

30 April 2021

## Appendix A - Agency Submissions

Summary of issue raised	Comment
<b>Department of Planning, Industry and Environment</b>	
<b>Location of the Building</b>	
Transport for New South Wales (TfNSW) have reviewed the EIS and advised that the proposed building would impact on an easement for support which benefits the public authority. You are requested to consult with TfNSW and determine the impact of this easement on the building footprint and amend the proposal so that no existing easements are impacted by this development.	Ongoing correspondence with Transport for NSW confirms that TfNSW are satisfied that the proposed built form will not compromise access to the existing easement, based on the responses to specific queries outlined below. A copy of all correspondence is provided at <b>Appendix B</b> . The detailed response to this has been discussed in the TfNSW section of this table below.
<b>Stormwater Management</b>	
The site has been identified as flood prone land; however, it is noted that flood risk has been addressed only very briefly within the Stormwater Management Plan provided. In this regard, the Department concurs with the comments from the Biodiversity and Conservation Group that a detailed flood impact assessment with catchment studies and appropriate modelling would have to be conducted and be provided for further assessment with the response to submissions (RtS) report.	A response from TTW regarding the likelihood of flooding on the site is provided at <b>Appendix F</b> . This letter notes that there is no significant flood path though the Kambala Sports Precinct. To respond to any changes in overland flow capacity as a result of the proposal, it is proposed to increase the capacity of the New South Head Road drainage pipe line running through the sports field to ensure any changes in flow can be accommodated.
<b>Removal of significant trees</b>	
The Arborist Report supporting the EIS indicates that Trees 1, 10-12, 14-17, 21, 22, 24, 27, 28, 30, 34-37 and 38 must be retained and protected. However, the Landscape Design Report had identified the removal of Tree 27 and potential removal of Tree 36, 37 and 38. The Department considers that additional justification should be provided regarding the proposed removal of trees that are identified as significant. Where possible, the proposal should be amended to retain significant existing trees within the site.	<p>The Landscape Design Report has been revised (<b>Appendix G</b>), in which Oculus have aligned documentation with the latest arborist report to retain and protect Trees 1, 11-12, 14-17, 21, 22, 24, 27, 28, 30, 34-37 and 38. All trees identified as significant are now being retained.</p> <p>However, it is noted that Tree 10 (<i>Melaleuca styphelioides</i>) is in the path of the bridge connecting the Minter Building to the proposed Sports Fields, and therefore will need to be removed. Tree 10 has been identified as having medium retention value.</p> <p>The project arborist Arborologix has confirmed that because Tree 10 has medium retention value, its removal is appropriate, provided that new tree planting on site will compensate for the canopy loss. As per the revised Landscape Design Report at <b>Appendix G</b>, 38 new trees are proposed to be</p>

Summary of issue raised	Comment
	planted, which will significantly increase the existing canopy cover on site. This is a net increase of 17 trees.
<b>Plans and elevations</b>	
The architectural plans should be updated to indicate the height of all buildings and structures from the existing ground levels in addition to the relative levels (RLs) shown.	Updated elevations have been provided at <b>Appendix I</b> , which show the height of all buildings and structures from the existing ground level.
The submitted architectural plans include elevations with incomplete references. The RtS must include updated architectural plans with elevations of all facades of each of the new buildings proposed that are clearly labelled to include North, South, East and West.	Updated elevations have been provided at <b>Appendix I</b> have been prepared, which show elevations of all facades of the buildings.
<b>Landscape Plans</b>	
A revised Landscape Plan that provides exact details of planting locations, species, quantities and pot size is to be submitted with the RtS.	A revised landscape plan has been provided at <b>Appendix H</b> , which shows these details.
<b>Response to applicable controls</b>	
The RtS should include a response to the controls pertinent within the Draft amendments to the State Environmental Planning Policy (Educational Establishments and Child Care Centre) 2017 which is currently on exhibition on the Department's website.	An assessment against the draft amendments to the Education SEPP has been provided at <b>Appendix J</b> .
<b>Built form and key views</b>	
As indicated within Woollahra Municipal Council's (Council) submission, the RtS should include an updated Visual Impact Assessment Report considering the visual impacts of the proposed development on Towns Street and New South Head Road.	Urbis inspected the views identified within the Woollahra DCP, in particular the views from Towns Road and New South Head Road. Upon inspection, it was identified that the site and proposed development was not visible from Towns Road or in the down-hill northerly view corridor along Towns Road the origin of which is only approximately identified in the WDCP. Given the lack of visibility it was not selected by Dr Lamb or Urbis for further analysis or modelling. The photograph showing the Towns Road DCP view corridor is included at View 23 (pp. 9) within the Visual Impact Assessment, which illustrates this. All DCP views are discussed in section 3.5.1 of the Urbis VIA report.
Details of infrastructure and amenities that are required to service the sporting facilities, especially during afterschool hours, are required to be included in the supporting analysis to enable a proper assessment of visual impacts.	<p>The VIA has addressed the amenities required to service the sporting facilities and their visual impacts on significant views. The photomontages include the fence posts and light poles. The fence infills use a mesh that will appear as a semi-transparent material. Light poles in the photomontages are visible as narrow slim structures widely spaced between the semi-translucent fencing material, the visual effects of which as modelled, are minor. The design and materiality of the sports fencing will facilitate the visibility of Tivoli House and reduce potential visual impacts on such views. Sports facilities features have been modelled in photomontages View 4, 5 and 6 in the VIA.</p> <p>In our opinion the inclusion of the sports facilities, and other infrastructure servicing the rooftop. fencing forms etc in photomontages has allowed their</p>

Summary of issue raised	Comment
	visual impacts to be adequately considered and addressed. A further response from Urbis in regard to visual impact of the project is provided at <b>Appendix D</b> .
<b>Traffic impact assessment</b>	
<p>The Noise and Vibration Impact Assessment Report (NVIA) submitted with the EIS states that the playing fields are to be likely shared with other schools for sporting events and also for community use (during weeknights and weekends).</p> <p>While the impacts of these activities have been addressed within the NVIA, the traffic impact of these activities have not been addressed in Traffic Impact Assessment Report (TIA) that has been submitted for the site. Consequently, the RtS should include an updated TIA including as assessment of the impacts of the additional out-of-school hours activities proposed within the site.</p>	<p>This comment raises concern for the traffic impact relating to use of the proposed Precinct by community users, as well as by Kambala School outside of standard operating hours.</p> <p>It is noted that the application does not propose any community use of the Sports, Wellbeing and Seniors Learning Precinct. Therefore, there is no need for a revised TIA to address the traffic impacts of community use of the precinct.</p> <p>Despite this, this application does propose for the new precinct to be used on Saturdays for intra-school sports between 7:30am and 1:00pm. This use currently occurs on Saturdays on the existing oval. Users of the sports field on Saturdays will be able to utilise the existing parking on the school site, reducing parking on the surrounding street network.</p> <p>As the existing TIA notes, traffic from any uses on Saturday would be much less than that generated by the school and staff, resulting in reduced traffic impacts as compared to the impacts modelled during school peaks. Further to this, as discussed above, visitor parking on Saturdays can be accommodated in the existing school carpark.</p> <p>Therefore, the proposed use of the precinct on Saturdays only includes a small number of visitors in comparison to school days, meaning that the traffic impacts already addressed for school days is sufficient in addressing the impacts. As a result, a revised Traffic Impact Assessment is not necessary to address the traffic impacts on the use of the new Precinct on a Saturday.</p> <p>In addition to this, a detailed table of the uses proposed across the Kambala campus and the operating hours of these uses is provided at <b>Appendix C</b>.</p>
As indicated within Council's submission, the Department agrees that further consideration should be given to the traffic impacts that would be generated through the proposed community uses.	This development does not propose any further community uses than those already operating on the site. A table of all the uses on the site and the corresponding operating hours is provided at <b>Appendix C</b> .
Details on the proposed shuttle bus drop-off areas / parking as well as number of buses and frequency are to be provided in the TIA.	It is proposed to use a 15 seater bus which would be parked near the boarding house on Bayview Hill Road. The bus stop for the collection of staff will be in the loading dock area of the current car parking facilities. This shuttle bus will provide one morning service before school and one afternoon/evening service after school to Edgecliff Station for staff members. It is anticipated that this service will be reviewed after 12 months to ensure it being appropriately utilised and capacity or demand for this service is being met.

