

29 January 2025

Navdeep Singh Shergill
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Re: Moriah College Redevelopment - Modification 1 Design changes (SSD-10352-Mod-1)

Dear Navdeep,

Thank you for the opportunity to make a submission on the above State Significant Development Modification 1 application. It is noted that the SSD-Mod relates to the staged redevelopment of the Moriah College Queens Park Campus, at Queens Park Road, Queens Park (the site).

The proposed modifications include:

1. internal and external alterations to the Stage 1A and Stage 1B built form of the STEAM and ILC buildings
2. delivery of canopy and pavilion connecting to existing school facilities as part of Stage 1
3. revisions at ground level to car parking, waste/storage areas, landscaping, vehicle/pedestrian
4. access arrangements, security arrangements
5. provision of a substation and generator on southern site boundary

The site falls just outside the Randwick City Local Government Area (LGA), however due to the proximity of the site to the Randwick LGA, our comments below address the potential negative impacts of the development on our built environment and residents.

Environmental Health

The Environmental Health Section raises no objections to the proposed modification and no additional conditions are recommended.

Sustainability

Council understands that a Biodiversity Development Assessment Report (BDAR) was prepared for the original application by Aver in September 2020. The Urbis Modification Report outlines proposed changes, including reducing the building height to minimise overshadowing of the critically endangered Eastern Suburb Banksia Scrub (ESBS).

However, the Council has noted the following additional modifications:

- adding a substation and generator near the York Road boundary
- altering the perimeter wall's location
- redesigning Gate 4

The Cumberland Ecology Report (October 2024) supports the Section 4.55 Modification Application for the site. The report also notes the carpark realignment at Gate 4 near the ESBS Vegetation Management Plan (VMP) area and buffer zone but does not address whether these modifications will impact the VMP area, which was a requirement of the original consent to protect the ESBS.

Part 7.17 Modifications of planning approvals or activities under the NSW Biodiversity Conservation Act 2016, outlines biodiversity assessment requirements for planning applications proposing to modify approved developments or activities. The modification application proposes infrastructure changes near the ESBS area west of the site on York Road. Since these modifications differ from the original proposal and involve work close to the ESBS, the original biodiversity assessment (BDAR) should be reviewed using the Biodiversity Assessment Method to assess any potential direct and indirect impacts of the modification and to confirm that the modification is acceptable and will not create any additional impacts.

Transport Engineer (Integrated Transport)

The impact on Darley Road at the intersection with York Road remains a concern and the following matters are recommended to be considered for this modification proposal:

- A. Traffic and transport assessment statement (with and without the proposed project)
 - Traffic Impact and Level of Service at key intersections at York Road and Darley Road based on SIDRA (To understand how the upgrade will affect traffic flow within our road network at key intersections within the vicinity of the proposed project)
 - Consider potential traffic shifts (traffic migration) to local roads due to the project upgrade.
- B. Pedestrian Facilities
 - Propose pedestrian-friendly facilities at main access points to enhance walkability and safety.
- C. Public Transport Emphasis
 - Prioritize mode shift options for both 'start and end' of journeys.
 - Encourage parents to rely less on cars by providing efficient public transport connections.
- D. Road Safety Improvements
 - Generate a star-rated report (pre- and post-upgrade) to identify safety improvement opportunities (aiming for a minimum 3-star road rating).

I trust that Council's comments will be taken into consideration for this modification proposal. Should you have any questions regarding Randwick City's submission, please contact Samira Abbasalipour on samira.abbasalipour@randwick.nsw.gov.au

Yours faithfully

A handwritten signature in black ink, appearing to read 'Stella', with a stylized flourish extending to the right.

Stella Agagiotis
Manager Strategic Planning