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RESPONSE TO SUBMISSIONS SSD 10352

Moriah College
Staged Redevelopment

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CONTENTS

1.	Introduction	1
1.1.	Overview	1
1.2.	Structure of this Report	2
1.3.	Reference Drawings and Supporting Documentation	2
2.	Amended Proposal.....	3
2.1.	Overview of the Proposal.....	3
2.2.	Key Amendments to the Proposal	3
2.3.	Description of Proposed Amendments	5
2.3.1.	Stage 1 STEAM and ILC Building	5
2.3.2.	Stage 2 ELC Building Envelope	9
2.3.3.	Gate 4 Vehicular Access	11
2.3.4.	Bicycle Parking.....	11
2.3.5.	Public Domain and Landscaping	11
2.3.6.	Stormwater Management	12
2.4.	Staged Increase In Student and Staff Numbers	13
3.	Department of Planning Industry and Environment Preliminary Assessment	14
4.	Response to Submissions	16
4.2	Government Agency Submissions.....	16
4.1.1.	Heritage Council of NSW.....	16
4.1.2.	Transport for NSW.....	17
4.1.3.	Greater Sydney Commission Eastern and South Districts Team	17
4.1.4.	Environment Energy and Science Group	18
4.1.5.	Waverley Council.....	20
4.2.	Organisation Submissions	31
4.2.1.	Randwick City Council.....	31
4.2.2.	Centennial Park and Moore Park Trust.....	32
4.2.3.	Queens Park Residents.....	32
4.3.	Public Submissions.....	33
4.3.1.	Overview.....	33
4.3.2.	Key Matters Raised in Support of the Proposal	34
4.3.3.	Response to Key Matters Raised in Objection of the Proposal	34
5.	Assessment of Design Amendments.....	38
5.1.	Overshadowing	38
5.2.	Visual Impact	40
5.3.	Biodiversity Impact.....	40
5.3.1.	Methodology	40
5.3.2.	Existing Environment.....	41
5.3.3.	Assessment	41
	Avoidance of Impacts on Native Vegetation and Habitat	41
	Direct and Indirect Impacts on Native Vegetation and Habitat	42
	Indirect Impact to ESBS.....	42
	Summary.....	42
5.3.4.	Mitigation Measures	42
6.	Supplementary Strategic Planning Assessment	44
6.1.	Eastern City District Plan 2056	44
6.2.	Draft Waverley Local Strategic Planning Statement 2036.....	45
6.3.	Waverley Local Environmental Plan 2012 – Housekeeping Amendment	46
7.	Conclusion.....	47
	Disclaimer.....	49
Appendix A	Amended Architectural Plans and Urban Design Response	50

Appendix B	Amended Landscape Plans and Report	51
Appendix C	Amended Transport Impact Assessment	52
Appendix D	Amended Green Travel Plan	53
Appendix E	Biodiversity Development Assessment Report.....	54
Appendix F	Visual Impact Assessment Addendum.....	55
Appendix G	Amended Operational Plan of Management	56
Appendix H	Amended Preliminary Construction Traffic Management Plan	57
Appendix I	Amended Stormwater Report	58
Appendix J	Amended Civil Services General Layout Plan	59
Appendix K	Vegetation Management Plan	60

FIGURES

Figure 1 Summary of submissions received.....	1
Figure 2 Perspective of amended Stage 1 STEAM Building from Baronga Avenue	4
Figure 3 Amended Stage 2 Landscape Masterplan	4
Figure 4 Comparison of submitted and amended proposal from intersection of York Road and Baronga Avenue	6
Figure 5 Comparison of submitted and amended proposal from Baronga Avenue	7
Figure 6 Amended Stage 2 building envelope south-west perspective	10
Figure 7 Amended Stage 2 building envelope north perspective.....	10
Figure 8 Relocation of Gate 4 Entrance off York Road	11
Figure 9 Amended Landscape Masterplan – Stage 2	12
Figure 10 Key Issues Raised in Objections	33
Figure 11 Existing (left) and proposed (right) overshadowing at 9am – 21 st of June	38
Figure 12 Existing (left) and proposed (right) overshadowing at 12 Mid-day – 21 st June	39
Figure 13 Existing (left) and proposed (right) overshadowing at 3pm – 21 st June	39
Figure 14 PCTs occurring within the site	41
Figure 15 Area of the site to be included in the terrestrial biodiversity map.....	46

TABLES

Table 1 Amended Supporting Documentation.....	2
Table 2 Amended built form overview – Stage 1	5
Table 3 Amended built form overview – Stage 2.....	9
Table 4 Response to DPIE Preliminary Assessment	14
Table 5 Response to Heritage Council of NSW	16
Table 6 Response to TfNSW	17
Table 7 Response to Greater Sydney Commission Eastern and South Districts Team	17
Table 8 Response to EES Group	18
Table 9 Response to Waverley Council	20
Table 10 Response to Randwick City Council.....	31
Table 11 Response to Centennial Park Trust	32
Table 12 Response to Public Submissions	34
Table 13 Directions for Sustainability – <i>Eastern City District Plan 2056</i>	44
Table 14 Waverley LSPS Compliance	45

1. INTRODUCTION

1.1. OVERVIEW

This Response to Submissions (RTS) report has been prepared to respond to the community and agency submissions received during the public exhibition of the Environmental Impact Statement (EIS) for the Moriah College Redevelopment (the proposal). The EIS accompanied 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 proposal was publicly exhibited from 21 November 2019 and 20 December 2019. A total of 327 submissions were received from state and local government agencies, authorities and members of the public, as follows:

Figure 1 Summary of submissions received



Correspondence was received on 20 December 2019 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. Further correspondence was provided on 4 February 2020 which identified 'matters to be addressed' arising from DPIE's preliminary assessment of the application. These matters related to:

- Provide updated shadow diagrams
- Provide the option analysis undertaken during the design stages of the proposal, including consideration of options to reduce massing on the eastern boundary adjacent to Queens Park
- The biodiversity development assessment report (BDAR) should identify relevant biodiversity related conditions of consent for past approvals on site
- The BDAR should assess the impact of any proposed/new shadow to the Eastern Suburbs Banksia Scrub (ESBS) generated by the proposal
- Provide an updated landscape plan detailing planting of native species
- Update the Green Travel Plan (GTP) to include measures promoting cycling
- Provide an assessment of cycling as a future mode of transport.

This report provides a comprehensive response to the matters identified by DPIE and the issues raised in the submissions received. The proposal has been amended in order to respond to the issues raised and additional justification and technical information has been provided.

1.2. STRUCTURE OF THIS REPORT

This RTS report is structured as follows:

- **Section 2 – Amended Proposal:** Outlines amendments made to the design in response to matters raised in the submissions.
- **Section 3 – DPIE Preliminary Assessment:** Provides a response to key issues raised following the preliminary assessment undertaken by the NSW Department of Planning, Industry and Environment (DPIE), as outlined in correspondence received 4 February 2020.
- **Section 4 – Response to Submissions:** Provides a detailed response to key issues raised by the various agencies, organisation, and the public in each submission received.
- **Section 5 – Assessment of Design Amendments:** provides an environmental impact assessment of amendments to the proposal.
- **Section 6 - Supplementary Strategic Planning Assessment:** provides an assessment strategic planning documents not covered in the EIS or finalised since lodgement of the EIS.
- **Section 6 – Conclusion.**

1.3. REFERENCE DRAWINGS AND SUPPORTING DOCUMENTATION

This RTS 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
Amended Architectural Plans and Urban Design Response	<i>FJMT</i>	Appendix A
Amended Landscape Plans and Report	<i>360</i>	Appendix B
Amended Transport Impact Assessment	<i>The Transport Planning Partnership</i>	Appendix C
Amended Green Travel Plan	<i>The Transport Planning Partnership</i>	Appendix D
Biodiversity Development Assessment Report	<i>Cumberland Ecology</i>	Appendix E
Visual Impact Assessment Addendum	<i>Cardno</i>	Appendix F
Amended Operational Plan of Management	<i>Moriah College</i>	Appendix G
Amended Preliminary Construction Traffic Management Plan	<i>The Transport Planning Partnership</i>	Appendix H
Addendum Stormwater Report	<i>JHA</i>	Appendix I
Amended Civil Services General Layout Plan	<i>JHA</i>	Appendix J
Vegetation Management Plan	<i>Cumberland Ecology</i>	Appendix K

2. AMENDED PROPOSAL

2.1. OVERVIEW OF THE PROPOSAL

The SSDA seeks consent for the concept development of the southern portion of the campus and the first stage of building works, including demolition, construction of a new Science Technology Engineering Arts and Maths (STEAM) Building and Independent Learning Centre (ILC), internal drop off and pick up area and staff car parking, sports court complex, open space and landscape works.

The project seeks to:

- Re-orientate the High School Main Entrance away from the residential areas of Queen's Park. The High School Pedestrian Entrance will be at Gate 3 on Baronga Avenue and the Vehicular Entrance will be at Gate 4 on York Road, south.
- Provide an improved traffic management system with on-site Drop Off and Pick Up for the High School students and the Early Learning Centre entering from York Road (Gate 4).
- Provide enhanced visitor parking for after-hours School Community Events accessed from Gate 4, York Road.
- Provide a new contemporary learning facility in Stage 1 to replace existing building stock which is 25 years old. This facility will provide updated environments for Science, Technology, Engineering, Art and Mathematics (STEAM) and an Independent Learning Centre, including a new High School Library.
- Provide for the future development of a new Early Learning Centre (ELC) and college teaching rooms in Stage 2.
- Provide significantly improved external recreational areas for the school community, including additional landscaped areas with a focus on increasing the parkland setting of the campus.
- Enable the growth of the student numbers to be developed in stages over a period of time. Specifically, approval is sought to increase the maximum capacity by a total of 290 students incrementally over a 15+ year period. The school campus currently has 276 staff members, which is proposed to be increased by 26 (302 total) to accommodate the additional student numbers.

The first stage of works will include:

- Staged demolition of existing buildings and structures, removal of existing tennis court and trees.
- Construction of a new part three, part four-storey STEAM Building and ILC.
- Creation of a new student and visitor pedestrian entrance on Baronga Avenue.
- Construction of a new internal drop off and pick up area, as well as provision for an additional 17 staff car parking spaces, bicycle and bus parking, as well as waste and service vehicle loading area.
- Construction of a new sports court complex, new outdoor learning gardens, and open space.

2.2. 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 are a result of design development and in response to matters raised in the submissions received.

Amended Architectural Plans prepared by FJMT are provided at **Appendix A**. A summary of the proposed amendments to the proposal are outlined below:

- The overall height of the Stage 1 STEAM building has been reduced with the Level 4 plant volume on the southern wing further set back from the eastern boundary.
- Changes to the materiality of the building façade particularly at the eastern and southern elevations to soften the material choices on the exterior.
- The bulk and scale of the Stage 2 ELC building has been reduced to ensure that there is no longer any overshadowing of the Eastern Suburbs Coastal Banksia Scrub.

- The landscape planting schedule has been updated to include additional native species endemic to the area.
- The driveway off York Road (Gate 4) has been moved further west with the security gate relocated further north into the building boundary and the slip lane has been replaced by a dedicated slip turn off York Road into Baronga Avenue.
- Provision of 52 additional bicycle parking spaces (total of 160) than originally proposed.
- Internal changes to the arrangement and location of learning spaces, services, amenities, access / egress, etc. as a result of further engagement with School staff and students, as well as design development.

Figure 2 Perspective of amended Stage 1 STEAM Building from Baronga Avenue



Source: FJMT

Figure 3 Amended Stage 2 Landscape Masterplan



Source: 360

2.3. DESCRIPTION OF PROPOSED AMENDMENTS

FJMT has refined the proposal to meet the specific operational requirements of the School and to address the concerns raised by DPIE, government agencies and the community during the exhibition period. The key design changes relate to height, bulk, and scale of the Stage 1 and Stage 2 building envelopes. All design changes are indicated on the accompanying Amended Architectural Plans (refer **Appendix A**) and summarised below.

2.3.1. Stage 1 STEAM and ILC Building

A comparison of the submitted and amended proposal for the Stage 1 STEAM and ILC Building is provided at Table 2.

Table 2 Comparison of submitted and amended proposal – Stage 1

Component	Submitted Proposal	Amended Proposal	Change
GFA	7,462.5m ²	7,669m ²	+206.5m ²
Height	Maximum Building Height (Lift Overrun): 20.7m	Maximum Building Height (Lift Overrun): 20.7m	Nil
	Northern Wing (Stage 1A): 20.1m	Northern Wing (Stage 1A): 20m	-100mm
	Southern Wing (Stage 1B): 19.1m	Southern Wing (Stage 1B): 18.73m	-370mm

The extent of the reduction in building height and scale is demonstrated in Figure 4 and Figure 5. The overall height of the building has been reduced from that submitted with the original SSDA. The level 4 plant volume at the southern wing of the building has been setback further from the eastern boundary along Baronga Avenue. This creates a more recessive appearance from when viewed from the surrounding parklands.

