



Moriah College Redevelopment Queens Park

State Significant Development Assessment SSD-10352

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Glossary

Abbreviation	Definition
Applicant	Moriah War Memorial College Association
BDAR	Biodiversity Development Assessment Report
CIV	Capital Investment Value
Council	Waverley Council
CPMP Trust	Centennial Park and Moore Park Trust
CTPMP	Construction Traffic and Pedestrian Management Plan
Department	Department of Planning, Industry and Environment
DOPU	Drop-off and pick-up
EESG	Environment, Energy and Science Group
EIS	Environmental Impact Statement
ELC	Early Learning Centre
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
ESBS	Eastern Suburbs Banksia Scrub
ILC	Independent Learning Centre
Minister	Minister for Planning and Public Spaces
SEARs	Planning Secretary's Environmental Assessment Requirements
STEAM	Science, Technology, Engineering, Art and Mathematics
Secretary	Planning Secretary of the Department of Planning, Industry and Environment
SRD SEPP	State Environmental Planning Policy (State and Regional Development) 2011
SSD	State Significant Development
TfNSW	Transport for NSW incorporating Roads and Maritime Services
WLEP	Waverley Local Environmental Plan 2012

Executive Summary

This report provides an assessment of a State significant development (SSD) application (SSD-10352) lodged by Urbis Pty Ltd on behalf of the Moriah War Memorial College Association (the Applicant) for the redevelopment of Moriah College in Queens Park.

Consent is sought for a concept development application (Concept Proposal) for the redevelopment of the senior school campus and an overall increase of the student population by an additional 290 students. Consent is also sought for the first stage of development (Stage 1) including an additional 160 students in Kindergarten to Year 12 (K-12).

The proposal is SSD under clause 15(2) of Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011, as it is development for the purpose of alterations or additions to an existing school that has a capital investment value (CIV) of more than \$20 million.

The application is referred to the Independent Planning Commission for determination as Waverley Council has made an objection to the proposal and more than 50 public submissions were received by way of objection.

Assessment summary and conclusions

The Department of Planning, Industry and Environment (the Department) has considered the merits of the proposal in accordance with the relevant matters under section 4.15(1) and the objects of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the principles of ecologically sustainable development, the issues raised in submissions as well as the Applicant's response to these. The Department concludes that the proposal is in the public interest and recommends that the application be approved subject to conditions.

The Department identified traffic and parking, built form and urban design, visual impact and biodiversity impacts as the key issues for assessment. The Department's assessment concludes that:

- the surrounding road network could accommodate the Stage 1 development, subject to conditions requiring intersection upgrades to be completed and a modal shift away from private car use to be achieved.
- further detailed traffic assessment would be required to address the anticipated traffic and parking impacts of future development stages where further increases in the student population is sought.
- the proposed building envelopes under the Concept Proposal would facilitate future built form on the site that would not result in an unacceptable impact on existing views, privacy and solar access or overshadow areas of the critically endangered Eastern Suburbs Banksia Scrub (ESBS) on and adjoining the site.
- the height and scale of the proposed Stage 1 building would not have an unacceptable impact on the character of the surrounding locality and the Applicant's justification for the variation of the height of buildings control in the Waverley Local Environmental Plan 2012 are considered acceptable.
- the visual impact of the Stage 1 building is acceptable as it would not obstruct any significant or important views or have an unacceptable impact on views from the surrounding residential

and public domain areas. Further, landscaping and new tree plantings would partially screen views of the Stage 1 building from within Queens Park.

- direct and indirect impacts to the critically endangered ESBS would be appropriately managed and mitigated through the establishment of a vegetated buffer to Lot 23 and the removal of existing school infrastructure from within the buffer area as part of Stage 1. The vegetated buffer would be managed as part of a Vegetation Management Plan (VMP) and supported by a landscape master plan for the site.

The Department is satisfied that the impacts of the proposal and the issues raised in the submissions have been addressed in the Applicant's Environmental Impact Statement (EIS), Response to Submissions (RtS) and Supplementary Response to Submissions (SRtS).

The site is considered suitable for the proposed school redevelopment as it is an existing educational establishment located on a site that is zoned for such purposes. The proposal would provide improved teaching and learning outcomes through the development of new, purpose-built and modern educational facilities. Conditions of consent are recommended to ensure the identified impacts are managed appropriately during construction and operation of the proposed development.

The proposal

Consent is sought for a Concept Proposal involving the redevelopment of the existing school campus including demolition, new building envelopes, car parking, on-site drop-off and pick-up (DOPU), improved vehicle and pedestrian access arrangements, establishment of a landscape master plan and a VMP.

The Concept Proposal also seeks consent for an additional 290 students (a 17 per cent increase of the approved student population) that is proposed to be staged over a 15-year period, including:

- 160 additional K-12 students at Stage 1 completion (2023).
- 40 additional K-12 students and 50 Early Learning Centre (ELC) students at Stage 2 completion (2030).
- 40 additional K-12 students by 2036 (ultimate stage).

Consent is also sought for the first stage of development (Stage 1) including:

- demolition of buildings, demountable structures and hardstand areas.
- removal of 34 trees and bulk earthworks.
- construction of a part three-storey and part four-storey building to accommodate Science, Technology, Engineering, Arts and Mathematics (STEAM) and an Independent Learning Centre (ILC).
- improved vehicle and pedestrian access and new on-site DOPU area for the senior school and ELC.
- improved active recreation zone, outdoor learning gardens and landscaping.
- signage, lighting and boundary walls.
- implementation of a VMP.
- intersection upgrades.
- 160 additional K-12 students (a 9.5 per cent increase of the approved student population).

The Concept Proposal has a CIV of approximately \$81.7 and would generate 250 future jobs including 224 future construction jobs and 26 future operational jobs.

Stage 1 has a CIV of approximately \$62.7 million and would generate 157 jobs including 140 construction jobs and 17 operational jobs.

The site

Moriah College is located at 101 York Road and 1 and 3 Queens Park Road, Queens Park in the Waverley local government area. The site includes an existing primary school, senior school and ELC. The school has a current combined population of 1535 students and an approved maximum capacity of 1680 students.

The site is located approximately six kilometres south-east of the Sydney central business district and is bound by Queens Park Road to the north, Baronga Avenue to the east and York Road to the west and south. The site adjoins public open space areas which form part of the Centennial Parklands, including Queens Park to the east and Centennial Park to the west and south. The Queens Park residential area is located to the north.

An area of approximately 1.07 hectares of remnant bushland including ESBS adjoins the site to the south-west within Lot 23 in DP 879582 (Lot 23) and is owned by the Centennial Park and Moore Park Trust.

Engagement

The EIS was publicly exhibited from 21 November 2019 to 18 December 2019 (28 days). The Department received a total of 321 submissions, comprising five from public authorities (including an objection from Waverley Council), 314 individual public submissions (including 141 objections) and two submissions from special interest groups (including one objection).

Key issues raised in the submissions related to impacts on the surrounding road network and on-street car parking associated with the increase in student population, built form impacts, visual impacts and overshadowing, noise and biodiversity impacts.

