

Mr Andrew Brady
Program Manager – Macquarie Readiness
Royal Institute for Deaf and Blind Children
361-365 North Rocks Road
North Rocks NSW 2151

21 December 2020

Dear Mr Brady,

**RIDBC Centre of Excellence (SSD-10451)
Response to Submissions**

The exhibition of the Environmental Impact Statement (EIS) for the above proposal ended on 16 December 2020. Submissions received from City of Ryde Council and all Government agency advice received by the Department of Planning, Industry and Environment (the Department) during the exhibition of the project are available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/31016>.

The Department requires that you provide a response to the issues raised in those submissions, in accordance with clause 82(2) of the Environmental Planning and Assessment Regulation 2000. Please provide a response to the issues raised in these submissions within two months.

Please be advised that Sydney Water and Heritage Division of the Department of Premier and Cabinet have yet to provide comments in relation to the application. Any pending public authority responses will be forwarded to you when received.

The Department has also undertaken a preliminary assessment of the EIS and, in addition to the issues raised in submissions, requires the matters at **Attachment 1** be addressed in full. You are requested to provide the Department with a response to the submissions as soon as possible.

Note that under clause 113(7) of the Environmental Planning and Assessment Regulation 2000, the days occurring between the date of this letter and the date on which your response to submissions is received by the Secretary are not included in the deemed refusal period.

If you have any questions, please contact Andrew Golden, who can be contacted on (02) 9995 6319 or at andrew.golden@dpie.nsw.gov.au.

Yours sincerely



David Gibson
Acting Director, Social and Infrastructure Assessments

as delegate for the Planning Secretary

ATTACHMENT 1

1. Relationship of the components forming part of the State significant development

- The Department requires you to provide additional evidence that every component in the development sufficiently relates to the proposed use of the school for the entire proposal to qualify as a State significant development.
- In this regard, the Department recommends that a breakdown of the Capital Investment Value is provided, apportioning amounts to each component of the development to demonstrate that the school is the predominant component of the proposal.

2. Assessment against Part 3A Concept Plan approval

- The Department notes that an assessment against relevant requirements of the Macquarie University Concept Plan (MP 06_0016, as modified) has been provided at section 7.1.3 of the EIS. However, the Department requires you to provide an addendum compliance table with the Response to Submissions (RtS) report, that details an assessment against all Concept Plan terms of approval and demonstrates compliance of the proposal against each of those requirements.

3. Inconsistencies between EIS and supporting documentation

- The Department notes that the EIS and the Operational Waste Management Plan have different waste generation estimates. Consequently, you are requested to provide an amended Operational Waste Management Plan or additional documentation with the correct waste generation rates that are expected during the operational phase of the development, consistent with the EIS.

4. Updates to the architectural plans

- The Department requires you to submit amended architectural plans including:
 - appropriate height information on all elevations and sections to ensure an appropriate assessment of the proposed maximum building height. The building height (in meters) should be provided considering the greatest vertical distance between existing ground level and the highest point of the buildings. The relative levels (RLs) of the topmost parts of the building should also be included.
 - a line indicating existing ground level on all elevations and sections.
 - information on the height of the basement entrance level on elevations and sections to demonstrate the clearance height and that it can accommodate a medium rigid vehicle (MRV). The Department notes the Transport Impact Assessment outlines a “clearance height of up to 4 metres (m)” is provided, however this cannot be verified by the information available in the submitted plans.
- The Department notes that the architectural plan set references each room with a specific notation (e.g. D3:1, A2:4 etc.), with the corresponding room schedule detailing the use of each room held separately in the architectural design statement package. The Department requests that you provide a corresponding room schedule in the architectural plan set. This is to ensure that the architectural package clearly demonstrates the use of each room. The corresponding room schedule is to be included as an additional drawing sheet in the architectural plan set.
- The Department notes that the architectural plan set shows awnings overhanging the boundaries. You must provide additional information, clarifying whether the

development includes any works within the public domain (whether there are any awning overhangs).