Reductions in massing are achieved by the following:

- Northern wing is setback to reduce bulk on Baronga Avenue. Façade is simplified.
- Level 4 plant is setback, reducing bulk on Baronga Avenue.
- Level 3 is setback, further reducing bulk on Baronga Avenue.
- Clear separation of forms through increase indent to courtyard on Baronga Avenue reduces overall scale of the Stage 1 building.
- Clearer articulation of the built form and façade expression reduces perception of scale to the York Road elevation.

As demonstrated in the accompanying shadow diagrams the amended proposal's reduction in bulk and scale at the eastern elevation has reduced overshadowing of the pocket of fig trees in the south-western corner of Queens Park from 1pm in winter periods.

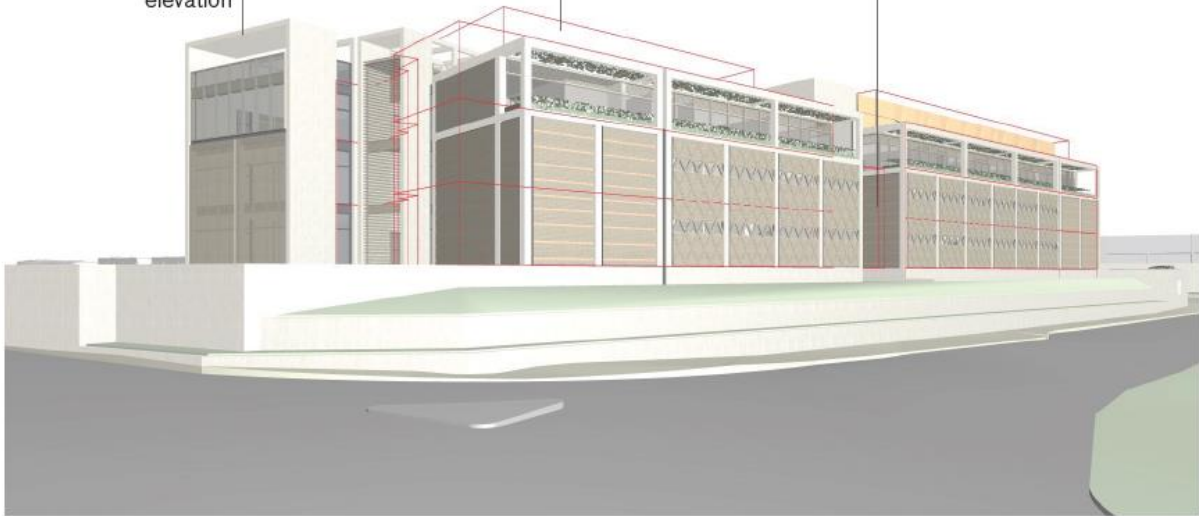
Figure 4 Comparison of submitted and amended proposal from intersection of York Road and Baronga Avenue



Clearer articulation of the built form and facade expression reduces the perception of scale to the York Road elevation

Overall reduction in bulk of eastern facade is further enhanced by the setback plan

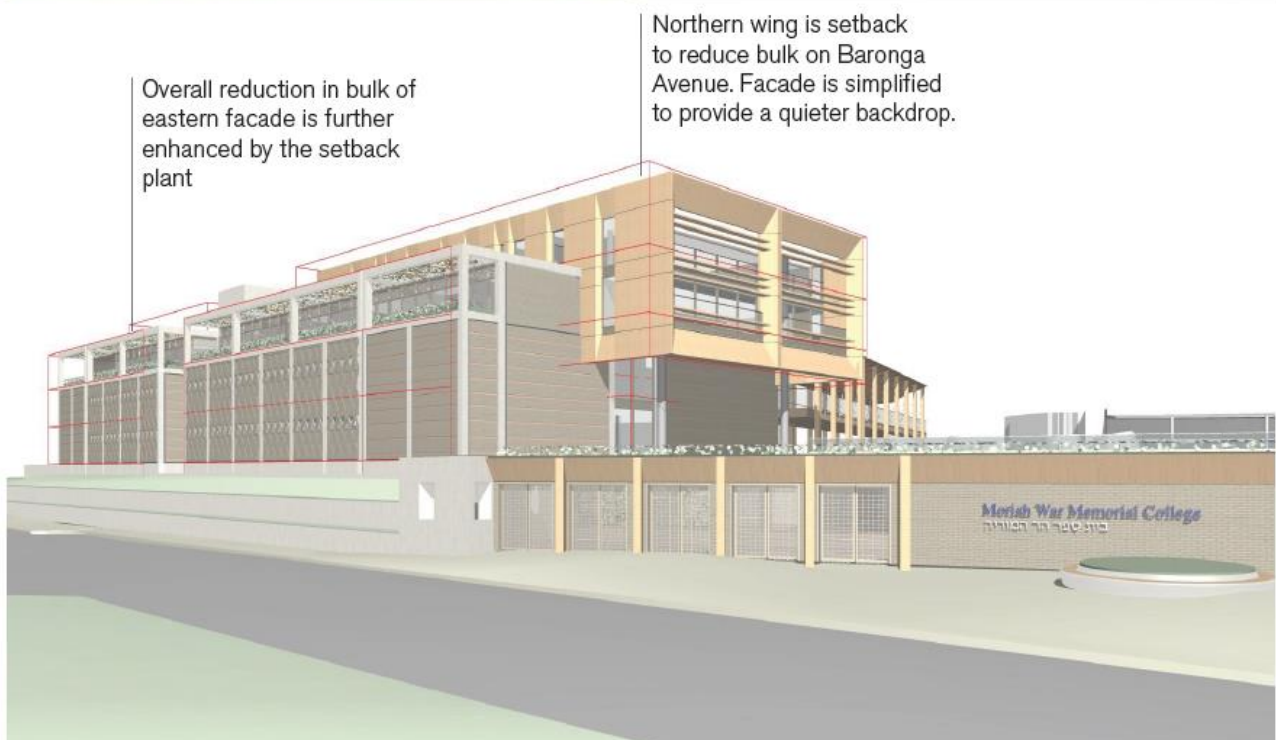
Clear separation of forms reduces overall scale



Revised "Response to Submissions" Proposal _York Road and Baronga Avenue intersection
Note: Overlaid red line indicates SSDA Proposal

Source: FJMT

Figure 5 Comparison of submitted and amended proposal from Baronga Avenue



Revised "Response to Submissions" Proposal _ view from High School Entrance looking towards York Road
Note: Overlaid red line indicates SSDA Proposal

Source: FJMT

A range of internal changes have been made to the arrangement and location of learning spaces, services, amenities, and access / egress, as a result of design development and continued engagement with School staff and students. In general, the major changes are identified as follows:

- Changes to Entry / reception including the Forum and entrance courtyard.
- Changes to internal lift position.
- Consolidation of Cores / Services.
- Internal Egress changes modified to provide compliance.
- Breezeway developed to provide enhanced external teaching space.
- Circulation refined to provide an improved response to way finding.
- Skylights and voids refined to provide improved access to daylight.
- Change to Functional relationships / planning to align with the College's Educational Model including Library to Ground & Lower Ground, D&T, Art, Food tech co-location, and Science Stacked over 2 floors.

A level by level description of the changes is provided below and further detailed within the Urban Design Response prepared by FJMT (refer Appendix A).

Level Upper Ground:

- Relocation of Library from Level 2/3 to Lower Ground and Upper Ground to provide a greater engagement with the main student zone within the new High School.
- Introduction of an innovation Centre to be used by the High School and placed at the heart of the new facility.
- Rationalisation of access/egress stairs to provide clear wayfinding, visible from the greater campus precinct.
- Development of services cores and support zones (amenities and stores) to provide a rational response to non-learning spaces.
- Relocation of the lift to enable the eastern form to be reduced in overall height along the boundary of Baronga Avenue.
- Development of the north/south axis to provide a greater connection with the campus masterplan and interface with outdoor learning opportunities.
- Design development of the Canteen to meet operational requirements.
- Consolidation of Design and Technology including the Kitchen to meet requirements of Educational Model.
- Increase indent to courtyard to provide a greater articulation between forms.

Level 1

- Relocation of Science over 2 levels to meet Educational Model.
- Relocation and consolidation of Art to meet Educational Model.
- Rationalisation of access/egress stairs to provide clear wayfinding, visible from the greater campus precinct.
- Development of services cores and support zones (amenities and stores) to provide a rational response to non-learning spaces.
- Relocation of the lift to enable the eastern form to be reduced in overall height along the boundary of Baronga Avenue.
- Increase indent to courtyard to provide a greater articulation between forms.

Level 2

- Relocation of Science over 2 levels to meet Educational Model
- Relocation and consolidation of General Learning to meet Educational Model.
- Rationalisation of access/egress stairs to provide clear wayfinding, visible from the greater campus precinct.
- Development of services cores and support zones (amenities and stores) to provide a rational response to non- learning spaces.
- Relocation of the lift to enable the eastern form to be reduced in overall height along the boundary of Baronga Avenue.
- Increase indent to courtyard to provide a greater articulation between forms.

Level 3

- Relocation of Executive to Level 3.
- Development of skylights above voids to provide enhanced daylight penetration.
- Relocation of plant to south / western zone.

Roof

- Development of skylights above voids to provide enhanced daylight penetration.
- Relocation of plant to south / western zone.

2.3.2. Stage 2 ELC Building Envelope

A comparison of the submitted and amended proposal for the Stage 2 building envelope is provided at Table 3. The extent of the reduction in building height and scale is demonstrated in Figure 6 and Figure 7. The building envelope has been further setback to the south and west to ensure there is no overshadowing of the Eastern Suburbs Banksia Scrub located on the adjacent lot. This has resulted in an overall reduction in GFA and a more refined three-dimensional building envelope.

Table 3 Comparison of submitted and amended proposal – Stage 2

Component	Submitted Proposal	Amended Proposal	Change
GFA	1,603.6m ²	1,526.8m ²	-76.8m ²
Height	11.6m	11.6m	Nil

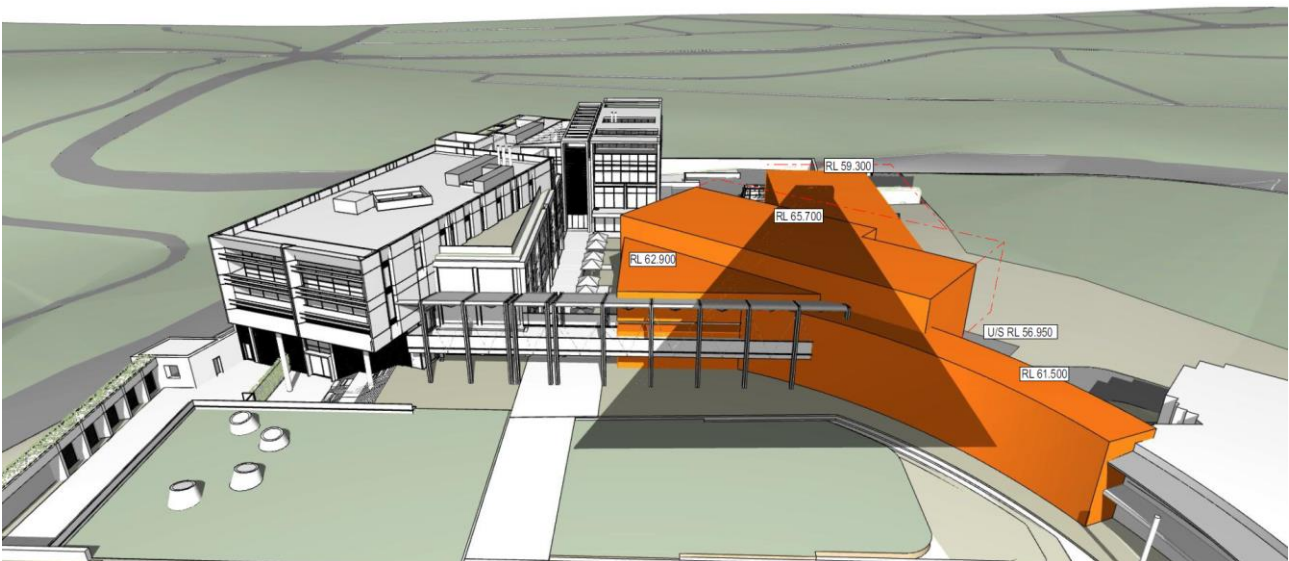
Figure 6 Amended Stage 2 building envelope south-west perspective



Note: overlaid red line indicates original SSDA proposal

Source: FJMT

Figure 7 Amended Stage 2 building envelope north perspective



Note: overlaid red line indicates original SSDA proposal

Source: FJMT

2.3.3. Gate 4 Vehicular Access

The site vehicular access point from York Road, known as Gate 4, has been moved further west along York Road to allow for the proposed slip lane within York Road. The security gate has been relocated further north within the property boundary. This allows a car to turn around wholly within the site when the gate is closed preventing reverse movements onto York Road.

In line with Waverley Council's suggestion, the existing median on York Road in front of the Gate 4 access is proposed to be extended towards the west to restrict access to left in / left out arrangement – to maintain the current scenario.

Figure 8 Relocation of Gate 4 Entrance off York Road



Source: FJMT

2.3.4. Bicycle Parking

The amended proposal includes an additional 52 bicycle parking spaces (160 total). This has been achieved through reorienting the proposed bicycle parking area within the Lower Ground Floor of Stage 1 and including additional bicycle parking spaces in the Baronga Avenue entry forecourt.

