

Our ref: DA-384/2019
Your Ref: SSD-10352

24 July 2020

Planning and Assessment
NSW Department of Planning, Industry and Environment
GPO 39
SYDNEY NSW 2001

Attention: Director – Social and Infrastructure Assessments
C/- Mr Brent Devine
By email: brent.devine@planning.nsw.gov.au

Dear Director - Social and Infrastructure Assessments,

WAVERLEY COUNCIL SUBMISSION TO APPLICANTS RESPONSE TO SUBMISSIONS
State Significant Development Application (SSD-10352) for Moriah College Redevelopment
Queens Park Road, Queens Park
(Waverley Council Ref.: DA-384/2019)

Thank you for giving Waverley Council ("Council") the opportunity to respond to the applicant's Response to Submissions documentation for the State Significant Development ("SSD") Application, known as SSD-10352, for the proposed staged redevelopment of the Moriah College Campus in Queens Park.

This response identifies how well all issues raised in Council's comprehensive submission made to the Department on 22 January 2020 have been addressed. Please refer to commentary provided in the table in this submission.

Issue raised by Council	Applicant's Response	Has the Issue been Addressed?
1. Traffic and Transport		
a. Increase of drop off and pick up (DOPU) activities is the principal point of objection.	Travel demand management measures to be implemented to reduce school car use by 10%.	Somewhat addressed. Greater details are required on how the modal shift targets outlined in the Green Travel Plan will be measured and implemented to support growth in student and staff capacity.
b. A proactive approach to encouraging greater public transport patronage and green travel modes.	An amended Green Travel Plan prepared, which includes measures such as a 'learn to ride' program and an additional shuttle bus service between Bondi Junction and the Collage	Addressed. Additional bicycle parking supported. A condition of consent is recommended to ensure these spaces are demarcated on the architectural plans.

Issue raised by Council	Applicant's Response	Has the Issue been Addressed?
<p>c. Growth of school population not supported if there will be additional impact on traffic and parking demands on the surrounding road network.</p> <p>d. Population increase should be staggered and be gradual.</p>	<p>Stagger increase of student population to the year 2036.</p>	<p>Somewhat addressed. A condition of consent is recommended to stagger the increase of school population up to the year 2036 and subject to satisfactory implementation of the Green Travel Plan.</p>
<p>e. A revised questionnaire/study on travel trends is recommended to achieve a minimum response rate of 80%.</p>	<p>A response rate of 62% achieved, which is considered adequate. No further questionnaire/study will be undertaken.</p>	<p>Satisfactory.</p>
<p>f. A dedicated Green Travel Plan required.</p>	<p>An amended Green Travel Plan has been provided (as a standalone document and separate from the overall traffic impact assessment report).</p>	<p>Addressed.</p>
<p>g. Bicycle parking should be more than minimum rate.</p>	<p>An addition of 52 bicycle parking spaces, to a total of 160.</p>	<p>Addressed. A condition of consent is recommended to ensure these spaces are demarcated on the architectural plans and designed to be secured and to relevant Australian Standards.</p>
<p>h. Ample locker or storage areas within the new STEAM building to reduce DOPU for secondary students.</p>	<p>Amended design accommodates placement of 500 lockers across Stages 1 and 2 buildings. Architectural plans annotate where lockers will be provided. Existing student locker provision is 1 locker per student. Size of lockers allows for short term storage of sport, clothing and school book items. The provision of 1 locker per student rate will be maintained.</p>	<p>Addressed.</p>
<p>i. Increase AM bus travel mode share in consultation with Council and STA.</p>	<p>Mayor of Waverley convening this consultation.</p>	<p>Noted. The submission is from Council's staff and is independent of Councillors.</p>

