

25 November 2014

Attention: Mr Peter McManus

Senior Planner
Industry, Key Sites and Social Projects
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Mr McManus,

**RE: ST CATHERINE'S SCHOOL MASTER PLAN (SSD 6339)
29 ALBION STREET, WAVERLEY**

I refer to the above detailed application which is currently under assessment by the NSW Department of Planning and Environment. A review of the application information has been undertaken and a number of comments are provided in this letter and attached.

The comments below were subject to, and subsequently amended by, a Resolution of the Council at their meeting of 18 November 2014.

Should you have any questions please contact the Manager, Development Assessment (South) - Lee Kosnetter on 9369 8213 or Lee.Kosnetter@waverley.nsw.gov.au.

Yours sincerely,



Peter Monks
Director, Waverley Futures

Submission to Department of Planning and Environment St Catherine's School Master Plan

The following key points are identified after reviewing the documentation and plans accompanying the application.

Waverley Local Environmental Plan 2012

Height and Floor Space Ratio (FSR)

The proposal substantially breaches site's height and FSR development standards contained in the WLEP 2012. The applicant has provided a detailed clause 4.6 Exception to development standards justifying the contravention of development standards and detailing the public benefit. However the additional height and FSR of the proposed development is likely to have considerable amenity impacts on adjacent residential uses. Accordingly, the height and gross floor area of the RPAC be reduced on MacPherson Street to align with the bulk and scale of neighbouring properties.

Furthermore, the proposal results in a significant increase to site coverage which should be reduced so as to minimise the loss of green space and minimise over-development of the site.

Preservation of trees and vegetation

The proposal seeks the removal of a number of existing trees and vegetation from the site. In the event the application is approved by The Department the recommended conditions of consent from Council Tree Management Officer should be imposed (see Attachment A).

Heritage

The site is heritage listed and located in a conservation area specified in Schedule 5 of the WLEP 2012. Accordingly, the proposed master plan should maintain and enhance the existing setting of heritage items and heritage conservation area. To address the provisions of clause 5.10 Heritage conservation application should address the comments provided by Councils Heritage Advisor (see Attachment B).

Traffic, vehicular access and car parking

The proposal will have significant implications for traffic, vehicular access and parking on surrounding street the locality.

To account for the significant impacts on traffic and parking within the vicinity of the site, Master Plan should be amended to provide a substantial amount of additional on-site parking, for example a minimum of 200 car spaces – currently only 19 extra car spaces are proposed in addition to the existing 56 car spaces. This is essential due to, but not limited by, the:

- i. existing over-subscribed on-street parking available in the area,
- ii. proposed increase in capacity of the school, including students, teachers, staff, and visitors, and
- iii. proposed intensification of school functions associated with the new buildings, including the 500 seat theatre and larger aquatic centre.

The development of the RPAC should be dependent on providing the additional parking, that is, the parking should be physically provided with the first stage of development.

A drive through drop off/pick up area be integrated into the proposal to:

- i. mitigate the compounding traffic congestion impacts around the school due to an increase in parent numbers as a result of the increase to student numbers,
- ii. improve community safety,
- iii. reduce illegal and unsafe parking, and
- iv. improve residential amenity.
- v. The applicant should also be amended to incorporate bicycle parking for students and staff (preferable near entry points).

A condition of consent should also be incorporated to include a requirement that the school development a mode shift policy with specific performance indicators aimed at minimising traffic volumes and parking capacity issues.

The DoPE should also have regard to the comments and recommendations provided by Council's Technical Services sub Program (see Attachment C).

Built form and urban design

The proposed multipurpose hall, theatre, fly tower and research centre will significantly alter the schools presentation to MacPherson Street and may have amenity impacts on surrounding residential properties and the public domain. Where unreasonable amenity impacts are identified the bulk, scale and building footprints should be reduced to minimise amenity impacts on surrounding properties and the public domain. In particular, the scale of the building at its eastern edge has been designed to accommodate plantings and a varied materials palette to break down its mass. This is an important aspect that should be retained and thoroughly investigated on site.

The proposed alterations and additions to existing buildings and reconstruction of the JB Hall are generally consistent with the built form of existing buildings. The proposal appears to ensure that it enhances the setting of existing heritage items and provides a positive streetscape presentation to Albion Street.