2.3.5. Public Domain and Landscaping

An amended site landscaping plan accompanies the proposal at **Appendix B**. The overall landscaping strategy as described in the original application is generally unchanged apart from minor amendments to ensure consistency with the amended built form of the proposal.

In accordance with agency comments received, the landscape planting schedule has been amended to include the provision of a greater diversity and quantity of local native provenance trees, shrubs and ground cover species from the ESBS native vegetation community, which is present and was once present on site.

A tree location plan has been prepared identifying species and locations across site for new tree planting. The species selection is represented by a majority of ESBS native trees. There remains a selection of exotic and broader native species to ensure the cross-cultural narrative of the school is clearly illustrated, including tree species significant to the Jewish community.

The combination of local endemic, and culturally significant species supports the school's theological teachings, community contribution and ecological habitat. The locally endemic tree species dominate the interface with the adjoining banksia reserve and landscape treatment fronting Baronga Avenue and Queens Park, and their presence continues throughout the campus to strengthen the ecological network, interspersed with culturally significant species and regional natives.

All previously listed species identified as invasive, including *Lampratinthus spectabilis* and *Thunbergia grandiflora* have been omitted from the planting schedule. A detailed list of the proposed planting is included in **Appendix B**.

The proposal achieves an increase in open space area of 4,520m² (or 51% of total site area) and an increase canopy coverage of 4,140m² (or 31% of total site area) at the completion of Stage 2.

Figure 9 Tree Species Masterplan – Stage 2



Source: 360

2.3.6. Stormwater Management

An amended Civil Services General Layout Plan accompanies the proposal at **Appendix J** which has been revised to reflect the amended proposal design and to ensure that no additional stormwater will impact the ESBS.

2.4. STAGED INCREASE IN STUDENT AND STAFF NUMBERS

The school campus currently has an approved maximum capacity for 1680 students, including no more than 80 ELC students. As stated in the EIS, the proposal seeks to increase this maximum capacity by a total of 290 students to 1970, including no more than 130 ELC students. It is anticipated that the proposed increase in students will occur progressively over a 15+ year timeframe, as outlined in Table 4.

Table 4 Proposed increase in student numbers

Year	ELC	K-12	Total	Difference
Current Student Cap	80	1600	1680	-
Proposed 2023 (completion stage 1)	80	1760 (+160)	1840 (+160)	Additional 160 students in K-12
Proposed 2030 (completion of stage 2)	130 (+50)	1800 (+40)	1930 (+90)	Additional 40 students in K-12 + Additional 50 students in ELC
Proposed 2036+	130	1840 (+40)	1970 (+40)	Additional 40 students in K-12

In accordance with the approved Plan of Management, Moriah College is required to ensure the staff population is maintained at reasonable numbers of full time or part time staff necessary to implement the College educational curriculum. The College currently employs approximately 276 full time and part time staff. It is anticipated that an additional 26 staff will be required over the 15+ year timeframe to accommodate the proposed increase in students across ELC and K-12.

The proposed estimated changes to the student and staff numbers across each stage of the development are summarised in Table 5.

Table 5 Proposed staging of increase in student and staff numbers

Group	Existing Population (Year 2019)	Approved Population	Stage 1 (Year 2023)	Stage 2 (Year 2030)	Ultimate Stage (Year 2036)
Early Learning Centre Children	80	80	80	130	130
K-12 Students	1,455	1,600	1,760	1,800	1,840
Primary School Students	595	654	720	736	752
High School Students	860	946	1,040	1,064	1,088
Total Students	1,535	1,680	1,840	1,930	1,970
Primary School and High School Staff	276	276	293	298	302
Early Learning Centre Staff	10	10	10	13	13
Total Staff	286	286	303	311	315

3. DEPARTMENT OF PLANNING INDUSTRY AND ENVIRONMENT PRELIMINARY ASSESSMENT

Correspondence was received on 20 December 2019 from DPIE requesting that the proponent provide a written response to the issues raised in the submissions. Further correspondence was provided on 4 February 2020 which identified 'matters to be addressed' arising from DPIE's preliminary assessment of the application. These matters are responded to in **Table 4** below.

Table 6 Response to DPIE Preliminary Assessment

Submission	Response
<u>General</u>	
<i>Provide updated shadow diagrams that correct discrepancies between the shadows generated by existing buildings on 'Existing Sunstudy21stJune' plans and shadows generated by existing buildings on 'Proposed Sunstudy21stJune' plans.</i>	This error has been corrected in the amended Architectural Plans and Urban Design Response at Appendix A .
<u>Built form and urban design</u>	
<i>Provide information that details whether an option analysis was undertaken in the design stages of the proposed development, including consideration of options to reduce massing on the eastern boundary adjacent to Queens Park.</i>	<p>A detailed options analysis has been provided in the Urban Design Response at Appendix A. A total of four massing options were considered by FJMT during the design development stage. These options built on the previous work undertaken by Gardner Wetherill Associates, who developed a School Master Plan over a period of 25 years since its original construction in 1994.</p> <p>In response to submissions received the Baronga Avenue (eastern boundary) massing and façade treatment has been further refined to reduce bulk and scale. The design has been further resolved to provide a highly articulated and engaging façade contributing to both the public domain and the embodiment of the culture of the college.</p> <p>The roof top plant zone to the western form has been setback substantially from Baronga Avenue reducing the overall bulk when viewed from both Queens Park and Centennial Park. The northern form of the western wing has been further articulated to provide a finer grain detail and to be also read as a clear part of a whole. This further reduced the bulk and scale from a more monolithic form to a collection of forms.</p>

Submission	Response
<u>Biodiversity and landscaping</u>	
<i>The required biodiversity development assessment report (BDAR) should identify relevant biodiversity related conditions of consent attached to past approvals on site that relate specifically to the protection of the Eastern Suburbs Banksia Scrub (ESBS) adjoining the site. The proposal should be assessed against any relevant and identified conditions of consent with any conflicting aspects of the proposal identified and appropriately justified.</i>	An updated BDAR is provided at Appendix E . The findings of this report are discussed at Section 5.3 of this RTS report.
<i>The BDAR should assess the impact of any proposed/new shadow to the ESBS generated by the proposal.</i>	The proposal has been amended to remove all overshadowing associated with the Stage 2 ELC building envelope from the ESBS to the west.
<i>The RtS should include an updated Landscape plan detailing: the native vegetation community that is present and previously existed on site; location, quantity, species and size of all proposed planting of trees and shrubs; updated species schedule restricted to the provision of diverse local native provenance trees, shrubs and ground cover species from the ESBS native vegetation community which is present and was once present on site.</i>	Amended Landscape Plans are provided at Appendix B . The updated planting schedule includes a greater quantity and diversity of native provenance trees, shrubs, and groundcovers species from the ESBS native vegetation community.
<u>Transport</u>	
<i>Given the likely increase in bicycle use due to increased bicycle parking and a planned cycleway on Darley Road, due to commence construction in 2020, Section 7.1 of the Traffic Impact Assessment (TIA) should be updated to include bicycles as a future estimated mode of transport.</i>	An amended Transport Impact Assessment is provided at Appendix C . Table 7.12 includes cycling in the existing and projected modal split. A 2% increase in bicycle use is projected for staff and students which is considered achievable noting the proposed increased bicycle parking and end of trip facilities.
<i>The Green Travel Plan (GTP) should be updated to include and promote increased bicycle use given the increase in end-of-trip facilities and bicycle parking proposed.</i>	An amended GTP is provided at Appendix D . The plan includes the recommendation for a program for students to learn to ride a bicycle in a safe and responsible matter. This initiative, along with the proposed increase in end-of-trip facilities and bicycle parking is expected to result in a 2% increase in bicycle use for staff and students.

4. RESPONSE TO SUBMISSIONS

The following section provides a detailed response to issues raised by the various agencies, organisation, and the public in each submission received. Further discussion and detail is provided in the supporting technical documentation appended to this RTS 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

Note: the submissions provided by the following agencies did not raise any issues that required further response or action by the Applicant:

- Government Architects Office of NSW

4.1.1. 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 7 Response to Heritage Council of NSW

Submission	Response
<u>Recommended Mitigation Measures</u>	
<i>All excavation works shall be limited to areas of existing buildings;</i>	It is not possible to limit excavation works to areas of existing buildings. Excavation will be required to facilitate the proposed underground car park and structural footings for the proposed buildings.
<i>New landscape elements should be introduced within the subject area along Baronga Avenue and York Road to reduce visual impact;</i>	The Landscape Plans provided at Appendix B incorporate perimeter landscape treatment and tree planting to the Baronga Avenue and York Road frontages.
<i>A detailed landscape maintenance plan shall be prepared and implemented to ensure that the new vegetation is maintained and retained in the future; and</i>	Agreed. An outline of landscape maintenance strategy and schedule of maintenance regime has been included in the revised documentation.
<i>Close consultation with relevant local councils and state agencies shall be undertaken to mitigate impacts to the LEP listed heritage items in the vicinity and heritage conservation areas.</i>	Agreed.

4.1.2. 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**. Further discussion is provided in the Amended Transport Impact Assessment at **Appendix C**.

Table 8 Response to TfNSW

Submission	Response
<u>Proposed road modifications</u>	
<i>Any road modifications to be made to Baronga Ave or to Queens Park Road/York Road in the future would require review/comment from State Transit Authority to facilitate continued effective bus operations to and past the site.</i>	Noted. The proposed road modifications are expected to be considered by the Waverley Traffic Committee in the coming months. It is understood the State Transit Authority will be consulted as part of this process.
<i>Prior to the issue of an Occupation Certificate, the applicant prepare a comprehensive Travel Plan (or amend and expand the existing GTP) taking into account of the GTP initiatives outlined in the framework GTP to assist with increasing the mode share of walking and cycling.</i>	An amended GTP is provided at Appendix D .
<i>A detailed Construction Pedestrian and Traffic Management Plan for various stages detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to the relevant consent authority for approval prior to the issue of a Construction Certificate.</i>	Noted. A condition of consent can be imposed in relation to this comment.

4.1.3. Greater Sydney Commission Eastern and South Districts Team

A review of the Greater Sydney Commission Eastern and South Districts Team submission has been undertaken and a detailed response to the issues is provided in Table 7.

Table 9 Response to Greater Sydney Commission Eastern and South Districts Team

Submissions	Response
<u>Planning Matters</u>	
<i>The EIS should discuss and address any relevant planning priorities under the Sustainability section of the Eastern City District Plan</i>	Refer Section 6.1 of this report.

Submissions	Response
<p><i>The EIS should confirm whether the proposal will involve work on land that is identified on the Terrestrial Biodiversity Map under Clause 6.4 of the LEP.</i></p> <p><i>For information, the DPIE issued Gateway Determination on 3 October 2019 for a Planning Proposal which seeks to rezone a portion of Lot 1 in DP701512 and a very small portion of Lot 22 in DP879582 and Lot 3 in DP701512</i></p>	<p>The proposal will not involve work on land that is identified on the Terrestrial Biodiversity Map. Refer to Section 6.3 of this report.</p>
<p><i>The EIS should consider the draft Waverly Local Strategic Planning Statement where relevant</i></p>	<p>Refer Section 6.2 of this report.</p>

4.1.4. 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 8. Further discussion is included in the amended Biodiversity Development Assessment Report (BDAR) at **Appendix E**.

Table 10 Response to EES Group

Submission	Response
<u>Aboriginal Cultural Heritage Assessment Report</u>	
<p><i>Recommendations included in the ACHAR should be implemented as conditions of consent.</i></p>	<p>Agreed. The Applicant accepts these as conditions of consent.</p>
<u>Biodiversity</u>	
<p><i>Comments included to assist in the preparation of the BDAR</i></p>	<p>Comments provided have been addressed in the updated BDAR provided at Appendix E.</p>
<u>Landscaping</u>	
<p><i>The Landscape Report and mitigation measures are amended, and a condition of consent is included which requires the landscaping for this SSD, particularly for the buffer areas adjacent to Lot 23 and Lot 1, to use a diversity of local native provenance species from the relevant ESBS native vegetation community that occurs and once occurred on the site to improve biodiversity (rather than use exotic species and non-locally occurring native species).</i></p> <p><i>The Response to Submissions (RTS) demonstrates that the plant species to be used in the landscaping are species of local provenance from the ESBS native vegetation community.</i></p>	<p>The landscape planting schedule has been amended to include the provision of a greater diversity and quantity of local native provenance trees, shrubs and ground cover species from the ESBS native vegetation community which is present and was once present on sit.</p> <p>The locally endemic tree species dominate the interface with the adjoining banksia reserve and landscape treatment fronting Baronga Avenue and Queens Park, and their presence continues throughout the campus to strengthen the ecological network, interspersed with culturally significant species and regional natives.</p>

Submission	Response
<p><i>EES recommends for elsewhere on the site, other than the buffer areas, that the development:</i></p> <ul style="list-style-type: none"> • <i>replaces the trees to be removed with local provenance native plant species from the ESBS native vegetation community, particularly areas adjacent to the remnant ESBS. Information should be sought from Randwick Council's nursery for appropriate local provenance species</i> • <i>uses advanced and established trees preferably with a minimum plant container pot size of 75-100 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</i> • <i>provides enough area/space to allow the trees to grow to maturity.</i> <p><i>The Landscape Plan shall include details on:</i></p> <p><i>a) the native vegetation community that occur or once occurred on site b) a list of local provenance tree, shrub and groundcovers to be used in the landscaping c) the quantity and location of plantings d) the pot size of the local native trees to be planted e) the area/space required to allow the planted trees to grow to maturity f) plant maintenance including on-going weed management. The planted vegetation should be regularly maintained, monitored and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species.</i></p>	<p>All trees have been scheduled, including nominating their size (a minimum of 100L).</p> <p>A detailed list of the proposed planting is included in Appendix B. An outline of landscape maintenance strategy and schedule of maintenance regime has been included in the revised documentation.</p>

4.1.5. Waverley Council

A review of the Waverley Council submission has been undertaken and a detailed response to the issues is provided in **Table 9**.

