proper assessment of the following:

- An analysis is to be undertaken to determine whether the current drop off and pick up provisions are sufficient to meet the demands of the student population at the final stage of the development during morning and afternoon school bell times. References should be made to future private vehicle mode share, identified appropriate car occupancy/car turnover rate for a peak 30 minutes, and length of Kiss & Drop required to ensure adequate functionality.
- An analysis is required to identify heavily used footpath/bicycle path links (Shortest Path Assessment) and propose footpath and cycleway improvements/interventions to justify incentives for mode shift scenarios. Consideration should include alignment improvements/interventions that are consistent with the Waverley Bike Plan 2013.
- Waverley Bike Plan 2013.
- Provide findings and summary of issues/concerns from the pedestrian and bicycle rider volume counts conducted. Are these volume counts consistent with the student/staff survey results?
- Identify which entrances/footpaths are more heavily used by pedestrians/cyclists to enter/exit the site.
- Identify road safety upgrade or improvements that would alleviate turning movements at Birrell Street/Council Street/Carrington Road intersection.
- Consultant to review and provide road safety interventions and their locations for implementation. Considerations could include, but not limited to, footpath improvements, crossing improvements and road safety barriers etc.
- Show where potential future bicycle parking would be located and the amount that would be required/provided.
- Clarify which policy was utilised to calculate the required and proposed locker and shower provision rates for the development ie. GreenStar, NSW Department of Education – Educational Facilities Standards and Guidelines etc).

- An Operational Transport Management Plan should be prepared to identify mode share targets for the proposed stage development of the college and strategies for reducing private vehicle trips to the site.

2. Building 1 built form and scale

Concern is raised regarding the proposed building height and bulk and scale of the new building identified as 'Building 1' located within the eastern portion of the site and adjacent to Henrietta Street. In particular, the proposed 6 storey building has a maximum building height of 16.5m measured to the top of the lift overrun and is incompatible with the predominant scale and character of the surrounding locality comprising of low density residential developments. Whilst the height of buildings development standard under Clause 4.3 of the LEP is not strictly applicable to the proposal, the 9.5m development standard is applicable to properties in the immediate vicinity of the site and contributes to the scale and character of the locality. A 7m variation to the development standard will result in a built form that is excessive to existing developments and the desired future character for the area.

Insufficient information has been submitted with the proposal to enable consideration of the environmental amenity impacts on surrounding properties, particularly overshadowing and privacy to surrounding residential developments. Council's Urban Designer recommends a reduction in building bulk and scale, particularly a reduction in building height to lessen overshadowing impacts and improve compatibility with the existing and desired future character of the surrounding streetscape.

Additional information is requested to enable a proper assessment of the amenity impacts of the proposed new building on adjoining properties and the locality, including the following:

- View from the sun diagrams clearly identifying the extent of any additional overshadowing on surrounding properties (including the dwellings at 4-12 Henrietta Street) between 9am and 3pm on 21 June, particularly overshadowing cast by the variation to the height of buildings development standard under the LEP.
- An elevation should be provided to illustrate the relationship between the new Langlee development to the east of the College at 163-260 Birrell Street. This elevation must detail building separation, comparative heights, continuity of the urban form, and any potential overlooking impacts.
- A 3D model that includes buildings beyond the site boundary would be valuable for visualising the development within its broader context and enable a proper assessment of the scale and form of the Centenary Building and Building 1 within the locality. Council requires a digital 3D model to be submitted in the necessary format and include details as follows:
 - 3DS file format;
 - Units of measurement in metres and at a scale of 1:1;
 - Model positioned relative to the site survey and RLs;
 - The model should be orientated and centred about the origin (0,0,0);
 - Ground level terrain showing accurate RLs extending to site boundaries;
 - A building envelope including all elements affecting shadow analysis;

- Accurate placement of glazing, balconies, roof pitches, terraces, roof services and any prominent external design features;
- Internal floor plate of each level showing accurate RLs;
- Details of neighbouring properties impacted by the proposal;
- All faces of the model need to be directed outwards with surfaces either all textured or all coloured (not both);
- All textured models must have an appropriate image applied, named with a maximum length of 8 characters, should not include any shadows. All textures must be in JPEG, TIFF or TGA format with texture dimension to the power of 2. Texture dimensions should be kept to a minimum with an ideal texture size being no larger than 512 x 512 pixels;
- File names are to include the site address and stage of approval; and
- The model should not include internal features such as stairs, walls furniture or people, vegetation, highly polygonised features, redundant or duplicate polygons, lines or textures, or gaps of missing elements.

3. Heritage impacts

The site, known as Waverley College contains a number of heritage items listed under Schedule 5 of the LEP as items of local significance including ‘The Grange’ building (Item No. I466), Federation style classroom buildings consisting of the Library, ‘Centenary Building’, ‘Conlon’ building (Item No. I450), and landscaping consisting of significant trees within the site (Item No. I518). These heritage listed buildings will be impacted by the proposed alterations and additions and has been reviewed by Council’s Heritage Advisor who has provided the following comments:

The Grange

Council previously supported demolition of the Carrington Road dwellings (Nos. 10A, 10 and 8 Carrington Road) adjacent to The Grange on the basis that future works would provide greater exposure of The Grange when viewed from the public domain and enhance the setting of the building.