Landscaping and open space

The proposal substantially increases the built upon areas within the site and drastically reduces the amount of landscaping and open space. Analysis should be undertaken to determine if the remaining open space and landscaping is adequate to accommodate the increased number of students. In addition, the proposal seeks to remove high value boundary planting and both brick and stone walls also considered to be high value, given the positive interface with the street frontages and ability to maintain privacy and limit amenity impacts on surrounding residential properties.

It is recommended that the boundary planting and stone walls be generally retained and enhanced. Particular attention needs to be given to the adjacency issues with the adjoining residential flat building to the site's east at 4 MacPherson Street. The Council's PreDA flagged this issue but it is not apparent in the plans that it has been resolved. The residential flat building's land is undulating and it is appropriate that the proposed side fencing and

landscaping within the school carefully consider the boundary treatment along this length of the site to ensure there is consistent fencing/landscaping, rather than some high points and some low points in the fence.

Increase to student and staff numbers

The proposal will increase student and staff numbers over a 15 year period. Detailed assessment of the vehicular access, traffic surveys and parking reports should be undertaken to determine the impacts of increasing student and staff numbers.

Any consent from the DoPE should clearly outline the staging of increases to student numbers on a 'stage by stage' basis as each stage of this project is completed.

Public/private use of school facilities

Section 4.5 Events and hours of operation and Appendix H of the Environmental Impact Statement outlines the proposed school, community and private use/events including use of the aquatic centre and performing arts and social events. The events are appropriately limited to school events and/or generally ancillary events commonly associated with schools. Any significant change to the makeup of events should be subject to some form of review and approval process. In this respect, Council recommends a facilitating condition of consent that allows the school to seek Council's endorsement of any major timetabling change on an as needs basis.

Visual and acoustic privacy

The proposal must not unreasonably impact on the amenity of surrounding residential properties and the public domain. The proposal must assess solar access, overshadowing, view loss on surrounding properties and the public domain. In addition acoustic impacts should be determined and mitigated to a reasonable level.

Light spill from RPAC building

The proposed RPAC building incorporates considerable glazing to the south elevation fronting MacPherson Street and east elevation adjacent to the residential flat building at 4 MacPherson Street. As the RPAC building is surrounded by low and medium density residential uses, consideration should be given to the amount of light spill from the proposed building into adjacent low and medium density residential areas. Of particular concern is the east elevation windows to the aquatic centre, which may have considerable light spill impacts that will undermine the residential amenity of adjacent units, particularly during early morning and evening hours.

Acoustic spill from RPAC building

Detailed acoustic conditions that are transparent, enforceable and reasonable should be imposed to protect the acoustic amenity of adjoining properties. Noise generated by any events in the Hall would likely not be an issue, as the space will be internally acoustically treated to keep road noise out – and therefore event noise in. However there is a likelihood that swimming events (which often include blowing whistles) may transmit noise to adjoining properties. Given the early starts associated with swimming classes and the weekend events associated with water polo and carnival activities, these are time sensitive issues when adjoining properties expect, reasonably, to enjoy a high level of acoustic

privacy. Conditions of consent to mitigated noise transmission (closed windows, acoustic treatments, hours of use) should be considered.

Conditions of consent should be imposed to mitigate noise transmissions (closed windows, acoustic treatments, hours of use) and ensure that appropriate hours of use are stipulated minimums amenity impacts on adjacent residential uses and the surrounding community.

Pedestrian access

The proposed changes to pedestrian access and management should be detailed and assessed. Changes to existing pedestrian access arrangement will have flow on impacts for traffic, vehicular access and parking at all of the sites frontages. The changes to pedestrian access arrangements should be detailed and incorporated into traffic, vehicular access and parking reports and assessments.

Construction management plan and construction vehicle plan of management

In the event the application is approved a condition of consent should be imposed requiring a detailed construction management plans for all stages of building works, and a construction vehicle plan of management which is to be forwarded to the Waverley Council Traffic Committee for review and input.

Waste minimisation and management

It is noted that the school has existing waste collection arrangements with Council and any changes to those arrangements should be identified and discussed with Council's waste management services. A condition of consent to this effect would suffice.