Table 11 Response to Waverley Council

Submission	Response
<u>Traffic and Transport</u>	
<i>The applicant should demonstrate that the net increase of student enrolments and staff will not further increase demand for drop off and pick up (DOPU) activities and will consequently increase traffic movements on the surrounding road network, specifically if traffic and transport issues are not adequately addressed.</i>	<p>The school will implement travel demand management measures to minimise its impact on the surrounding road network. The proposed measures are expected to reduce the school car use by 10%. The achievement of 10% will ensure that traffic levels post development are similar to the existing scenario.</p> <p>Refer amended Transport Impact Assessment at Appendix C.</p>
<p><i>Council strongly recommends Moriah College take a proactive approach to encouraging students and staff to green travel modes and plan initiative to alleviate traffic and parking impacts arising from the proposed growth of the student population. Further initiatives must firstly be implemented and additional public transport services (such as bus services) guaranteed to reduce any net impact on the surrounding road network.</i></p> <p><i>No actual GTP or report appears to have been submitted.</i></p>	<p>A GTP accompanied the EIS lodged in November 2019. The GTP details the recommended measures that can be implemented to encourage active transport and reduce car use (especially single car trips).</p> <p>An updated GTP accompanies the RTS at Appendix D. In addition to the previous recommended measures proposed, the amended GTP includes:</p> <ul style="list-style-type: none"> – A 'learn to ride' program to offer lessons for students learning how to ride bicycles. – An additional shuttle bus services to what is currently provided between Bondi Junction and Moriah College is recommended.
<i>Any increase to school population should be staged over a number of years.</i>	The proposed redevelopment is to be delivered in two key stages. It is anticipated that the proposed increase in students will occur progressively over a 15+ year timeframe. Refer Section 2.4 of this Report for further detail.
<i>A revised questionnaire/study of school parents and staff (minimum of 80% response rate) on transport trends is recommended.</i>	Overall, a response rate of 62% has been obtained from the travel questionnaire survey amongst students and staff which is considered adequate. No further questionnaire / study will be undertaken.
<p><i>Consideration should be given to providing additional bicycle parking beyond the minimum amount.</i></p> <p><i>'learn to ride a bike' programs could be incorporated into the school programming (eg sport activities)</i></p>	<p>The amended proposal includes an additional 52 bicycle parking spaces (now 160 in total). This exceeds the minimum statutory requirement of 108 bicycle parking spaces.</p> <p>A 'learn to ride' program has been included as a recommended measure in the GTP at Appendix D.</p>

Submission	Response
<p><i>Provide ample locker or storage areas within the new Science, Technology, Engineering, Art and Mathematics (STEAM), Independence Learning Centre and Library buildings to ensure adequate storage for students' items and equipment.</i></p>	<p>The amended architectural plans have identified and annotated appropriate locations for the placement of 500 lockers across both the Stage 1 and Stage 2 buildings. This includes a total of 419 lockers within Stage 1.</p> <p>The existing campus includes student lockers provided at a rate of 1 per student. The Stage 1 building proposal includes 419 new lockers which are designed into the furniture and classroom walls to be as accessible and unobtrusive as possible. The size of the lockers allows for the short term storage of sports clothes, bicycling gear, spare jackets and school books to reduce the amount of items students have to carry each day. The new building will cater for 22% of the school's total locker needs and will cater for the proposed growth in students and maintain a provision of 1 locker per student.</p>
<p><i>The applicant should investigate opportunities to improve and increase AM bus travel mode share in consultation with Council and the State Transit Authority (STA).</i></p>	<p>It is understood that the Mayor of Waverley Council (Councillor Paula Masselos) is currently engaging with the STA regarding increased bus services in the Local Government Area.</p>
<p><i>Consideration should be given to providing increased shuttle bus services between the school and the Bondi Junction interchange to enable greater flexibility with students and staff using public transport.</i></p>	<p>An additional shuttle bus service between Bondi Junction and the School has been included as a recommended measure in the updated GTP (Appendix D).</p>
<p><i>Council's Infrastructure Services and Strategic Transport departments generally support the proposed road and intersection upgrades as part of the SSD application. They have provided specific comment on each of the proposed upgrades in Council's submission including:</i></p> <p><i>i. York Road pedestrian refuge to be upgraded to the NSW Roads and Maritime Services (RMS) standard refuge, including a 'zebra' pedestrian crossing. The concept of the pedestrian crossing on York Street is strongly supported, however a raised form of the crossing is not supported due to STA buses using this route to access the nearby Bondi Junction depot.</i></p> <p><i>ii. Extension of the existing pedestrian crossing in Baronga Avenue across the layby is supported. Lighting should be reviewed for compliance with AS1158 - Lighting for Roads and Public Spaces.</i></p>	<p>Concept design plans for the proposed infrastructure upgrades are presented in the TIA (refer Appendix C) and Architectural Plans Package (refer Appendix A). These will be presented to Council at the Waverley Traffic Committee once finalised.</p> <p>(i) As requested, the York Road pedestrian refuge is to be upgraded to either a 'zebra' crossing or a Children's crossing. The detailed design of the crossing is subject to finalisation at the Waverly Traffic Committee prior to implementation.</p> <p>(ii) Noted. Condition of consent can be included.</p> <p>(iii) As requested, the Gate 4 gateway is further set back inside the property to cater for queuing.</p> <p>(iv) Noted.</p>

Submission	Response
<p><i>The crossing will likely be required to be refurbished or reconstructed.</i></p> <p><i>iii. The entrance to Gate 4 of the Campus needs to be set back into the property to reduce queuing back onto York Road.</i></p> <p><i>iv. The recommended slip lane treatment to the York Road / Baronga Avenue is supported.</i></p> <p><i>v. The recommended 'seagull treatment' for the York Road / Queen Park Road intersection is supported. A pedestrian refuge in this location would assist community members to safely cross the wide intersection when accessing the existing pedestrian refuge or proposed Zebra Crossing on York Road to access Centennial Park.</i></p>	<p>(v) Options for a pedestrian refuge at this location are presented at Section 7.2.4 of the TIA at Appendix C. It is requested that Council further investigate the need for a pedestrian refuge noting that initial design testing has found that a refuge could result in pedestrian safety issues.</p>
<p><i>Council's Infrastructure Services department recommends meaningful consultation with residents to determine appropriate traffic calming measures with input from Council traffic engineers. The Department should ask the applicant to consider future LATM measures for the Queens Park residential streets to respond to projected traffic impacts on residential streets of Queens Park as a result of the proposal.</i></p>	<p>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 LATM plans.</p>
<p><i>The introduction of the slip lane at the intersection of York Road and Baronga Avenue may conflict with pedestrian traffic, particularly students alighting from bus services operating along Clovelly Road. The applicant's 'Green Travel Plan' should be amended to direct students using Clovelly Road bus services to alight immediately before Avoca Street and use the footpath along Avoca Street to access the signalised crossing over Darley Road and then the shared path through Queens Park to access the school via the Baronga Avenue Gate.</i></p> <p><i>The applicant should either request bicycle access from the Queens Park shared path to the Baronga Avenue zebra crossing, provide the infrastructure in coordination with Council and the Centennial Park Trust or propose an alternative route.</i></p> <p><i>More broadly, the proposal should have greater consideration of pedestrian and bike movements to ensure a balanced transport solution that reflects the transport hierarchy adopted in Council's People Movement Places Policy.</i></p>	<p>There is no existing pedestrian facility at the York Road and Baronga Avenue intersection and therefore the proposed slip lane is not expected to affect or conflict with pedestrian traffic. Additional measures are provided to encourage use of Queens Park shared path to access the school via Baronga Avenue.</p>

Submission	Response
<u>Built Form and Urban Design</u>	
<p><i>The non-compliance with the height of buildings development control will result in unreasonable visual and overshadowing impacts on Queens and Centennial Park rendering the proposal inconsistent with the objectives of the height of buildings clause in the LEP.</i></p> <p><i>The overall building height of the buildings is not supported as:</i></p> <ul style="list-style-type: none"> <i>• it is double the maximum height set under the LEP</i> <i>• the Campus is surrounded by open park land and significant tree plantings to the east, west and south and the buildings will appear dominant in this surrounding landscape setting</i> <i>• it will cause overshadowing of the large pocket of Fig trees in the south-west corner of Queens Park.</i> <p><i>A fourth storey is not supported, and Council recommends it be either deleted or set back to appear recessive and less conspicuous from surrounding parklands.</i></p>	<p>As described in Section 2, the proposal has been amended to address concerns raised by Council, government agencies and the community. The key design changes relate to height, bulk, and scale of the Stage 1 and Stage 2 building envelopes.</p> <p>Specifically, the overall height of the Stage 1 STEAM building has been reduced with the Level 4 plant volume on the southern wing further set back from the eastern boundary. The amended proposal has reduced overshadowing of the pocket of Fig trees in the south-western corner of Queens park from 1pm in winter periods.</p> <p>In addition, the bulk and scale of the Stage 2 ELC building has been reduced to ensure that there is no longer any overshadowing of the Eastern Suburbs Coastal Banksia Scrub.</p> <p>We note Section 4.12.3 of the EIS provided a justification for the exceedance of the height of building development standard. Notwithstanding, that a Clause 4.6 variation would not ordinarily be required in this instance as per Clause 42 of <i>State Environmental Planning Policy (Educational Establishments and Childcare Facilities) 2017</i>.</p>
<p><i>The relationship to Centennial Park is blocked by existing and proposed buildings and structures. The physical or visual connection to the western side requires greater resolution to achieve the initial conceptual idea underpinning the master plan.</i></p>	<p>The Proposal's relationship with Centennial Park is established by the new 'Green Connector' and the existing north/south link. To ensure that this link achieves full clearance, the Stage 2 building envelope has been further reduced in bulk and scale.</p>
<p><i>The creation of two distinct forms separated by a bridge for the Stage 1A and 1B wings of the proposed buildings is supported. It is recommended that:</i></p> <ul style="list-style-type: none"> <i>• These two forms are articulated further to break up the facades of the buildings. An alternative solution is a stronger vertical emphasis of the façade to reduce the horizontal appearance of the building.</i> <i>• Materials with high sound absorption utilised in the informal spaces to reduce audible interference from neighbouring formal classrooms and to ensure an acceptable level of sound attenuation is achieved that is suitable for learning.</i> 	<p>The separation between Wings A and B of Stage 1, is defined by a central stair – a strong vertical element that further punctuates the eastern facade of the building along Baronga Avenue, by providing a 5.6m-wide recess. This makes for two distinct volumes on this elevation of the proposal, reducing its horizontality.</p> <p>Additionally, horizontality is further reduced by the amended proposal through fine-grain texturing of the brick façade with layers of hit and miss screening, different levels of relief in the coursing, and the introduction of a triangulated pattern - a motif that runs through various elements of the building, from the glazing on the eastern facade, to the skylights and central voids within.</p>

Submission	Response
	<p>Central informal spaces are designed such that acoustically-sound partitions can be used to define and enclose them, while maintaining their openness and flexibility, for example, concertina door systems and acoustically rated glazing. Similarly, partitions between central spaces and classrooms can receive the required acoustic treatment, with lockers lining these walls acting as an additional sound buffer.</p>
<p><i>The new security wall is lacking detail and resolution; the alignment is demonstrated in the landscape package with no specific detail of the material, treatment or construction type. The interpretive elements are supported, however greater clarity on the type of wall is required. It is recommended that the wall is integrated into the existing landscaped retaining wall with additional vegetation to screen the wall or integrated into building to reduce the visual impact of a large security wall.</i></p>	<p>The amended proposal includes a security wall that is of face-brick construction, articulated through patterned placement of bricks.</p> <p>Additional planting is proposed to achieve integration into the landscaped retaining wall along the eastern boundary.</p>
<u>Heritage</u>	
<p><i>There is a need to provide further detail of security measures and to ensure that these do not impact visually or functionally on the surrounding listed heritage sites, the amenity of the general public and the established flora and fauna of the setting.</i></p> <p><i>All external security fixtures and fencing are to be reviewed as to aesthetic impact, light spill on park and road areas and intrusion on public amenity. The quality of the setting is to take precedent over security construction in all areas of interface with the public realm.</i></p>	<p>Security measures implemented include:</p> <ul style="list-style-type: none"> – Two lines of security are provided at the Baronga Avenue entrance. – A blast-proof facade along Baronga Avenue. <p>These security measures have been carefully designed and integrated into the built form so as not to impact on the visual setting or surrounding heritage sites. The first line of security (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.</p> <p>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.</p> <p>The blast-proof facade along Baronga Avenue has been carefully developed and detailed through planting, artwork integration and durable yet aesthetically pleasing materiality.</p>

