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SUPPLEMENTARY RESPONSE TO SUBMISSIONS SSD 10352

Moriah College
Staged Redevelopment

Prepared for
MORIAH COLLEGE
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1. INTRODUCTION

1.1. OVERVIEW

This Supplementary Response to Submissions (SRtS) report has been prepared to respond to the community and agency submissions received during the public exhibition of the Response to Submissions (RtS) and amended proposal accompanying State Significant Development Application 10352 (SSDA) for the redevelopment of the Moriah College Queens Park Campus, at Queens Park Road, Queens Park (the site).

The RtS and amended proposal concluded public exhibition on 20 July 2020. A total of 41 submissions were received from state and local government agencies, authorities, and members of the public, as follows:

- **Public Submissions**: 37 received
- **Organisation Submissions**: Queens Park Residents and Centennial Park and Moore Park Trust
- **Agency Submissions**: the following public agencies prepared a submission commenting on the RtS and amended proposal
  - Environment, Energy and Science Group
  - Heritage Council of NSW
  - Randwick City Council
  - Transport for NSW/Roads and Maritime Services NSW
  - Waverly Council.

Correspondence was received on 27 July 2020 from the NSW Department of Planning, Industry and Environment (DPIE) requesting that the proponent provide a written response to the issues raised in the submissions, as well as a response to the further matters identified by DPIE in their assessment of the amended application. These matters relate to:

- Provide updated photomontages from selected viewpoints
- Confirmation as to whether the applicant intends to surrender any of the existing development consents previously granted by Waverley Council that apply to the site
- Confirm that certain trees are to be retained as part of the amended proposal
- Detail the proposed security and traffic management measures and procedures to manage the vehicles entering the new drop-off and pick-up area at Gate 4 from York Road
- Undertake further traffic modelling at key intersections analysis for the school AM and PM peak periods
- The vegetation management plan is to be amended to ensure that the development does not impact on the Eastern Sydney Banksia Scrub (ESBS) community.

This report provides a comprehensive response to the matters identified by DPIE and the issues raised in the submissions received and additional justification and technical information has been provided where required.

In accordance with Section 55 of the *Environmental Planning and Assessment Regulation 2000*, the applicant seeks minor amendments to the Proposal. The amendments sought are to align the vehicular hardstand area of the proposal to accommodate a 3-10m landscape buffer zone to the Eastern Suburbs Banksia Scrub (ESBS) area adjoining the site in accordance with the consent conditions stipulated by LD 282/00. No amendments are proposed to the built form of the Stage 1 STEAM building, and the Stage 2 ELC building envelope as submitted with the RtS.

1.2. STRUCTURE OF THIS REPORT

This SRtS report is structured as follows:

- **Section 2 – DPIE Request for Supplementary Response to Submissions**: Provides a response to key issues raised following the exhibition of the RtS and amended proposal from DPIE, as outlined in correspondence received 27 July 2020.
- **Section 3 – Supplementary Response to Submissions**: Provides a detailed response to key issues raised by the various agencies, organisation, and the public in each submission received.
- **Section 4 – Conclusion**.

1.3. SUPPORTING DOCUMENTATION

This SRtS is supported by the following technical studies provided in the appendices of this report. This information is intended to supersede and/or supplement those originally lodged in November 2019. All other consultant reports remain unchanged from the original Environmental Impact Statement lodgement and can be found on the DPIE website.

Table 1 Amended Supporting Documentation

Document	Consultant	Appendix
Staging Plans	*FJMT*	**Appendix A1**
Alterations to the Existing Early Learning Centre	*FJMT*	**Appendix A2**
Amended Transport Impact Assessment	*The Transport Planning Partnership*	**Appendix B**
Visual Impact Assessment Addendum	*Cardno*	**Appendix C**
Amended Biodiversity Development Assessment Report	*Cumberland Ecology*	**Appendix D**
Amended Vegetation Management Plan	*Cumberland Ecology*	**Appendix E**
Amended Landscape Plans	*360*	**Appendix F**

2. AMENDED PROPOSAL

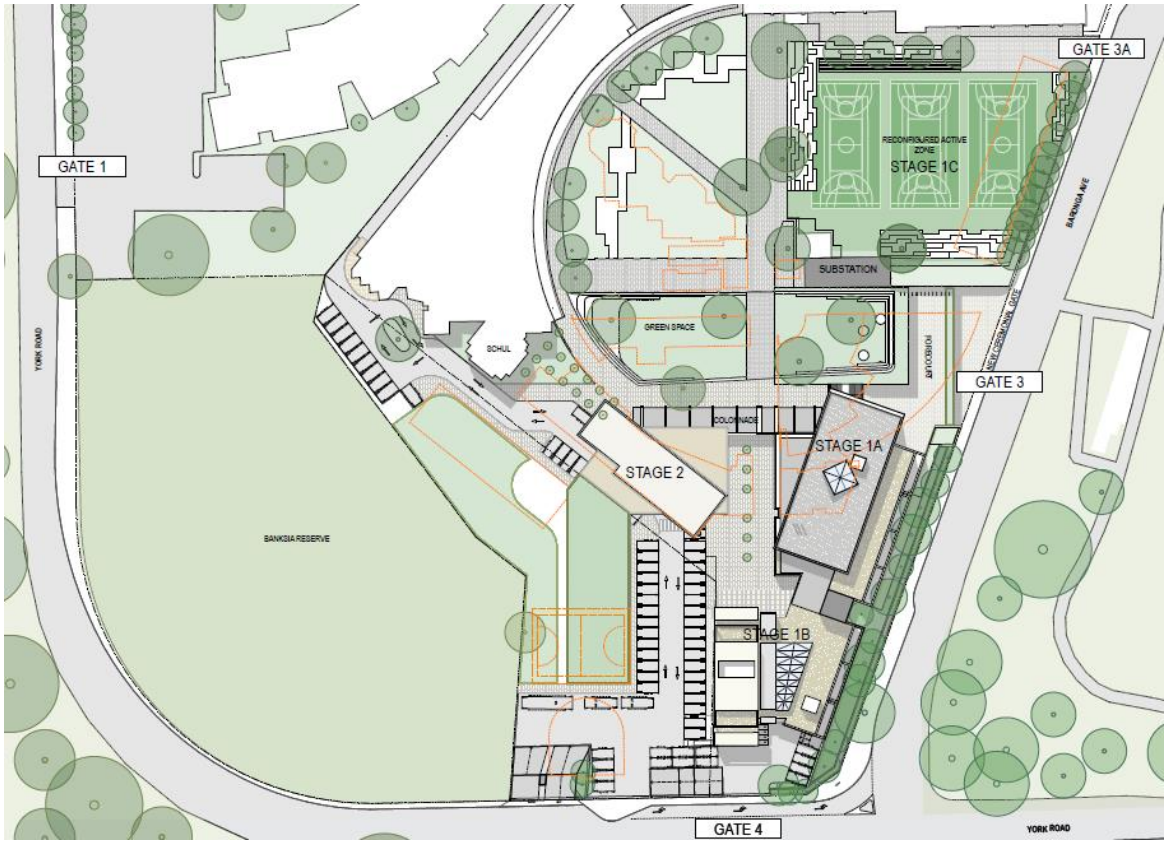
2.1. KEY AMENDMENTS TO THE PROPOSAL

In accordance with Section 55 of the *Environmental Planning and Assessment Regulation 2000*, the Applicant seeks to make minor amendments to the proposal. The amendments sought are to align the vehicular hardstand area of the proposal to accommodate a 3-10m landscape buffer zone to the ESBS area adjoining the site in accordance with the consent conditions stipulated by LD 282/00 and EPBC 2002/575 (shaded in blue in **Figure 1**). Specifically, the following amendments are proposed:

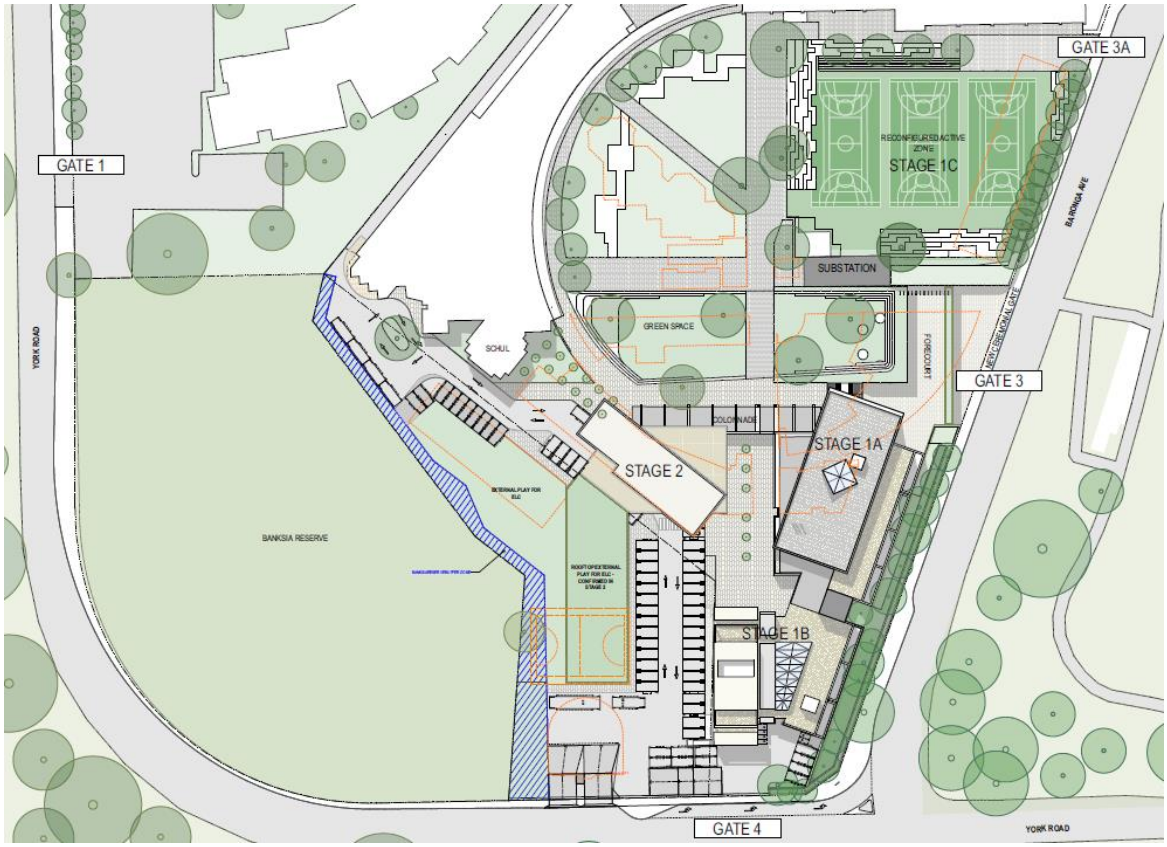
- The vehicular ingress/egress point at York Road (Gate 4) has been shifted approximately 9m east to accommodate the landscape buffer zone.
- The vehicular parking area located to the north west of the existing Early Learning Centre (ELC) has been reconfigured from horizontal parking bays to parallel parking and shifted approximately 3m east to accommodate the landscape buffer zone.
- A 3-10m landscape buffer has been established along the site's western boundary to the ESBS area on Lot 23. To ensure that this buffer can be established at the commencement of Stage 1 of the development, minor alterations are proposed to the existing ELC outdoor play space to remove built form from within the landscape buffer area prior to the complete demolition of the ELC to accommodate Stage 2 of the development.
- Minor amendments proposed to the site landscaping planting strategy to incorporate ESBS species throughout the site where appropriate.

