#### Attachment A – Mosman High School Upgrade SSD-10465 – Response to Request for Additional Information **Proponent Response** Issue **Public Authority Submissions Department of Planning, Industry and Environment** Following a review of the accessible parking space on Belmont Road, it has A map indicating the precise location of the existing accessible parking space on Belmont Avenue and the information demonstrating the been determined by PTC consultants that the accessible car space was feasibility of this being utilised by the school given likely existing removed during the process of the SSD application. community demand having regard to the existing surrounding developments (commercial areas, residences, bowling club) and The exact location of this space and the pedestrian connectivity between Council's objection to its use as part of the operation of the school. the space and the school entry are shown in Figure 2 and Figure 3 at Attachment C. There is a raised zebra crossing across Belmont Road providing a level path to the school. It is unclear to the project what the exact purpose of the accessible space was and why it was removed, however consultation with Council has already commenced. Refer to correspondence at **Attachment D**. Considering the above, it is proposed that the accessible parking space be reinstated for the purpose of the school use. In the event that this is not achievable, in consultation with key stakeholders including Council, the project will explore options for the installation of an onsite accessible parking space. For further information, refer to Traffic Statement, prepared by PTC Consultants at Attachment C. Further to the above, it is noted that there is also ability for holders of disabled parking stickers to park in other (non-disabled) parking spaces (depending on the time restriction as sign-posted) without penalty. The current proposal for Mosman High School includes the planting of 34 justification for not meeting the 28% canopy cover recommended by the Government Architect NSW, noting that this represents a reduction new trees and a significant increase of the canopy cover of 3.4% to a total below that in the Draft Greener Places Design Guide. of 24.6% canopy cover and equates to an additional 492 square metres of canopy cover.

It is noted that tree canopy provision is accepted and commended by the NSW Government Architect Office (GAO). Due to the current conditions and constraints of the site there are limited opportunities to increase the canopy cover. Considering this, the increase in GFA on the site has required the landscape design proposal to balance the requirements for open play space and the need for canopy cover. The current proposal manages to do both through careful configuration of the landscape spaces on the ground plane and utilisation of terraces on level 3 & 4. The design includes tree planting around the perimeter of the two proposed open play areas (basketball court & lawn) on ground level, replacement tree planting along Military Road and replacement tree planting within the arts courtyard. In addition, tree planting has been maximised on the rooftops (Level 3 & 4) in accordance with structural engineers' guidance and recommendations. Therefore, there is no further opportunity to increase the tree canopy beyond 24.6% without compromising the provision of playground space and building development. For further information refer to the Landscape Statement prepared by Black Beetle at Attachment B, which also provides illustrations on the proposed tree canopy coverage submitted as part of the SSDA submission. Student enrolments (inside vs. outside school and/or SCG boundaries) are confirmation whether it is intended to restrict student enrolments to subject to ongoing review, in line with the demand and capacity of the within the local catchment given the statement in the traffic assessment that this has the potential to alleviate some traffic/parking issues at the school. site. If proposed to be implemented, information on how this would be It is noted that existing enrolment data sees the vast majority of student put in place should be provided given the performing arts speciality of enrolments from within the school catchment area and this trend is forecast the school. to continue. **Mosman Council** Council appreciates and acknowledges the minor changes that have been Noted. made to the proposal, i.e. the provision of end of trip facilities to encourage cycling and willingness to work with Council to minimise impacts. However, The Proponent acknowledges Council's concerns. A response to issues the fundamental issues of concern raised, i.e. the overall height of the previously raised in relation to building height and impact on streetscape

documentation.