Submission	Response
<p><i>The photomontage and the visual impact assessment images taken from surrounding parklands are considered to be based on limited and selective viewing points. Site inspection supports the proposed development having far greater visual impact on surrounding parklands. The scale of the development particularly that generated by the fourth storey and the relationship of the new works to the parklands is considered substantial and should be mitigated by an amended design.</i></p> <p><i>The photomontages show the new works rising substantially over the tree screen and the tree screen being of limited extent to the southern end of Baronga Avenue and along York Road, the areas having the greatest impact upon views between Centennial and Queens Parks.</i></p>	<p>The visual impact assessment undertaken (refer Appendix F) concludes that the proposal would not have an unacceptable impact on views from the locality specifically Queens Park and Centennial Park. The visual impact addendum to accompany the amended proposal has found that views from Queens Park marginally improve with built form less visible in these views as a result of the decreased building height and additional articulation in the facade.</p>
<p><i>Apart from the designated area of Eastern Suburbs Banksia Scrub to the south of the primary school carpark, there appears little or no effort to integrate the species within the overall landscape of the School campus despite the importance of the species.</i></p> <p><i>Eastern Suburbs Banksia Scrub planting should be extended into the overall campus rather than marginalised. This planting is invaluable to small birdlife and extension of planting areas enables movement of fauna through the Campus.</i></p> <p><i>Increased landscape planting within the Campus and to the hard-paved forecourt fronting Baronga Avenue.</i></p>	<p>The landscape planting schedule has been amended to include the provision of a greater diversity and quantity of local native provenance trees, shrubs and ground cover species from the ESBS native vegetation community which is present and was once present on site. A detailed list of the proposed planting is included at Appendix B.</p> <p>The entrance fronting Baronga Avenue is largely a paved forecourt to support the daily function as the school's primary entrance and congregation space. Additional gardens in this area are not practical and compromise the functionality of the main entrance.</p> <p>As a gateway to the school, the extent of paved forecourt is necessary, however this space is supported by a green roof to the entry gates providing gardens and planting with connection to the landscape buffer along Baronga Avenue. Additionally, increase landscape gardens have been provided to the roof and rear of the Early Learning Centre Building, identified to be composed predominantly of ESBS species.</p>

Submission	Response
<p><i>Consider reorientation of the STEAM building to an east- west alignment integrated with the curve of the existing campus buildings rather than an element that dominates the Baronga Avenue frontage and Baronga Avenue and York Road corner. Re-orientation would also reduce the impact on visual links between Centennial and Queens Parks both from street level and from within these parks. This would also enable retention of the low-scaled frontage to much of Baronga Avenue.</i></p>	<p>Options considered during the design development of the proposal and the rationale as to why the proposed orientation of the STEAM building was chosen are detailed in the Urban Design Response at Appendix A.</p>
<p><i>A further front setback of the fourth-floor level. In the event of re-orientation not being provided, a front setback of the fourth floor would substantially reduce the bulk of the building seen from Baronga Avenue and enable the top floor to serve as a covered way over the pedestrian path from the York Street entry.</i></p>	<p>Refer to Section 2.3 of this report. The Level 4 plant volume on the southern wing (Stage 1B) has been set back from the eastern boundary, to appear recessive and less conspicuous from surrounding parklands.</p>
<p><i>Details of any external signage are to be included in the SSD application.</i></p>	<p>External signage detail plans are provided at Appendix A.</p>
<p><u>Operational and Event Management</u></p>	
<p><i>The PoM should include a map of the campus.</i></p>	<p>Included in the amended Operational Plan of Management at Appendix G.</p>
<p><i>Council recommends that the constitution and terms of the Moriah College Consultative Committee be modified so that meetings are not necessarily held at the offices of Waverley Council and to remove the role of Council to mediate consensus on decisions.</i></p>	<p>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.</p>
<p><i>Commentary and concerns on proposed additional events, shown in the ‘changes’ version of the PoM, are as follows:</i></p> <p><i>i. No. 53 Year K-2 Sausage Sizzle & Movie Night – Tuesday 4:30pm and 6:30pm. Council has previously not approved and supported screening of movies as an ‘additional use’ as inadequate evidence has been provided in the past that clearly demonstrates that this event/activity is considered normally ancillary to a school use and the operations of the school. Generally, the use of the school for regular screening of movies outside of school hours is not supported.</i></p>	<p>(i) This event is considered ancillary to the school use in that it is only available to students, parents, and staff.</p> <p>(ii) The time out for this event has been amended to 10:00pm.</p> <p>(iii) The time out for this event has been amended to 10:00pm.</p>

Submission	Response
<p>ii. No.55 Yom Ha'atzmaut (Israel Independence Day Celebration) Fete and Concert – “bump out: 11pm”. Council has never approved any event that extends past 10pm.</p> <p>iii. No.63 Major College Community Celebrations (i.e. College Anniversary, Open Day, Spring Fair Event Duration up to 6 hours on Sunday) “bump out: 11pm”. Council has never approved any event that extends past 10pm.</p> <p>Council recommends the applicant remove/and or modify these events from the schedule of ‘out of core activities’ in the PoM.</p>	
<p>The PoM submitted with the SSD application states the maximum student population for the ELC has increased from 80 to 130 students, which would be at odds with the current consent. Given the ELC does not substantially form part of Stage 1 of the overall redevelopment project and the detailed design of the ELC, including indoor and outdoor areas, is unknown, the student population of 80 for the ELC should remain a maximum of 80 students. Consideration for the approval of the increase of the capacity of the ELC should be deferred for the relevant planning application for Stage 2 of the overall project.</p>	<p>The proposal seeks concept approval for a future ELC at Stage 2. The EIS and RTS has provided a comprehensive assessment of the potential impacts associated with the proposed increase in ELC student numbers and has demonstrated that there is sufficient capacity, indoor and outdoor areas, to accommodate this increase. Therefore, it is reasonable for the POM to include the increase in ELC student numbers.</p>
<p><u>Tree Management and Biodiversity Impacts</u></p>	
<p>Council recommends that the Department adopt a condition in any development consent to ensure trees that are retained are adequately protected during demolition and construction phases of the development.</p> <p>An amended landscape plan that has a plant schedule with quantum of plants and comprised of a minimum of 90% of the proposed plantings (not including turfed areas) are to be indigenous or local native plants listed in Annexure B2 - 1. Invasive plants including <i>Lampranthus spectabilis</i> and <i>Thunbergia grandiflora</i> should be omitted from the plans.</p>	<p>A condition of consent can be imposed in relation to this comment.</p> <p>An amended site landscaping plan is provided at Appendix B. The landscape planting schedule has been amended to include the provision of a greater diversity and quantity of local native provenance trees, shrubs and ground cover species from the ESBS native vegetation community, which is present and was once present on site.</p> <p>All previously listed species identified as invasive, including <i>Lampratnthus spectabilis</i> and <i>Thunbergia grandiflora</i> have been omitted from the planting schedule.</p>

Submission	Response
<p><i>An updated vegetation management plan (VMP) to the satisfaction of Council's Urban Ecology Co-ordinator, who can be contacted to find out details of the requirements for the updated VMP. Contact details are: Sue Stevens, Urban Ecology Coordinator Ph: 9083 8226 Email: sue.stevens@waverley.nsw.gov.au</i></p>	<p>An updated Vegetation Management Plan has been prepared by Cumberland Ecology and is provided at Appendix K.</p>
<p><u>Land Contamination</u></p>	
<p><i>Council recommends that an NSW EPA Accredited Site Auditor be engaged to provide the following prior to the granting of development consent:</i></p> <ul style="list-style-type: none"> <i>(i) A Site Audit Statement clearly stating that the site is/or will be suitable for the intended use. Or</i> <i>(ii) A letter/interim advice stating that the recommendations are practical and will result in the site being made suitable for the intended use.</i> 	<p>The Phase 1 Preliminary Site Investigation undertaken by JBS&G confirmed: "...no contamination which would preclude the redevelopment of the site has been identified". Notwithstanding, JBS&G have recommended that a detailed soil assessment be undertaken at the site, once demolition of existing site buildings has been completed, to confirm the characterisation of potential contamination and to support management and disposal of materials. As the detailed soil assessment cannot be undertaken until the existing buildings have been demolished it is requested that the following condition of consent is imposed:</p> <p>A. On Completion of Demolition and Prior to Construction and Issue of Construction Certificate</p> <p><i>On completion of demolition of existing buildings, concrete slabs and associated structures; further site contamination investigation which includes soil sampling, must be undertaken.</i></p> <p><i>The further investigation must take the form of a Supplementary Detailed Site Investigation and must be undertaken by an appropriately qualified and experienced environmental consultant under the direction of the supervising environmental consultant.</i></p> <p><i>The investigation and reporting must be undertaken in accordance with relevant NSW EPA Guidelines including, but not limited to "Guidelines for Consultants Reporting on Contaminated Sites 2011." The investigation must also meet the requirements of the National Environment Protection Measure - Assessment of Site Contamination 2013 (NEPM 2013).</i></p>

Submission	Response
	<p><i>The Supplementary Detailed Site Investigation must include an assessment of the suitability of the land for the proposed land use and outline remedial measures that may be required to ensure the site is suitable for the proposed use. If site remediation is not required, then details of the appropriate waste characterisation of fill material must be documented for suitable offsite disposal.</i></p> <p>This approach will allow for the demolition of buildings, further detailed analysis and characterisation to be completed, and a remediation / management plan to be prepared (if required). In addition, as required by Clause 7 of <i>State Environmental Planning Policy No 55—Remediation of Land</i> this approach will ensure the consent authority can be satisfied that where contaminated soil is identified on site, it is appropriately remediated, confirming the site remains suitable for the ongoing educational use.</p>
<u>Noise Impacts</u>	
<p><i>A detailed acoustic report addressing mechanical plant noise impacts should be submitted to Council for approval prior to the issue of the relevant construction certificate for the development.</i></p>	<p>A condition of consent can be imposed in relation to this comment.</p>
<p><i>Noise impacts from the school address system should be assessed prior to the issue of relevant construction certificate for the development.</i></p>	<p>A condition of consent can be imposed in relation to this comment.</p>
<p><i>Compliance testing of the lecture theatre should be required and a report submitted to Council prior to the issue of the relevant occupation certificate for the development.</i></p>	<p>A condition of consent can be imposed in relation to this comment.</p>
<p><i>Prior to the commencement of work, a detailed construction noise management plan, outlining times for respite periods and scheduling/restricting very noisy activities, would be required to the satisfaction of Council.</i></p>	<p>A condition of consent can be imposed in relation to this comment.</p>
<u>ESD Measures and Commitments</u>	
<p><i>The application should include an energy assessment report that demonstrates that the project will deliver a development with emissions that are 30% less than those of a reference building in accordance with the DCP.</i></p>	<p>An ESD report was provided at Appendix L of the EIS which detailed the measures and commitments to be adopted.</p>

Submission	Response
<u>Stormwater and Infiltration</u>	
<i>Council recommends an advisory note on the development consent which requires the applicant to seek certification from a hydraulics engineer prior to the issue of an OC.</i>	A condition of consent can be imposed in relation to this comment.
<u>Water and Recycling Management</u>	
<i>Council recommends that the Department ask for an updated SWRMP and adopting Council's Site Waste and Recycling Management Plan (SWRMP) template. Otherwise, a condition of consent could be imposed in any development consent that requires the applicant to address these matters prior the relevant construction certificate being released for the development.</i>	The applicant has reviewed Council's SWRMP template and notes it does not relate to School Infrastructure. The detail required by Council is provided in the Waste Management Plan submitted at Appendix V of the EIS, on pages 3, 6 and 7. Note: a private contractor is responsible for the management and collection of waste at Moriah College.
<u>National Construction Code and Fire Safety</u>	
<i>The development consent should include a condition or an advisory note to ensure new buildings accord with the NCC and essential fire safety measures and services have been and will be incorporated.</i>	A condition of consent can be imposed in relation to this comment.
<u>Impacts on the surrounding existing public domain and opportunities for improvements</u>	
<p><i>Recommended public domain upgrades including:</i></p> <ul style="list-style-type: none"> ▪ <i>Renewal of asphalt pavement along Baronga Avenue and York Road</i> ▪ <i>New footpath links between York Street and Baronga Avenue</i> ▪ <i>New kerb and gutter adjacent to the extended footpath between Gate 4 and Baronga Avenue</i> ▪ <i>Street planting at the corner of York Road and Baronga Avenue</i> ▪ <i>Slope stabilisation at the Baronga Avenue frontage</i> ▪ <i>New street lighting</i> 	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.

4.2. ORGANISATION SUBMISSIONS

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

4.2.1. 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 10**.