On 26 June 2020, the Applicant submitted a RtS to address the issues raised in the submissions and by the Department. The RtS included amendments to the Concept Proposal and Stage 1, including:

- reduced massing of the Stage 2 ELC building envelope to ensure no overshadowing of the ESBS.
- amendments to the Stage 1 STEAM and ILC building including a minor reduction in height, changes to the building facade and revised internal layout.
- relocation of the driveway off York Road (Gate 4) to the east and relocation of the associated security gate further north within the boundary of the site.
- an additional 52 bicycle parking spaces.

The RtS and amended proposal were publicly exhibited from 6 July 2020 to 20 July 2020 (15 days). The Department received a total of 44 submissions in response to the RtS, comprising six from public authorities (including comments from Waverley Council), 36 individual public submissions (including 34 objections) and two submissions from special interest groups (including one objection).

On 14 December 2020, the Applicant submitted its SRtS which provided a further response to the issues raised. The SRtS included further amendments to the proposal, including:

- provision within the site of a vegetated buffer to the ESBS located on adjoining Lot 23, including the removal of existing school infrastructure from within the buffer area.
- further relocation of the driveway from York Road (Gate 4) approximately 9m to the east to accommodate the buffer area.
- reconfiguration of the parking area located to the north-west of the existing ELC and moving it approximately 3m to the east to accommodate the buffer area.
- an amended landscape planting strategy.

The SRtS included an updated traffic assessment with more comprehensive traffic modelling of the surrounding road network that addressed the recommendations of the Department's independent traffic consultant.

The SRtS and amended proposal were made publicly available on the Department's website and referred to the relevant public authorities and Council for comment in December 2020. The Department received three submissions in response to the SRtS, comprising two from public authorities (including comments from Waverley Council) and one from a special interest group.

The Department considered the issues raised by Council, agencies and special interest groups could be appropriately managed and mitigated by the recommended conditions of consent.

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1 Introduction

- 1.1.1 This report provides an assessment of a State significant development (SSD) application (SSD-10352) lodged by Urbis Pty Ltd on behalf of the Moriah War Memorial College Association (the Applicant) for the redevelopment of Moriah College in Queens Park.
- 1.1.2 Consent is sought for a concept development application (Concept Proposal) for the redevelopment of the senior school campus and an overall increase of the student population by an additional 290 students. Consent is also sought for the first stage of development (Stage 1) including an additional 160 students in Kindergarten to Year 12 (K-12).

1.2 Site description

- 1.2.1 The site is located at 101 York Road and 1 and 3 Queens Park Road, Queens Park in the Waverley local government area (LGA). The site is legally described as Lot 22 in DP 879582 and Lots 1 and 3 in DP 701512.
- 1.2.2 The site is located approximately six kilometres (km) south-east of the Sydney central business district and 1.2km south of Bondi Junction. The site in its regional context is shown in Figure 2.

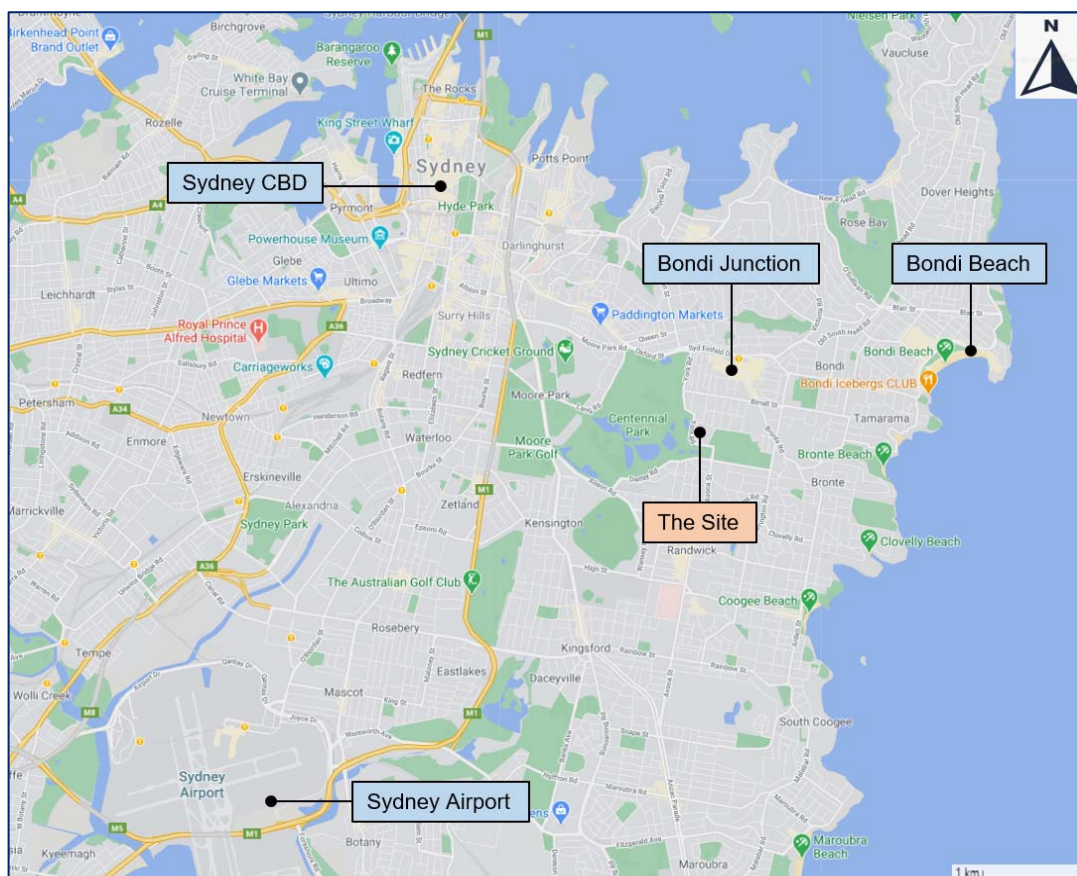


Figure 1 | Site location – regional context (Base source: Google Maps)

- 1.2.3 The site comprises an area of approximately 4.5 hectares (ha) and is bound by Queens Park Road to the north, Baronga Avenue to the east and York Road to the west and south. The site includes an existing primary school, senior school and Early Learning Centre (ELC). The site in its local context and existing site layout are shown in Figure 2 and Figure 3.



Figure 2 | Site location – local context (Base source: Applicant's EIS)



Figure 3 | Site layout – Moriah College, Queens Park campus (Base source: Applicant's EIS)

Existing development

- 1.2.4 Moriah College is an independent Jewish school and has operated from the Queens Park campus since its construction in 1984. The design and layout of the school campus has expanded under various development consents and approvals following initial construction. The campus comprises 18 buildings ranging in height from one to three-storeys located across both the primary and senior school campuses. The layout of existing school buildings is shown in Figure 4.
- 1.2.5 The primary school occupies the north-western part of the site and includes five buildings that accommodate various classrooms and administration areas, covered outdoor play areas, multi-purpose sports courts, an internal drop-off and pick-up (DOPU) area, at-grade carpark accessed from York Road, landscaped areas and internal pedestrian pathways.
- 1.2.6 The senior school occupies the eastern part of the site and includes 13 buildings that accommodate various classrooms and administration areas, outdoor multi-purpose sports courts, separate at-grade carparks accessed from Queens Park Road and York Road, landscaped areas and internal pedestrian pathways. The senior school also accommodates an ELC with a dedicated internal DOPU area accessed from York Road. The senior school DOPU area is located on York Road near the southern entry to the site.

