

30 April 2021

2190171

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
12 Darcey Street
Parramatta NSW 2150

Attention: Rita Hatem

Dear Mr Betts,

KAMBALA SPORTS, WELLBEING AND SENIORS LEARNING PRECINCT RESPONSE TO SUBMISSIONS

The Environmental Impact Statement (EIS) for the Kambala Sports, Wellbeing and Seniors Learning Precinct State Significant DA was publicly exhibited for a period of 28 days, concluding on 24 November 2020. In total, five public submissions, four submissions from organisations and seven public authority submissions were received. Four of the five public submissions and all of the submissions from organisations were in support, whilst one public submission was an objection to the proposal. Key comments raised were in relation to visual impact, traffic, built form and urban design.

The Department of Planning, Industry and Environment (DPIE) has also prepared a letter setting out additional information or clarification required prior to final assessment of the project. The proponent, Kambala School and its specialist consultant team have reviewed and considered all issues raised.

This letter, prepared by Ethos Urban on behalf of the proponent, sets out the responses to the issues raised in accordance with Clause 85A of the *Environmental Planning and Assessment Regulation 2000* (EP&A Reg). The response relates to clarification of certain elements of the proposal and the provision of additional technical assessment to address issues raised. The description of the proposed development remains the same as originally sought.

A detailed response to each submission, as well as the Request for Information from the Department of Planning, Industry and Environment is provided in the response table at **Appendix A**.

The report and **Appendix A** should be read in conjunction with the following attached documentation:

- Easement Response prepared by Roads and Maritime Services (**Appendix B**);
- Uses and Operating Hours Table prepared by Ethos Urban (**Appendix C**);
- Visual Impact Addendum prepared by Urbis (**Appendix D**);
- Revised Visual Impact Assessment prepared by Urbis (**Appendix E**);
- Civil Engineering Response prepared by Taylor Thomson Whitting (**Appendix F**);
- Revised Landscape Design Report prepared by Oculus (**Appendix G**);
- Revised Landscape Plans prepared by Oculus (**Appendix H**);
- Revised Architectural Plans prepared by AJ+C (**Appendix I**);
- Assessment against changes to the *State Environmental Planning Policy (Educational Establishments and Childcare Facilities) 2017* prepared by Ethos Urban (**Appendix J**);
- Revised Construction Management Plan prepared by Buildcorp (**Appendix K**);

- Traffic Response prepared by TTPP (**Appendix L**);
- Revised Aboriginal Cultural Heritage Assessment Report prepared by Ecological (**Appendix M**);
- Historical Archaeological Assessment prepared by Urbis (**Appendix N**);
- Detailed Site Investigation prepared by JBS&G (**Appendix O**);
- Remediation Action Plan prepared by JBS&G (**Appendix P**); and
- Correspondence with Woollahra Council regarding Stormwater Pipe Diversion (**Appendix Q**).

1.0 Key Issues and Responses

This section of the report provides a response to the following key issues raised by the Department, other government agencies and organisations, and by the public during the exhibition of the SSDA:

- Easement access for Roads and Maritime Services / Transport for NSW
- Traffic and Parking
- Use by the community
- Built form and view impacts
- Contribution

1.1 Transport for NSW Easement

Issue

Transport for NSW (TfNSW) identified that they have previously acquired an easement on the subject site to support the operation of New South Head Road, and that access to this easement should not be compromised by the development. This easement is located to the north of the Sports, Wellbeing and Seniors Learning Precinct, between the building and New South Head Road.

Response

Further consultation directly undertaken with TfNSW has confirmed that the proposed built form does not restrict the ability for maintenance staff to access the easement. Written correspondence is provided from TfNSW at **Appendix B**, which confirms that the easement access and management can be accommodated notwithstanding the proposal, with the incorporation of some additional conditions (as outlined at **Appendix B**). Specific responses to TfNSW's queries is provided in the RTS table at **Appendix A**.

1.2 Parking

Issue

Woollahra Council identified that no additional car parking is proposed to be provided as a result of the development, and that the site provided 58 less car parking spaces than the Woollahra Development Control Plan 2015 (DCP). Woollahra Council suggest that that streets surrounding the school have very high occupancy rates on school days and has queried if additional parking should be provided.