Summary of issue raised	Comment
<b>Acoustic Assessment</b>	
It is unclear whether an acoustic assessment of out-of-school hours community use of school facilities has been conducted in the NVIA. An updated acoustic assessment including this component is to be provided. The acoustic assessment must include recommendations regarding limitations on permitted hours and frequency of such use, in particular for any outdoor spaces, to mitigate potential noise impacts on the neighbouring residents.	Since no new community use of the school facilities is proposed, further acoustic assessment is not required. The various uses currently operating and proposed to operate on the Kambala Campus, and the subsequent operating hours are shown in the table at <b>Appendix C</b> .
Although the design of a public address system has not been finalised, further details should be provided within the RtS on the design, siting and operation of these elements to minimise / mitigate noise impacts on the surrounding community	<p>As documented in Section 7.2.6 of the N&amp;VIA, noise emissions from the Public Address (PA) system are controlled principally via system design.</p> <p>Directional speakers should be used with orientation downwards and inwards towards the sporting fields to minimise sound spill outside the grounds. The intervening distance and topography between the fields and surrounding receivers is considered to be advantageous for attenuation of noise emissions.</p> <p>During commissioning, measurements of operational noise can be conducted at surrounding residential locations to determine the maximum limit for PA operations. Given the frequency, hours and durations of operations, it is considered unlikely that noise emissions from the PA will adversely impact upon the surrounding residential community.</p>
<b>Construction Management Plan</b>	
Further details are required relating to the safety measures that would be employed to protect student amenity and safety during the staged construction of the proposed development including.	Section 4.1.19 of the Construction Management Plan ( <b>Appendix K</b> ) has been revised to incorporate measures relating to student amenity and safety.
The CMP should be accurately updated to include the details of the proposed operations of the school concurrently with the construction works.	Section 4.1.20 of the Construction Management Plan ( <b>Appendix K</b> ) has been revised to include details of the operations of the school during each of the construction phases.
The CMP should also include a clarification relating to the impact that these staged activities would have on the student and staff parking areas.	Section 4.1.21 of the Construction Management Plan ( <b>Appendix K</b> ) has been revised to include details of staff and student parking during construction.
<b>Construction Hours</b>	
Inconsistencies relating to the nominated construction hours for the site have been noted between the documents provided. Page 18 of the NVIA indicates that standard construction hours have been nominated for the site from 8am-1pm on Saturdays. However, the EIS states that construction hours of 7am - 5pm Saturdays would apply to the site. All documents provided must be revised to ensure that reference to the nominated construction hours are consistent.	Section 4.1.5 of the Construction Traffic Management Plan ( <b>Appendix K</b> ) has been updated to request standard construction hours on Saturdays.
Minimal justification has been provided to support non-standard construction hours. If these hours are to be elected, further justification for their nomination is required.	As discussed above, the Construction Traffic Management Plan has been revised to remove the request for extended construction hours.
<b>Student amenity</b>	

Summary of issue raised	Comment
The proposed courtyard in between the two buildings (identified as an outdoor area for students) would be overshadowed in excess of three hours between 9am – 3pm during the winter solstice. It is considered that this area may not have an acceptable level of amenity during winter due to the reduced solar access.	The courtyard between the buildings is an outdoor courtyard and should not be treated like an indoor habitable room. The Design Guide for Schools does not require 3 hours sunlight in mid-winter (which is a residential requirement). The Design Quality principle No. 5 Amenity identifies access to sunlight as important.
The RtS should be updated to address how these overshadowing impacts would be addressed to protect the amenity of the courtyard and students in the future.	<p>The courtyard is oriented to the north which maximises sunlight in mid-winter. It receives sunlight in a sweeping motion across the day with the courtyard in part sun and part shade which ensures the space will be useable. Indeed, the school values shaded spaces in the increasingly hot Australian climate.</p> <p>Notwithstanding, the proposal is seeking to deliver extensive open space including four new open play area, as well as the new multi sports courts that will have significant sunlight access. While the courtyard is part shaded in Winter, the school has a variety of open spaces which receive sunlight, meaning students and the school will have a choice of space to enjoy sunlight or shade if desired.</p>
<b>Community and out of hours use of the site</b>	
Details are to be provided of future shared use of school facilities / outdoor play areas with the community including (but not limited to) a schedule of: list of all school facilities to be used (meeting rooms, parking spaces, halls, etc). types of functions/activities carried out. maximum occupancy and hours/days of operations of such uses. likely frequency of community uses within the site.	No new community uses are proposed as part of this application. A complete table of all of uses to occur on site and their associated operating hours is shown in the table at <b>Appendix C</b> .
Any additional noise and traffic assessment in relation to out of hours community use of school facilities. Details of any proposed out-of-school hours care (OOSH) or intensification of use of the existing OOSH are to be provided including the maximum number of students that are likely to use this facility.	No changes to the existing OOSH operations are proposed. No new community uses are proposed. A complete table of all uses to occur on site and the associated operating hours is shown in the table at <b>Appendix C</b> .
<b>Green Travel Plan</b>	
A GTP that details how the school would support and promote the use of sustainable transport methods must be prepared and submitted for the site.	<p>A Green Travel Plan was prepared and submitted as part of the Traffic Impact Assessment that accompanied the SSDA. This has been resubmitted at <b>Appendix L</b>.</p> <p>The GTP outlines the following measures to encourage more sustainable travel use:</p> <ul style="list-style-type: none"> <li>• Implementing a '10,000 steps a day initiative' for staff, including rewards for those consistently meet this goal.</li> <li>• Provision of high quality bicycle parking and end of trip facilities to encourage staff and students to travel by bicycle.</li> </ul>