Objection is raised to the design of the sports courts, particularly the proposed fixed landscape planter and tree plantings parallel to the car park within the front setback of The Grange which will reduce direct views of The Grange from Carrington Road and detract from the setting of the heritage item. It is recommended that the proposed planter be relocated further to the north adjacent to the alignment of the new sports fence and not parallel with the car park. Any landscaping should comprise of low height species that will minimise obstruction of views of The Grange from Carrington Road.

Centenary Building

Council’s Heritage and Urban Design Advisors raise no objection, in principle, to the proposed alterations and additions to the Centenary Building, however it is recommended that the articulation of the new Level 6 and rooftop additions be amended to reduce bulk and scale to better respond to the existing proportions and

articulation of the building, noting that the existing and proposed additions exceed the height of buildings development standard under the LEP. Should the additions be reduced in bulk and scale, particularly the proposed screen around the roof top plant, it would result in less visual prominence when viewed from the surrounding public domain.

It is noted that the architectural plans do not clearly identify the height (in dimensions of RLs) of the proposed screen around the roof top plant area. Council requires the architectural plans to be amended to include the proposed height of the screen around the roof top plant in both metres and RL on plans, sections and elevation to enable a proper consideration of the extent of the variation to the height of buildings development standard under Clause 4.3 of the LEP.

The proposed relocation of the Our Lady statue is considered to need further design development. Historically the statue being at the highest point in Sydney's East was prone to lightning strikes, an aspect possibly alleviated by the nearby Telstra Communications Tower. With the lowering of this tower, the previous incidence of lightning strike may return, and provision needs to be made for lightning rods and grounding wires in the relocation. The indicative relocation is considered to require further design development both in terms of location and treatment of the statue relative to surrounding building fabric.

Character and setting

There needs to be a clear statement of campus 'character' e.g. shaded courts, use of landscape, axial or serried movement ways, material consistency etc responding to the buildings of heritage significance on the site and providing outlook to key aspects of the setting of these buildings rather than pragmatic development stages.

Ecologically sustainable development

Council's Heritage and Urban Design Advisors support the proposal to achieve net zero greenhouse gas emissions, reduce fossil fuel use and improve energy efficiency across the campus.

However, the proposal does not incorporate sufficient detailed considerations for the location and potential number of solar photovoltaic (PV) panels that would be required to achieve energy efficiency targets per building and across the campus. As solar panels are likely to be required to be installed on the roof of heritage buildings, concern is raised with the proposal to leave design details to a later stage. As the location of roof top solar panels on heritage buildings has the potential to negatively impact the appearance, setting and significance of the buildings, they should be integrated into the design of buildings at the early development stages.

It is strongly recommends design details that identify the potential number of solar panels be provided as part of this application to enable a proper assessment of any potential impacts on the appearance and significance of heritage items, particularly any additional building bulk or scale where solar panels will result in further

exceedance of the maximum building height controls or EV chargers to be located within the open car park areas.

Open car parking areas

The opportunity to provide underground car parking beneath new buildings to reduce the areas occupied by open car parking areas has not been incorporated into the proposal and is considered a missed opportunity to reduce the extent of hardstand car parking and improve the setting of the campus.

4. Waste management

Council's Waste Management Officer has reviewed the proposed Waste Management Plan (WMP) and accepts the waste and recycling generation calculations of 2.5L/student/day and 2L/staff/day. However, calculations for organic waste, number of food waste receptacles and collection frequency appear to be insufficient. It is recommended that this is revised to align with the upcoming NSW Government Mandate for separate food organics collections aimed to achieve a target of 50% reduction in food waste going to landfill.

The proposal for waste collection from Salisbury Street via a kerbside service is not supported by Council as the narrow width of Salisbury Street will not adequately accommodate large 660L bins and will obstruct pedestrians and have additional amenity impacts on surrounding residential properties.

It is recommended that the WMP be amended to replace kerbside collection with a 'collect and return' or 'wheel-in, wheel-out' service from the waste storage areas adjacent to Salisbury Street.

5. Public domain impacts and improvements

Council's Public Domain team has reviewed the proposal and is concerned that the staged development of the site does not include any public domain upgrade works along the frontages of the site. In particular, any required upgrade works to public infrastructure including but not limited to footpaths, vehicle crossings, intersection and traffic signal upgrades, street lights or the like, must be undertaken in accordance with Council's Public Domain Technical Manual.

Council's Assets and Infrastructure team strongly encourages the proponent to engage in discussions with Council to identify public domain upgrade and improvements that would improve the amenity for students, staff and the wider community. It is recommended that any identified public domain works should be incorporated into the development stages for the site.