building, impact on streetscape and lack of off street parking facilities have

has already been well justified in the EIS, RTS and supporting

not changed. Accordingly, the issues previously raised should be given consideration.	In relation to lack of off-street parking facilities, PTC Consultants have realised that the accessible parking space on Belmont Road has been removed, since lodging the SSDA.  PTC Consultants have provided a response to this issue and request that the off-street disabled car parking space be reinstated for the purposes of school use. For further information refer to supporting Traffic Statement, prepared by PTC Consultants at <b>Attachment C</b> .
NSW Government Architects	
Landscape 1. GANSW advice (dated 5th May) recommended that additional tree planting to achieve a canopy cover of 28%, as stated in Section 8.0 of the Landscape Report be pursued.  It is commended that the proposed tree canopy cover has been increased from 23.5% to 24.6%. It is recommended that a landscaped drawing be provided that illustrates the existing and proposed tree canopy and includes the calculation demonstrating how the proposed 24.6% canopy will be achieved.	Noted. Refer to Tree Canopy Diagrams, prepared by Black Beetle Landscape Architects at <b>Attachment B</b> , which illustrate existing and proposed tree canopy provision across the site.  Note. These diagrams were also provided in the Landscape Design Report, prepared by Black Beetle Architects ( <b>Appendix I</b> to the EIS).
2. GANSW advice (5th May) requested clarification on how access will be restricted to areas designated as 'out of bounds'.  The response from Black Beetle, dated 27th May 2021 stated that these areas will be maintained in line with current out of bounds areas. This response is accepted given that the designated 'out of bounds' areas are largely existing, and where they differ (north-west corner) the configuration will require a similar management strategy to the existing condition.	Noted.
Built Form  3. GANSW advice (5th May) recommended that the design of the level 4 roof court and star core 3 achieve unobstructed sightlines from the footpath on the east side of Military Road as this represents a departure from one of the commended elements of the architectural design strategy, refer advice letter dated 21.12.20.  This departure is considered acceptable in this instance given that the stair core will be set back from the eastern parapet (just less than 3.9m), has a	Noted.

roof sculpted to minimise bulk, and represents only a small proportion of the eastern façade. The court netting is visually permeable, and setback approximately another 8m which will reduce the visual impact from Military Road.	
4. GANSW advice (5th May) recommended that the façade composition provide a more disciplined approach to the application of the playful façade elements and articulation, to achieve a balance between its playful qualities and civic presence.	Noted.
The design logic and more muted colours are accepted. It is recommended that an External Materials and Finishes schedule with accurate colour matching be provided that clearly illustrates the desaturation of colour with increased height.	
5. GANSW advice (dated 5th May), advised that the sustainability recommendations made in the advice letter dated 09.02.21 still apply.	Noted.
The response provided is accepted. Acknowledging the criticality of climate change across NSW, leadership in sustainability is recommended for all future school projects. Narrow single-loaded floorplates that have operable windows on opposite sides of a room can enable good access to daylight and promote cross ventilation, which are both critical elements in optimising building performance.	
Transport for NSW (TfNSW)	
TfNSW has reviewed the submitted information and raises no objections to the proposed development, subject to the Department's approval and the following requirements being included in the development consent:  1. All buildings and structures, together with any improvements integral to the future use of the site are wholly within the freehold property (unlimited in height or depth), along the Military Road boundary.  2. A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access	Noted and no objection, subject to review of draft conditions.
arrangements and traffic control should be submitted to the Department for approval prior to the issue of a Construction	

- Certificate. The CTMP must be in consultation with Council, and be endorsed by TfNSW.
- 3. A Road Occupancy Licence (ROL) should be obtained from Transport Management Centre for any works that may impact on traffic flows on Military Road during construction activities. A ROL can be obtained through <a href="https://myrta.com/oplinc2/pages/security/oplincLogin.isf">https://myrta.com/oplinc2/pages/security/oplincLogin.isf</a>
- 4. All demolition and construction vehicles are to be contained wholly within the site and vehicles must enter the site before stopping. A construction zone will not be permitted on Military Road.
- 5. Prior to the issue of the first Occupation Certificate, the applicant should prepare an updated Green Travel Plan in consultation with and endorsed by TfNSW. The Green Travel Plan should be submitted to development.sco@transport.nsw.gov.au.

TfNSW also provides the following comments to the Department for consideration:

- 1. The Green Travel Plan should include, but not be limited to:
- analysis of current travel survey data and school postcode data and discussion of how this data has informed the mode share targets and actions of the GTP:
- identifying the number of staff and students within reasonable walking / cycling distance;
- staged mode share targets for staff, students and visitors which reflect a commitment to increase non-car mode share for travel to and from the site;
- implementation strategy that commits to specific actions (including operational procedures to be implemented along with timeframes) to encourage the use of public and active transport and discourage the use of single occupant car travel to access the site;
- details of bicycle parking and dedicated end of trip facilities including but not limited to lockers, showers and change rooms and e-bike charging station(s) for staff and students to support an increase in the non-car mode share for travel to and from the site;
- a Transport Access Guide for staff, students and visitors providing information about the range of travel modes, access arrangements and supporting facilities that service the site;

- a communication strategy for engaging with students, staff and visitors regarding public and active transport use to the site and the promotion of the health and wellbeing benefits of active and non-car travel to the site:
- include a mechanism to monitor the effectiveness of the measures of the plan; and
- the appointment of a Travel Plan Coordinator responsible for implementing the plan and its ongoing monitoring and review, including the delivery of actions and associated mode share targets.