No amendments are proposed to the built form of the Stage 1 STEAM building, and the Stage 2 ELC building envelope as submitted with the RtS.

Figure 1 Comparison Between the Stage 2 Plan Submitted with the RtS and Amended by this SRtS



Picture 1 Stage 2 Complete Plan - Submitted with the RtS

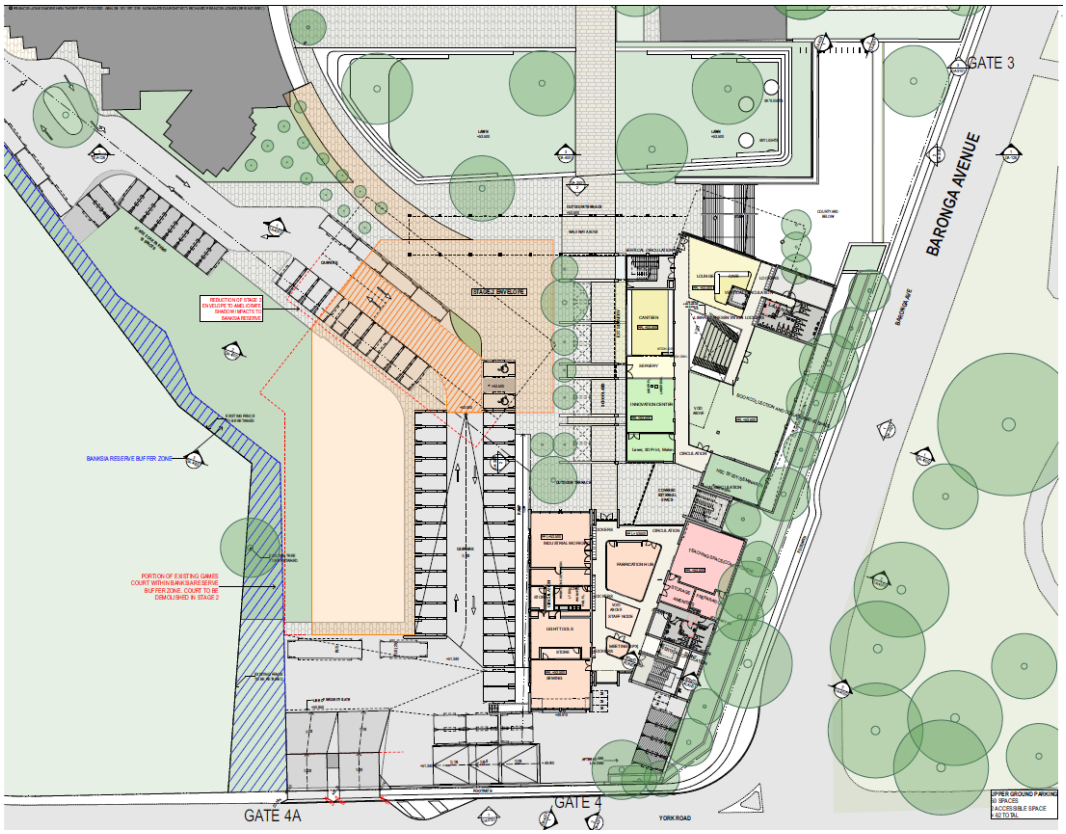


Picture 2 Stage 2 Complete Plan - Amended by this SRtS

Source: FJMT

Figure 2 Comparison Between the Upper Ground Floor Arrangement Plan Submitted with the RtS and Amended by This SRtS

Picture 3 Upper Ground Floor Arrangement Plan – Submitted with the RtS



Picture 4 Upper Ground Floor Arrangement Plan – Amended by this SRtS

Source: FJMT

2.2. BUFFER ZONE TO THE BANKSIA RESERVE AREA

The proposal has been amended to accommodate a 3-10m landscape buffer zone along the western boundary of the site to the ESBS area located on Lot 23. The buffer zone is to be reinstated in accordance with the consent conditions stipulated by LD 282/00 granted by Waverley Council on 22 May 2001 and EPBC 2002/575 granted by the Commonwealth Minister for the Environment and Heritage on 25 October 2002.

The conditions of approval required:

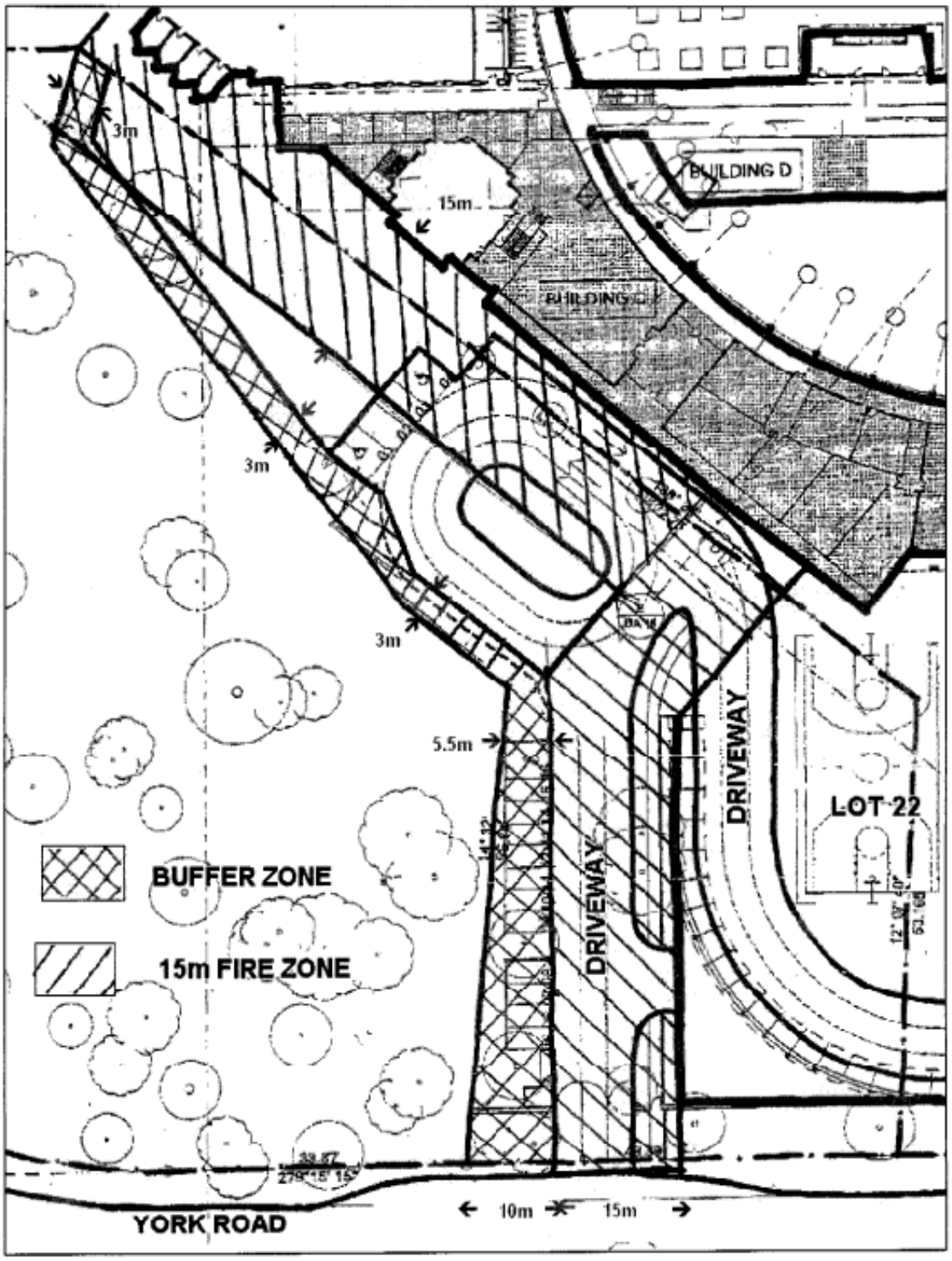
- Rehabilitation of ESBS (either on Lot 23 or an “area of equivalent size and condition”), governed by an approved vegetation management plan.
- Provision in Lot 22 along the boundary with Lot 23 of a vegetated buffer zone as shown on the map (Annexure 2 of the approval – extract provided at Figure 3).
- Measures to prevent grass from landscaped other parts of Lot 22 entering the buffer zone.
- Fencing along the common boundary of Lots 23 and 22, the construction of which was to avoid impact on ESBS mature tree and shrub species (other than *Leptospermun laevigatum*) on Lot 23.
- No structures to be erected on Lot 22 that will cast shadow onto Lot 23.