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	<ul style="list-style-type: none"><li>Consider the provision of Opal Cards with a monthly allowance to facilitate travel for staff.</li></ul> Implementation of a shuttle bus for staff members to and from Edgecliff Station.
<b>Contributions</b>	
It is noted that an exemption from contributions is being sought on the grounds that there is no increase in staff or student numbers. The Department notes that Section 7.12 development contributions are applicable to all types of development, regardless of the intensification of uses or increase in student numbers. The applicant may wish to reconsider the justification for exemption.	Based on the Woollahra Section 94A Development Contributions Plan 2011, the estimated contributions cost for this development would be approximately \$597,000. It is requested that the payment of the contributions is to be staged in accordance with the staging plan outlined in Section 3.20 of the original of EIS submitted.
<b>Reference errors</b>	
As noted within Heritage Division of the Department of Premier and Cabinet (Heritage NSW) submission, the Aboriginal Cultural Heritage Assessment Report (ACHAR) contains several errors including: incorrectly recommending that a section 90 Aboriginal Heritage Impact Permit (AHIP) be sought if Aboriginal objects are to be moved or harmed (pages vi and 35). Heritage NSW notes that an AHIP is not required as the proposed development has been declared SSD. referring to the National Park and Wildlife Regulation 2009 (page 7) which was updated in 2019 with the Aboriginal cultural heritage clauses re-numbered. no letter attached from La Perouse LALC in Appendix C as stated under section 4.3 Field Survey (page 24) section 7.1.2 incorrectly referring to OEH (page 33) instead of Heritage NSW.	The Aboriginal Cultural Heritage Assessment Report has been revised to resolve these errors and is provided at <b>Appendix M</b> .
An amended / updated ACHAR should be submitted with the RTS addressing the above errors.	
<b>Landowners Consent</b>	
A signed letter indicating the landowner's consent for this application to proceed is required to be formally submitted with the Rts.	Landowners Consent was submitted with the original SSDA application. This has been resubmitted with this RTS application for completeness.
<b>Site Area</b>	
Please provide site area of the Sports, Wellbeing and Seniors Learning Precinct.	<p>The proposed building and landscaping works has an approximate footprint of 10,977m<sup>2</sup>.</p> <p>This includes an approximate building footprint of 6,086m<sup>2</sup>, and landscaping area of 4,909m<sup>2</sup>.</p> <p>A GFA schedule has been provided at <b>Appendix I</b>.</p>
<b>Heritage Council of NSW</b>	
The archaeological assessment contains several errors including quoting the definition of a 'relic' under the NSW Heritage Act prior to amendments made to that Act in 2009, and also	The Historical Archaeological Assessment has been updated to incorporate this comment. See <b>Appendix N</b> .

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misunderstanding that the provisions for State Significant Development under the EP&A Act, 1979, suspend most of the approvals section of the Heritage Act.	
The archaeological assessment recommends that an application is submitted for a section 139 exception prior to the commencement of work within areas identified as having moderate archaeological potential. Heritage NSW notes that a section 139 is not required as the proposed development has been declared SSD. The archaeological assessment also recommends monitoring within areas of moderate archaeological potential. While monitoring may be an appropriate approach to the management of areas of moderate archaeological potential, further information would be required about this approach if it was to proceed. It is recommended that an archaeological research design, including a methodology for archaeological monitoring be prepared by a suitably qualified archaeologist, and submitted to Heritage NSW (as delegate of the Heritage Council of NSW) for comment. This can be conditioned or resolved at Response to Submissions stage to enable Heritage NSW to provide appropriate comment to DPIE on the management of areas of moderate archaeological potential. If it is conditioned, Heritage NSW recommends that the following conditions of consent are included, if the proposed development is approved:	The Historical Archaeological Assessment has been updated to incorporate this comment. See <b>Appendix N</b> .
The applicant shall nominate a suitably qualified and experienced archaeologist to manage the historical archaeological program according to the following conditions.	The Historical Archaeological Assessment has been updated to incorporate this comment. See <b>Appendix N</b> .
An archaeological research design, including a methodology for archaeological monitoring shall be prepared to inform the archaeological program. This document shall be submitted for comments to the Heritage Council of NSW Prior to approval by DPIE.	The Historical Archaeological Assessment has been updated to incorporate this comment. See <b>Appendix N</b> .
A final report shall be prepared within 12 months of the completion of the archaeological program. It should include details of any significant artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the landowner. Copies of the final report shall be provided to the DPIE, the Heritage Council of NSW and the local library.	The Historical Archaeological Assessment has been updated to incorporate this comment. See <b>Appendix N</b> .
<b>Aboriginal Cultural Heritage Regulation</b>	
The ACHA has assessed that there is low to nil potential for archaeological material to be located or harmed within the development area due to high disturbance associated with the early urban development of Sydney. It is noted that only four areas were assessed which were open areas containing no structures, with an effective coverage recorded as 0%, although there is no map showing the survey transects employed across the development area. No test excavations have been considered or undertaken to confirm the disturbance levels or any low subsurface potential.	<p>Test excavations should be undertaken if areas of Potential Archaeological Deposit are identified. The potential archaeological deposits should be tested to establish whether Aboriginal objects are located there.</p> <p>The entire study area was surveyed except inside the buildings as they have basements and foundations and services. No archaeological potential was identified.</p> <p>The entire study area is on the Hawkesbury soil landscape which is characterised by shallow sandy soils on the slopes and has benching sandstone with outcropping, the soil landscape is highly erodible and acidic. The likelihood of intact soil deposits is nil.</p>

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	<p>The entire study area has been impacted by urbanisation, New South Head Road has been cut into the bedrock modifying the eastern end of study area, the playing fields have been benched and levelled to create a flat level surface for the grassed area, below the grassed area is constructed drainage lines, a plan was provided by the client. – No potential for intact archaeological deposits</p> <p>Test excavations were not warranted, the LALC agreed in the field that test excavations were not required.</p>
We note the ACHA states that a copy of the draft ACHA was provided to Registered Aboriginal Parties for review and comment.	Evidence of Draft ACHA being provided to Registered Aboriginal Parties for review and comment is provided in the updated Aboriginal Cultural Heritage Assessment at <b>Appendix M</b> . The updated ACHA also includes responses from the Registered Aboriginal Parties, such as the response received from A1 Indigenous Services shown on page 73 of the ACHA.
<p>The itself ACHA contains several errors including:</p> <ul style="list-style-type: none"> <li>incorrectly recommending that a section 90 Aboriginal Heritage Impact Permit (AHIP) be sought if Aboriginal objects are to be moved or harmed (pages vi and 35). Heritage NSW notes that an AHIP is not required as the proposed development has been declared SSD.</li> <li>referring to the National Park and Wildlife Regulation 2009 (page 7). Heritage NSW can advise that the Regulation was updated in 2019 with the Aboriginal cultural heritage clauses re-numbered.</li> <li>incorrectly referencing section 5.3, under section 3.2.2, as containing the survey details (page 16).</li> <li>having no text under section 4.1.3 Previous archaeological research and studies – within the study area (page 22).</li> <li>no letter attached from La Perouse LALC in Appendix C as stated under section 4.3 Field Survey (page 24).</li> <li>section 7.1.2 incorrectly refers to OEH (page 33). This should now refer to Heritage NSW.</li> <li>a number of references within the ACHA are not listed in the References section on page 36: Kate Sullivan &amp; Associates 2001 (page 22); Jo McDonald CHM 2010 (page 22); Brown 2008 (page 34); Australian Heritage Commission 2002 (page 34); Byrne et al 2003 (page 34).</li> </ul>	The ACHA has been revised to resolve these errors. See <b>Appendix M</b> .
We note the EIS summarises the mitigation measures from the ACHA. The mitigation measure for Aboriginal Archaeology outlined in Table 6 of the EIS is: “If any unexpected archaeological items are found, the procedures in the Aboriginal Heritage Impact Statement should be followed”. While Heritage NSW supports an unexpected item procedure, we note that the recommendations listed in the ACHA incorrectly recommend seeking an AHIP	The ACHA has been amended to address this and supersedes any prior information in the EIS. Approvals are required from the Minister for Planning who is advised by Heritage NSW. An AHIP is not required once SSD has been authorised.
We note the Construction Management Plan does not contain any provisions for Aboriginal cultural heritage matters to be considered as part of construction activities.	The revised Aboriginal Cultural Heritage Assessment outlines several mitigation measures for managing impacts to any potential Aboriginal cultural values or objects within the site. These measures include updating the ACHA following any changes to proposed works, utilising an unexpected finds protocol and