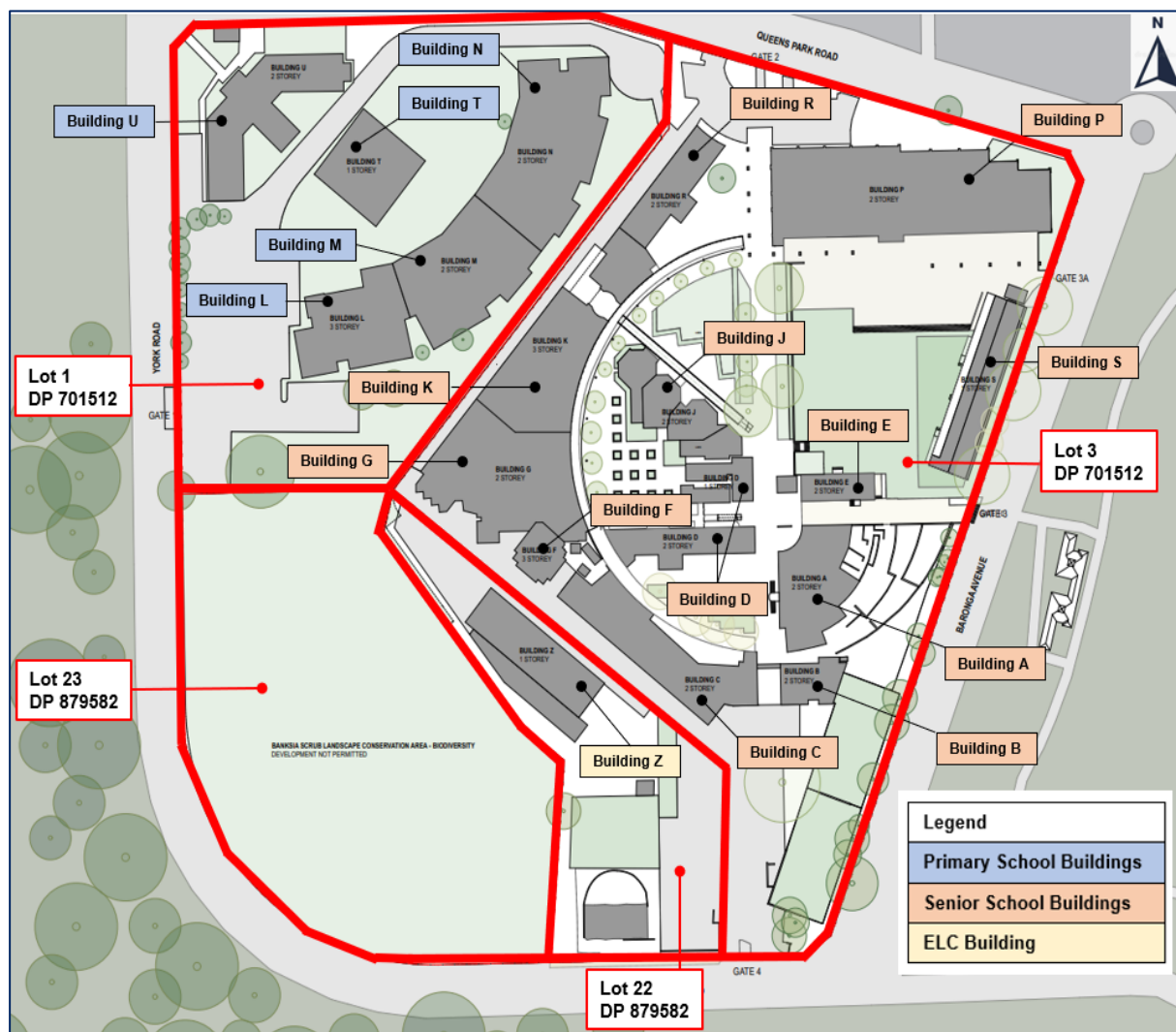


Figure 4 | Layout of existing school buildings (Base source: Applicant's EIS)



Figure 5 | Building C (left) and Building D (right) – senior school campus (Source: Applicant's EIS)



Figure 6 | Building P (left) and demountable Building S (centre) – senior school campus (Source: the Department)



Figure 7 | Baronga Avenue (Gate 3) entry to the senior school campus (Source: the Department)



Figure 8 | Building A (left) and Building E (right) – senior school campus (Source: Applicant's EIS)



Figure 9 | Senior school DOPU area and vehicle entry point from York Road (Gate 4) (Source: the Department)



Figure 10 | ELC car parking area (Source: Applicant's EIS)

Site access

1.2.7 There are five vehicle and pedestrian access points to the campus, including:

- Gate 1: vehicle access from York Road to the primary school campus and on-site DOPU area.
- Gate 2: separate vehicle entry and access points from Queens Park Road to the school's administration buildings.
- Gate 3: pedestrian access only from Baronga Avenue to the senior school campus.
- Gate 3A: pedestrian and service vehicle (Ausgrid) access from Baronga Avenue.
- Gate 4: vehicle access from York Road to the senior school campus and ELC.

The vehicle and pedestrian access gates are shown in **Figure 11**.

1.2.8 Sealed pedestrian footpaths are provided around the perimeter of the site, including along all site frontages. Pedestrian facilities including pedestrian refuges and pedestrian crossings are located on York Road, Queens Park Road and Baronga Avenue.

1.2.9 A dedicated cycle lane along the northern side of Queens Park Road provides a connection to the wider cycle network including to Bondi Junction.

Car parking and DOPU

1.2.10 The school has 185 on-site car parking spaces located across three separate car parking areas. Overall, the school allocates 158 spaces for staff, 13 spaces for the ELC, seven spaces for school-owned vehicles and seven spaces for school visitors. The on-site car parking areas are shown in **Figure 11**.

1.2.11 The school has separate DOPU areas:

- the primary school DOPU area is accessed from York Road (west) via Gate 1 and includes an internal loop road for vehicles to queue on-site.
- the senior school DOPU area is external to the site and comprises an indented parking area on the northern side of York Road, to the west of Gate 4.
- school bus DOPU activities are carried out within an indented parking area on the western side of Baronga Avenue.
- DOPU activities for the ELC are carried out in the on-site car park accessed from York Road (south) via Gate 4.