As part of these approvals, a Memorandum of Understanding was established between Moriah College and the Centennial Park and Moore Park Trust for weed management, protection and enhancement works in the Lot 23 lands. This work was undertaken between 2004 and 2009.

It is understood the required buffer zone was established in accordance with the conditions of approval. However, overtime that buffer zone has been impacted by various structures and hard surfaces associated with the existing ELC and Astro turf playing fields.

The development consents for the ELC (DA-163/2017 and DA-71/2018) were granted without apparent knowledge of — or consideration of — the buffer requirement under EPBC 2002/575). Consequently, it is proposed (as part of the Stage 1 early works) to reinstate the required buffer zone to the configuration, width and condition required by these prior approvals, including removal of encroaching structures and hard surfaces.

Figure 3 – Required vegetated buffer zone – Annexure 2 of EPBC 2002/575



To ensure that the buffer zone can be established at the commencement of the Stage 1 early works, minor alterations are proposed to the existing ELC and Astro turf playing field to remove built form from within the buffer area prior to the complete demolition of the ELC to accommodate Stage 2 of the development (refer Figure 4). Alterations include:

- Existing timber deck to be altered and reduced in size to accompany the buffer zone
- Shade structure to be altered and moved 3.5m north east
- Open space area reduced in size to accommodate the buffer zone
- Existing Astro turf area to be reduced in size to accommodate the buffer zone.

To avoid any apparent inconsistency between SSD 10352 and the ELC development consents (DA-163/2017 and DA-71/2018), it is proposed (under the new consent) that DA-71/2018 be modified in accordance with section 4.17(1)(b) of the *Environmental Planning and Assessment Act 1979.* The modification must be effected prior to the issue of a construction certificate under the new consent.

Figure 4 Proposed External Alterations to the Existing ELC

Source: FJMT

2.3. AMENDED LANDSCAPING STRATEGY

Amended Landscape Drawings accompany this SRtS at **Appendix F**. The landscaping strategy has been amended to accommodate the establishment of a 3-10m landscape buffer along the site's western boundary, as well as incorporate ESBS species throughout the site where appropriate (refer Figure 5).

Note: planting across the site cannot be restricted to only ESBS species due to:

- ESBS species primarily comprise low wooded shrubs and therefore do not provide mature canopy cover required for functional educational open space areas.
- The need to provide cultural planting across the site in accordance with the School's requirements.
- The requirement to propose a planting across the site that can be readily maintained throughout the operational phase of the development.
- The relative commercial unavailability of ESBS species.

The amendments have resulted in an overall increase in the total landscape coverage, canopy cover, and new trees across the site as outlined in Table 2. There has also been a minor reduction in overall play space due to the incorporation of the landscape buffer zone.

Table 2 Comparison Between the RtS and this SRtS – Landscaping Analysis

Aspect	Stage	RtS	SRtS	Change
Canopy Cover	Stage 1	6,640m^2 (26%)	10,122m^2 (39%)	+3,482m^2
	Stage 2	8,000m^2 (31%)	11,095m^2 (43%)	+3,095m^2
Landscape Area	Stage 1	4,590m^2 (18%)	5,245m^2 (20%)	+655m^2
	Stage 2	5,665m^2 (22%)	6,390m^2 (25%)	+725m^2
New Trees	Stage 1	96	109	+13
	Stage 2	112	121	+9
Open Space (Play Space)	Stage 1	14,580m^2 (56%)	13,740m^2 (54%)	-840m^2
	Stage 2	13,280m^2 (51%)	13,070m^2 (51%)	-210m^2

Figure 5 Comparison Between the Landscape Planting Plan Submitted with the RtS and Amended by this SRtS

Picture 5 Planting Plan Submitted with the RtS

Source: 360

Picture 6 Planting Plan Amended by this SRtS

Source: 360

2.4. AMENDED VEGETATION MANAGEMENT PLAN

An amended Vegetation Management Plan (VMP) accompanies the SRtS at **Appendix E**.

The amended VMP removes all reference to Lot 23, which is under the ownership of Centennial Park and Moore Park Trust and subject to an existing Vegetation Management Plan (dated November 2018) covering the remnant patches of Eastern Suburbs Banksia Scrub within Centennial Park, Queens Park and York Road (Banksia Reserve VMP).

The amended VMP seeks to link to, be consistent with, and complement measures for the management of the ESBS that have been prescribed in the Banksia Reserve VMP, due to the proximity of the Moriah College VMP area to already managed ESBS in the adjoining Lot 23.

The amended VMP submitted with this SRtS creates two separate management zones within the Moriah College site (refer Figure 6), including:

- Zone 1 – Remnant ESBS (highlighted in green below)
- Zone 2: Buffer Area (highlighted in yellow below).

Specific objectives and actions are proposed for each zone.

Due to the condition of the vegetation within zone 1, regeneration strategies are required in order to improve the condition of the ESBS. However, consistent with the Banksia Reserve VMP, no re-vegetation practises are proposed within the existing ESBS of the VMP Area. Re-vegetation practises are proposed only for Zone 2 with species consistent with ESBS and weed control activities will be carried out to assist regeneration of native plantings.

Figure 6 Amended VMP Site Plan

Source: Cumberland Ecology

3. DEPARTMENT OF PLANNING INDUSTRY AND ENVIRONMENT PRELIMINARY ASSESSMENT

The following Section provides a response to key issues raised following the exhibition of the Response to Submissions and amended proposal from the NSW DPIE, as outlined in correspondence received 27 July 2020.

In addition, on 22 September 2020 the applicant was informed that DPIE had engaged an independent traffic consultant to undertake a peer review of the SIDRA modelling and results presented in the Amended Transport and Accessibility Impact Assessment (dated June 2020). A full response to matters raised in the independent assessment is provided at **Appendix B**, a summary of which is provided at **Section 3.2**.

For ease of reference the key issues raised have been repeated verbatim in *italics.*

3.1. TRAFFIC AND CAR PARKING

Issue: *Detail the proposed security measures and procedures to manage the vehicles entering the new drop-off and pick-up area at Gate 4 from York Road.*

Further to the point above, provide details of any traffic management measures proposed as part of the development to ensure that queuing along York Road does not occur from the security measures and procedures carried out at Gate 4.

Response: As detailed in the Transport and Accessibility Impact Assessment (TAIA) the following security measures and procedures are proposed to manage vehicles entering the new drop-off and pick-up area at Gate 4:

- All parents dropping off and/or picking up their child at the College are required to display a pre-registered designated “number” on their vehicle to access the drop-off/pick-up areas.
- At drop-off/pick-up times, the security gate will be in the open position as to reduce the impact on York road from queuing cars.
- Cars will enter the driveway and have their driver visor down and name/number label visible identifying the family name of the child(ren) they are collecting.
- The security guard positioned at the driveway gate will usher through all permitted vehicles to enter the drop-off/pick-up ‘go with the flow’ queue.
- If a car that is not permitted to enter the school is in the queue, they will be turned around with a U-turn before entering the school premises and exit onto York Road.
- Outside of drop-off/pick-up times, the gate will be closed and will open when the driver is cleared for entry by the security guard positioned at the driveway gate.
- The Gate 4 security gate has been setback to allow a car to turn around wholly within the site when the gate is closed instead of doing a reverse movement onto York Road.

These traffic management measures are detailed in the Transport, Traffic and Parking Plan, which was submitted at Appendix CC to the EIS and are consistent with the existing Junior School drop-off/pick-up arrangement at Gate 1.

Issue: *Update Tables 7.10 and 7.11 of the Transport and Accessibility Impact Assessment (TAIA) (submitted at Appendix C1 of the RtS) to include the following traffic data and intersection analysis for the school AM and PM peak periods (i.e. additional columns):*

- *Stage 1 with intersection upgrades (with no modal shift).*
- *Stage 1 with intersection upgrades and modal shift.*
- *Stage 1 and Stage 2 with intersection upgrades (with no modal shift).*

Response: Tables 9 – 12 of the TAIA have been updated accordingly (refer **Appendix B**). A summary of the updated SIDRA assessment is presented in **Section 3.2** below.

Issue: *Update the TAIA to accurately reflect the total number of existing on-site car parking spaces currently provided for school staff and visitors. Table 2.2 at Section 2.4.2 of the TAIA currently includes the provision of four motorcycle spaces and two buckle-up bay spaces, which should be excluded from the total number of available parking spaces.*

Response: Table 2.2 of the TAIA has been updated to identify the four motorcycle and buckle up bays as "Other Parking Spaces excluded from the total available parking spaces (refer **Appendix B**).

Issue: *Update any reference to on-site car parking spaces in the TAIA considering the total number of existing on-site car parking spaces currently provided for school staff and visitors. In particular, the Parking Assessment at Section 6 should be amended to ensure the car parking provisions and assumptions are accurate.*

Response: The car parking assessment at Section 6 of the TAIA accurately reflects the total number of existing on-site car parking spaces currently provided for school staff and visitors (refer **Appendix B**).

3.2. RESPONSE TO INDEPENDENT TRAFFIC ASSESSMENT

On 22 September 2020, DPIE provided the following request for additional traffic information, following review of the TAIA (dated June 2020) by an independent traffic consultant:

1. *Please provide evidence of model calibration and validation to real life conditions to ensure confidence in a robust Existing Base model.*

A calibration report has been prepared documenting the methodology undertaken in developing the existing base model. The calibration report is presented in Attachment One of **Appendix B**.