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	<p>ensuring adequate heritage interpretation of any Aboriginal cultural values associated with the site.</p> <p>It is anticipated that these mitigation measures captured within the ACHA report form a condition of approval.</p>
Under 6.2.1.3 and 8.7 of the Conservation Management Plan there are several errors including outdated references to the Office of Environment and Heritage administering the National Parks and Wildlife Act 1974 (NPW Act) and the National Parks and Wildlife Service needing to be informed under Section 91 of the NPW Act. Heritage NSW, in the Department of Premier and Cabinet, now administers Part 6 of the NPW Act in relation to Aboriginal cultural heritage regulation matters and section 91 of the NPW Act was renumbered to section 89A in 2010 under amendments to the NPW Act	<p>At the time of the report being written Heritage NSW was known as Office of Environment and Heritage, this has now been amended throughout the report.</p> <p>All other references have been amended.</p>
An Unexpected Finds Protocol for Aboriginal objects needs to be prepared as part of the Construction Management Plan (CMP) for the site and be implemented during all development works	<p>The revised Aboriginal Cultural Heritage Assessment outlines several mitigation measures for managing impacts to any potential Aboriginal cultural values or objects within the site. These measures include updating the ACHA following any changes to proposed works, utilising an unexpected finds protocol and ensuring adequate heritage interpretation of any Aboriginal cultural values associated with the site.</p> <p>It is anticipated that these mitigation measures captured within the ACHA report form a condition of approval</p>
The ACHA needs to be updated to ensure it correctly references the appropriate legislative and approval context in the recommendations.	The ACHA has been updated to incorporate this comment. See <b>Appendix M</b> .
We would support ongoing consultation with the Aboriginal community as part of construction activities.	This has been noted.
We note the ACHA outlines heritage interpretation elements that could be considered as part of the development and we would support the preparation of a Heritage Interpretation Plan that incorporates Aboriginal history and cultural heritage.	Noted. Any future Heritage Interpretation Plan prepared for the works will incorporate Aboriginal history and cultural heritage.
Heritage NSW also recommends that the Aboriginal Participation in Construction Policy (APIC) is considered for this development.	Aboriginal participation in construction is a consideration of the construction program and the builder which have yet to be selected. The project is supportive of encouraging Aboriginal participation in construction.
<b>Transport for NSW</b>	
<b>Easement</b>	
<p>TfNSW has previously acquired an easement for support over the subject site as shown by the brown colour in Attachment A, defined by DP 186227 and noted on title (Dealing C208705).</p> <p>Any new building or structures, together with any improvements integral to the future use of the site, shall be erected clear of the identified easement and New South Head Road boundary</p>	<p>Ongoing correspondence with Transport for NSW confirms that TfNSW are satisfied that the proposed built form will not compromise access to the existing easement, based on the responses to specific queries outlined below. A copy of all correspondence is provided at <b>Appendix B</b>.</p>

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<p>(unlimited in height or depth). Access and integrity of the TfNSW easement is not to be denied or compromised.</p> <p>TfNSW has identified that the proposal does not comply with the above as part of the external rooftop of the sports field and retaining wall, illustrated in the submitted architectural plans (page 11, 20 and 21) is within the identified easement area (Dealing C208705). Amended plans demonstrating this revision should be provided to TfNSW to review and comment on as part of the Response to Submissions (RtS).</p>	
<p>Information regarding the Concrete Retaining Wall states that:</p> <p><i>“Regarding the existing retaining wall at the base of the permanent batter between the Kambala School sports field and New South Head Road, in the portion of the site where the project proposes to undertake construction immediately in front of the existing retaining wall, as part of the proposed new structure, a new integral concrete retaining wall is proposed to be built directly in front of the existing masonry retaining wall. In this event, the existing retaining wall is no longer providing a soil retaining function, and will act akin to fill behind the new concrete retaining wall.”</i></p> <p>With regard to the statement above, please confirm that the new integral concrete retaining wall will support the batter slope and the existing one will become redundant in the future. It is noted that the design plans show a gap between the existing and proposed retaining wall.</p>	<p>Regarding the existing retaining wall at the base of the permanent batter between the Kambala School sports field and New South Head Road, in the portion of the site where the project proposes to undertake construction immediately in front of the existing retaining wall, as part of the proposed new structure, a new integral concrete retaining wall is proposed to be built directly in front of the existing masonry retaining wall. In this event, the existing retaining wall is no longer providing a soil retaining function and will act akin to fill behind the new concrete retaining wall.</p>
<p>GTD 2012-01</p> <p>It is noted that the design involves deep excavation adjacent to TfNSW structures. As such, please ensure that the design complies with TfNSW GTD 2012-01.</p>	<p>Noted. It is expected that this will be included as a condition of consent.</p>
<p>Weep Holes within Existing Retaining Wall</p> <p>The current design does not seem to be able to collect any water coming out from the weep holes of the existing retaining wall. Please see the diagram below. As such, additional measures would need to be implemented to prevent ponding in front of the existing wall.</p>	<p>Sub-surface seepage flows are to be collected in a spoon drain located parallel to the excavation face at the lower ground level and discharged to stormwater, with weepholes provided between the shoring piles at regular centres. At high level, drainage will be connected to the existing weep holes through the existing retaining wall and extended through the contiguous piled wall. Sizing of the drain and pipework for the sub-soil is subject to inflow rate study and advice by the geotechnical engineer.</p>
<b>Green Travel Plan</b>	
<p>The Travel Demand Management team in Transport Operations has reviewed the Green Travel Plan (GTP) for the proposal and has a number of recommendations to improve the GTP and sustainable travel outcomes for the site. Transport Operations welcomes the opportunity for direct consultation with the proponent regarding all aspects of the GTP.</p> <p>It is noted that the GTP effectively proposes continuing a ‘business as usual’ approach to travel to the school. Transport Operations recommends that the school take a more responsive approach and that the GTP is amended to include considerably more ambitious mode share targets that encourage sustainable transport use to the school, in accordance with broader</p>	<p>It is proposed that a modal shift of 5% be targeted, which is not a business-as-usual approach. This is considered to be a reasonable and a realistic value, with consideration for the site surrounds and existing infrastructure.</p> <p>Several Land and Environmental Court proceedings have indicated that a mode shift of 5% is a significant achievement for site specific measures. Mode shifts of greater than 5% typically only occur when there are major infrastructure upgrades nearby (e.g., rail, cycleways etc.)</p>