Building Code of Australia (BCA) and disabled access

All standard conditions of consent regarding compliance with the BCA, relevant disabled access legislation and standards should be included in the event the application is approved by The Department.

Conditions generally

Given that the remaining stages of after the RPAC building will likely return to Waverley Council as the consent authority for future Development Applications, it would be useful to have Council's standardised conditions of consent incorporated into any approval that is granted. A full copy of these will be made available to the DoPE and sent separately.

Attachment A – Tree referral

Impacts on Existing Trees and Vegetation

Approval is supported for the following tree works to be undertaken to trees within the subject property:

Based on a formal assessment, the following proposal can be approved in its current format.

- **Trees to be removed**

Species	Location	Action
4X Cinnamomum camphora	T8,T9,T10,T11	Remove
1x Archontophoenix cunninghamiana	T12	Remove

- **Trees to be retained and protected**

Species	Location	Action
Magnolia bullbay	T6	Protect & retain TPZ of 3 m on all sides.
Port Jackson Fig	T1	Protect & retain TPZ of 3 m on all sides.

*TPZ- Tree Protection Zone

TPZ – A 1.8m chain link wire fence or the like shall be erected around the above trees to be retained to protect them from damage during construction. Fencing is not to be removed until all building work has been completed. Fencing to be installed to the dimensions outlined in the table above.

Soil levels are not to be changed around any trees.

To prevent compaction within the root zone, excavation undertaken within the specified radius of the trunks of the following trees must be hand dug. Beyond this radius, mechanical excavation is permitted, when root pruning by hand along the perimeter line of such works is completed. Any hand excavation must be carried out in the presence of experienced Arborist/Horticulturist (with a minimum of the Horticulture Certificate or Tree Surgery Certificate).

If any tree roots are exposed during any approved works then roots smaller than 30mm are to be pruned as per the specifications below. Any roots greater than 30mm are to be assessed by a qualified arborist before any pruning is undertaken.

If tree roots are required to be removed for the purposes of constructing the approved works they shall be cut cleanly by hand, by an experienced Arborist/Horticulturist (with a minimum of the Horticulture Certificate or Tree Surgery Certificate).

It is the arborist's responsibility to determine if such root pruning is suitable. If there are any concerns regarding this process then Waverley Council's Tree Management Officer is to be contacted to make final determination.

If any trees on neighbouring properties require pruning then permission must be gained from the owner of the tree(s) and an Application to Prune or Remove Trees on Private Property is then to be presented to Council for processing.

- **Street Trees to be protected T22 to T 30**

Tree Protection

Precautions shall be taken when working near trees to ensure their retention, including the following:

- (a) Do not store harmful or bulk materials or spoil under or near trees;
- (b) Prevent damage to bark and root system;
- (c) Do not use mechanical methods to excavate within root zones;
- (d) Do not add or remove topsoil from under the drip line;
- (e) Do not compact ground under the drip line;
- (f) Do not mix or dispose of liquids within the drip line of the tree; and
- (g) All trees marked for retention must have a protective fence/guard placed around a nominated perimeter.

Attachment B - Heritage referral

Current Status

The existing campus is listed as an item of heritage significance in Waverley LEP 1996 – Schedule 6.

Proposed Development

Proposed works comprise master planning allowing for demolition of an existing hall, construction of additional accommodation, recreational facilities, car parking and disability compliant access together with amended landscaping. The Pre DA also covers the construction of Stages 1A and 1B of the master plan.

Comments

The need for a master plan has been demonstrated by recent repeat applications for expansion of the Campus and reconfiguration of existing structures.

- It is considered important that the master plan retain and enhance the original 1857 building at the core of the campus.
- As the existing campus contains a wide variety of structures, several by noted architectural practises, it is recommended that an inventory of buildings including age and designer together with photographic archival records of each be incorporated in the master planning and DA process. A detailed archival record of Jane Barker Hall should be provided prior to demolition.
- The sports precinct and particularly the pool are likely to have extended hours of use including possible use by swim groups such as those operating at The Cranbrook School. These are generally of low impact but consideration should be given to access, parking, signage and change facilities for such groups.
- The use of corner cross over points between buildings is noted in the master plan and considered a positive response to access and the avoidance of visually disruptive covered ways.
- Visual links between the open courts should be maintained as pocket glimpses enhancing the continuity of the campus and adding to the value of landscaping.
- High value boundary planting and walling both stone and brick should be maintained and extended to provide an interface with the street of notable quality to maintain privacy and limit impact of new works upon the setting.
- New Construction should be of a scale responding to surrounding structures with height limited at boundaries and buildings screened and setback to maintain neighbours amenity.
- New and existing entries should be clearly defined whilst maintaining the human scale and amenity of the existing entry.
- Where new works and alterations affect existing buildings by known architectural practises reference to these practises should be made for comment by the original designer.
- Management of traffic and waiting areas about each entry should be clarified in the design approach. This should include limitation of any proposed shelters and design of such in a manner cohesive to the existing campus.