2. *A Base scenario was prepared for existing year, 2023, 2030 and 2036. Future background growth rates were based on predictions extracted from the RMS Strategic Traffic Forecasting Model. Upon review of the provided SIDRA models, it is noted that some volumes remained unchanged at Queens Park Road / Baronga Avenue. The west approach volumes on Queens Park Road show no growth between existing, 2023, 2030 and 2036 base scenarios. Additionally, the south approach volumes on Baronga Avenue remain consistent between 2023, 2030 and 2036 base scenarios.*

   Please clarify the adopted background growth rates for the modelled network.

Traffic growth rates used in developing the future base models were based on the 2018-2026 Strategic Traffic Forecasting Model (STFM) plots received from Roads and Maritime Services on 15 August 2019. Latest STFM growth plots have been requested which have be adopted in the updated SIDRA modelling.

Similar to the method used in the June 2020 TIA report, the growth rates have been applied to the background traffic model only (i.e. excluding estimated existing school traffic generation). Where the net difference resulted to negative figure (i.e. York Road left turn to Baronga Avenue), the background traffic in this movement is estimated to be zero which indicates that this movement is generally generated by the existing school traffic.

3. *The scope of the modelled road network is limited to the three (3) main intersections located near the school – these intersections should not be modelled in isolation. The York Road / Darley Road intersection is noted to affect the performance of the York Road / Baronga Avenue intersection, with downstream blockages causing a significant pushback of the queue. This has not been considered in the modelling, which consequently shows uninterrupted eastbound flow on York Road and is not representative of the existing peak period traffic conditions.*

   Also, the pedestrian crossing at the mid-point of Baronga Avenue has not been modelled in SIDRA. Given the proximity of the crossing to the school gate (Gate 3), it is frequently used during peak hour periods. Vehicles are currently required to stop to allow pedestrians to cross, with queues propagating towards Queens Park Road to the north and York Road to the south. This reduces the available capacity of the road and affects performance at the respective intersections.

   The scope of modelling should be widened to also include: Darley Road / York Road traffic signals and Pedestrian Crossing (Zebra) on Baronga Avenue.

Additional traffic surveys were undertaken on 22 October 2020 from 7am to 9am and from 2pm to 4pm at the following locations (refer Figure 7):

- Classified vehicle and pedestrian counts at the following intersections:
  - York Road-Darley Road-Avoca Street
  - York Road-Baronga Avenue
- Pedestrian crossing movements at the following locations
  - Baronga Avenue zebra crossing
  - Queens Park Road zebra crossing

Figure 7 Additional Survey Locations

Source: TTPP

York Road-Baronga Avenue intersection was included in the survey scope to compare traffic volume differences due to impacts of COVID-19 and HSC exams. A comparison between May 2019 and October 2020 traffic volumes at York Road-Baronga Avenue intersection confirms that there is no adverse decrease in traffic volumes between the two time periods.

SIDRA modelling has been updated to include York Road-Darley Road-Avoca Street intersection and zebra crossings at Baronga Avenue and Queens Park Road. The model has been assessed as a network to determine impacts of the signals and queue at York Road-Darley Road-Avoca Street and pedestrian movements at nominated crossing locations.

4. *York Road (West) has been modelled as two approach lanes: a through-lane and a short 45m left turn lane into Baronga Avenue. However, there is no existing line-marking at this intersection delineating two turning lanes. The lane is observed to be around 5.3m wide at the intersection, as measured from Nearmap satellite imagery which does not allow safe adequate width for two side-by-side lanes. Accordingly, the intersection model does not reflect the actual intersection operation. The modelling is expected to show greater delays compared to reality for the right turn from York Road into Baronga Avenue.*

   The York Road / Baronga Avenue geometry should be adjusted to remove short turning lane on west approach – otherwise, provide evidence of road utilisation in this manner.

The intersection of York Road and Baronga Avenue for the existing and future base models has been updated to remove the short left turn lane on York Road west approach. The model has been recalibrated to suit observed queue lengths as documented in the attached calibration report.

5. *Model intersections together with SIDRA Network to replicate the effects of queue pushback and present the modelling results for each intersection on a by-Approach basis to ensure greater clarity of information.*

The model has been assessed as a network to determine impacts of the signals and queue at York Road-Avoca Street-Darley Road and pedestrian movements at nominated crossing locations.

6. *Clarify the adopted traffic distribution for development-generated traffic.*

As part of the travel questionnaire survey, staff and students were asked where they currently reside. The responses from car users have been assessed to determine the likely routes that they take to travel to/from the school.

It is noted that the June 2020 only included the top 20 responses from the survey. The trip distribution has been further refined to include all responses (refer **Appendix B**).

7. *Prepare a 2036 Ultimate + Improvements scenario to demonstrate future intersection performance where aspirational mode shift targets (i.e. 10% shift) are not met.*

The requested additional scenario has been included in the amended TAIA (refer **Appendix B**).

8. *Consider preparing 2023 Stage 1 + Improvements and 2030 Stage 2 + Improvements scenarios to inform required staging of upgrades.*

The proposed roadworks will be undertaken as part of the Stage 1 works. The requested additional scenarios have been included in the amended TAIA (refer **Appendix B**).

SIDRA Traffic Modelling Results

The updated SIDRA modelling results are presented in the amended TAIA at **Appendix B** and summarised as follows:

Stage 1:

- Stage 1 development scenario results indicate that the proposed upgrades would be sufficient to cater the future background growth and additional Stage 1 development trips, even without the modal shift.
- With the proposed intersection upgrades, the key intersections would operate satisfactorily with LoS A or B, with the exception of York Road-Darley Road-Avoca Street intersection.
- With modal shift alone (i.e. no intersection upgrades), York Road-Queens Park Road and York Road-Baronga Avenue intersections would still operate above their theoretical capacities in the morning and afternoon peak periods, respectively.

Stage 1 and 2:

- The intersection of York Road-Queens Park Road would operate at LoS A in both peak periods with the proposed intersection upgrades even with the additional combined trips of Stage 1 and Stage 2.
- Providing the intersection upgrades alone (i.e. no modal shift) would still result to York Road-Baronga Avenue intersection operating above its capacity for both peak periods.

- With the additional improvement associated with the modal shift, York Road-Baronga Avenue intersection would operate at LoS B in the morning peak.
- It is noted that York Road-Baronga Avenue intersection would still be performing at LoS F in the afternoon peak even with the proposed upgrades and modal shift. High delays at this intersection are from the left-turn movements from Baronga Avenue which is caused by the upstream congestion generating from York Road-Darley Road-Avoca Street.

Ultimate Development:

- Intersection upgrades would be required at York Road-Queens Park road intersection for it to operate satisfactorily even with the combined additional trips from the three development stages.
- Although there would be significant improvement in the delays at York Road-Baronga Avenue intersection due to the combined improvement from the proposed upgrades and modal shift, the intersection would still operate at LoS F in both peak periods. The high delays at this intersection are generally caused by the left-turn movements from Baronga Avenue which are in turn caused by the upstream congestion generating from York Road-Darley Road-Avoca Street.
- It is noted that analysing York Road-Baronga Avenue intersection with proposed upgrades and modal shift in an isolated model would result to a satisfactory level of service (level of Service B). Therefore, poor LoS at this intersection is caused by the congestion at York Road-Darley Road-Avoca Street intersection.
- Even on the existing scenario, York Road-Darley Road-Avoca Street intersection is already operating at its theoretical capacity with LoS D. Future traffic growth is anticipated to tip the intersection performance to LoS F even without the development traffic, as shown in the future base year scenarios.
- As such, it is noted that an existing traffic capacity issue already exists at the York Road-Darley Road-Avoca Street intersection and this intersection will go overcapacity with background traffic growth even without the subject development. This existing traffic capacity issue does have knock on effects at intersections closer to the college notably York Road- Baronga Avenue.
- Whilst the College can directly address the impacts in the close vicinity of the College with the roadworks proposed, the York Road-Darley Road-Avoca Street intersection is an existing problem which needs to be addressed by Council.
- Notwithstanding this, it is of note that the average delay at the York Road-Darley Road-Avoca Street intersection in the “With Development Scenarios” compared to the “Background traffic growth only” is only 3 seconds longer with 4m more additional queue in the AM peak whereas in the PM peak, there is 3 additional second delay but the queue is the same length. Consequently, the proposed development will have little impact at this intersection.
- The resulting queue on the future left turn slip lane at York Road-Baronga Avenue intersection has been assessed to determine if the proposed left turn slip lane storage length would be able to accommodate the future queues.

Conclusion

To manage the impacts associated with the proposal, the school will implement travel demand management measures to minimise its impact on the surrounding road network, including the:

- provision of a green travel plan for the school
- introduction of staggered arrival and departure times for each year group and ELC.

The proposed travel demand measures are expected to reduce the school car use by 10%. The achievement of 10% modal shift will ensure that traffic levels post development are comparable to those currently achieved.

Overall, it is concluded that the traffic and parking aspects of the proposal could be managed and would generally be acceptable. With the implementation of green travel strategies, the vehicle trip generation of the proposed scheme would significantly be reduced such that it would be comparable with that generated by the approved school capacity. Thus, the surrounding key intersections would not be unreasonably affected by the proposed school expansion.

Regular management and extensive education/consultation with key stakeholders of the schools, including staff and parents, will be conducted to ensure the success of the proposed mitigation measure and green travel strategies/initiatives.

3.3. VISUAL ANALYSIS

Issue: *Provide revised photomontages for the six selected viewpoints in the Moriah College STEAM Facility – View Analysis (submitted at Appendix I of the Environmental Impact Statement (EIS)) to provide an informed view assessment of the amended proposal. Specifically, the Figures 3-5, 3-8, 3-10, 3-12, 3-14 and 3-16 of the View Analysis Report prepared by Virtual Ideas should be updated to reflect the built form amendments to the proposed STEAM and ILC building.*

Response: Revised photomontages for the six selected viewpoints are provided at **Appendix C**. The photomontages have been updated to reflect the built form amendments of the proposed STEAM and ILC buildings presented in the RtS.