1.2.12 The general location of the school's DOPU areas are shown in **Figure 11**.

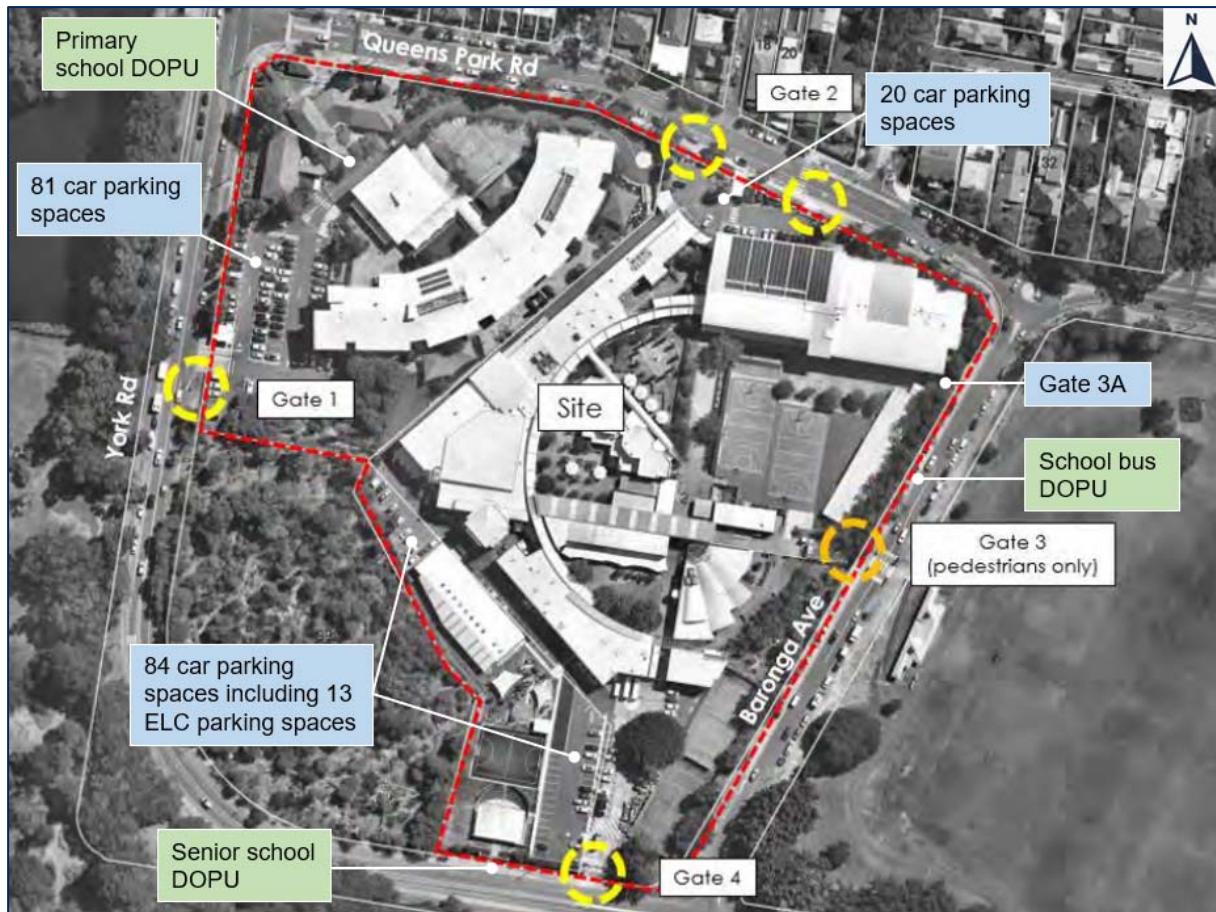


Figure 11 | On-site car parking areas and indicative DOPU locations (Base source: Applicant's EIS)

Heritage

- 1.2.13 The site is located in the Remnant Bushland Landscape Conservation Area (LCA) and adjoins the Eastern Suburbs Banksia Scrub LCA and identified as items C57 and C40, respectively, under Schedule 5 of the Waverley Local Environmental Plan 2012 (WLEP).
- 1.2.14 The site contains a local heritage item listed under Schedule 5 of the WLEP, which is described as a Former Tram Shed (Item No. I428) located at the north-western part of the site on the primary school campus.

Public transport

- 1.2.15 The site is serviced by several public bus services operated by Sydney Buses. Bus route 357 is the primary route servicing the site providing connection between Mascot and Bondi Junction via Kingsford and Randwick and operates every 15 minutes during peak periods.
- 1.2.16 The school has an agreement with the State Transit Authority of NSW for special school bus services to transport students in the morning and afternoon periods from a bus queuing area in Baronga Avenue.
- 1.2.17 The school also operates the Moriah Shuttle Bus service between the site, Bondi Junction and Maroubra to supplement the regular bus services. The location of bus stops in context to the site and the bus routes servicing these stops is shown in **Figure 12**.

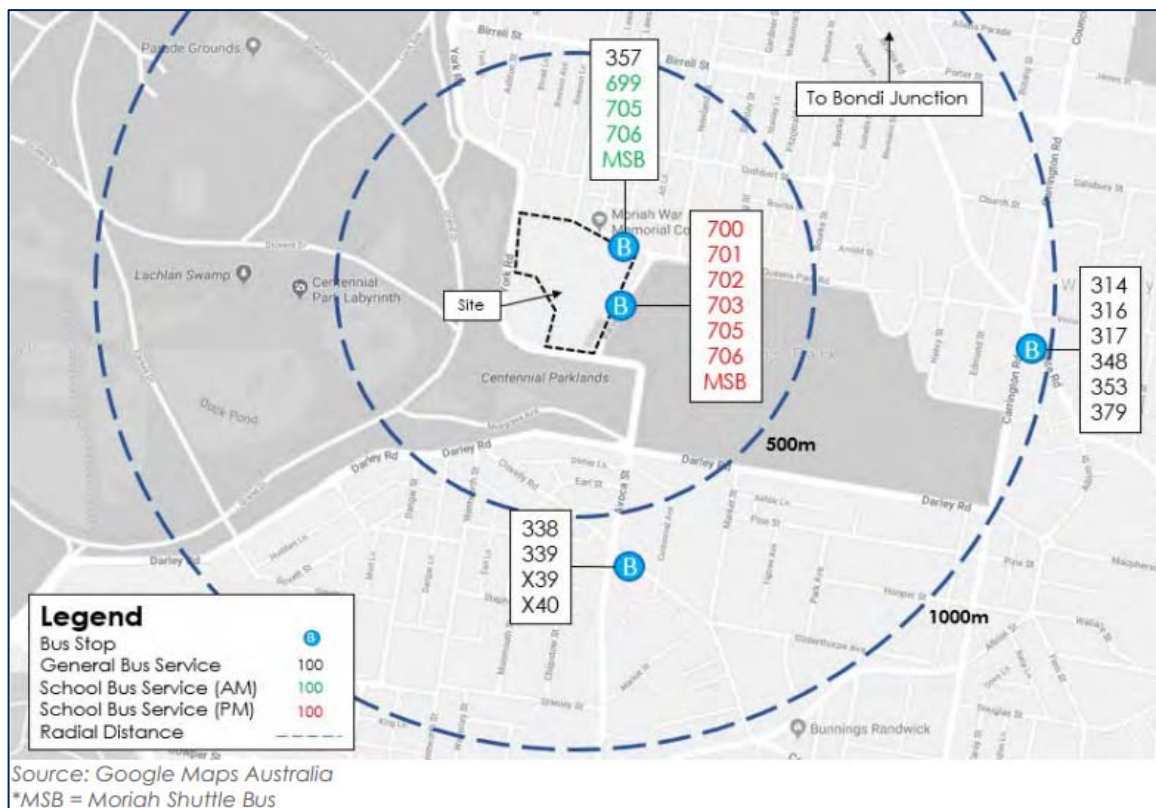


Figure 12 | Bus stops and services in context to the site (Source: Applicant's RtS)

- 1.2.18 Bondi Junction train station is located approximately 1.2km north of the site and is serviced by the T4 Eastern Suburbs and Illawarra Line. The T4 Line connects Bondi Junction with the Sydney CBD and southern suburbs of Sydney including Sutherland and Cronulla.