Attachment C – Technical Services referral

New RPAC Car Park with Access off Macpherson Street

- (a) The vehicular access ramp should be either widened to allow for full two way operation or be fitted with an electronically operated traffic control system that will allow only one vehicle on the ramp at a time. The proposed ramp is suitable only for a single vehicle and there is potential for a driver entering the site to have to reverse out onto Macpherson St to make way for an exiting vehicle. Reversing onto Macpherson St at any time is unsatisfactory on traffic and pedestrian safety grounds;
- (b) The gradients and gradient changes on the ramp will need to be amended to comply with the requirements of AS 2890.1: 2004 - Off Street Car Parking; and
- (c) Sight distances requirements for drivers of vehicles exiting the carpark onto Macpherson Street will need to be improved to comply with the requirements of AS 2890.1: 2004 - Off Street Car Parking.

Service Vehicle Area

Service vehicles accessing the site off Albion Street will be required to enter and exit the site in a forward direction at all times. In this regard, the applicant will need to provide details of the type and size of service vehicles expected at the site and include details of their swept wheel paths and location and dimensions of the loading bay(s).

Waste Collection

Council currently collects waste and recyclable materials from the college via Leichhardt Lane. Council's Waste Supervisor informs trucks are reversed along Leichhardt Lane from Leichhardt Street before 7am with bins being emptied into the truck in the vicinity of the Ausgrid substation. As the truck is too large to travel around the bend in Leichhardt Lane to access the gates at the proposed bin store, the following will be required:

- (a) The bins will need to be wheeled by persons from the college to a suitable and second bin bay area within the site near the substation and wheeled back once being emptied; or
- (b) The bin storage area needs to be deleted from the location proposed and relocated so as to be in the vicinity of the substation.

The latter is preferred on resident amenity grounds.

Attachment D – Environmental Health referral

Hazardous materials audit

Prior to any demolition, assess the presence of structural and residual building materials that may be of environmental concern and hazardous materials that may have been used within the structural components of all buildings are adequately addressed to protect site personnel & surrounding properties from risk of exposure.

Asbestos removal

All demolition works involving the removal and disposal of asbestos cement must be undertaken by contractors who hold a current WorkCover Asbestos or “Demolition Licence” and a current WorkCover Class 2 (Restricted) Asbestos licence and removal must be carried out in accordance with National OH & S Commission Code of Practice for the Safe Removal of Asbestos.

Noise

There should be an acoustic report for proposed use of the whole site, including but not limited to the Performing Arts & Aquatic Centre, sporting facilities, food preparation areas, music rooms. All plant and equipment is to be in an acoustically treated plant room not on the roof. Noise management plan should be required for the construction site conditions and is to include mitigation measures for all aspects of works (demolition, excavation and construction).

Odours

Ensure no nuisance will arise from the proposal and complies with the Protection of the Environment Operations Act, 1997.

Mechanical Ventilation

Comply with BCA and Relevant Australian Standards including but not limited to, AS1668 1991

Microbial control

Any cooling towers and warm water systems must be installed, commissioned, operated and maintained in accordance with AS 3666 2002, the Public Health Act 2010 and the Public Health Regulation 2012.

Toilet Facilities and BCA

Complies with the BCA for sanitary facilities

Hot water scalding, mixer valves & warm water systems

Consideration needs to be made for the above

Soil & Water Management Plan

Also known as a Erosion and Sediment Control Plan shall be prepared according to SSROC’S Soil & Water Management Brochure and the NSW EPA Managing Urban Stormwater: Soils and Construction.