The viewpoints identified for amendment are predominately located within Queens Park looking towards the school from the east, south east, and south west (refer Figure 8). Camera 09 provides a viewpoint of the STEAM building from York Road looking north.

Figure 8 Amended Photomontage Viewpoint Locations

Source: Visual Ideas

Extracts of the updated photomontages are provided at Figure 9 - Figure 11. The built form of the proposal is unchanged to that submitted with the RtS except for the relocation of Gate 4 approximately 9m east to accommodate the establishment of the landscape buffer zone. Therefore, the visual impact assessment from all perspectives is consistent with that already assessed in Section 5.2 and Appendix F to the EIS and RtS report, as follows:

Assessment of the Design Submitted with the EIS

Views from the East (Queens Park)

- *The development will create a new built element on the skyline in views from Queens Park.*
- *In both close and distant view from the Park the built form will be screened to differing degrees by existing vegetation along the boundaries of Queens Park and adjacent to the western edge of the Moriah College site.*
- *In views from the south east (around viewpoints 3 & 4) the new building will be substantially screened by vegetation with the screening effect increasing with movement to the south towards York and Darley Roads.*
- *From the central western and north western edges of Queens Park (around viewpoints 1 & 2) the building would form a substantial new skyline element in the view, with its lower portions screened by vegetation occurring largely within the boundary of the College site along its frontage to Baronga Avenue.*
- *From more distant views from the eastern edges of Queens Park, the developed site would form a small built horizon component in expansive views that include both built and vegetated horizons.*

Views from the West (Centennial Park)

- *The views assessment has found that the new development would be unlikely to be visible from*
- *Centennial Park. If visible at all, it would form a very small built component in expansive views from very restricted portions of elevated land near the north eastern boundary of the Park.*
- *The impact of the development on the visual integrity of Centennial Park would be negligible.*

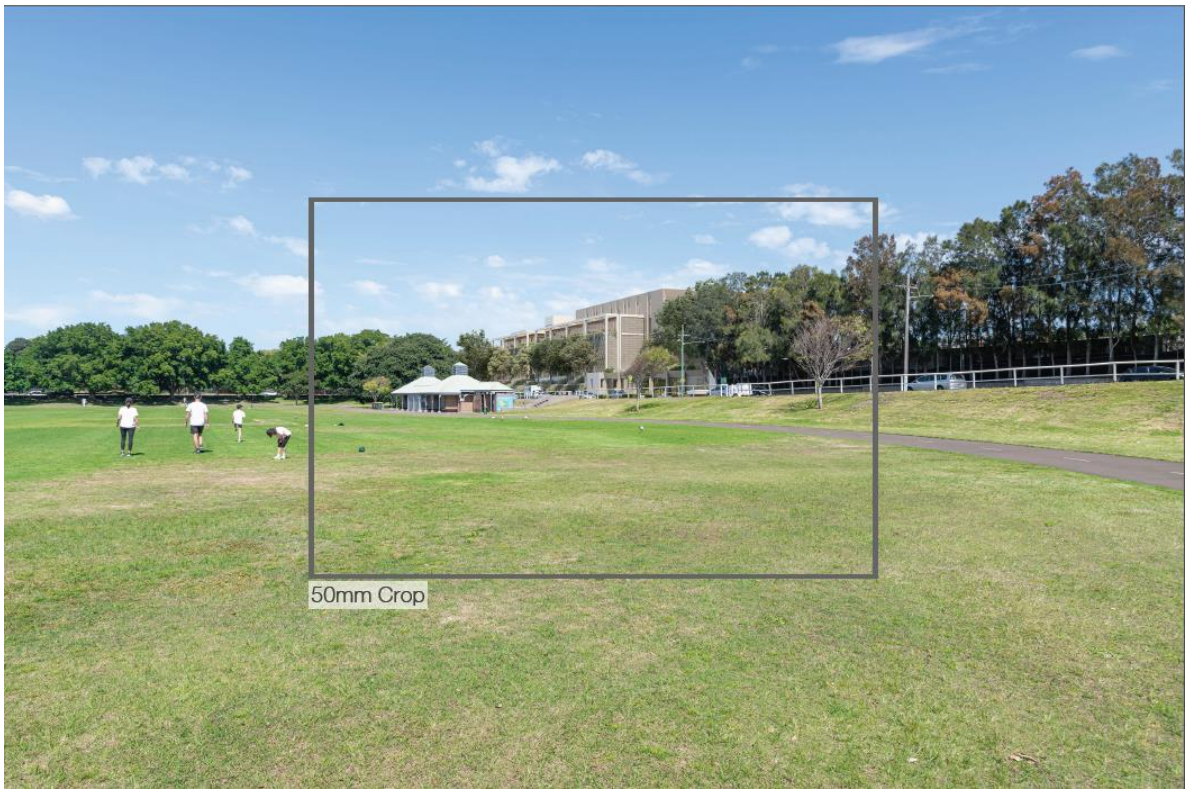
Assessment of the Amendments to the Proposal submitted with the RtS

The assessment found that the amended design results in the following changes to the assessment submitted with the EIS:

- ***Views from the south**: Further setback of the building from the southern boundary of the site will result in potentially less of the building mass to be visible from locations to the south of the site, specifically from York Road.*
- ***Views from the east**: Specifically, from Queens Park, will change minimally as a result of the amended proposal. There is likely to be a marginally lesser amount of built form visible in these views as a result of the decreased building height and additional articulation in the facade. It is possible that a small portion of the proposed extraction stacks will be visible in distant views but this would form only a very small component of the overall view of the building group and would have a negligible impact on visual quality.*
- ***Views from the west**: Specifically, from Centennial Park, would not change from that originally assessed as a result of the amended proposal, and its impact on these views would remain negligible.*

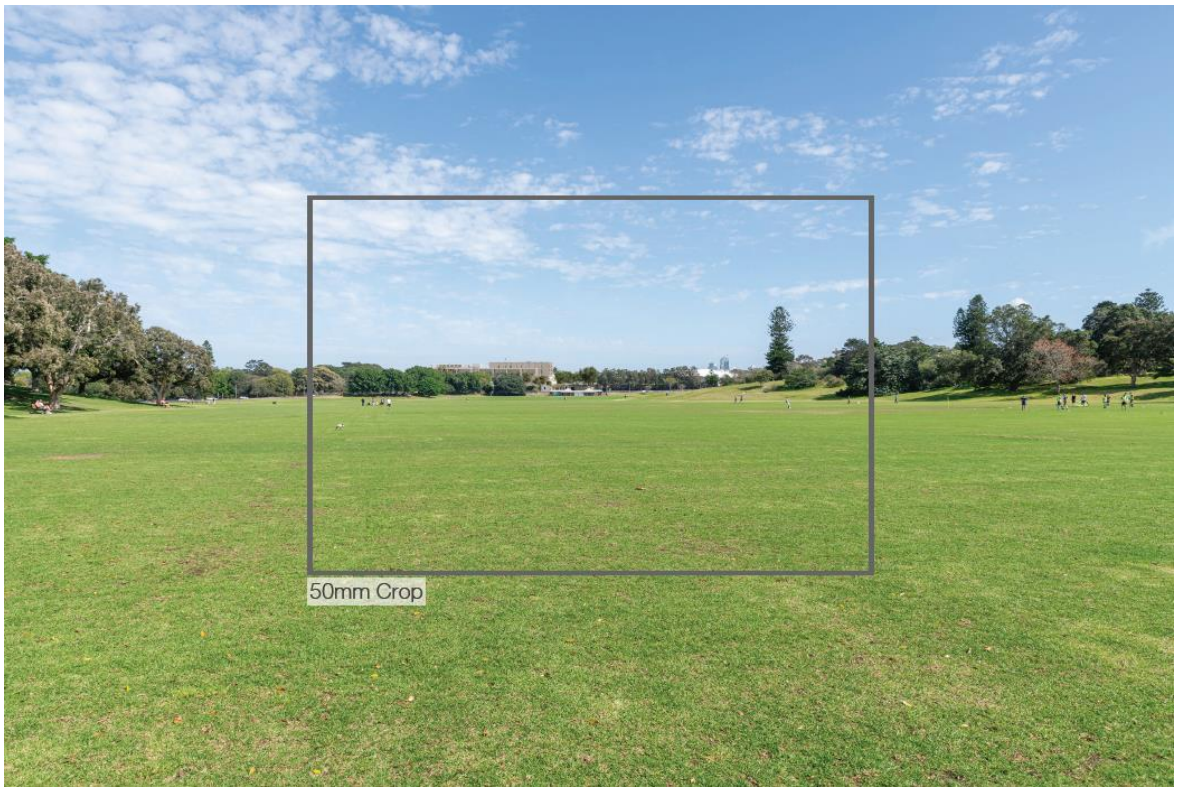
It is therefore concluded that the design amendments would render the built from marginally less visible, particularly from the south and east. Overall, the local visual quality will be essentially unchanged when compared to that originally assessed.

Figure 9 Viewpoint 01 – From Queens Park Looking South West



Source: Visual Ideas

Figure 10 Viewpoint 05 – From Queens Park looking West



Source: Visual Ideas

Figure 11 Viewpoint 09 – From York Road Looking North

Source: Visual Ideas

3.4. TREE RETENTION

Issue: *Confirm that tree numbers T5, T8, T9 and T10 identified in the Construction Impact Assessment and Management Plan (submitted at Appendix U the EIS) are to be retained as part of the amended proposal.*

Response: Due to the extent of excavation work to the berm wall, these trees (T5, T8, T9 and T10) are required to be removed as part of the proposal and replaced with landscape planting as detailed in **Appendix F**.