1.3 Surrounding development

- 1.3.1 The site is surrounded by public open space areas which form part of the Centennial Parklands including Queens Park to the east and Centennial Park to the south and west. These areas form part of a State Heritage Register (SHR) listed item, referred to as 'Centennial Park, Moore Park and Queens Park' (SHR Item No. 01384).
- 1.3.2 An area of approximately 1.07ha of Eastern Suburbs Banksia Scrub (ESBS), a critically Endangered Ecological Community (EEC) adjoins the south-western boundary of the site on Lot 23 in DP 879582. The land is zoned E2 Environmental Conservation under the WLEP and also forms part of the ESBS Landscape Conservation Area (Item No. C40). The land is owned by the Centennial Park and Moore Park (CPMP) Trust and has been subject to rehabilitation measures undertaken by the Applicant, which were required as part of previous development consents and approvals.
- 1.3.3 The Queens Park residential area is located directly to the north of the site and generally comprises one and two-storey dwellings and medium density residential flat buildings. Low and medium density residential development is located approximately 250m from the site to the south of the Centennial Parklands, in the suburb of Randwick.
- 1.3.4 The Bondi Junction mixed-use residential, commercial and retail centre is located approximately 1.2km north of the site. The surrounding development and public open space areas around the site are shown in **Figure 13**.



Figure 13 | Surrounding development (Source: Applicant's RtS)

1.4 Site history and existing operations

- 1.4.1 The Eastern Suburbs Hospital occupied the site from 1935 to 1980. Moriah College has occupied the site since 1984. The campus has progressively developed in accordance with an existing site master plan that was originally prepared in 1994.
- 1.4.2 The site has been subject to numerous DAs following its conversion from a hospital to an educational establishment. The main development consents are listed in **Table 1**.

Table 1 | Previous development consents and approvals

DA number	Development description	Consent authority	Determination date
DA 97/84	Conversion of existing hospital buildings for the purpose of a school on a temporary basis to 31 December 1989.	Waverley Council	24 July 1984
DA 193/86	Erection of a secondary school and associated car parking, recreational facilities and landscaping.	Waverley Council	23 October 1986

DA number	Development description	Consent authority	Determination date
DA 254/92	Alterations and additions to the existing school buildings, construction of a swimming pool and gymnasium and provision of a primary school. Increase in student enrolments to 960 students comprising 360 primary school and 600 high school students.	Waverley Council	30 March 1993
LD 282/00	Demolition, construction and refurbishment of education buildings together with the construction of new buildings, car parking, internal road way and removal of remnant bushland.	Waverley Council	22 May 2001
DA 446-10-2003	Construction of a primary school on Lot 1 in DP 701512 including a new two to three-storey building incorporating 24 classrooms, 83 car parking spaces, landscaping, security fencing, stormwater absorption area and buffer area for conservation purposes.	Minister for Infrastructure and Planning	21 October 2004
DA 205-8-2004	Partial demolition and removal of existing structures, internal refurbishment of existing buildings, new vehicle access ramp, landscaping, fencing and new a retaining wall.	Minister for Infrastructure and Planning	31 January 2005
DA 163/2017	Conversion of an existing building to an ELC.	Waverley Council	22 November 2017
DA 71/2018	Removal of existing building and replacement with new single storey building and associated new landscaping.	Waverley Council	14 May 2018

- 1.4.3 The school has an approved population of 1680 students, comprised of a maximum of 1600 students in Years K-12 and 80 ELC students.
- 1.4.4 The school has a current population of 1535 students, comprising 1455 K-12 students (595 primary students and 860 senior students) and 80 ELC students. The school currently employs 286 full-time and part-time staff including 276 primary and senior school staff and 10 ELC staff.
- 1.4.5 The school operates in accordance with a Plan of Management (PoM) overseen by the Moriah Community Consultative Committee. The PoM outlines the school operating hours between 6am and 6pm (Australian Eastern Standard Time) and 6am to 8pm (Australian Eastern Daylight Time). Out-of-hours events carried out on the site are subject to prior approval of Waverley Council (Council).

2 Project

- 2.1.1 The key components and features of the Concept Proposal and Stage 1 (as refined in the Response to Submissions (RtS) and Supplementary Response to Submissions (SRtS)), are provided in **Table 2** and shown in **Figure 14** to **Figure 32**.

Table 2 | Main components of the Concept Proposal and Stage 1

Aspect	Description
Project summary	<ul style="list-style-type: none"> Concept Proposal and first stage of development (Stage 1) for the redevelopment of Moriah College and an additional 290 students over a 15-year period.
Site area	<ul style="list-style-type: none"> Approximately 4.5ha.
Concept Proposal	
Development components	<ul style="list-style-type: none"> Demolition, tree removal and earthworks. Building envelopes for a new: <ul style="list-style-type: none"> Science, Technology, Engineering, Art and Mathematics (STEAM) and Independent Learning Centre (ILC) building. ELC building. Enhanced vehicle and pedestrian access and road network upgrades. On-site DOPU area for the senior school and the ELC. An additional 15 on-site car parking spaces and 160 bicycle parking spaces. Improved sporting and recreation facilities. Landscape master plan. Vegetation management plan (VMP). Signage and boundary walls. An additional 290 students over a 15-year period.
Building envelopes	<ul style="list-style-type: none"> STEAM and ILC building envelope (Stage 1): maximum height of 20.7m (RL 70.2). ELC building envelope (Stage 2): maximum height of 11.6m (RL 65.7).
Gross floor area (GFA)	<ul style="list-style-type: none"> Removal of 4935.8m² of existing GFA from the demolition of existing school buildings and demountable structures. Creation of 9203.8m² of GFA including: <ul style="list-style-type: none"> 7677m² GFA in Stage 1 (STEAM and ILC building). 1526.8m² GFA in Stage 2 (ELC building).