6. Operational and event management

The Plan of Management (PoM) submitted with the SSD application identifies school activities during core school hours and buildings and facilities that will be available for community use or private hire during school terms and out of school terms. However, the PoM should be revised to include additional details to provide certainty and clarity to the public where specific activities are held within the campus and how visitors will be managed to minimise amenity impacts on surrounding properties. In particular, the PoM should include the following:

- A map of the campus;
- Maximum student and staff population per stage of the development and total student and staff population at the final stage;
- References to the Operational Traffic management Plan and Green Travel Plan for staff, students and visitors to reduce traffic impacts on surrounding road networks;
- Traffic and car parking strategies to manage traffic flow and carparking demands from future community uses and private hire of buildings and facilities; and
- Additional details of complaint management procedures including contact details for complaints, and procedures to address and resolve complaints.

Reference in the PoM that some activities may operate beyond the listed operating hours and will be “limited and managed appropriately” is not acceptable as there are insufficient details within the management plan that clarifies the maximum operating hours for such events, how often such events are likely to take place and how any amenity impacts will be mitigated particularly potential noise impacts beyond 9pm.

7. Tree management and biodiversity

Council’s Tree Management Officer has reviewed the proposal, specifically the Landscape Plan prepared by Taylor Brammer and the Arboricultural Impact Assessment Report prepared by The Tree Fellas and does not object to the retention of significant trees transplanting of existing trees, tree removal, and new landscape works. It is noted that no trees on neighbouring properties will be affected by the proposal.

The site currently contains nine (9) trees that are listed on Council’s Significant Tree Register comprising 6 x *Ficus macrocarpa* var. “*Hillii*” (Hills Weeping Fig), 1 x *Ficus rubiginosa* (Port Jackson Fig) and 2 x *Ficus macrophylla* (Moreton Bay Fig). The proposal has identified five (5) of the trees with major encroachments as a result of the proposal and four (4) that will not be encroached by the development. Council’s Tree Management Officer supports the retention and protection of the significant trees, subject to root mapping and tree protection measures to be implemented during and post construction.

Two street trees identified as 1 x *Cupaniopsis anacardioides* (Tuckeroo) and 1 x *Angophora hispida* (Dwarf Apple) located adjacent to 10 and 10A Carrington Road, respectively, are to be retained and protected as part of the development. Council’s

Tree Management Officer supports the retention and protection of the street trees, subject to conditions requiring the payment of tree protection bonds prior to commencement of Stage 3 works.

Council's Tree Management Officer also supports the proposed tree planting across the site which will increase tree canopy coverage to approximately 2,820m² and satisfies tree canopy coverage under the Waverley Development Control Plan 2022.

However, Council's Tree Management Officer and Biodiversity Officer raise concerns with the proposed planting of five (5) *Phoenix canariensis* (Phoenix Palm) as the species is considered a significant weed in the Waverley locality due to their invasive nature, ability to displace native species, and safety hazards. The species is incompatible with the proposed Eastern Suburbs Banksia Scrub vegetation community, as well as the 'Exposed Ridgetops and Shallow Soils Over Sandstone' planting zone in which the site is located, as per Waverley Council's Street Tree Masterplan 2008. In addition, the Phoenix Palm comprises sharp leaf spikes that can cause serious injuries and infections and are not considered suitable within school grounds. It is recommended that an alternative endemic species listed on the Tree Schedule in the Masterplan, such as the *Archontophoenix cunninghamiana* (Bangalow Palm) or *Livistona australis* (Cabbage Palm) be selected to replace the Phoenix Palm.

8. Noise impact and management

Council's Environmental Health Officer has reviewed the proposal particularly the submitted Construction Noise and Vibration Management Plan contained within the Noise and Vibration Impact Assessment [Ref:20231036.1/2008A/R4/JHT] prepared by Acoustic Logic dated 20 August 2024.

It is noted that the Construction Noise and Vibration Management Plan and Noise and Vibration Impact Assessment states construction is proposed Monday to Friday **7am to 6pm** which is inconsistent with Council's restrictions on construction hours between **7am and 5pm** Mondays to Fridays. Council recommends the revision of the Construction noise and Vibration Management Plan and Noise and Vibration Impact assessment to be in accordance with Council's standard construction hours to appropriately address potential noise and vibration impacts on surrounding properties.

In addition, the Noise and Vibration Impact Assessment does not detail plant selection and lacks detail regarding the Performing Arts Centre chiller. In this regard, Council's Environmental Health Officer recommends the preparation of a further Acoustic Report to address noise from mechanical plant and equipment before the issue of a Construction Certificate.

9. Site Investigation

Due to the potential data gaps identified in the Preliminary Site Investigation [Ref:60675600] prepared by AECOM dated 6 March 2024, the proposal in its current

form is not supported and requires further information to be provided for consideration, including but not limited to the following:

- Detailed Site Investigation (DSI)
- Remediation Action Plan (RAP)
- Validation Assessment
- Site Audit Statement (SAS)

- END OF SUBMISSION -