Table 12 Response to Randwick City Council

Submission	Response
<u>Transport</u>	
<i>Transport Assessment to be updated to provide for cycling within the modal split</i>	An amended Transport Impact Assessment is provided at Appendix C . Table 7.12 includes cycling in the existing and projected modal split. A 2% increase in bicycle use is projected for staff and students which is considered achievable noting the proposed increased bicycle parking and end of trip facilities.
<p><i>A suitable Construction Traffic Management Plan should be submitted.</i></p> <p><i>Council recommends all construction vehicles use York Road and Oxford Street as both their arrival and departure route, to reduce impacts on our community.</i></p>	<p>An amended CTMP is provided at Appendix H.</p> <p>Construction vehicles are restricted to left-in and left-out access at Gate 4 due to the presence of median island on York Road. However, it is noted that both Baronga Avenue and Queens Park Road are local residential streets. Trucks travelling down lower order roads could result to undesirable outcome for the School and the local community.</p> <p>As such, three egress route options are provided which are to be finalised following consultation with Council and the local community. Options include:</p> <ul style="list-style-type: none"> ▪ Option 1: Via Baronga Avenue and Queens Park Road to get back to York Road. ▪ Option 2: The existing median on York Road has to be shortened to allow right turn movement from the site. All construction vehicles exiting Gate 4 are only allowed to leave the site under the supervision of a traffic controller. ▪ Alternate option 2: Exiting trucks are to continue travelling along York Road towards Darley Street and Anzac Parade.

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 in **Table 11**. Further discussion is provided in the updated BDAR at **Appendix E**.

Table 13 Response to Centennial Park Trust

Submission	Response
<u>Biodiversity</u>	
<p><i>The Trust wish to prevent impacts from any development and activities adjacent to the Eastern Suburbs Banksia Scrub (ESBS) that might result in degradation, and request that the following impacts are appropriately mitigated:</i></p> <ul style="list-style-type: none"> ▪ <i>Overshadowing the ESBS in the bushland area will reduce germination and growth of native remnant species</i> ▪ <i>Overshadowing occurs at Queen's Park during the mid-afternoon</i> ▪ <i>Tall trees should not be planted along the fence line of the ESBS to prevent build-up of leaf litter</i> ▪ <i>Stormwater diversion should be detailed in the plans to ensure that no water runoff will impact the ESBS</i> ▪ <i>Protection measures for ESBS should be included in the Construction Environment Management Plan</i> 	<p>The proposal has been amended to remove all overshadowing associated with the Stage 2 ELC building envelope from the ESBS to the west.</p> <p>The Civil Services General Layout Plan has also been amended to ensure no additional stormwater impact on the ESBS.</p> <p>Refer to the updated BDAR at Appendix E and further discussion at Section 5.3 of this RTS report.</p>

4.2.3. 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.

4.3. PUBLIC SUBMISSIONS

4.3.1. Overview

During the public exhibition period DPIE received 317 public submissions. The submissions received are summarised as follows.

Supports

- 168 (53%) of public submissions.
- Predominately originated from Dover Heights, North Bondi, Rose Bay, Bellevue Hill, Vaucluse, Maroubra, and Queens Park.
- Acknowledged that the proposal will improve the existing pick up and drop off arrangement, improve the learning environment for existing and future students, and represents a sustainable growth in student numbers.

Comments

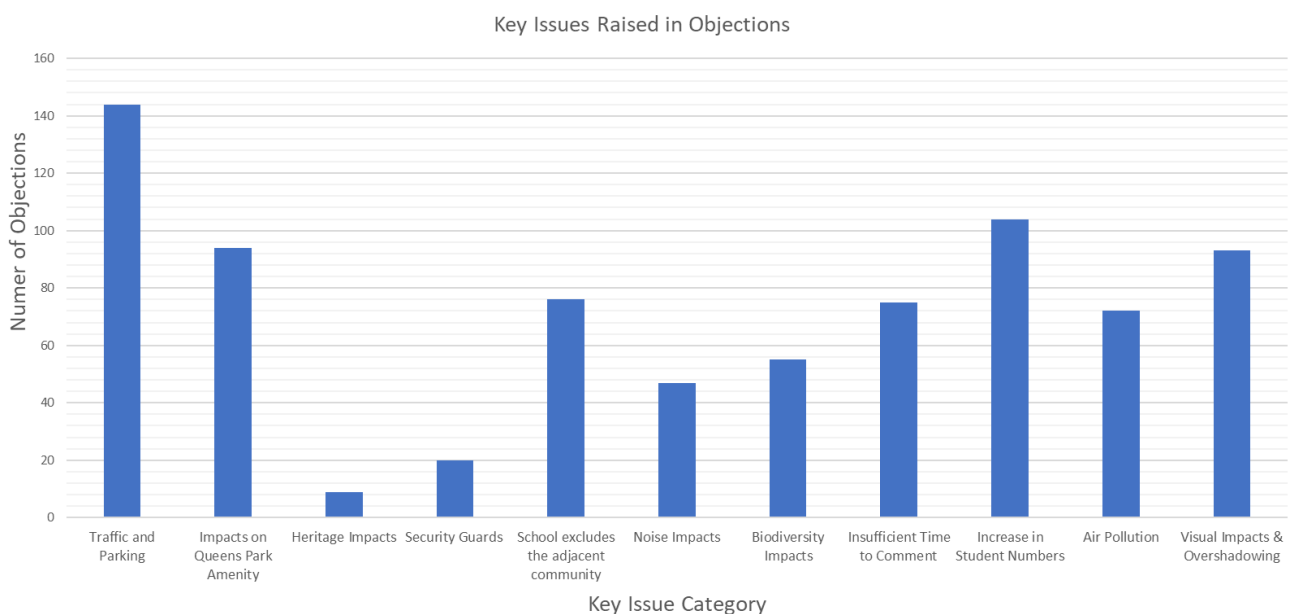
- 6 (2%) of public submissions.
- Predominately originated from Queens Park (83%).

Objects

- 143 (45%) of public submissions.
- Predominately originated from Queens Park and Randwick.

Figure 10 provides a summary of key issues raised in objections received.

Figure 10 Key Issues Raised in Objections



Source: Urbis

4.3.2. Key Matters Raised in Support of the Proposal

It is noted that a majority of submissions (53% or 168 submissions) expressed support for the proposal. Those who provided their supported for the proposal generally raised the following key benefits:

- The proposal creates an improved learning environment fit for modern teaching methods to the benefit of existing and future students.
- The proposal relocates the main school entry away from the adjacent residential area at Queens Park to Baronga Avenue.
- The proposal includes local road network improvements which will improve traffic flows in the locality.
- The new internal 'ring road' student drop off and pick up will improve local traffic flows.
- The Green Travel Plan will encourage alternate modes of transport to the college other than vehicles which is expected to result in a reduction in private vehicle use.
- A sustainable growth of student numbers is proposed.
- The Applicant has worked collaboratively with Waverly Council to develop local road network upgrades.
- Staggered arrival and departure times for different cohorts of students will help reduce traffic congestion during the peak traffic periods.

4.3.3. Response to Key Matters Raised in Objection of the Proposal

A total of 149 public submission (47%) either objected or commented on the proposal. Table 12 below provides a response to each key issue raised in the community submissions:

Table 14 Response to Public Submissions

Issue	Response	Refer
Traffic and Parking – increased traffic congestion.	The Transport Assessment undertaken for the proposal concludes that traffic impacts can be managed and will generally be acceptable. With the implementation of the 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 existing approved school capacity. The surrounding key intersections will not be unreasonably affected by the proposal.	Sections 4.1.2, 4.1.5, and 4.2.1 of this report and Appendix C.
Traffic and Parking – increased pedestrian safety risks.	<p>The proposal seeks to re-orientate the High School Main Entrance away from the residential areas of Queen's Park. The High School Pedestrian Entrance will be at Gate 3 on Baronga Avenue and the Vehicular Entrance will be at Gate 4 on York Road, south.</p> <p>In addition, the proposal will relocate the existing on-street drop-off/pick-up facilities on York Road (south) so that they take place entirely within the site in the south car park. This new drop-off/ pick-up area is proposed to be allocated for secondary students via a loop road system, similar to the existing drop-off/pick-up area already provided for the primary school. This loop road will enable queuing to occur within the site to minimise on street queueing.</p>	

Issue	Response	Refer
	<p>The proposal also includes a number of recommended actions to improve pedestrian safety which are currently being reviewed by Council's traffic committee.</p>	
<p>Traffic and Parking – students and staff parking in residential streets.</p>	<p>Measures will be introduced through implementation of the Green Travel Plan to discourage travel to the school via vehicle. 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.</p>	
<p>Impacts on Queens Park Amenity</p>	<p>The further setback of the level 4 plant volume at the southern wing of the STEAM building from the eastern boundary along Baronga Avenue has resulted in a minor reduction in overshadowing of Queens Park. In addition, views from Queens Park will change minimally as a result of the amended proposal. A marginally less amount of built form visible in these views as a result of the decreased building height and additional articulation in the facade.</p>	<p>Section 5.1 and 5.2 of this report.</p>
<p>School Excludes the Adjacent Community – facilities are not available to the public.</p>	<p>In accordance with Waverley Council DA Consent 86/193 the Moriah College Swimming Pool, Gymnasium and Auditorium are made available for general public use. In addition, the School facilities are made available for use by the Jewish community. These 'out of core hour' activities are detailed in the approved Plan of Management.</p>	<p>Appendix G</p>
<p>Noise Impacts</p>	<p>The Noise and Vibration Impact Assessment undertaken to accompany the EIS concluded the following:</p> <ul style="list-style-type: none"> ▪ Construction Noise: Based on the results of the preliminary assessment, the noise associated with normal construction works is expected to meet the noise limits for standard hours at the nearest residential receivers. ▪ Operational Noise: all operational noise emissions can meet relevant Australian Standards provided the recommended mitigation measures are adopted. <p>A range of recommended measures to mitigate noise impacts during both construction and operation of the proposal have been summarised in the relevant section of the EIS.</p>	<p>Section 7.12 and Appendix G of the EIS</p>

Issue	Response	Refer
Biodiversity Impacts	The actions and measures taken to avoid impacts to Eastern Suburbs Banksia Scrub include amendments the location of building footprints to wholly contain the disturbance to cleared land and Urban Native/Exotic Vegetation. In addition, mitigation measures are proposed to further protect the ESBS both during construction and operation of the proposal are detailed in this report. These measures have also been designed to minimise indirect impacts to the retained area of Eastern Suburbs Banksia Scrub within the site.	Section 5.3 of this report and 0 .
Insufficient Time to Comment on the EIS	<p>The EIS was exhibited by the DPIE for 28 days in accordance with the requirements of Schedule 1 of the <i>Environmental Planning and Assessment Act 1979</i>.</p> <p>In addition, to the statutory consultation requirements, the Applicant has undertaken a comprehensive range of engagement activities during the preparation of the proposal as outlined in Section 6 and Appendix Y of the EIS.</p> <p>Since exhibition of the EIS the Applicant has undertaken the following additional community engagement activities:</p> <ul style="list-style-type: none"> – Letter drop (x 2) 22 November 2019 and 9 December 2019 – Media release 3 December 2019 – Website update 9 December 2019 – Enquiry email and phone number - 8 email enquiries, (about traffic management and planning process) no phone enquires. 	
Increase in Student Numbers	The proposal seeks a sustainable growth in student numbers over a 15+ year timeframe. This growth in student numbers is coupled with significant improvements to the school facilities detailed within the information provided. In particular the proposal seeks to establish state of the art modern teaching facilities that meet the future needs of a growing population. This increase in student numbers is coupled with travel demand measures including improvements to the existing pick up and drop off arrangement, green travel plan measures, and pedestrian safety measures.	Section 3.3 of the EIS.
Air Pollution Impacts	Appropriate control measures are proposed in order to mitigate health and safety issues within the building and emanating from the building to the surrounding public domain.	Mechanical Services Assessment at Appendix B of the EIS.

Issue	Response	Refer
Visual Impact and Overshadowing – onto Queens Park and Centennial Park	<p>The amended proposal results in a minor reduction in overshadowing of Queens Park. In addition, the ESBS community adjacent to the site is no longer overshadowed by the development.</p> <p>In addition, the visual impact assessment undertaken concluded that the proposal would not have an unacceptable impact on views from the locality specifically Queens Park and Centennial Park. The visual impact addendum to accompany the amended proposal has found that views from Queens Park marginally improve with built form less visible in these views as a result of the decreased building height and additional articulation in the facade.</p>	Section 5.1 and 5.2 of this report.
Heritage Impacts	<p>The Heritage Impact Statement accompanying the EIS concludes that the proposal is acceptable from a heritage perspective noting that there is an absence of direct and indirect impacts on locally listed heritage items. Due to the location of the buildings and the existing College buildings (which will remain), they will not be visible from the Queens Park heritage Conservation Area.</p>	Section 7.10 and Appendix M of the EIS.
Security Guards – Imposing nature of the boundary wall and security guards.	<p>The amended Landscape Report at 0 includes a security strategy for the campus. The campus has strict security requirements that have been implemented into the proposal design and the campus as a whole. These measures are further detailed in Section 3.6.7 of the EIS.</p> <p>The amended proposal has sought to soften the visual impact of the security wall at Baronga Avenue articulated through patterned placement of bricks. Additional planting is also proposed to achieve integration into the landscaped retaining wall along the eastern boundary.</p>	Appendix A, Appendix B, and Section 3.6.7 of the EIS

5. ASSESSMENT OF DESIGN AMENDMENTS

This section provides an environmental impact assessment of amendments to the proposal.