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strategic Transport for NSW and NSW Government aims outlined in various policy documents available to the proponent, such as Future Transport 2056.	
That the proponent consider the following commentary and proposed amendments to the GTP and operation of the site:  Provide an analysis of aggregated trip origin data (e.g residential postcodes) for staff and student travel, to determine appropriate catchments for walking and cycling; propensity to use public transport; development of appropriate sustainable transport strategies; and amendment of mode share targets accordingly.	Section 3.8 of the GTP has been updated to include this data.
Include details on current and proposed bicycle parking and End of Trip Facilities for students and staff, and how they are being improved to support this GTP;	The TIA notes that four spaces are required. The GTP has been updated to include this information.
Include more ambitious mode share targets for sustainable transport modes, particularly for senior students and staff that have more propensity to travel by public and active transport;	On the basis that a shuttle bus will be provided, a higher shift to buses can be proposed. The GTP proposed a shift of 3% to buses. We have now adjusted to 6%, giving a total shift of 8%. It is unlikely that a large shift in cycling would be achieved given the surrounding terrain.
Provide further details regarding proposed shuttle service to Edgecliff Station;	It is proposed to use a 15 seater bus which would be parked near the boarding house on Bayview Hill Road. The bus stop for the collection of staff will be in the loading dock area of the current car parking facilities. This shuttle bus will provide a morning and evening service to Edgecliff Station for staff members.
Include a comprehensive communications strategy which has actions to encourage more trips by walking, cycling and public transport and consider participating in events such as walk to school and bicycle week;	As noted in the GTP, communication strategies include a school newsletter to all parents, posters around the school of key events and provision of the TAG via email, online and at the front desk.  The GTP has included the participation of walking and cycling events such as Ride2Work, Ride2School and National Bike Week. Refer to Section 5.1 of the GTP.
Identify a respected champion/s within the school (such as the Principal) to model desired behaviours and drive change;	Any proposal to change current behaviour and culture will need to be directed by the Principal and thus the Principal will need to be the respected champion for change to be supported by the risk and compliance office.
Consider charging staff to park on site and/or subsidising or otherwise incentivising the travel of staff that travel to work by public or active transport;	This application does not propose any increase in staff.  However, this request contradicts the request to provide more parking. It may also push staff to park on the street, causing greater impact for surrounding residents.
Explore gamification strategies to encourage students to travel by sustainable transport modes;	There is currently a walk to school day promoted in the Junior School once a year the plan would be to expand this to Senior School and make this a more regular competition and offer house points as part of the initiative.
Explore strategies that promote the health benefits of sustainable transport modes;	Section 5.1.6 of the GTP has been updated to include this information.

Summary of issue raised	Comment
Include information on school operation hours including before and after school care as well as extra-curricular activities, and the projected spread of the demand throughout those hours;	A complete breakdown of the various operating hours of the different activities on site has been prepared. See table at <b>Appendix C</b> .
Provide greater details of measures to encourage sustainable transport choices amongst parents, students and staff for example information on walking routes, walking groups, cycling routes and information packs for parents and students	Walking and cycling groups were suggested in Section 5.1 of the GTP.
Consider storage facilities (for large items and to reduce daily trips with these items) for students;	Lockers are currently provided on site there are also additional storage cubes for larger items for students around the school. The music centre and Junior School have storage on site for musical instruments. There will be additional storage of sporting equipment in the proposed development.
Include a behaviour change program to encourage greater sustainable transport choices that target specific student groups e.g. encourage early sustainable behaviours through Bike Ed in primary years; and provide more specific targeted programs for high school students;	Section 5.1.2 of the GTP notes “the organisation of further educational programmes to teach staff and students how to properly and safely ride a bike”. Section 5.4 has proposed educational programmes as an action to be implemented by the TPC.  Nonetheless, Section 5.1.2 of the GTP has been updated to be more specific.
Provide details of who will be responsible for delivering the actions in the Green Travel Plan and how its actions will be resourced	The Principal of the school will be responsible for delivering the actions of the Green Travel Plan.
Ensuring the plan is evaluated, reviewed and updated annually, including by undertaking annual travel surveys at the same time each year for both staff and students to understand how the Green Travel Plan is performing against mode share targets and adjust accordingly.	Monitoring is already noted in Section 6 of the GTP.

## Woollahra Council

### Parking Provision

A significant shortfall of 58 car parking spaces, including one (1) accessible parking space than the minimum DCP requirement.	<p>This application seeks to formalise the cap on the number of students to reflect the existing number of students currently enrolled at the school. Therefore, there is no increase in the number of students currently attending the school and the formalising of the student cap will reflect the existing situation. Whilst the DCP stipulates car parking rates based on the amount of floor space, the proposed formalisation of student numbers does not result in additional parking requirements.</p> <p>Importantly, this application does not seek to increase the number of staff, and therefore there is no need for an increase in staff parking. Once again, whilst the DCP stipulates that parking rates are calculated based on floor space, this proposal does not increase staff numbers, therefore not requiring any additional parking to be accommodated.</p> <p>Therefore, the proposed expansion will provide services and facilities to existing students and staff, rather than provide capacity for additional students. On this basis, the additional floorspace in this scenario is not appropriate in calculating an increase in the school's parking provisions.</p>
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Summary of issue raised	Comment
	Furthermore, Kambala's implementation of a Green Travel Plan to reduce car travel to and from school and encourages staff and students to travel by alternative modes of transport, such as public transport, cycling, walking etc. The Green Travel Plan submitted with this SSDA proposes a number of additional transport options and initiatives, including a staff shuttle bus too and from the station, bicycle classes and rewards programs for students who use active transport to travel to school. On this basis, any increase to the site's parking provisions for the existing school body would counter any initiatives implemented by the Green Travel Plan.
It is envisaged that additional supporting staff would be required in the operation of the new precinct. No details are provided.	As discussed above, there is no increase in staff proposed.
Anecdotal evidence suggests that a typical weekday in surrounding streets of the school premises consists of a very high parking occupancy rates. Such impacts can lead to an increased prevalence of illegal parking, impeding traffic flow and impairing traffic performance in terms of safety and efficiency in the vicinity.	The Traffic Impact Assessment prepared by TTPP and submitted with the original EIS assessed the existing performance of surrounding roads and traffic volumes during school hours. This assessment confirmed that the surrounding streets do have high occupancy rates. However, it is anticipated that the measures proposed in the Green Travel Plan will reduce school car usage by 5% and achieve a 5 modal shift that will ensure that traffic levels post development are less than or similar to those currently achieved. Therefore, ongoing transport and parking management will assist in the management of high occupancy rates on surrounding streets.
A shortfall of six (6) motorcycle parking spaces than the DCP's minimum requirement	There is no increase in the number of staff on site. However, an additional five motorcycle parking spaces are proposed to be provided in and around the Fernbank Cottage driveway. Refer to <b>Appendix I</b> for revised Architectural Drawings.
<b>Traffic Generation</b>	
Further investigation to be carried out with consideration of community users and potential growth of supporting staff.	There will not be community events held at school, outside of school hours. There will not be any growth in staff.  The operating hours for all uses on site is provided in the attached table at <b>Appendix C</b> .
The submitted Traffic Report only considers traffic generated by the proposed additional 70 students, which clearly neglects post-development traffic from community users, who can also access the proposed wellbeing and seniors learning precinct between 5:30am to 8:00am and 3:30pm to 6:15pm.	Community users will not have access to the school during these hours. Additionally, there will not be any growth in staff.  It is noted that outside of peak school traffic, traffic from any community uses would be much less than the school / staff so the traffic generation will be less and the time that they would be on the road network will be quieter than the peaks modelled. Consequently, any impact will be significantly less than the school peaks tested.
<b>Green Travel Plan</b>	