Further to this, Woollahra Council requested that six additional motorcycle parking spaces are provided, as per the Woollahra DCP.

Response

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 proposed 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 requires

car parking rates based on the amount of floor space, the proposal does not include development that would service additional students or staff demand (such as classrooms), rather the proposed sports, wellbeing and seniors precinct will service the existing school population and will not create demand for additional parking. 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 seeks that parking rates are calculated based on floor space, this proposal does not propose floor space that will increase the student or staff numbers, therefore not requiring any additional parking to be accommodated.

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.

Furthermore, in accordance with best practice, 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.

Whilst there is no increase in staff or students, an additional six motorcycle parking spaces will be provided in the driveway of Fernbank Cottage, to respond to the request by Woollahra Council.

1.3 Community Users

Issue

Several submissions were concerned with the impact of community users accessing the new development would have on traffic and noise, and the lack of clarity around when these users would be utilising the premises.

Response

This application does not seek to alter the current community usership beyond what is currently approved. At present, community users only utilise the Kambala Swimming Pool before and after school, which is located separately to the new Sports, Wellbeing and Seniors Learning Precinct. This application does not seek to include any additional community use within new buildings or across the campus.

A schedule of all uses proposed on site, including community uses, as well as the buildings these uses will be located in and the hours of operation of these uses is provided at **Appendix C**.

A summary of the proposed hours of Sports, Wellbeing and Seniors Learning Precinct sought under this application are summarised below:

- Monday-Friday: 5:30am-6:15pm during term time,
- Saturdays: 7:30am-1:00pm during term time.

It is noted that the use of sports fields currently occurs on Saturdays on the existing oval.

1.4 Built Form and View Impact

Issue

The submissions raised concerns in relation the proposed built form of the Sports, Wellbeing and Seniors Learning Precinct, and the potential impact that the design could have on the views to Sydney Harbour from neighbouring properties. Particularly, submissions were concerned with the impact that the infrastructure associated with the sports field on the roof of the building would have on views.

Woollahra Council and DPIE also requested that further view analysis be undertaken to respond to the view corridors identified in the Woollahra Development Control Plan (DCP).

Response

The proposed built form has been strategically designed to sit below the height of New South Head Road and utilises the topography of the site and surrounding area to reduce the impact on views for surrounding neighbours and from key public viewpoints. It is noted that in 2005, a development application was approved for the construction of a gym, sports hall, change rooms, offices and performing arts centre in the location of the proposed Sports, Wellbeing and Seniors Learning Precinct proposed in this application. This building had an approved height of 14 metres. Therefore, this SSDA seeks approval for a significantly lower height than the approved development.

The Visual Impact Assessment prepared by Urbis which accompanied the original SSDA application has addressed the amenities required to service the sporting facilities in preparing the visual impact on significant views. This assessment concluded that the impact of this infrastructure is negligible on views. It is noted that the tensile fencing around the sports field uses a semitransparent mesh material that does not preclude access to views in any way.

In relation to the prescribed Woollahra DCP views, Urbis inspected the identified views from Towns Road and New South Head Road. It was identified that the site and proposed development is 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 Woollahra DCP. Given the lack of visibility it was not selected by Dr Lamb or Urbis for further analysis or modelling. Accordingly, all relevant views from the DCP have been assessed. This is discussed further in the response prepared by Urbis at **Appendix D**.

1.5 Contributions

Issue

Woollahra Council has identified that, in accordance with Schedule 1 of the Woollahra Section 94A Development Contributions Plan 2011, a 1% levy applies with the monies being used for a variety of works as outlined in schedule 2 of the policy. This contribution levy amounts to a total of \$597,000.

Response

Based on the above contributions cost, it is requested that the payment is staged in accordance with the staging plan outlined in Section 3.20 of the original of EIS submitted.

2.0 Conclusion

The proponent and project team have considered all submissions made in relation to the public exhibition of the proposed Sports, Wellbeing and Seniors Learning Precinct at Kambala School, Rose Bay. A considered and detailed response to all submissions has been provided within the accompanying documentation and **Appendix A**.

We trust that this information is sufficient to enable a prompt assessment of the proposed development. Should you have any queries on this matter, please do not hesitate to contact me on 9409 4923 or ecoleman@ethosurban.com.



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