5. Earthworks and retaining walls

- The Department notes that the development includes substantial earthworks, in the form of both cut and fill. The EIS outlines the development seeks consent for earthworks, and the Geotechnical Investigation outlines a maximum cut of about 5m and a maximum fill of about 6m. Given this, the Department requests that you submit:
 - a separate earthworks plan that accurately shows the extent, depth, volume and balance of cut and fill proposed.
 - details of retaining walls (including top-of-wall heights, bottom-of-wall heights, construction materials and finishes).

6. Traffic and transport

- The Department notes that City of Ryde Council (Council), in its submission to the EIS, raised significant concerns regarding the impacts of the proposed porte-cochere from Culloden Road. Council's concerns relate to the extent of hardstand surface, dominance of vehicular access and circulation, limited soft landscape planting and lack of definition of the main entry. The Department agrees with these concerns and recommends that you investigate alternative access arrangements to introduce more soft landscaping along this frontage. Otherwise you should provide sufficient additional justification detailing the unique circumstances of the school and the specific need for the porte-cochere in this configuration.
- The Department notes that Transport for NSW (TfNSW) and Council have both raised concerns around pedestrian safety, and potential conflicts that may arise between pedestrians and vehicles within basement and porte-cochere areas. In this regard, you should provide additional information to demonstrate that pedestrian safety and connectivity have been prioritised throughout the development.
- A Green Travel Plan has not been submitted with the application. Whilst the Department acknowledges the development is wholly within the Macquarie University campus, the facility is a separate entity and requires its own Green Travel Plan, which should form part of the RtS.
- The Department notes that Council has requested a queuing analysis to determine whether the length of the pick-up/drop-off areas is sufficient to support the maximum vehicle queues generated during the peak periods, without spilling over onto Culloden Road. The Department requires you to consider Council's comments and provide a queuing analysis as an addendum to the Transport Impact Assessment.

7. Tree removal and landscaping

- The Department notes that Council has raised significant concerns regarding the environmental and visual impacts of the proposed tree removal, with particular concern regarding lack of a tree canopy along the Culloden Road frontage. The Department agrees with these concerns and requires you to investigate opportunities for further tree retention within the site.
- The proposed landscape strategy includes trees planted over underground structures. For example, the courtyard in the consulting building includes a feature tree (*Acer palmatum* 'Senkaki' 'Coral Bark Maple', mature size 6m x 5m) above the on-site

detention tank. There are no details as to the depths of the soil for trees planted on structures. The Department requires you to provide additional information by including additional sections in the landscape plans for any planting on structures (including appropriate dimensions) to ensure soil depths are suitable for successful planting.

- The Department notes that the civil drawing set shows two swales proposed as part of the stormwater strategy to assist in the management of overland flow. The Infrastructure Management Plan further outlines that they are 40 square meters (sqm) and 8sqm in size, approximately 0.15m deep with a 100mm vegetation height and a 1% slope. The swales are to be vegetated but are not shown on landscape or architectural plans. The Department requires you to submit amended landscape plans and architectural plans to accurately show the location, extent and details of vegetation for the swales to ensure consistency across documentation.

8. Child Care Planning Guideline

- The Department notes that the EIS includes an assessment against State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 and the Child Care Planning Guideline 2017. In this assessment, it is outlined that compliance is achieved with regards to unencumbered indoor and outdoor play space. However, there are no figures or plans verifying the unencumbered play areas.
- Consequently, the Department requires you to provide an addendum to the EIS that shows the entire floor plan for the pre-school, with the unencumbered spaces hatched to demonstrate compliance.

9. Playing field

- The Department notes that the school does not include any playing/sport field, with the primary outdoor play area including hardstand surfaces (handball court, accessible netting and multi-purpose half court). The Department requires you to provide additional justification as to why there is no requirement for a formal playing field with a grass surface.