Summary of issue raised	Comment
A green travel plan is to be submitted for further assessment, as per Section E1.12 of the Woollahra DCP 2015	A Green Travel Plan was submitted as part of the Traffic Impact Assessment accompanying the original SSDA package.
Pick-up/Drop off and Operational Traffic Management Plan	
Council's Traffic Section raises safety concerns regarding the existing pick up/drop off arrangements. In this regard, an OTMP must be formulated and implemented by the school to provide an efficient and safe environment for pick up and drop off	At present, there are staggered drop off and pick up times in the Junior School to provide a safe and efficient environment, which is currently working well. Extra-curricular activities running before and after school also help to alleviate the congestion during drop off and pick up times.  It is requested that the preparation of an Operational Traffic Management Plan be required as a condition of consent prior to construction of the development.
<b>Construction Traffic Management Plan</b>	
A revised CTMP is to be provided to address the following:  <i>Hours of work:</i> All vehicular movements associated with demolition, excavation and construction works on school days shall only be undertaken between the hours of 9:30am and 2:30pm in order to minimise disruption to the traffic network during school pick up and drop off times.	It is proposed that vehicle movements are restricted from 9:00am-2:30pm on school days, to reduce the impact on the surrounding traffic network during peak school times. The CTMP has been updated to reflect this.
<i>Access and egress route of construction vehicles:</i> The proposal to access and exit the site via the school's main entrance on New South Head Road and wait for gaps in traffic at the signalised crossing cannot be supported, as it would impede traffic flow and adversely impact on the efficiency of traffic movements.	The construction works generate between 3-8 vehicles per hour. This equates to one vehicle every 8-20 minutes, outside of peak periods.  The construction access is currently an existing service access. The kerbside lane is already a bus lane and informal drop-off/pick-up area.  Therefore, 3-8 vehicles per hour entering and exiting this location is not expected to affect traffic beyond existing traffic movements in the area.
<i>Work Zone:</i> the proposed work zone is located on New South Head Road, which is a classified road under the care and control of TfNSW. As such, the applicant is to liaise directly with TfNSW to seek written concurrence for such an arrangement.	Noted. Kambala will liaise with TfNSW as necessary.
<i>Bus stop closure:</i> A temporary closure is proposed for the northbound bus stop adjacent to the school's main entrance. The application is to liaise with STA and conduct community consultation to seek written concurrence for such arrangements.	Noted. Kambala will liaise with TfNSW and STA as necessary.
<b>Landscaping</b>	
A revised Landscape Plan is to be submitted providing exact details of planting locations, quantities and pot size at the time of planting.	Landscape Plans ( <b>Appendix H</b> ) have been updated to provide these details.
<b>Contributions</b>	
In accordance with Schedule 1 of the <i>Woollahra Section 94A Development Contributions Plan 2011</i> , a 1% levy applies with the monies being used for a variety of works as outlined in schedule 2 of the policy, as follows:	Based on the Woollahra Section 94A Development Contributions Plan 2011, the estimated contributions cost for this development would be approximately \$597,000. It is requested that the payment of the contributions is to be stage in

Summary of issue raised	Comment
\$597,000.	accordance with the staging plan outlined in Section 3.20 of the original of EIS submitted.
<b>Operational details</b>	
<p>The proposal seeks to reconcile student numbers and increase the previously approved capacity from the permitted 950 to current enrolment of 1020 students, which clearly suggests a breach of previous consent conditions.</p> <p>Consideration of the proposed increase in student numbers should have regard to the impacts of the approved student numbers compared to the existing/proposed student numbers. It is not accepted that the student increase would not result in any intensification of the existing use because there would be no change to the existing impacts, particularly in terms of traffic parking.</p>	<p>It is not reasonable to suggest that the traffic impact would be greater than the surveyed traffic which includes the increased cap.</p> <p>However, in the TIA, we have modelled the increase on the existing traffic levels as a sensitivity test and this shows a low traffic impact.</p> <p>As stated above, increasing parking would have a contradictory impact to the efforts of the GTP</p>
<b>Urban design</b>	
<p>The Visual Impact Assessment Reports by Richard Lamb and Associates and Urbis selected views from New South Head Road, Bayview Hill Road, Towns Road and Tivoli Avenue.</p> <p>There are inconsistencies between the values attributed to the assessed views. In particular, the RLA report states that view impacts to views 6, 9, 10, 15 and 16 would be 'high' and at View 5 the proposal would have 'medium' view impacts.</p> <p>The impacts are described in the Urbis Report as 'acceptable' on the basis that the view impacts of the proposed development from close locations would be lower than the approved development for a music building (DA 387/2005/1).</p>	<p>The Richard Lamb and Associates (RLA) views analysis report does not assess visual impacts, and instead only refers only to the external visibility of the proposed development and only rates the level of external visibility of parts of the built form proposed from public view places. Therefore, the RLA report states that part of the proposed development will only be highly visible from locations 6,9, 10, 15 and 16 but does not rate visual impacts. The ratings attributed in the RLA report therefore are not inconsistent and do not conflict with visual impact ratings made by Urbis and included in the Visual Impact Assessment.</p> <p>The RLA report concludes that views to scenic and other items beyond the site would generally be unaffected. The RLA report also identified that the approved DA (but not constructed development) would have more effect on view compositions and visibility than the proposal in some cases. This is consistent with the VIA, whereby it concludes that the development is considered compatible with the surrounding urban environment.</p> <p>The impacts described in the Urbis Report as acceptable have been based on weighting the importance of the visual effects considering relevant factors, such as visual absorption capacity, compatibility with the approved development envelope and compatibility with urban features including heritage items outlined in section 6.0 of the VIA report.</p> <p>Further response has been provided by Urbis in their VIA Addendum at <b>Appendix D</b>.</p>
Section B1.9 of the Woollahra DCP 2015 identifies significant views and vistas across the Rose Bay Precinct. The views from Towns Street and New south Head Road towards Sydney Harbour are relevant to this proposal, and have not been addressed. It is unclear which	Urbis inspected the views identified within the Woollahra DCP, including the views from New South Head Road and Towns Road. Upon inspection, it was identified that the site and proposed development is not visible from Towns



Summary of issue raised	Comment
<p>assessed view is equivalent to the DCP view corridor from Towns Road. It is recommended that further information is requested by DPIE in relation to this issue in order to carry out a proper assessment.</p>	<p>Road or in the downhill northerly view corridor along Towns Road, the origin of which is only approximately identified in the Woollahra DCP. Given the lack of visibility, it was not selected by RLA or Urbis for further analysis or modelling. The photograph showing the Towns Road DCP view corridor is included at View 23 within the Visual Impact Assessment reflects this. All DCP views are discussed in section 2.5.1 of Urbis' VIA report.</p> <p>DCP views are also identified and discussed as follows: View 7 (pp. 27) is similar to DCP view from Towns Road, which is a view south-west from the footpath at the corner of Towns Road, parallel to New South Head Road. The modelling indicates that the majority of the proposed built form is below the road level and in fact generates less visual effects compared to the approved DA.</p> <p>Other significant views identified within the Woollahra DCP were addressed and modelled within the Visual Impact Assessment including View 6 (view south-west from footpath along New South Head Road adjacent to Kambala School Sporting Fields), which is equivalent to a significant view identified on New South Head Road within the DCP.</p> <p>In addition, View 5 (view south-west from footpath near intersection of Bay View Hill Road and New South Head Road) is also equivalent to a significant view stated within the DCP.</p> <p>Further response has been provided by Urbis in their RTS document at <b>Appendix D</b>.</p>
<p>The proposed bulk and scale at view locations 5, 6, 15 and 16 would largely block the existing views from New South Head Road to the Tivoli Heritage Building. Views 6 and 15 are in similar locations/equivalent to the identified views by Woollahra DCP 2015 B1.9. According to the DCP, these are 'significant' views and vistas. The proposal has high visual impacts on the public views achieved from these locations, eliminating the visibility of the heritage building when viewed from New South Head Road. This is inconsistent with the provisions of the Woollahra DCP.</p>	<p>The RLA views analysis report rates 'access to views' (external visibility) of the proposed development from DCP locations via location 5, 6, 15 and 16 meaning that from moving viewing locations, immediately adjacent to the subject site, direct views of the proposed development will be available. Views to the heritage item are not eliminated and are not significantly blocked as shown by the light grey block in each photomontage. The yellow mass represents the approved DA which will not be constructed and which creates a high level of blocking in the DCP views. The grey block representing the proposed development does not eliminate any access to the DCP views. The proposed development</p>
<p>Insufficient details of the infrastructure/amenities requirements such as lighting, furniture, nets and fencing that would be required to service sporting facilities of this nature have been provided. This may further impact upon significant views. Details are required to enable a proper assessment.</p>	<p>The VIA has addressed the amenities required to service the sporting facilities and their visual impacts on significant views. The photomontages include the fences, fence posts and light poles. The fence infills use a mesh that will appear as a semi-transparent material, which will not preclude access to any views. Light poles in the photomontages are visible as narrow slim structures widely spaced between the fencing material, the visual effects of which, as modelled,</p>