3.5. EXISTING DEVELOPMENT CONSENTS

Issue: *Confirm if Moriah College intends to surrender any of the existing development consents previously granted by Waverley Council that apply to the site.*

Response: The applicant does not intend to surrender any existing development consents. However, as outlined in Section 2.2 of this report, it is proposed that (under the new consent) DA-163/2017 and DA-71/2018 be modified in accordance with Clause 4.17(1)(b) of the *Environmental Planning and Assessment Act 1979* - to avoid any apparent inconsistency between SSD 10352 and the ELC development consents (DA-163/2017 and DA-71/2018).

4. RESPONSE TO SUBMISSIONS

The following section provides a detailed response to the issues raised in submissions by state and local government agencies, authorities, and members of the public. Further discussion and detail are provided in the supporting technical documentation appended to this SRtS report. For ease of reference the matters raised by the various agencies and other stakeholders are repeated in *italics* under each section.

4.2 GOVERNMENT AGENCY SUBMISSIONS

4.1.1. Waverley Council

A review of the Waverley Council submission has been undertaken and a detailed response to the issues which council have identified as requiring further information is provided in **Table 3**.

Table 3 Response to Waverley Council

Issue raised by Council	Council assessment on whether the issue been addressed?	SRtS Response
1. Traffic and Transport		
a. Increase of drop off and pick up (DOPU) activities is the principal point of objection.	*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.*	For the Green Travel Plan (GTP) to be effective, it is recommended that the GTP be monitored on a regular basis, e.g. per term or yearly, through travel surveys, staff meetings, parent consultations or similar. Travel surveys would show how staff, students and parents travel to/from the site and assist identify whether the proposed initiatives and measures outlined in the GTP are effective or are required to be replaced or modified to ensure that the best outcomes are achieved. Regular consultation with staff, students and parents would also be beneficial to help understand people's reasons for travelling the way they do and help identify any potential barriers to change their travel behaviours. In order to ensure successful implementation of the GTP, a Travel Plan Coordinator (TPC) should be appointed to oversee the measures and resultant impacts of the GTP.
b. A proactive approach to encouraging greater public	*Addressed.* *Additional bicycle parking supported. A condition of consent*	Noted. The applicant accepts a condition to this effect.

Issue raised by Council	Council assessment on whether the issue been addressed?	SRtS Response
transport patronage and green travel modes.	*is recommended to ensure these spaces are demarcated on the architectural plans.*	
c. Growth of school population not supported if there will be additional impact on traffic and parking demands on the surrounding road network. *d. Population increase should be staggered and be gradual.*	*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.*	The applicant is willing to accept a suitable condition of consent to address this matter – to be agreed prior to determination.
e. A revised questionnaire/study on travel trends is recommended to achieve a minimum response rate of 80%.	*Satisfactory.*	Noted.
f. A dedicated Green Travel Plan required.	*Addressed.*	Noted.
g. Bicycle parking should be more than minimum rate.	*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.*	Noted.
h. Ample locker or storage areas within the new STEAM building to reduce DOPU for secondary students.	*Addressed.*	Noted.
i. Increase AM bus travel mode share in consultation with Council and STA.	*Noted. The submission is from Council's staff and is independent of Councillors.*	Noted.
j. Increased shuttle bus services between Bondi Junction and the College.	*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.*	The provision of additional shuttle bus services is one of seventeen recommended on-site measures to encourage more sustainable travel use. Scheduling of the additional shuttle bus service will be explored at the appropriate time in conjunction with the broader suite of recommended measures outlined in the Green Travel Plan.

Issue raised by Council	Council assessment on whether the issue been addressed?	SRtS Response
		Note: site observations indicate that the existing shuttle bus services have spare capacity which may be able to accommodate additional demand. The School will continue to undertake regular monitoring of bus usage and bus demand based on the expected student intake each year and their associated catchment radius from the school.
k. Road and intersection upgrades supported with recommended changes.	*Addressed.*	Noted.
l. Local Area Traffic Management (LATM) measures to be encouraged for residential streets of Queens Park.	*Noted.* *Council has met with residents of Queens Park to consider LATM for future implementation.*	Noted.
m. Pedestrian traffic conflict as result of new slip lane at the York Road and Baronga Avenue intersection.	*Addressed.*	Noted.
2. Built Form and Urban Design		
a. Visual and overshadowing impacts of the STEAM building upon Queens Park and Centennial Park	*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*	It is acknowledged that the proposal will create a new built element on the skyline in views from Queens Park. However, as demonstrated by the photomontages in the Visual Impact Assessment, in both close and distant views from the Park the built form will be screened to differing degrees by existing vegetation along the boundaries of Queens Park and adjacent to the western edge of the Moriah College site. The height of the street/boundary wall is dictated by strict security requirements. The blast proof façade has been carefully designed and integrated into the built form so as not to impact on the visual

Issue raised by Council	Council assessment on whether the issue been addressed?	SRtS Response
	dominance and soften the visual presentation to the streetscape. *Note: The elevation plans submitted provide limited detail on boundary fencing.*	setting or surrounding heritage sites. The street/boundary wall is to be of face-brick construction, articulated through patterned placement of bricks, and incorporates landscape planting and artwork integration. The main entry along Baronga Avenue is set back from the site boundary, creating a plaza just outside of the school, increasing public amenity along the footpath, rather than intruding on it. Similarly, the car-park entry on York Road is carefully designed and landscaped to recede from the road and the southern boundary of the site.
b. Built form and urban design change recommendations relating to: *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*	*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.*	The proposal provides perimeter landscape treatment and tree planting to the Baronga Avenue frontage. A 3-10m landscape buffer is to be reinstated along the site's western boundary with the Lot 23 ESBS area. The security measures proposed have been carefully designed and integrated into the built form so as not to impact on the visual setting or surrounding heritage sites. .
3. Heritage		
i. Reorientate the Stage 1/STEAM building to an east-west alignment.	*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.*	As presented in the RtS a series of options were explored and tested during the design development of the proposal. The design and orientation of the Stage 1B building has been carefully considered and provides the optimum outcome for the site and the School's future operations. The design has been reviewed by the NSW Government Architect who did not raise any concern with the orientation of the Stage 1B building.

Issue raised by Council	Council assessment on whether the issue been addressed?	SRtS Response
ii. Reduce the apparent bulk of Stage 1 building.	*Addressed.*	Noted.
4. Operational and Event Management		
a. Map of Campus included in Plan of Management (PoM).	*Addressed.*	Noted.
b. Moriah College Consultative Committee (MCCC) not necessarily always involve Council.	*Addressed.*	Noted.
c. Certain 'out of core' activities not normally ancillary to school use and/or its time/duration extend past 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.*	The applicant continues to maintain that these activities are ancillary to the School use. The activities are only available to students, parents, and staff. These activities regularly occur at public and private Schools across NSW. Management measures are in place to ensure impacts on neighbouring residents are minimised.
d. Maximum capacity of the Early Learning Centre (ELC) restricted to 80 students (as enforced by development consent DA-163/2017).	*Addressed.* *A condition of consent is recommended regarding overall student population growth, including a breakdown of various aspects of the College.*	The applicant is willing to accept a suitable condition of consent to address this matter.
5. Tree Management and Biodiversity Impacts		
a. A condition be adopted to ensure trees to be retained are adequately protected	*Addressed. Relevant conditions recommended.*	Noted.
b. An updated Vegetation Management Plan (VMP) required to effectively manage the Eastern Suburbs Banksia Scrub. The landscape plan is also inadequate.	*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.*	Amended Landscape Drawings are provided at **Appendix F**. The Drawings identify 100% locally native species within the 3-10m landscape buffer zone, with the remainder of the site proposed to comprise landscape planting that is characterised as native vegetation. An amended Vegetation Management Plan is provided at **Appendix E**.

Issue raised by Council	Council assessment on whether the issue been addressed?	SRtS Response
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.*	*Addressed.* *The applicant's suggested condition of consent is recommended to be imposed.*	Noted.
7. Noise Impacts		
a. A detailed acoustic report addressing noise from use of mechanical plant.	*Addressed.* *A condition of consent is recommended to this effect.*	Noted.
b. A detailed acoustic report addressing noise from public address and use of school bell system.	*Addressed.* *A condition of consent is recommended to this effect.*	Noted.
c. Compliance testing required for noise emissions from the lecture theatre.	*Addressed.* *A condition of consent is recommended to this effect.*	Noted.
d. A detailed construction noise management plan required.	*Addressed.* *A condition of consent is recommended to this effect.*	Noted.
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.	*Not addressed.* *A condition of consent is recommended to overcome this matter.*	The Sustainability Report prepared by Northrop and submitted with the EIS detailed the ecologically sustainable development measures and commitments to be provided as part of the staged redevelopment of the site. It is expected that a condition of consent will be imposed that will require the development demonstrate consistency with the measures and commitments outlined in that Report.

Issue raised by Council	Council assessment on whether the issue been addressed?	SRtS Response There is no basis for a separate Energy Assessment Report to be provided.
9. Stormwater and Infiltration		
Stormwater plans accord with Council's Waste Management Technical Manual July 2014.	*Addressed.* *A condition of consent is recommended to this effect.*	Noted.
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.	*Not addressed.* *A standard condition of consent for waste management is recommended to address this deficiency.*	Noted.
11. National Construction Code (NCC) and Fire Safety Considerations		
NCC and fire safety measures be implemented in the development.	*Addressed. Relevant conditions recommended.*	Noted.
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.	*Not addressed. Specific public domain improvements are recommended to be implemented by way of conditions of consent.*	Moriah College are required to pay Section 7.11 Contributions, which are expected to be used by Council to contribute to any public domain works in the area.

4.1.2. Randwick City Council

A review of the Randwick City Council submission has been undertaken and a detailed response to the issues is provided in Table 4.