j. Increased shuttle bus services between Bondi Junction and the College.	The Green Travel Plan identifies additional shuttle bus services as part of a suite of measures to encourage more sustainable travel uses.	Somewhat addressed. Lack of details about scheduling and provision (number and capacity per day) provided in the Green Travel Plan, other than a 'time scale' in the year 2023/2024.
k. Road and intersection upgrades supported with recommended changes.	Recommended changes noted and adopted.	Addressed.
l. Local Area Traffic Management (LATM) measures to be encouraged for residential streets of Queens Park.	Traffic on surrounding road network cannot be directly attributed to the College. Onus is on Council to implement LATM.	Noted. Council has met with residents of Queens Park to consider LATM for future implementation.
m. Pedestrian traffic conflict as result of new slip lane at the York Road and Baronga Avenue intersection.	Slip lane not expected to affect or conflict with pedestrian traffic. Measures to encourage use of Queens Park shared path to access the school via Baronga Avenue.	Addressed.
2. Built Form and Urban Design		
a. Visual and overshadowing impacts of the STEAM building upon Queens Park and Centennial Park	<p>Building height of Stage 1/STEAM building has been reduced (between 100mm and 370mm) and the Baronga Avenue (eastern) setback of the uppermost floor level increased. These building envelope reductions have lessened the overshadowing impact on Queens Park.</p> <p>Stage 2 ELC building envelope has been reduced to ensure no overshadowing of the Eastern Suburbs Banksia Scrub.</p>	Partially addressed. The lessening of the overshadowing impact of the Eastern Suburbs Banksia Scrub is welcomed. Council's Heritage Advisor is still not satisfied, from a visual impact and curtilage perspective, that the overall building height of the series of new buildings extends above the established tree canopy within the Queens Park and Centennial Park surrounds. Further, the new street/boundary walls to the site present as solid 4 to 5m high walls which dominant the presentation of the site to the streetscape. Council's preference is for lower street walls that incorporate landscaping into the design (particularly where greater

		security is desired), to reduce the dominance and soften the visual presentation to the streetscape. Note: The elevation plans submitted provide limited detail on boundary fencing.
<p>b. Built form and urban design change recommendations relating to:</p> <ul style="list-style-type: none"> i. Greater street setback of top level ii. Greater articulation across street façade of the buildings iii. High sound absorption materials iv. Security wall integrated into existing landscaped retaining wall 	The amended design of the STEAM has adopted the design change recommendations relating to setback, articulation, materiality and security wall/fence.	Partially addressed. Council's Heritage Advisor is concerned with the predominance of hard surfaces, metal fencing, security lighting and CCTV cameras. These elements need to be substantially mitigated by detailed tree and screen planting cohesive with the established planting of the visually related Centennial Parklands, including the Eastern Suburbs Banksia Scrub to the west.
3. Heritage		
i. Reorientate the Stage 1/STEAM building to an east-west alignment.	Urban design options were explored during the design development of the STEAM building, which have been discussed in an urban design response that is part of the SSD application.	Partially addressed. Council's Heritage Advisor has suggested that the building identified as 'Stage 1b' could be readily rotated 90 degrees to extend west from Stage 1b and erected partially over existing vehicle hardstands and the through pedestrian way leading to the central campus area. This approach should still be explored.
ii. Reduce the apparent bulk of Stage 1 building.	A greater front setback of the top fourth floor level provided to the Stage 1/STEAM building. Further landscaping provided.	Addressed.
4. Operational and Event Management		
a. Map of Campus included in Plan of Management (PoM).	Map of campus included in amended PoM.	Addressed.
b. Moriah College Consultative Committee (MCCC) not	Terms and constitution of the MCCC have been amended to this effect.	Addressed.