Student population	<ul style="list-style-type: none"> • 290 additional students over a 15-year period including: <ul style="list-style-type: none"> ○ 160 additional K-12 students at Stage 1 completion (2023). ○ 40 additional K-12 students and 50 ELC students at Stage 2 completion (2030). ○ 40 additional K-12 students by 2036 (ultimate stage).
Capital investment value (CIV)	<ul style="list-style-type: none"> • Total CIV of \$81,712,574 including: <ul style="list-style-type: none"> ○ Stage 1: \$62,722,058. ○ Stage 2: \$18,990,516.
Jobs	<ul style="list-style-type: none"> • 250 future jobs including: <ul style="list-style-type: none"> ○ 224 future construction jobs. ○ 26 future operational jobs.
Stage 1	
Demolition, tree removal and earthworks	<ul style="list-style-type: none"> • Staged demolition and removal of existing school buildings, demountable structures and hardstand areas on the senior school campus, including: <ul style="list-style-type: none"> ○ demolition of Buildings A, B, C, D and J. ○ partial demolition of Building E. ○ removal of demountable Buildings S and D. ○ removal of multi-purpose outdoor sports courts. ○ infill of the outdoor amphitheatre. • Removal of 34 trees. • Earthworks to facilitate construction of a new STEAM and ILC building including basement car parking. • Removal of infrastructure in the buffer to Lot 23 to comply with existing development consents, including: <ul style="list-style-type: none"> ○ partial demolition of a timber deck connected to Building Z (ELC). ○ relocation of ELC shade structure and minor reduction of ELC open space. ○ removal of artificial sports turf.
Built form and uses	<ul style="list-style-type: none"> • Staged construction of a part three-storey and part four-storey STEAM and ILC building incorporating the following uses: <ul style="list-style-type: none"> ○ Lower ground: main entry forecourt, lobby and reception area, forum and multi-purpose room, meeting rooms, administration offices, library, security office, storage rooms, bicycle storage and

end-of-trip facilities, amenities, waste storage, plant rooms and basement car park.

- **Upper ground:** library, cafe and lounge, canteen, innovation centre, study rooms, food technology spaces, design and technology spaces, storage rooms, amenities, plant rooms and outdoor terraces.
- **First floor:** STEAM labs, preparation and storage rooms, art studios, dark room, informal general learning areas, outdoor learning area, amenities, plant rooms and undercover colonnade linking to the future ELC building.
- **Second floor:** STEAM labs, preparation and storage rooms, mathematics spaces, meeting rooms, general learning areas, outdoor learning area, amenities and plant rooms.
- **Third floor:** governance and administration offices, seminar and boardroom, lounge areas, amenities and outdoor terraces.

Building height	<ul style="list-style-type: none"> • 20.7m (maximum).
GFA	<ul style="list-style-type: none"> • 7677m².
FSR	<ul style="list-style-type: none"> • 0.39:1.
Vehicle access and DOPU	<ul style="list-style-type: none"> • Alterations to existing vehicle access arrangements from York Road (Gate 4). • Creation of a new on-site DOPU area for the senior school and ELC.
Car parking	<ul style="list-style-type: none"> • 31 basement car parking spaces in the STEAM and ILC building, including six accessible spaces. • 62 car parking spaces located at-grade, including two accessible spaces.
Bicycle parking	<ul style="list-style-type: none"> • 160 bicycle parking spaces.
Intersection upgrades	<ul style="list-style-type: none"> • Construction of a left-turn slip-lane from York Road into Baronga Avenue. • Upgrades to the York Road / Queens Park Road intersection. • Upgrades to an existing pedestrian refuge on York Road.
Landscaping, public domain and outdoor play areas	<ul style="list-style-type: none"> • Landscaping on the senior school campus including: <ul style="list-style-type: none"> ○ Central lawn adjacent to the Baronga Avenue entry. ○ Reflection garden.

	<ul style="list-style-type: none"> ○ Atrium gardens surrounding the STEAM and ILC building. ○ Landscaping across the campus, including 121 new tree plantings. • Enhanced outdoor play areas including three new multi-purpose sports courts with adjacent terraces and raised seating platforms. • Public artwork at the Baronga Avenue entry.
Vegetation management	<ul style="list-style-type: none"> • Implementation of a VMP to manage existing ESBS and indirect impacts on native vegetation on adjacent Lot 23.
Signage and boundary walls	<ul style="list-style-type: none"> • Business identification signs and new boundary walls at the eastern (Baronga Avenue) and southern (York Road) elevations.
Student population	<ul style="list-style-type: none"> • 160 additional K-12 students at Stage 1 completion (2023).
Jobs	<ul style="list-style-type: none"> • 157 jobs including: <ul style="list-style-type: none"> ○ 140 construction jobs. ○ 17 operational jobs.
CIV	<ul style="list-style-type: none"> • \$62,722,058.
Construction hours	<ul style="list-style-type: none"> • 7am to 6pm Monday to Friday. • 8am to 5pm Saturday.

2.2 Demolition and construction staging

- 2.2.1 The Concept Proposal and Stage 1 development seek consent for the demolition and removal of a number of existing school buildings, demountable structures and hardstand areas within the senior school campus including 84 car parking spaces. The extent of demolition is shown in **Figure 14**.
- 2.2.2 Construction of the new STEAM and ILC building is proposed as part of the Stage 1 and is sought to be constructed in two sub-stages (Stages 1A and 1B). The new building would become operational at the completion of Stage 1A and a temporary sports court would be constructed at the future Stage 1B area. **Figure 15** and **Figure 16** show the proposed site layout at the completion of Stages 1A and 1B, respectively.
- 2.2.3 The EIS states that the demolition, decanting and construction activities would be staged generally in accordance with the sequencing outlined in **Table 3**. The demolition of Building Z and the construction of a new ELC building, including completion of the ELC landscaping strategy is proposed as part of Stage 2 and would be subject to separate approval.

Table 3 | Demolition and construction staging

Construction	Stage	Description of works	Timing
Phase 1	1	<ul style="list-style-type: none"> Establishment of the VMP area adjacent to Lot 23 including partial demolition of an existing timber deck connected to Building Z, relocation of ELC shade structure and removal of artificial sports turf. Construction of new Gate 4 access, DOPU area and car parking. Construction of new access ramp at Gate 3A. Infill of existing amphitheatre. 	2 months
	2	<ul style="list-style-type: none"> Demolition of Buildings A and B. Tree removal. Construction of Stage 1A of the STEAM and ILC building including bulk excavation of the basement level. Construction of temporary outdoor sports court at the future Stage 1B area (Figure 15). 	18 months
	3	<ul style="list-style-type: none"> Construction of Stage 1B of the STEAM and ILC building. 	12 months
	4	<ul style="list-style-type: none"> Removal of demountable structures including Building S. Uses decanted into the new STEAM and ILC building. 	
	5	<ul style="list-style-type: none"> Demolition of Buildings C, D, E and J. 	
	6	<ul style="list-style-type: none"> Landscaping and construction of outdoor sports courts. 	
Phase 2	7	<ul style="list-style-type: none"> Construction of Stage 2 ELC building. 	Stage 2 (subject to separate approval)
	8	<ul style="list-style-type: none"> Demolition of Building Z and completion of the ELC outdoor landscaped area. 	