The Green Travel Plan shall be reviewed annually for at least the first five years and involve surveys, evaluation and review.

Transport for NSW has developed a Travel Plan Toolkit designed for the person or group responsible for developing and implementing a Travel Plan. This toolkit provides the steps, templates and resources for developing a comprehensive Travel Plan and may be accessed at: https://www.mysydney.nsw.gov.au/travelchoices/tdm

#### **Heritage NSW**

The RtS responded to several issues raised by Heritage NSW by providing a finalised an Updated Aboriginal Cultural Heritage Assessment Report (ACHAR) and Updated Aboriginal Archaeological Report (AAR), both prepared by Austral.

Based on a review of the Updated ACHAR and Updated AAR, Heritage NSW advises that they are adequate in addressing the RtS. However, there is a discrepancy in the Unexpected Finds Procedure provided in Appendix H of the ACHAR and Appendix C of the AAR, with the AAR Procedure providing additional information on Aboriginal Material. This must be included in the Procedure included in the ACHAR. The Procedure supplied in the AAR appears to be incomplete, with point three under Aboriginal material an incomplete sentence.

The Unexpected Finds Procedure must be included in the methodology for undertaking archaeological investigation provided in Appendix A of the Historical Archaeological Assessment and Archaeological Research

Noted. The Proponent acknowledges this request and suggest that the ACHAR, AAR, HAA and CMP reports are updated accordingly in line conditions of consent specifying this requirement.

Designed, prepared by Austral (Appendix M of the EIS) and as part of the Construction Management Plan (Appendix AH of the EIS). HNSW accepts the proponent's response to submission. HNSW does not have comments about the separate submissions raised by other parties as described in the Response to Submission Report. **Environment, Energy and Science Group (EES)** EES has reviewed the RtS table prepared by Architectus Australia Pty Ltd Noted. dated 17 June 2021 and has no comments in relation to this project. **NSW Environment Protection Authority (EPA)** The EPA has no comments to provide on this project and no follow-up Noted. consultation is required. **Public submission** Public Submission 1 - Robert Sutton 1. Parking surveys should take into consideration year 12 students Noted. The Proponent acknowledges concerns raised by Mr Sutton. driving to the school. Please note that NSW Planning requested this work to be completed and this accurate work has not been A response to many of these issues raised has already been established as completed or provided. outlined in the EIS, RTS and supporting technical documentation. 2. School student from the age of 17 or above (REAL STUDENT In relation to parking surveys, the Proponent would like to reiterate that the NUMBERS) should be identified as possible drivers to Mosman High School. Clearly the number of school student drivers increases Traffic Impact Assessment was updated in May 2021 to include surveys of as they approach final year exams, this is not reflected in the Year 12 students and this showed that 16.2% of Year 12 students drive to subsequent recent May survey that fails to capture the pressure of school. Based on this information, with a potential increase of sixteen (16) students parking in all surrounding streets and then those students Year 12 Students (out of the 100 overall increased student population) and walking to school. The response incorrectly and intentionally with a car usage of 16%, this would result in an increased parking demand provides misleading driver numbers and the car parking impact of generated by the development by 3 cars. our current and future expanded school community. 3. The development proposal does not accurately reflect community It is acknowledged that a small increase is also likely to occur during HSC impact in current shade diagrams supplied. No information is periods, however overall impact on demand for student parking in the area will be negligible. provided on morning shade at the hours of (6am, 7am, 8am) and afternoon shade (4pm, 5pm, 6pm). Shade diagrams should be provided by the applicant to show real shade impact on As previously noted, SINSW aim to provide measures that would help neighbouring properties. No approval should be granted where decrease the use of private vehicles and increase active and public shade increases to historic Keston Avenue properties during transport options to commute to and from school. daylight hours particularly because of the limited capacity of those

properties to adapt due to existing heritage planning controls. Supply of limited shade data is intentional and misleading. The impact on Military Road shopping high street and Keston Avenue is unacceptable and the impact needs to be clearly defined prior to approval. The proposed shade impact will have significant loss of morning sun amenity on school neighbours. Additionally, please note that no calculation and shade impact is provided for nettings and the corresponding "Green House shade cloth effect" on the neighbours from rooftop courts.

