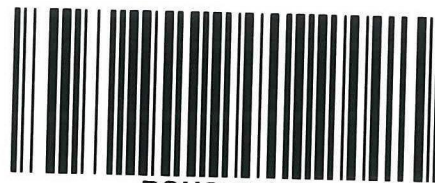


28 November 2017



PCU073173

Carolyn McNally  
Secretary  
Department of Planning and Environment  
320 Pitt Street  
Sydney NSW 2000



Attention: Adam O'Connor

Dear Ms McNally,

**Submission on State Significant Development Application SSD 16\_7503 for Redevelopment of Ultimo Public School**

This submission is made by the TOGA Group in relation to the proposed redevelopment of the Ultimo Public School located at 47-53 Jones Street, Ultimo. The TOGA Group develops and manages a large portfolio of high quality residential apartments, hotels and mixed-use developments. Our main office is located within the heritage listed Elder Smith and Co. Woolstore building, located directly opposite the school site at 45 Jones Street. Our current holdings in Ultimo comprise approximately 15,000m<sup>2</sup> of land bounded by Quarry, Jones, Fig and Wattle Streets.

The TOGA Group are supportive of the redevelopment of the primary school and recognise its role in providing essential community infrastructure to support a growing population. Upon reviewing the SSDA and associated technical documents, we believe there are two issues that require further consideration:

- The proposed use of the existing 'S.7567 Jones Street Quarry' substation by the school during the redevelopment of the site; and
- The lack of on-site mitigation measures to address the impacts of drainage and stormwater run-off.

The redevelopment of the school site involves the demolition of existing structures, bulk earthworks and the construction of new school buildings to accommodate up to 800 primary school students. During the redevelopment of the site, the applicant has sought approval from Ausgrid to connect into the existing chamber substation known as S.7567 Jones Street Quarry, located directly under one of our key assets, the Elder Smith building.

The SSDA Report identifies a need to augment the existing electricity supply to the school site on a permanent basis and proposes the installation of a new on-site substation.



TOGA do not object to the applicant using the substation for temporary power supply during construction however we are concerned that any ongoing use of the substation, beyond the construction period, may preclude TOGA from realising future development capacity within our current land holdings.

In recent years, we have undertaken significant expenditure in upgrading the capacity of the Jones Street Quarry substation in anticipation of future demand generated from within our site. It is acknowledged that the applicant proposes to develop a new surface substation within western boundary of the school site and it is requested that a condition be included on development consent to ensure that this substation is constructed and installed accordingly prior to the issue of an occupation certificate.

We also express concern regarding the applicant's approach to stormwater mitigation and on-site detention. The intensification of the site and proposed hard surfaces will result in an increase of stormwater runoff. Although the proposal seeks to install a pit and pipe drainage network to collect any additional run-off, no on-site detention is proposed. We question the modelling undertaken as part of the technical flooding assessment as we have observed, on numerous occasions, the impacts from heavy rainfall which have exceeded the acceptable level of run-off (identified in the proposal as 'below the level of the kerb'). In addition, the mitigation measures proposed in the SSDA, do not adequately consider the impact or risk of increased storm water run-off to adjacent sites. It is the responsibility of anyone undertaking development to ensure that adequate mitigation measures are undertaken to reduce environmental impacts to all surrounding land. Subsequently, it is requested that proper mitigation measures, including the installation of on-site detention, should be required prior to granting of any development consent.

We thank you for the opportunity to comment on the Proposal. Should you wish to discuss this matter further, please contact Jacob Rolls.

Yours Sincerely



Jacob Rolls

General Manager, Toga Group Property Investment