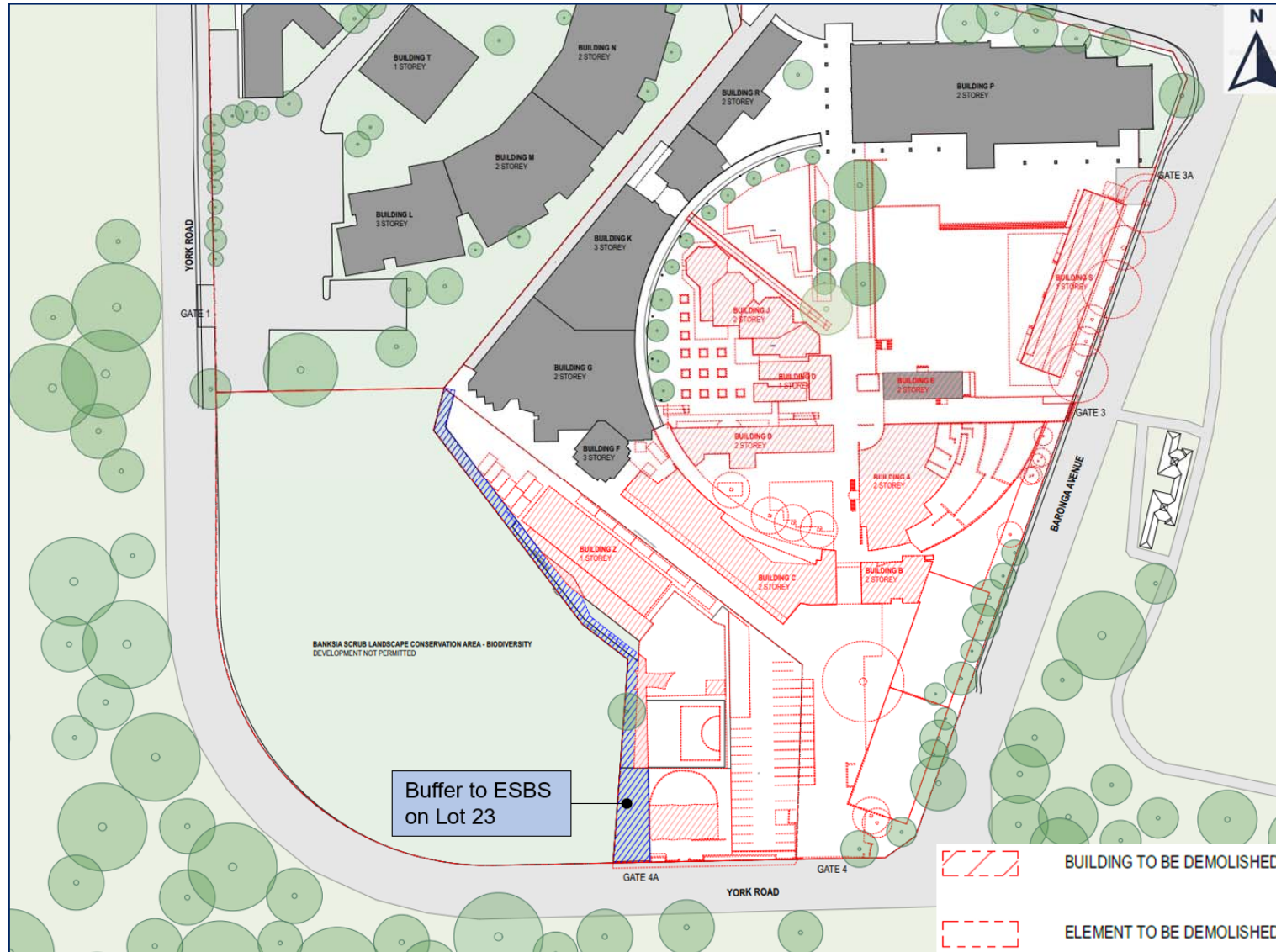


Figure 14 | Concept demolition plan (Base source: Applicant's SRtS)

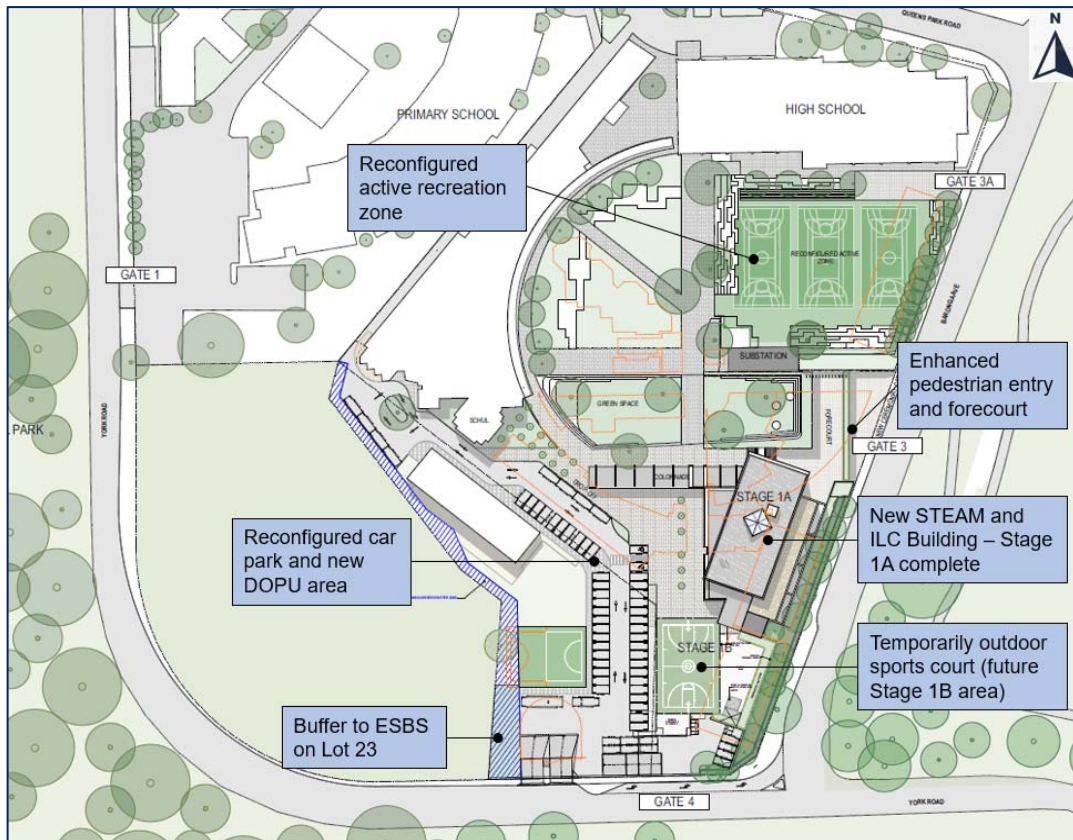


Figure 15 | Site layout – Stage 1A completion (Base source: Applicant's SRtS)