Table 4 Response to Randwick City Council

Submission	Response
Transport	
Council officers note that the Traffic Impact Assessment and the Green Travel Plan now provide for a cycling target of 2% of the proposed modal split of staff and students. We consider the inclusion of cycling within the proposed modal split appropriate considering the cycleways on surrounding streets, including the high-quality off-road cycleway on Darley Road, planned for construction in 2020.	Noted. No further response required.
Construction Traffic	
Council notes that the Construction Traffic Management Plan has been amended to show York Rd as the primary departure route, with Darley Rd as the alternative departure route. The amended Construction Traffic Management Plan states "The above alternate routes are to be consulted with Council, local community and relevant authorities prior to implementation". The alternate departure route should only be implemented with the prior approval of Randwick City Council. Council staff welcome future discussions with the applicant and other relevant stakeholders regarding the departure route of construction traffic.	Noted. A suitable condition of consent to be included.

4.1.3. Heritage Council of NSW

A review of the Heritage Council of NSW submission has been undertaken and a detailed response to the issues is provided in Table 5.

Table 5 Response to Heritage Council of NSW

Submission	Response
Recommended Mitigation Measures	
HNSW recommends the project adopts unexpected finds procedures to manage any unanticipated historical archaeological finds or relics during the works.	Agreed. The project will adopt unexpected finds procedures to manage any unanticipated historical archaeological finds or relics during the works. A suitable condition of consent to be imposed.
It is recommended that the perimeter plantation extend to York Street as well as Baronga Avenue, to improve the visual amenity of the subject area and surrounding locality.	It is not possible to provide perimeter planting along the York Road frontage due to the new slip lane and car park design.

The applicant has incorporated a landscape maintenance plan in the supporting documentation. It is recommended that a copy of the plan be stored on site to ensure that future maintenance is conducted periodically.	Agreed. No further response required.
It is recommended that the applicant continue to liaise with local councils and state agencies during detailed design to mitigate impacts to the LEP listed heritage conservation areas and heritage items in the vicinity.	Agreed. No further response required.

4.1.4. Transport for NSW

A review of the Transport for NSW submission has been undertaken and a detailed response to the issues is provided in Table 6.

Table 6 Response to TfNSW

Submission	**Response**
Road Safety Audit	
Prior to the issue of a construction certificate, a Road Safety Audit (RSA) shall be undertaken by an independent TfNSW accredited road safety auditor for the proposed improvement of the existing pedestrian crossing on Baronga Avenue. The applicant shall implement safety measures as proposed by the RSA.	Agreed. To be included as a condition of consent.

4.1.5. Environment Energy and Science Group

A review of the Environment Energy and Science Group (EES Group) submission has been undertaken and a detailed response to the issues is provided in Table 7. Note: the original submission provided by EES group dated 27 July 2020 was supplemented by a revised submission date 31 July 2020. The issues raised in the revised submission are addressed in Table 7.

Table 7 Response to EES Group

Submission	**Response**
Biodiversity assessment and impacts by the development	
Maroubra Woodland Snail *Meridolum maryae* *This species has not been surveyed for, nor the possible impacts on it, considered at all in the BDAR. The BDAR should be revised accordingly.*	Surveys for the Maroubra Woodland Snail were undertaken on 15 September 2020. The BDAR has been revised accordingly and is provided at **Appendix D**.

Protection of Eastern Suburbs Banksia Scrub critically endangered ecological community – requirements of approvals for previous development on Lot 22 DP 879582 *EES's understanding is that the conditions of approval of both the consent by Waverley Council (LD 282/00) and the approval by the Commonwealth Minister for the Environment (EPBC 2002/575) remain in force. Consequently, if this SSD is approved EES recommends that:* – *The conditions of these prior approvals apply* – *The buffer zone be reinstated to the configuration, width and condition required by those prior approvals, including removal of any encroaching structures and hard surfaces* – *With the exception of works necessary to achieve the reinstatement of the buffer zone, earthworks, soil disturbance or machinery access be prohibited from the buffer zone.*	The conditions of development consent LD 282/00 (granted by Waverley Council on 22 May 2001) have been partially replaced by ELC application development consents (DA-163/2017 and DA-71/2018). Nonetheless EPBC 2002/575 granted by the Commonwealth Minister for the Environment and Heritage on 25 October 2002 still applies. This needs to be resolved and works will be carried out to reinstate the buffer zone under EPBC 2002/575. The proposal has been amended to accommodate a 3-10m landscape buffer zone along the western boundary of the site to the ESBS area located on Lot 23. The buffer zone is to be reinstated in accordance with the consent conditions stipulated by LD 282/00 and EPBC 2002/575. To ensure that the buffer zone can be established at commencement of the Stage 1 early works, minor alterations are proposed to the existing ELC and Astro turf playing field to remove built form from within the buffer area prior to the complete demolition of the ELC to accommodate Stage 2 of the development.
Protection of Eastern Suburbs Banksia Scrub critically endangered ecological community – requirements of previous approvals for development on Lot 1 DP 701512 *EES's understanding is that the conditions of approval of both the consent by DIPNR (DA 446-10-2003) and the approval by the Commonwealth Minister for the Environment (EPBC 2004/1676) remain in force. Consequently, if this SSD is approved EES recommends that the conditions of these prior approvals apply.*	See above. The VMP has been amended to address the relevant conditions of approval.
Vegetation Management plan	
If the SSD is approved EES considers it is important that the following are included in conditions of consent: – *Prior to issue of a construction certificate, a revised Vegetation Management Plan must be revised in consultation with and be endorsed by Environment, Energy and Science Group of DPIE, Waverley Council, and Centennial Park and Moore Park Trust (CPMPT).* *The revised VMP should:*	Agreed. An amended Vegetation Management Plan (VMP) is provided at **Appendix E**. The amended VMP removes all reference to Lot 23, which is under the ownership of Centennial Park and Moore Park Trust and subject to an existing Vegetation Management Plan (dated November 2018) covering the remnant patches of Eastern Suburbs Banksia Scrub within Centennial Park, Queens Park and York Road (Banksia Reserve VMP). The amended VMP also considers all relevant conditions of previous NSW and Commonwealth development approvals LD 282/00, EPBC 2002/575, 446-10-2003 and EPBC

– *apply only to land under the ownership or control of Moriah War Memorial College* – *be consistent with, and not compromise the objectives and methods of, the current Centennial Parklands and York Road Eastern Suburbs Banksia Scrub Vegetation Management Plan of the Centennial Park and Moore Park Trust (CPMPT) that applies to conservation of ESBS on Lot 23 in DP 879582* – *take into account, and not contain any provisions that are inconsistent with, the conditions of previous NSW and Commonwealth development approvals LD 282/00, EPBC 2002/575, 446-10-2003 and EPBC 2004/1676 relating to protection and conservation of ESBS* – *include information about and conservation management measures relating to the endangered Maroubra Woodland Snail Meridolum maryae*.	2004/1676 relating to protection and conservation of ESBS.
If the SSD is approved EES considers it is important that the following condition of consent is included: ▪ *Any revegetation of the VMP Area must be undertaken by suitably qualified bush regenerators with experience in restoring and maintaining the Eastern Suburbs Banksia Scrub in the Sydney Basin Bioregion (ESBS) vegetation community.* *If the SSD is approved the following it is recommended the following conditions are included for the rehabilitation of the VMP Area/Banksia Reserve and/or the landscaping of the site:* ▪ *All plants to be used in the VMP Area must be of local ESBS provenance. Local ESBS provenance means plants that are grown from seed or cuttings collected from plants growing Eastern Suburbs Banksia Scrub in the Sydney Basin Bioregion (ESBS) ecological community near to and in similar environmental conditions as the planting site.* ▪ *The VMP must include procedures to demonstrate how plants and seed of local ESBS provenance are to be obtained and used.*	Agreed. The VMP has been amended to address these requirements (refer **Appendix E**).

Ongoing Weed Maintenance	
If the SSD is approved it is important that a condition of consent is included to ensure the VMP Area is managed, maintained and monitored on an ongoing basis by the proponent in perpetuity: ▪ *The VMP Area / Banksia Reserve must be managed, maintained and monitored in perpetuity by a suitably qualified bush regenerator with experience in restoring and maintaining the Eastern Suburbs Banksia Scrub in the Sydney Basin Bioregion (ESBS) vegetation community*.	Agree. The VMP has been amended to address these requirements (refer **Appendix E**).
Site landscaping outside 'VMP Area'	
If the SSD is approved, it is recommended the following conditions of consent are included for the site landscaping: – *The site landscaping (except for the learning landscape gardens) -including areas adjacent to the VMP Area shall use a diversity of local native species from the ESBS.* – *In Lot 22 DP 879582 landscaping in the buffer zone should be consistent with the requirements of previous development approvals LD 282/00 and EPBC 2002/575, including no trees within the buffer zone* – *In Lot 1 DP 701512 landscaping in the ESBS area(s) must be consistent with the requirements of previous development approvals 446-10-2003 and EPBC 2004/1676* – *Enough area/space is provided on site to allow the trees to grow to maturity* – *Tree planting at the site shall use advanced and established local native provenance trees with a minimum plant container pot size of 100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed.*	Lists of suitable ESBS plant species for revegetation are provided at Appendix C of the amended VMP (refer **Appendix E**). Minor amendments have been made to the site landscaping planting strategy to incorporated ESBS species throughout the site where appropriate, however planting across the site cannot be restricted to only ESBS species due to: ▪ ESBS species primarily comprise low wooded shrubs and therefore do not provide mature canopy cover required for function educational open space areas. ▪ The requirement to include cultural planting across the site in accordance with the School's requirements. ▪ The requirement to propose a planting across the site that can be readily maintained throughout the operational phase of the development. ▪ The relative commercial unavailability of ESBS species.