5.1. OVERSHADOWING

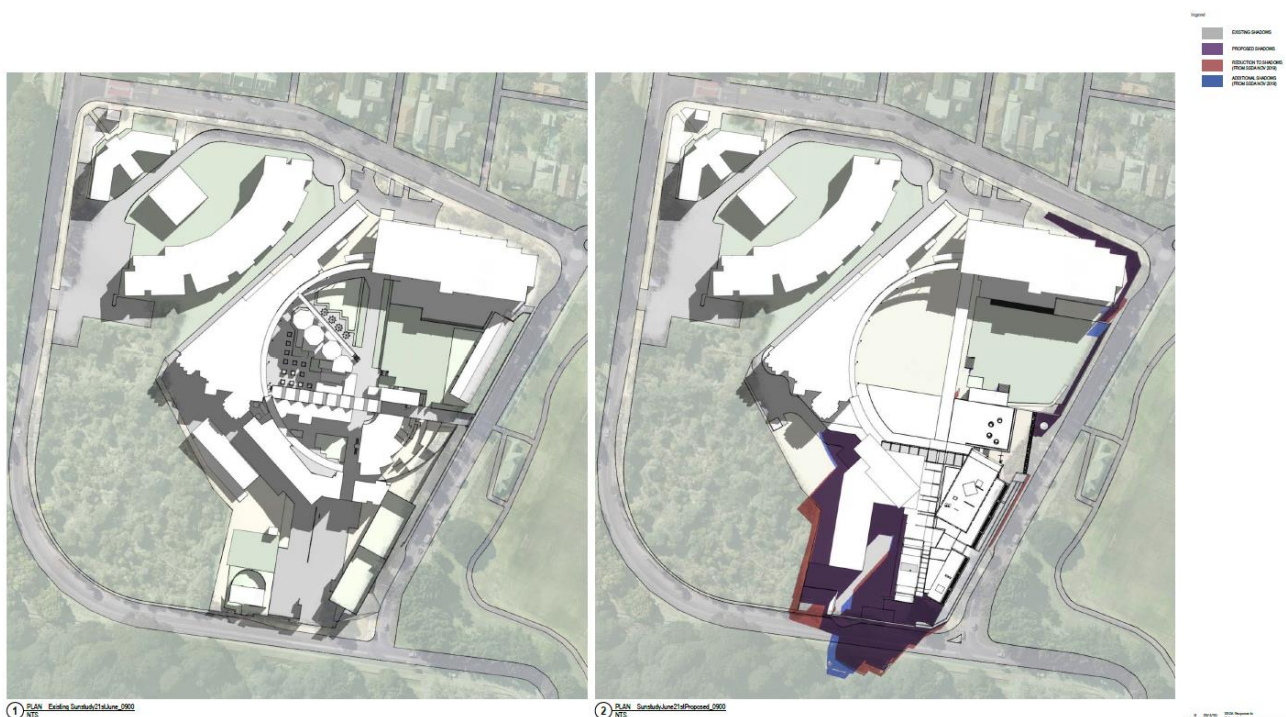
FJMT have prepared an updated overshadowing analysis of the amended design on the winter solstice from 9am to 3pm (refer **Appendix A**). An error identified by DPIE in the submitted plans has also been corrected.

The following provides an assessment of the overshadowing impacts of the original design (red) and amended design (blue).

9am – 21st June

Reduction in bulk and scale of the Stage 2 Building envelope have resulted in no additional overshadowing to the ESBS when compared to the existing environment.

Figure 11 Existing (left) and proposed (right) overshadowing at 9am – 21st of June

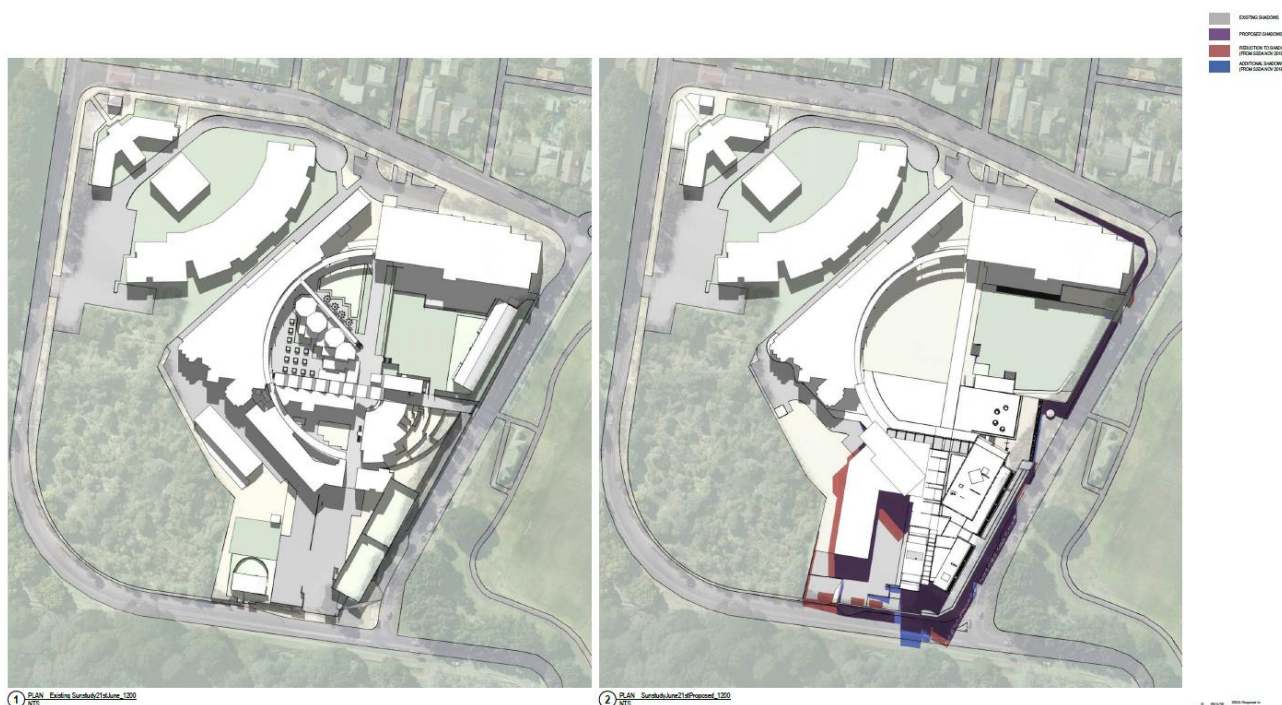


Source: FJMT

12 mid-day – 21st June

Shadowing during the mid-day period continues to be restricted to the road pavement.

Figure 12 Existing (left) and proposed (right) overshadowing at 12 Mid-day – 21st June

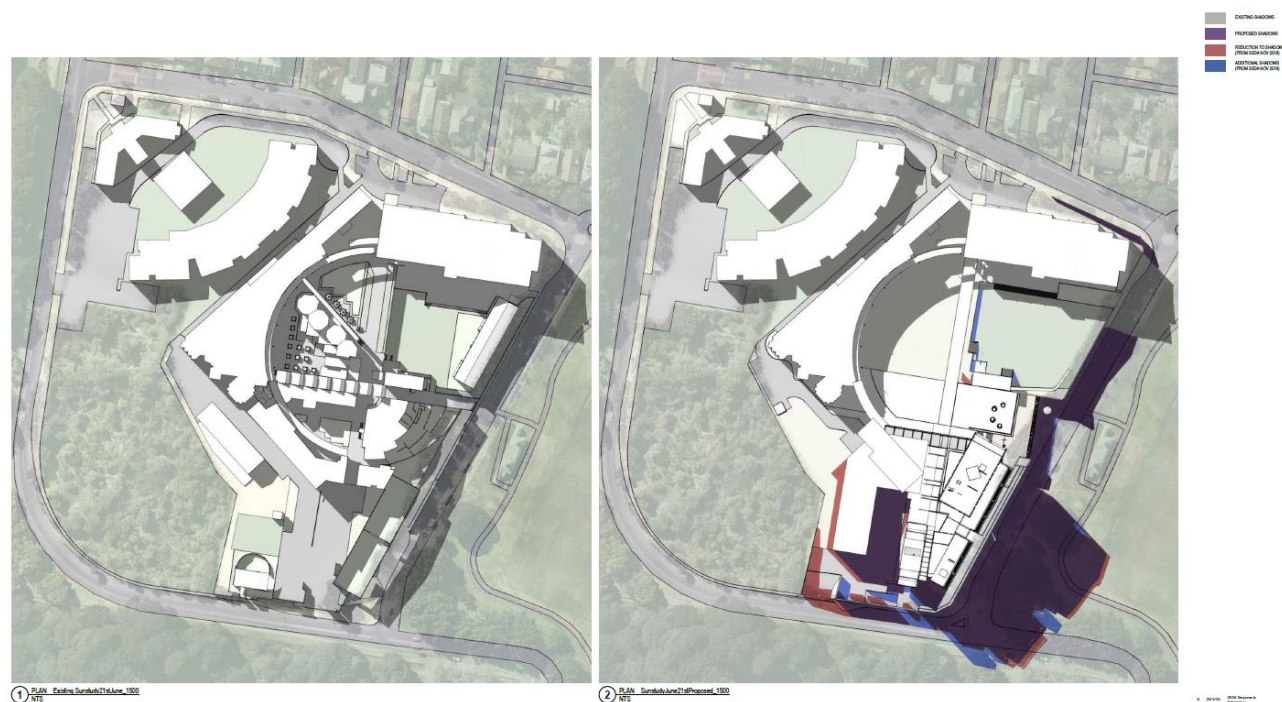


Source: FJMT

3pm – 21st June

The further setback of the level 4 plant volume at the southern wing of the building from the eastern boundary along Baronga Avenue results in a minor reduction in overshadowing of Queens Park. This overshadowing is considered acceptable noting that the park will have unobstructed solar access between 9am and 2pm.

Figure 13 Existing (left) and proposed (right) overshadowing at 3pm – 21st June



Source: FJMT

Overall, the shadow impact of the amended proposal is appropriate. No residential properties are impacted. The majority of the ESBS (to the west) and Queen's Park (to the east) receives unobstructed sunlight.

5.2. VISUAL IMPACT

Cardno have undertaken an addendum Visual Impact Assessment of the amended design (refer **Appendix F**). The assessment has found that the amended design results in the following changes to their 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 form marginally less visible, particularly from the south and east. Overall, the local visual quality will be essentially unchanged when compared to that originally assessed.

5.3. BIODIVERSITY IMPACT

5.3.1. Methodology

A Biodiversity Development Assessment Report (BDAR), prepared in accordance with the requirements for an SSD pertained in Section 7.9 of the *Biodiversity Conservation Act. 2016* and the Method ('BAM'; OEH 2017) accompanies the amended proposal at **Appendix E**: Investigations comprised:

- Desktop review of available databases searched during the preparation of the BDAR.
- Review of available literature available during the preparation of the BDAR.
- Review of aerial imagery sourced from NearMap and SixMaps.
- Identify the landscape features and site context (native vegetation cover) within the subject land and assessment area.
- Assess native vegetation extent, plant community types (PCTs), threatened ecological communities (TECs) and vegetation integrity (site condition) within the subject land.
- Assess habitat suitability for threatened species that can be predicted by habitat surrogates (ecosystem credits) and for threatened species that cannot be predicted by habitat surrogates (species credit species).
- Identify potential prescribed biodiversity impacts on threatened species.
- Describe measures to avoid and minimise impacts on biodiversity values and prescribed biodiversity impacts during project planning.
- Describe impacts to biodiversity values and prescribed biodiversity impacts and the measures to mitigate and manage such impacts.
- Identify the thresholds for the assessment and offsetting of impacts, including:
 - Impact assessment of potential entities of serious and irreversible impacts (SAIL).
 - Impacts for which an offset is required.
 - Impacts for which no further assessment is required.
- Describe the application of the no net loss standard, including the calculation of the offset requirement.

5.3.2. Existing Environment

The native vegetation existing on the site occupies approximately 1.70 ha, which represents approximately 30% of the site area. The remaining native vegetation is represented by the Urban Native/Exotic Vegetation. The following figure illustrates the location of the two PCTs which occurring within the site.

Figure 14 PCTs occurring within the site



Figure 6. Plant Community Types

Source: Cumberland Ecology

A total of two flora species and 18 fauna predicted ecosystem species have been predicted for the proposal. Of these, no species have been retained for further assessment due to the scarcity of habitat constraint.

5.3.3. Assessment

Avoidance of Impacts on Native Vegetation and Habitat

Avoidance of impacts on native vegetation and habitat has been achieved through the following measures:

- The proposal is positioned over an area within the site containing the lowest biodiversity values, consisting predominantly of cleared land, exotic trees and some scattered native trees, including some nonendemic native species.
- Locating the construction facilities within the operational footprint/
- Utilising existing access roads.
- Retaining existing planted trees within areas proposed for landscaping.
- Areas of landscaping to incorporate locally indigenous species, including those conforming with the TEC of Eastern Suburbs Banksia Scrub.
- The development site has been situated in the south-east portion of the subject land to avoid impacts to the adjacent ponds located adjacent to the western edge of the site.