necessarily always involve Council.		
c. Certain 'out of core' activities not normally ancillary to school use and/or its time/duration extend past 10pm.	Activity No. 53 'Year K-2 Sausage Sizzle and Movie Night' is ancillary to the school use and is for students, parents and staff. All other activities will conclude by 10pm.	Partially addressed. Council has not and will not endorse activities No. 53 'Year K-2 Sausage Sizzle and Movie Night', No 63 'Moriah College Community Celebrations', and No 86 'Jewish Community /Organisation Events' as 'ancillary' activities and these should not be approved in the PoM.
d. Maximum capacity of the Early Learning Centre (ELC) restricted to 80 students (as enforced by development consent DA-163/2017).	The SSD seeks approval for a future ELC at Stage 2 with a capacity of 130 students and the EIS and RTS have considered the potential impacts of the increase of ELC student numbers.	Addressed. A condition of consent is recommended regarding overall student population growth, including a breakdown of various aspects of the College.
5. Tree Management and Biodiversity Impacts		
a. A condition be adopted to ensure trees to be retained are adequately protected.	Agreeable to a condition being imposed in this regard.	Addressed. Relevant conditions recommended.
b. An updated Vegetation Management Plan (VMP) required to effectively manage the Eastern Suburbs Banksia Scrub. The landscape plan is also inadequate.	An updated VMP has been prepared and submitted. The landscaped plan has been amended to greater diversity and quantity of local native plants.	Partially addressed. Conditions of consent are recommended to ensure the landscape plan provides for at least 90% native plants. A further condition is required to amend the content of VMP to be more robust.
6. Land Contamination		
NSW EPA Accredited Site Auditor required to be engaged to provide either: i. A Site Audit Statement ii. Interim Advice. This is to conclusively demonstrate if the site is suitable for its intended use.	The Phase 1 Preliminary Site Investigation concluded "no contamination which would preclude the redevelopment of the site has been identified". A detailed soil assessment will be undertaken once exiting site buildings have been fully demolished and a condition of consent is requested in this regard.	Addressed. The applicant's suggested condition of consent is recommended to be imposed.
7. Noise Impacts		

a. A detailed acoustic report addressing noise from use of mechanical plant.	Agreeable to a condition being imposed to give effect to this requirement.	Addressed. A condition of consent is recommended to this effect.
b. A detailed acoustic report addressing noise from public address and use of school bell system.	Agreeable to a condition being imposed to give effect to this requirement.	Addressed. A condition of consent is recommended to this effect.
c. Compliance testing required for noise emissions from the lecture theatre.	Agreeable to a condition being imposed to give effect to this requirement.	Addressed. A condition of consent is recommended to this effect.
d. A detailed construction noise management plan required.	Agreeable to a condition being imposed to give effect to this requirement.	Addressed. A condition of consent is recommended to this effect.
8. Ecologically Sustainable Development Measures and Commitments		
A specific Energy Assessment Report should be prepared to demonstrate the project will deliver a development with emissions that are 30% less than a baseline building.	The ESD initially submitted with the SSD addresses ESD measures and commitments.	<i>Not</i> addressed. A condition of consent is recommended to overcome this matter.
9. Stormwater and Infiltration		
Stormwater plans accord with Council's <i>Waste Management Technical Manual July 2014</i> .	Agreeable to a condition being imposed ensuring certification from a hydraulics engineer is provided prior to the issue of an occupation certificate.	Addressed. A condition of consent is recommended to this effect.
10. Waste and Recycling Management		
The Operational, Construction and Demolition Waste Management Plan, known as a Site Waste Recycling Management Plan (SWRMP) in Council's terms, is insufficient.	Council's SWRMP Template does not relate to educational establishments. Private contractors will be engaged for waste and recycling collection.	<i>Not</i> addressed. A standard condition of consent for waste management is recommended to address this deficiency.
11. National Construction Code (NCC) and Fire Safety Considerations		
NCC and fire safety measures be implemented in the development.	Agreed to imposition of condition in this regard.	Addressed. Relevant conditions recommended.
12. Impacts on The Surrounding Existing Public Domain and Opportunities for Improvements		
Recommended upgrades of footpath, kerb and gutter, street lighting and other public domain aspects.	Section 7.11 contributions payable will go towards any public domain upgrade works in the area.	<i>Not</i> addressed. Specific public domain improvements are recommended to be implemented by way of conditions of consent.

A full set of Council-written conditions of consent is provided in **Attachment A** of this response. Should the Department resolve to support the application, it is recommended these conditions be imposed on any consent granted to the SSD application.

Should you require any further information, please do not hesitate to contact Ben Magistrale, Senior Development Assessment Planner, by email ben.magistrale@waverley.nsw.gov.au.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Peter Monks', is positioned above the printed name.

Peter Monks
Director, Planning, Environment and Regulatory
Waverley Council