Pre-clearance surveys	
If the SSD is approved EES recommends the following conditions of consent are included to minimise potential impacts from clearing of vegetation on native fauna: ▪ *A pre-clearance survey for native fauna must be undertaken by a suitably qualified ecologist in all areas of vegetation on the site that is required to be cleared within (a) one week of any clearing activities commencing and (b) immediately prior to any clearing of vegetation commencing on the site. Any resident native fauna found during the pre-clearance surveys should be appropriately captured by a licensed wildlife carer prior to any clearing commencing and relocated in a sensitive manner to appropriate nearby habitat locations under the supervision of a qualified ecologist/licensed wildlife handler.* ▪ *A qualified ecologist/licensed wildlife handler must be present on site during the clearing of any vegetation. Any resident native fauna found during the clearing should be appropriately captured by a licensed wildlife carer and relocated in a sensitive manner to appropriate nearby habitat locations under the supervision of a qualified ecologist/licensed wildlife handler.*	Agree. Section 5.6 of the amended VMP provides measures to be implemented for preclearance surveys for native fauna consistent with the EES Group requirements.
Stormwater runoff	
The Stormwater Report indicates a temporary sedimentation basin is required and that the basin is to be located at the downstream portion of the site but the report does not include a scaled plan which shows the proposed location of this basin (section 3.3, page 11). EES seeks clarification as to whether the temporary sedimentation basin is proposed in the same location as the OSD.	Erosion and Sedimentation Control Plans are provided at Appendix T to the EIS. A 118m^3 sediment earth basin is proposed to be located within the southern portion of the site adjacent to York Road.

4.2. ORGANISATION SUBMISSIONS

The following sections provide a response to submissions received from organisations.

4.2.1. Queens Park Residents

This submission comprised a 'pro-forma' list of objections to the proposal repeated in public submissions. For this reason, key issues raised in this submission are responded to in **Section 4.3** of this report.

4.2.2. Centennial Park and Moore Park Trust

A review of the Centennial Park and Moore Park Trust submission has been undertaken and a detailed response to the issues is provided below.

Issue: *The Moriah College VMP does not mention the Centennial Park and Moore Park Trust as the owner of Lot 23 DP879582 (See Map below, Attachment A). The VMP suggests that 3 monitoring plots (See Attachment B) will be established within the ESBS remnant owned and managed by the Trust, with none in the ESBS area managed by Moriah College.*

Response: The monitoring plots have been relocated to within the subject site, including within the area of ESBS managed by Moriah College (refer **Figure 12**).

Figure 12 Amended Monitoring Plot Locations

Source: Cumberland Ecology

Issue: *The Trust have our own VMP in place (WSP, 2018), and our approach predominately uses natural regeneration techniques. The proposed planting plan by Moriah College (Cumberland Ecology, 2020) is not consistent with our management plans. The location and quantity of proposed planting of trees and shrubs is not approved within the ESBS owned by the Trust.*

Response: No landscape planting is proposed within the Banksia Reserve Area on Lot 23.

Issue: *The CPMPT request that the VMP make clear the boundaries of different landowners. If Moriah College are required to improve the current condition of the ESBS in Lot 23 DP879582 as part of the DA approval, then the CPMPT would wish to oversee these works and a memorandum of understanding would be required.*

Response: The site area plan has been amended accordingly to clearly delineate that the VMP relates to the ESBS area within the Moriah College site only as depicted in Figure 13 below.

Figure 13 Amended VMP Site Area Plan

Source: Cumberland Ecology

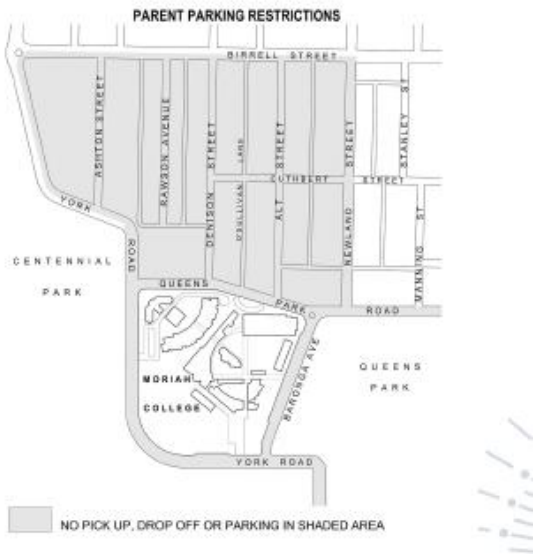
4.3. PUBLIC SUBMISSIONS

During the public exhibition period of the Response to Submissions and amended proposal the DPIE received 37 public submissions which all either objected to, or commented on, the proposal. The public submissions received generally raised similar concerns to those raised in submissions to the EIS which were addressed in the RtS report.

Noting this, Table 8 below provides a response to each of the key issue raised in the community submissions and, where appropriate, refers to where matters have been previously addressed in the EIS and RtS report and supporting technical documentation.

Table 8 Response to Public Submissions

Issue	Response	Refer
Traffic and Parking – increased traffic congestion.	The proposed travel demand measures are expected to reduce the school car use by 10%. The achievement of 10% modal shift will ensure that traffic levels post development are comparable to those currently achieved. Overall, it is concluded that the traffic and parking aspects of the proposal could be managed and would generally be acceptable. With the implementation of green travel strategies, the vehicle trip generation of the proposed scheme would significantly be reduced such that it would be comparable with that generated by the approved school capacity. Thus, the surrounding key intersections would not be unreasonably affected by the proposed school expansion. Regular management and extensive education/consultation with key stakeholders of the schools, including staff and parents, will be conducted to ensure the success of the proposed mitigation measure and green travel strategies/initiatives.	**SRtS:** Sections **4.1.1** and **0** and **Appendix B**. **RtS:** Sections 4.1.2, 4.1.5, and 4.2.1 of the RtS report and Appendix C. Transport Traffic and Parking Plan at Appendix CC to the EIS.
Traffic and Parking – Additional local area traffic management measures should be considered on Queens Park Road and York Road. Further community consultation is required for any proposed traffic management measures.	Noting that the traffic through the surrounding road network cannot be directly attributed to the College, it is requested that Council investigate this separately to determine the appropriate traffic calming measures required in the area. Consultation with residents and other agencies such as State Transit Authority should be undertaken to adequately discuss the positive and negative implications of proposed local area traffic management plans.	

Issue	Response	Refer
Traffic and Parking – students and staff parking in residential streets.	As detailed in the Transport, Traffic and Parking Plan (refer Appendix CC to the EIS) parking, stopping, dropping children off or picking children up, is not permitted on the southern side of York Road (opposite the College), or on the eastern side of Baronga Avenue (opposite the College), or on either side of Queens Park Road or on any of the streets adjoining Queens Park Road (Denison Street, O'Sullivan Lane, Alt Street or Newland Street) being the shaded areas in the map below (Parent Parking Restrictions).  To further discourage vehicular travel to the site, measures will be introduced through implementation of the Green Travel Plan. These measures predominately focus on encouraging alternative forms of transport including bicycle, public transport, and walking. This is coupled with the provision of improved bicycle parking and end of trip facilities.	
Plan of Management – Moriah Community Consultative Committee (MCCC) meetings should be held at Council chambers and involve Council.	At the request of Council in their submission to the EIS, the Operational Plan of Management has been amended accordingly to remove the requirement for meetings to be held at Waverley Council and to remove the role of Council to mediate consensus on decisions.	Appendix G to the RtS.
Noise impacts from the school announcements	All operational noise emissions can meet relevant Australian Standards provided the recommended mitigation measures are adopted.	Section 7.12 and Appendix G of the EIS Table 14 of the RtS Report.

Issue	Response	Refer
Increase in student numbers is unreasonable	The proposal seeks a sustainable growth in student numbers over a 15+ year timeframe.	Section 3.3 of the EIS and table 14 of the RtS Report
Visual Impact – the amended proposal only seeks minor changes to the height and design of the buildings	No further amendments are sought to the built form of the proposal.	Section 2 and Appendix A to the RtS Report
Visual Impact – the proposal is not compatible with its location	Revised photomontages from the six selected viewpoints is provided within **Appendix C**. The photomontages have been updated to reflect built form amendments of the proposed STEAM and ILC building. The built form of the Proposal is unchanged to that submitted with the RtS except for the relocation of Gate 4 approximately 9m east to accommodate the establishment of the landscape buffer to York Road. Therefore, the visual impact assessment from all perspectives is consistent with that already assessed in Section 5.2 and Appendix F to the RtS report.	Sections 5.1 and 5.2 of the RtS **Appendix C** of this SRtS.
Security Guards – Imposing nature of the boundary wall and security guards.	The School has strict security requirements that have been implemented into the proposal design and the campus as a whole.	**Appendix A**, **Appendix B** of the RtS and Section 3.6.7 of the EIS.

5. CONCLUSION

This Supplementary RtS report has been prepared to respond to the community and agency submissions received during the public exhibition of the Response to Submissions and amended proposal accompanying State Significant Development Application 10352 (SSDA) for the redevelopment of the Moriah College Queens Park Campus, at Queens Park Road, Queens Park (the site).

The submissions received have been directly responded to by the School and the project team in the supporting technical reports annexed. The amendments sought are to align the vehicular hardstand area of the proposal to accommodate the 3-10m buffer zone to the Banksia Reserve Area adjoining the site in accordance with the consent conditions stipulated by EPBC 2002/575. No amendments are proposed to the built form of the Stage 1 STEAM building, and the Stage 2 ELC building envelope as submitted with the RtS.

We reaffirm, the proposed staged redevelopment of the Moriah College Senior School Campus will provide high quality, flexible indoor and outdoor spaces to suit contemporary teaching methodologies and technologies. The proposal will create a clear identity, entry, and shared student gathering space, as well as greater connectivity to the landscape and bushland setting. In addition, the proposal will result in a significant improvement in vehicle access and traffic movements in and around the site.

There remain compelling reasons why a positive assessment and determination of the project should prevail, as outlined in the EIS, RtS and this Supplementary RtS.

This Supplementary RtS and accompanying documentation, along with the additional information submitted with the RtS, appropriately addresses, and resolves the issues raised by the referral agencies and members of the public. We therefore request the NSW Department of Planning Industry and Environment proceed to finalise its assessment of the application.

DISCLAIMER

This report is dated December 2020 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Moriah College **(Instructing Party)** for the purpose of Response to Submissions **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

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