Summary of issue raised	Comment
	<p>are minor. The design and materiality of the sports fencing will facilitate the visibility of Tivoli House and reduce potential visual impacts on such views.</p> <p>Sports facilities features have been modelled in photomontage views 4, 5 and 6 in the Visual Impact Assessment accompanying the EIS. In our opinion, the inclusion of the sports facility fencing and facilities in the photomontages has allowed for their visual impacts to be adequately considered and addressed.</p>
<b>Building height</b>	
<p>Under the Woollahra LEP 2014, the maximum permissible height on the subject site is 9.5 metres. According to the Cl. 4.6 report prepared by Ethos Urban, the proposal seeks a maximum height of 12.5 metres, three (3) metres higher than the LEP height limit.</p>	<p>Clause 42 of the Education SEPP permits that development consent may be granted for the purpose of a school that is State Significant Development despite the contravention of a development standard imposed by an Environmental Planning Instrument (EPI). In this case, the proposed building contravenes the height of building standard imposed under the Woollahra LEP. Whilst this is not applicable to the development, a clause 4.6 variation request has been submitted that justifies the variation sought.</p>
<p>The height non-compliance would result in unacceptable visual impacts on the existing public domain views as discussed previously. A proposal which complies with the height control would maintain higher visibility to the precinct's heritage building/site and would result in less impacts on the quality of the existing views.</p>	<p>It is noted that the Woollahra LEP height control does not apply to the site, as the Education SEPP has primacy over the Woollahra LEP. Nevertheless, the proposed development sits below the height of the approved music building DA, and in this regard creates a lower level of visual impacts compared to the approved development. This is discussed further at <b>Appendix D</b>.</p> <p>Further, the Visual Impact Assessment has assessed the impact of the proposal and found that the overall visual impacts of the proposed development were low and acceptable. When all impacts are considered, the proposed development generates a lower level of visual impact when compared to previously approved developments. In this regard, it provides a better view sharing outcome and an acceptable level of visual impacts.</p>
<p>In summary, the following recommendations are made:</p> <p>The view analysis reports are updated to address the significant public domain view from Towns Street and New South Head Road towards Sydney Harbour.</p>	<p>Both the Urbis and RLA reports address significant public domain views towards Sydney Harbour. During fieldwork inspections, it was determined that the site and proposed development would not be visible within the Towns Road DCP view corridor, which emanates at the intersection of Towns Road and Old South Head Road 500 metres east of the site and is constrained to the road corridor by built forms. Therefore, the Towns Road view was not selected for modelling. View 23 of the VIA illustrates this.</p> <p>However, a view that is similar to the Towns Road view in the DCP was modelled accordingly at View 7 of the VIA. It was identified that the majority of the proposed built form is below the road level and in fact generated less visual effects compared to the previously approved music building DA.</p>

Summary of issue raised	Comment
	Furthermore, View 5 and 6 within the VIA model the visual impacts of the development from New South Head Road towards Sydney Harbour, and therefore adequately satisfy this requirement.
Details of infrastructure/amenities to service the sporting facilities be provided to enable a proper assessment of visual impacts in terms of building height compliance and public domain views.	As identified, the visual impact assessment has addressed the amenities required to service the sporting facilities and their visual impacts on significant views. The photomontages include the fence, fence posts and light poles. The fencing comprises of a semitransparent netting material, which will allow visibility of Tivoli House and Sydney Harbour beyond. This has been modelled in View 4, 5 and 6 in the VIA.
Details on the precise nature of HVAC mechanical plant is not available. Environmental Health Services recommends that options for noise mitigation that may need to be considered at the design stage of the development may include, but is not limited to: <ul style="list-style-type: none"> <li>• Selection of lower noise plant and equipment; and</li> <li>• Screening of external plant using solid barriers or acoustic louvres; and</li> <li>• Appropriate housing of HVAC mechanical plant in plant rooms to reduce noise emissions to neighbouring land uses.</li> </ul>	The HVAC plant is based on an air cooled variable refrigerant volume system. There are several options for consideration for the location of the air cooled condenser: Option 1: locate in the level 2 plantroom with acoustic duct discharge. Option 2: locate externally to the building under ramp where it is acoustically shielded by the ramp undercroft area and the adjacent sloping. The preferred solution to meet Council requirements will be developed during the detailed design phase of the development.
A Detailed Site Investigation (Phase 2) may be required to confirm or qualify the findings of the initial preliminary site investigation report.	A Detailed Site Investigation and Remediation Action Plan has been attached as part of this RTS, see <b>Appendix O</b> and <b>Appendix P</b> .
<b>Heritage</b>	
The proposed groundworks have the potential to disturb or uncover aboriginal and historical archaeology.	An Historical Archaeological Assessment and Aboriginal Cultural Heritage Assessment Report (in full) has been carried out by Urbis and Ecological respectively to assess these impacts. These reports conclude that the archaeological of the site is low due to its historical land use and existing pattern of disturbance to date. An Unexpected Finds Procedure has been prepared in the unlikely circumstances that any archaeological items are identified during construction. It is expected that this will form a condition of consent.
Whilst the proposal is not considered to result in any adverse impact to elements of 'Exceptional' or 'High' significance within the Kambala School site, it would be appropriate to photographically record all elements and landscaping proposed to be demolished and/or modified in order to provide a record of the current layout and character of the school	Noted. This can be appropriately addressed through a condition of consent.
Potential damage to the Tivoli building during construction works.	Urbis have confirmed that damage to the Tivoli Building during construction is unlikely. However, to mitigate any potential impacts, a condition of consent requiring inspection by a qualified heritage inspector throughout the project's construction would be acceptable.
Protection of two significant Norfolk Island Palm Trees	The Norfolk Island Palms will need to be protected according to AS_4970-2009 (Protection on Trees on Development Sites) throughout the development works if any activity is planned within their TPZ as discussed in the arborist report.