Direct and Indirect Impacts on Native Vegetation and Habitat

The proposal will result in a net loss of 0.09ha of the Smooth-barked Apple on the site which is not a species listed under the BC Act.

Due to the existing highly modified nature of the vegetation within the development site and the mitigation measures proposed for avoiding impacts to the ESBS TEC within the subject land, the indirect impacts of the project are not considered to be significant.

Indirect Impact to ESBS

The following provides an assessment of indirect impacts to the Eastern Suburbs Banksia Scrub adjacent to the subject land above those that are listed under the BAM:

- **Shading:** No additional overshadowing of ESBS community is proposed.
- **Altered Drainage/Runoff:** The civil services general layout plan has been amended to ensure that no additional stormwater will impact the ESBS post development.
- **Hybridisation with native species not of local provenance or weed invasion by species used in landscaping:** Cumberland Ecology has informed the planting list of the landscape plan to only include flora species indicative of ESBS. No native species not of local provenance or exotic species will be planted within the subject land as part of the Project.

Summary

The actions and measures taken to avoid impacts to Eastern Suburbs Banksia Scrub include amendments the location of building footprints to wholly contain the disturbance to cleared land and Urban Native/Exotic Vegetation. In addition, mitigation measures proposed to be undertaken during construction and operation of the proposal are detailed in **Section 5.3.4** below. These measures have also been designed to minimise indirect impacts to the retained area of Eastern Suburbs Banksia Scrub within the site.

5.3.4. Mitigation Measures

Cumberland Ecology have identified a range of mitigation measures at Section 8.3 of the BDAR. Measures include:

- In order to minimise the spread of weeds throughout the subject land and adjoining areas, appropriate weed control activities will be undertaken prior to vegetation clearing in accordance with the Greater Sydney Local Land Services Area and is subject to the Greater Sydney Regional Strategic Weed Management Plan 2017 – 2022 under the *NSW Biosecurity Act 2015*.
- Appropriate construction site hygiene measures will be implemented to prevent entry of new weeds to the area such as the cleaning of equipment prior to entering the subject land.
- Initial weed management will be carried out within the subject land according to best-practice methods under the direction of a suitably qualified bush regenerator.
- Best-practice bush regeneration should undertake measures to avoid adverse impacts to retained vegetation within the subject land, including not over clearing (remove only targeted species), employment of minimal disturbance techniques to avoid soil and surrounding vegetation disturbance, and replacement of disturbed mulch/leaf-litter.
- Follow-up monitoring and maintenance should be undertaken in the subject land following vegetation clearing activities, to contain any re-emergence of weed species.
- The current limits of clearing will be marked either by high visibility tape on trees or metal/wooden pickets, fencing or an equivalent boundary marker that will be installed prior to clearing.
- Trees retained within the subject land will be subject to tree protection measures detailed within the Aboricultural Impact Assessment.
- In order to minimise impacts to fauna species during construction, pre-clearance surveys will be conducted in all areas of vegetation that are required to be cleared.
- Clearing is to be undertaken in a two staged approach as detailed in the BDAR.

- Construction activities will be undertaken in accordance with “The Blue Book” (Landcom 2004).
- A 1 metre buffer surrounding the ESBS will be retained.

6. SUPPLEMENTARY STRATEGIC PLANNING ASSESSMENT

6.1. EASTERN CITY DISTRICT PLAN 2056

Released in October 2017, the Revised Draft Eastern City District Plan includes a range of goals, directions and actions that aim to support the strategic growth of Sydney over the long term. The Revised Draft Eastern City District Plan was finalised as the Eastern City District Plan (District Plan) on 18 March 2018.

An assessment of the proposal against key planning directions in the District Plan is included in the EIS lodged with the application in November 2019. The following table provides an assessment against key planning priorities and directions for sustainability.

Table 15 Directions for Sustainability – *Eastern City District Plan 2056*

Direction	Planning Priority	Comment
A city in its landscape	E15 - Protecting and enhancing bushland and biodiversity	Refer to Section 5.3 and Appendix E . The proposal has been sited to avoid impacts to Eastern Suburbs Banksia Scrub.
	E16 - Protecting and enhancing scenic and cultural landscapes	The landscape planting schedule has been amended to include the provision of a greater diversity and quantity of local native provenance trees, shrubs and ground cover species from the ESBS native vegetation community which is present and was once present on site
	E18 - Delivering high quality open space	As demonstrated in the amended Landscaping Strategy at Appendix B , a comprehensive landscaping strategy is proposed comprising both hard and soft landscaping, playground areas, sporting fields, gardens, and a range of furniture and lighting.
	E17 - Increasing urban tree canopy cover and delivering Green Grid connections	The amended landscape planting schedule includes the provision of a greater diversity and quantity of local native provenance trees, shrubs and ground cover species from the ESBS native vegetation community which is present and was once present on site.
An efficient city	E19 - Reducing carbon emissions and managing energy, water and waste efficiently	<p>The proposal achieves the following sustainability objectives:</p> <ul style="list-style-type: none"> ▪ The incorporation of ESD principles into the design and ongoing operational phases of the development. ▪ The inclusion of considered materiality and waste reduction measures, futureproofing and use of low carbon materials, energy and water efficiency, and technology such as renewable energy, to demonstrate alignment to industry best practice frameworks.
A resilient city	E20 - Adapting to the impacts of urban and natural hazards and climate change	The proposal includes of climate change adaption and mitigation measures within the building design where possible.

6.2. DRAFT WAVERLEY LOCAL STRATEGIC PLANNING STATEMENT 2036

The draft Waverley Local Strategic Planning Statement 2036 (Draft LSPS) and supporting documentation was on public exhibition between 28 June and 16 August 2019. The Draft LSPS sets out a 20-year plan to guide the Waverley LGA's growth to 2036. It features four main themes which are supported by 10 Directions.

The following table provides an assessment of the proposal against relevant directions and planning priorities included in the Draft LSPS.

Table 16 Waverley LSPS Compliance

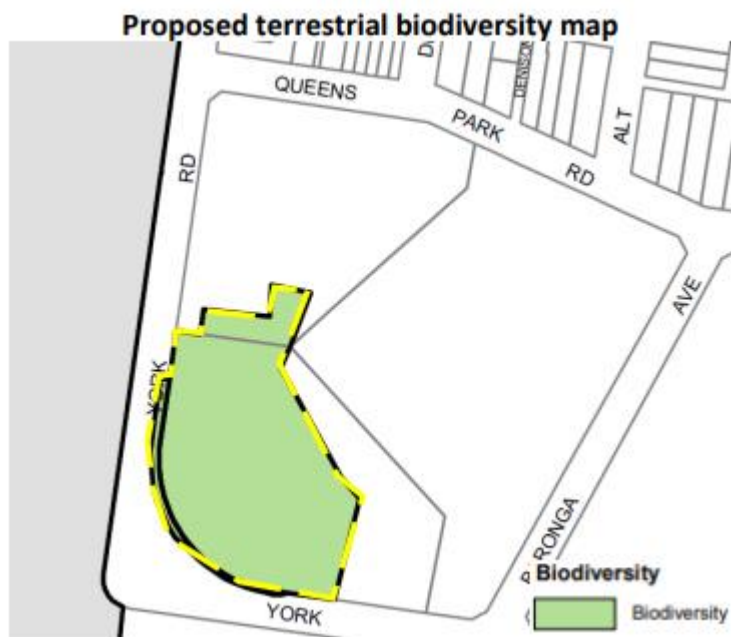
Direction	Planning Priority	Comment
A city supported by infrastructure	4 – Ensure the community is well serviced by crucial social infrastructure	<p>The proposal will ensure that Moriah College can continue to deliver high quality education to meet the Waverley LGA's growing educational needs.</p> <p>The proposal has been designed to be adaptable to meet the future needs of the community, with innovative contemporary design, flexible learning spaces and a more efficient use of land that will be essential in responding to growth and changing demands.</p>
Jobs and skills for the city	11 – Bondi Junction is a lively and engaging strategic centre with a mix of employment, entertainment and housing options	The proposal will improve a vital piece of educational infrastructure in Eastern Sydney. It will provide contemporary facilities to meet modern educational standards and provide increased jobs and growth for the Waverley LGA.
A city in its landscape	13 – Protect and grow our areas of biodiversity and connect people and nature	Refer to Section 5.3 and Appendix E . The proposal has been sited to avoid impacts to Eastern Suburbs Banksia Scrub. In addition, mitigation measures proposed to be undertaken during construction and operation of the proposal are detailed in Section 5.3.4 of the report.
An efficient city	<p>14 – Waverley is a leader in moving towards net zero carbon emissions in the built environment</p> <p>15 – Waverley is a leader in moving towards zero waste</p>	Employees and students can cycle, walk or catch the bus or train to the School. This will reduce reliance on cars, decrease congestion and promote sustainable outcomes. A Green Travel Plan has been prepared by TTPP to accompany the proposal and is included at Appendix K of this EIS. The Green Travel Plan proposes a range of strategies aimed at encouraging public and active transport use, which will further reduce reliance on private vehicle use.
A resilient city	16 – Plan for and manage our assets and urban environment to adapt and be resilient to a changing climate	The proposal includes consideration of future climate alterations into its design. This is seen through the incorporation of good shading and passive design.

6.3. WAVERLEY LOCAL ENVIRONMENTAL PLAN 2012 – HOUSEKEEPING AMENDMENT

Planning Proposal (PP_2019_WAVER_001_00) received gateway determination on 3 October 2019 for housekeeping amendments to the Waverley Local Environmental Plan 2012 including the rezoning of a small portion of Lot 1 in DP 701512 from SP2 Education Infrastructure to E2 Environmental Conservation.

Council exhibited the planning proposal in March 2020. The planning proposal (as amended) no longer seeks to rezone the selected land of the Moriah College site to E2 as the zone would be too restrictive to the operation and growth of the school. Instead this portion of the site is proposed to be protected by way of the terrestrial biodiversity map which is subject to the provision of Clause 6.4 of the LEP (refer **Figure 12**).

Figure 15 Area of the site to be included in the terrestrial biodiversity map



Source: Waverley Council

As detailed in **Figure 11** the proposed works are restricted to Lot 22 in DP 879582 and Lot 3 in DP 701512. In addition, no clearing of ESBS is proposed. Therefore, Clause 6.4 of the LEP would not apply to the site following the finalisation of the planning proposal (as amended).

7. CONCLUSION

This RTS has considered the responses received from DPIE, state and local government agencies, authorities and members of the public during the public exhibition of SSD 10352. The submissions received have been directly responded to by the School and the project team in the supporting technical reports annexed. In addition, minor amendments have been made to the proposal to address key issues raised, including:

- The overall height of the Stage 1 STEAM building has been reduced with the Level 4 plant volume on the southern wing further set back from the eastern boundary.
- Changes to the materiality of the building façade particularly at the eastern and southern elevations to soften the material choices on the exterior.
- The bulk and scale of the Stage 2 ELC building has been reduced to ensure that there is no longer any overshadowing of the Eastern Suburbs Coastal Banksia Scrub.
- The landscape planting schedule has been updated to include additional native species endemic to the area.
- The driveway off York Road (Gate 4) has been moved further west with the security gate relocated further north into the building boundary and the slip lane has been replaced by a dedicated slip turn off York Road into Baronga Avenue.
- Provision of 52 additional bicycle parking spaces (total of 160) than originally proposed.
- Internal changes to the arrangement and location of learning spaces, services, amenities, access / egress, etc. as a result of further engagement with School staff and students, as well as design development.

These amendments to the proposal, along with the additional justification and technical information, appropriately respond to all relevant issues raised in the submissions.

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 below:

- The proposal demonstrates a high level of consistency with state and local statutory and strategic planning policies.
- The proposal has been designed in accordance with relevant objectives and development controls listed in *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*, the *Waverly Local Environmental Plan 2012* and the *Waverly Development Control Plan 2012*.
- Subject to the mitigation measures recommended by the specialist consultants, the proposal will not have any unacceptable impacts on adjoining or surrounding properties or the public domain in terms of built form, social or environmental impacts.
- The proposal is highly suitable for the site, as it continues the established educational use of the site and provides state-of-the-art school facilities in line with modern day teaching practices for the benefit of current and future students. Further, there are no significant environmental constraints that would prevent the proposal from being delivered at the site. A visual impact assessment has been undertaken to accompany the EIS which concluded that existing vegetation will significantly frame or screen the proposal. Regardless, it is considered that the proposal will contribute to the visual quality of the locality.
- The proposal is in the public interest in that it will ensure more students have access to new state-of-the-art school facilities, including new indoor learning spaces and outdoor recreation spaces.

- The proposal has been designed to make a positive contribution to the overall built form of the site, having regard to the existing characteristic school campus and the landscaped setting in which the site is located.
- To manage the traffic impacts associated with the proposal, the School will implement travel demand management measures including the provision of a green travel plan and introduction of staggered arrival and departure times. With the implementation of these measures, as well as the proposed intersection upgrades, 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.

This RTS and accompanying documentation 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.

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