- 4. All approved developments in Mosman Council Area are expected to meet or exceed current development standards. Current School parking as proposed is not adequate for business operations of the school and staff parking causes excessive impact on neighbours.
- 5. Loss of existing staff parking during construction unacceptable. Where does the applicant propose or imagine their employees will park when demountable building (3,4 &5) are installed on the current staff parking.
- 6. 6. The department should be required to contract their agreement to ALL submission commitments made to NSW Planning during this process.
- 7. The Applicant prior to approval must be required to provide a breakdown of staff numbers by Full Time and Part Time and the maximum "peak" number of school visitors on site during the life of the building. The use of FTE (Full time equivalent is not a standard for car parking requirements in NSW). The upgraded development including demountable buildings on current parking should require as a minimum 1 Car parking space per employee plus standard specialty use parking (Ambulance, Disability etc). Furthermore, Mosman Council has previous recent examples of parking requirements for multistorey development near the school such as the approved underground parking numbers for the public indoor pool development. Further consultation should be provided on all parking.
- 8. The PROPOSED "Green Travel Plan" is as amusing as it is fanciful. Clearly the Applicants employees nor a high proportion of future students or parents use green travel as a means to access the school. If the Applicant is genuine and true about their claims in relation to full implementation of this plan, they will agree to contract all current and future employees to use public transport as an

Changes to arrangements have been made for staff parking during construction with key school and local facility stakeholders.

It should be noted that since receipt of this submission, SINSW has reached out to Mr Sutton noting the receipt of the submission and the concerns raised within. Noting many of these issues raised have already been responded to via the EIS, RTS and supporting documents, SINSW will seek to provide further detail to this in a secondary direct response.

- employment requirement over the full life of the proposed new building. Currently in excess of 70% of all employees drive single occupant vehicles.
- The amended proposal fails to provide sufficient parking and therefore should be rejected or only approved with modification and acceptance of +100 onsite underground car parks to ensure new works meet current standards of operation in the Mosman Council area.
- 10. Tree Protection Zones (TPZ) identified by consultant are unacceptable and do not reflect Mosman Council Policy of tree maintenance for important local trees. The proposal does not reflect typical council requirements for significant compensation for any proposed tree loss with typically reduces construction scope and building scale. E.g bird habitat trees: White Gum, Bloodwood or Lilly Pilly. Furthermore, the classification of proposed removed trees of significance is incorrect. Please check and correct.
- 11. Loss of trees. Response to Applicant promises. The response suggests that overall shade loss of established trees will be mitigated by planting of small future shade trees. Rubbish. The proponent should not be allowed to cut down established trees and should be contracted with financial penalties of \$20,000 per tree that do not meet the agreed height and contracted shade cover within 5 years.
- 12. The applicant claims extensive use of cost benefit analysis to justify SSD works that trample standards in the Mosman Council Area, but no written evidence is provided of this cost benefit analysis or the financial results of that work. Please request this full financial work to be tabled prior to a decision.
- 13. Any SSD approval should restrict and contract construction equipment operations with NO movement on Keston Avenue to avoid impact to heritage values and noise. NO night or weekend works should be approved.
- 14. No applicant design provision has been made for the return of community pedestrian access outside of school hours for local residents to walk to the shops from Gladstone to Military Road. This design amendment would assist the return of community engagement and local support to the site.
- 15. Proposed Development has inadequate Parking Proposed response by Mosman Council. Community consideration should be

- given to the introduction of timed 2hour parking for all non-residents if the development application is approved without resolving staff parking.
- 16. Consultation Period inadequate. The response period has been impacted by COVID-19 lockdown restricting local movement and meetings. This was a NSW state imposed lockdown and no allowance has been made for additional community consultation at this challenging time. This is an unfair and unreasonable process. Considering the changes now made to the submission by the Applicant, a further round of community consultation should be advertised and meetings allowed to consider this modified development proposal.