Summary of issue raised	Comment
Preparation of a Heritage Interpretation Strategy and incorporation of heritage interpretation measures into the design.	Kambala request that a condition of consent is included that requires a Heritage Interpretation Strategy to be prepared prior to the issuing of a Construction Certificate.
<b>Sydney Water</b>	
<b>Water servicing</b>	
Potable water servicing should be available via a 100mm DICL water main on Tivoli Avenue, a 100mm CICL water main on Bayview Hill Road, and a 150mm CICL water main on New South Head Road.	The existing Potable and Fire connections are proposed to be reused. The approval process with Sydney Water will include the submission of a Section 73 application, which will result in Sydney Water issuing Notice of Requirements, where the solution proposed by the design team will be commented upon.
This development will likely connect into the 150mm CICL water main (laid in 1933) on New South Head Road.	It is proposed that the existing connections are used. This will be confirmed through the Section 73 process.
Detailed requirements including confirmation of the appropriate potable water connection will be provided at the Section 73 application stage.	A Section 73 application will be submitted after the SSDA approval process is finalised.
<b>Wastewater servicing</b>	
Wastewater servicing should be available via a 225mm VC wastewater main (laid in 1925) located within the property boundary.	It is proposed that the existing connections are used. This will be confirmed through the Section 73 process with Sydney Water.
Amplifications, extensions and adjustments may be required.	It is proposed that the existing on-site infrastructure is used to cater for the new buildings, however that intent should be confirmed through the Section 73 process with Sydney Water.
<b>Environment, Energy and Science Group - Biodiversity and Conservation Division</b>	
<b>Flooding</b>	
The Stormwater Management Plan states that the any overland flow on New South Head Road is assumed to remain on the road and bypass the subject site. Furthermore, the 2013 Rose Bay FRMS/P states in Section 4.4.1 – “It should be noted that design flood levels, extents and velocities were not determined in the upper catchment”.	A response has been prepared by Taylor Thomson Whitting and is provided at <b>Appendix F</b> . This response confirms that in events of significant overflow on New South Head Road during 1% AEP flood event (1 in 100-year event) would bypass the development site.
Considering these assumptions, it is recommended that a more detailed flood assessment is undertaken of the upper Rose Bay sub catchment relevant to the subject site, to determine the level of flood risk from overland flooding into the subject precinct from the surrounding roads. The flood assessment should consider and assess the impact from the full range of floods (up to the probable maximum flood).	
The flood assessment should map the hydraulic categorisation (flood ways and flood storage areas) and flood hazard relevant to flooding as described in the Floodplain Development Manual 2005.	A hydraulic categorisation map has been provided in <b>Appendix F</b> .
Climate change implications from increased rainfall intensity should be considered in the flood assessment using the 0.5% and 0.2% AEP events as a proxy. The proposed development	TTW have confirmed that, as per their overland flow study which is referenced in section 4 of the attached report at <b>Appendix F</b> , that the existing overland flow

Summary of issue raised	Comment
should be designed to include any climate change increase. The 0.5m freeboard should not be eroded to account for climate change impacts.	<p>on New South Head Road has been analysed and calculated as remaining in the New South Head Road Reserve bypassing the development site.</p> <p>There is not a material flood risk to the development site. The piped diversion system provides sufficient capacity to accommodate the piped flows through the development site in storm events up to the 100-year storm event.</p>
The increase in development in the floodplain can become troublesome during infrequent flooding considering that it can occur from intense short duration storms with minimal warning times. The 2013 Rose Bay FRMS/P recommends that Council and NSW SES provide measures to improve awareness possibly on an LGA wide basis.	Noted.
Ongoing education and awareness are relevant to the subject precinct area as there are high hazard floodways to the south of the site about 200m away. It is advisable that in addition to Woollahra Council the NSW SES Zone Commander is consulted on the preparation of a Flood Emergency Plan. The Plan should consider the impacts on managing risk to life, emergency management arrangements, evacuation, access and contingency measures for the development considering the full range of flood risk. This Plan should include education and awareness of owners and occupiers of the proposed precinct site. Reference should be made to the Local Flood Plan, if available.	TTW have confirmed that an evacuation plan for the proposed development is not required.
The subject site is identified as a 'Flood Planning Area' within the LEP Flood Planning Map. The flood planning levels which are applicable to the land should be incorporated into the design.	Noted.

## Public Submissions

Summary of issues raised	Response
Traffic	
Baview Hill Road should be widened to accommodate construction vehicles and traffic so that the existing housesCM don't get blocked.	The Traffic Impact Assessment that accompanied the original SSDA application identifies that Bayview Hill Road operates at a Level of Service A, meaning that it has an average delay of less than 14 seconds per vehicle. This delay is for both current and post development circumstances. Therefore, widening Bayview Road is not necessary in this circumstance.
I object to 70 extra pupils with the accompanying 70 extra cars to the area.	The Traffic Impact Assessment from the original SSDA identifies that the small increase in student population and resultant increase in traffic can be managed effectively through the implementation of the Green Travel Plan and other travel demand measures. As a result, it is anticipated that the traffic levels post development will be similar to those currently achieved.
Views	
We are very concerned about the impact of the development on our amenity particularly the impact of the new sports centre proposed for the existing oval. In particular we are concerned at the proposed installation of tennis courts on the roof of the centre and particularly bright tennis court floodlights. Lights often left on beyond hours of tennis court use.	The tennis courts and sports fields will not be used any later than 6:15pm, as outlined in the Hours of Operation table at <b>Appendix C</b> . Further to this, lighting must comply with relevant Australian Standards, including AS 2560.1 and AS 2560.2.1, meaning that all lighting design must minimise obtrusive light spill and glare to surrounding properties. Lighting will be on a timer and will automatically turn off once operations have ceased.
Concern that large trees planted on the embankment continue to grow up and block our view. We note from the arborist plan that none of the trees currently impacting our view are proposed to be removed or pruned - we would ask that this be reconsidered with replacement by smaller trees.	The trees being retained on the embankment of the site are of medium to high significance and are identified for retention due to their ecological and canopy value. No larger trees are proposed to be planted on the embankment.
The position of the lift on the roof is right in the path of views.	The design seeks to reduce the built structure to a height that responds to the surrounding context of the site. All elements have been designed to be as recessive as possible, while ensuring that the playing field is accessible to all members of the community, including those with ambulatory access requirements. A View Impact Analysis has been carried out by Urbis that has considered the views from surrounding vantage points and has concluded that this proposal does not impact view access significantly, including the elements servicing rooftop access.
Location and canopy of grandstand exceeds height limit and will impact views.	<p>The canopy proposed to be located on the roof has been designed as to reduce the blocking of views as much as possible. The canopy's slender design allows for views through the canopy to the harbour. Further to this, the Visual Impact Assessment that accompanied the original SSDA identified that the views of the services and infrastructure of the roof top sports field do not significantly impact views, and that the impact is acceptable.</p> <p>It is noted that the Education SEPP has primacy over the Woollahra LEP, and therefore, the additional three metres of height proposed over the LEP height limit is permissible.</p>

Summary of issues raised	Response
Height of chain wire fencing around tennis courts exceeds height plane and will impact views.	It is noted that the Education SEPP has primacy over the Woollahra LEP, and therefore, the additional three metres of height proposed over the LEP height limit is permissible. In addition to this, the fencing comprises semi-translucent netting that has been chosen because of the reduced impact on views
Hours of operation	
Objection to hours of operation of tennis courts.	The tennis court will cease operation at 6:15pm, which is in line with the operating hours of the existing tennis courts. In addition, the ongoing noise impact of the tennis courts is not expected to increase from the current noise levels, and therefore, there are no additional impacts expected from the hours of operation of the tennis courts. As discussed above, the lighting strategy requires that all lighting will operate via a timer and will turn off once operations have ceased.
Consultation	
Following the receipt of a circular from the school's planning advisors I made contact with them to request further information other than the illegible drawing. The consultant I spoke to (Laura?) undertook to send me elevations from our location / across New South Head Road towards the proposed development. I received nothing and I would comment that the community consultation and communications from this company has been woeful - one double sided A4 pamphlet only the whole time!	A program of consultation activities was undertaken between February and July 2020 and was tailored to the scale and impact of the proposal. The program included two door knocks of approximately 35 residents most impacted by the proposal, visual impact assessment from neighbouring properties, two notification of works letters (traffic and visual impact), and a project factsheet inviting feedback through 1800 and email enquiry lines.