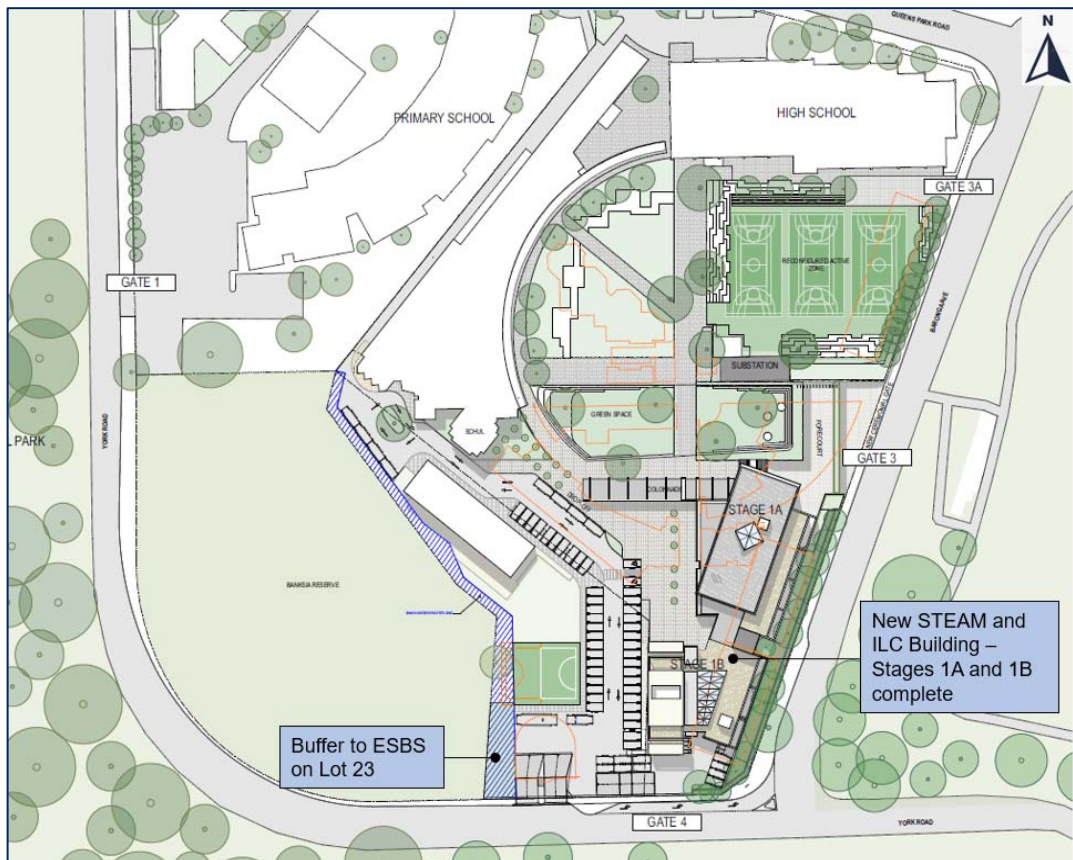


Figure 16 | Site layout – Stage 1B completion (Base source: Applicant's SRtS)

2.3 Building envelopes

- 2.3.1 The Concept Proposal (as amended) seeks consent for building envelopes to accommodate:
- a STEAM and ILC building (Stage 1).
 - an ELC building (Stage 2).
- 2.3.2 The Stage 1 building envelope is designed to accommodate a three to four-storey building to a maximum height of 20.3m and a GFA of approximately 7677m². The built form of the Stage 1 STEAM and ILC building within the proposed conceptual building envelope is described in further detail at **Section 2.4**.
- 2.3.3 The Stage 2 building envelope is designed to accommodate a three-storey building to a maximum height of 11.6m and a GFA of approximately 1526.8m². A new ELC would be developed within the Stage 2 building envelope and is envisaged to comprise three interlocking forms with an activated and landscaped rooftop. The form of the northern component would span above the new internal access road and car parking area that is proposed to be constructed in Stage 1.
- 2.3.4 The construction and operation of the Stage 2 ELC building would be subject to a future development application (DA). The proposed ELC building envelope is shown in **Figure 19**.

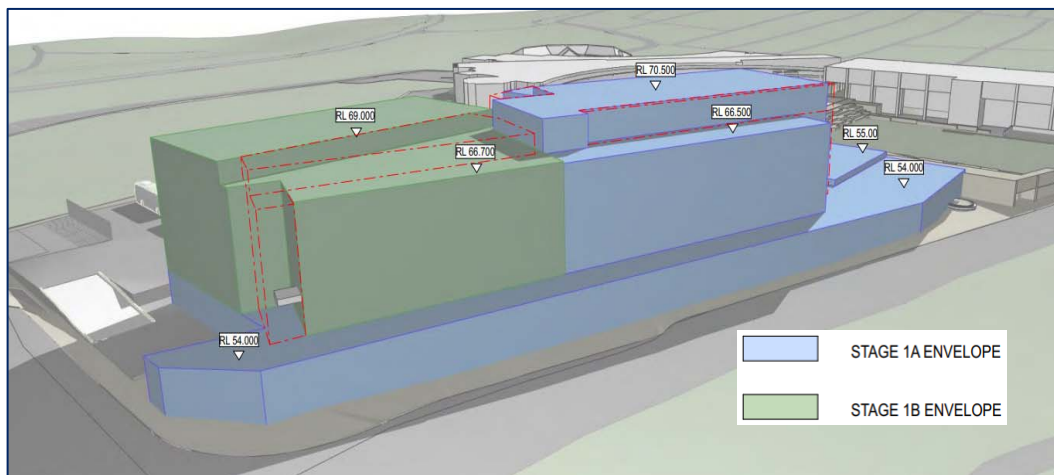


Figure 17 | STEAM and ILC building envelope – eastern perspective (Source: RtS)

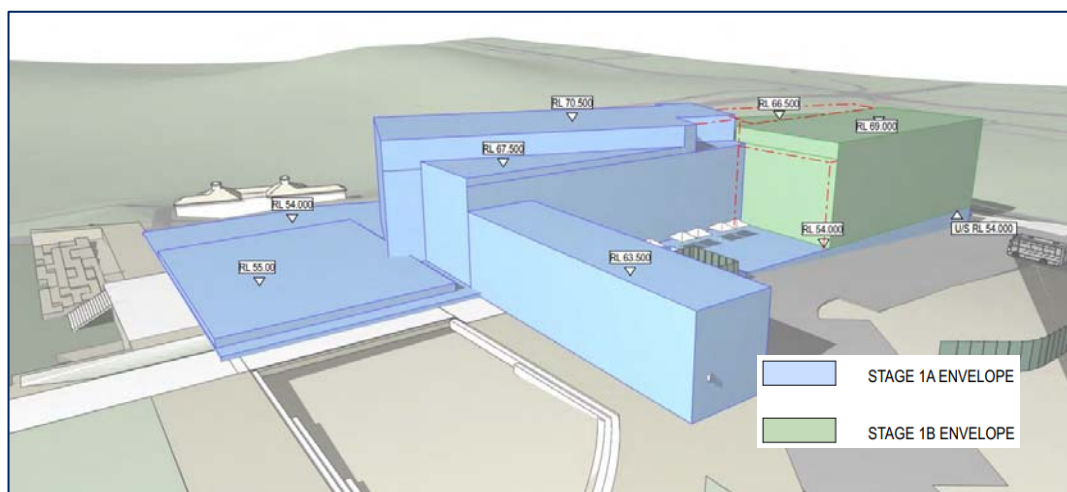


Figure 18 | STEAM and ILC building envelope – western perspective (Source: RtS)

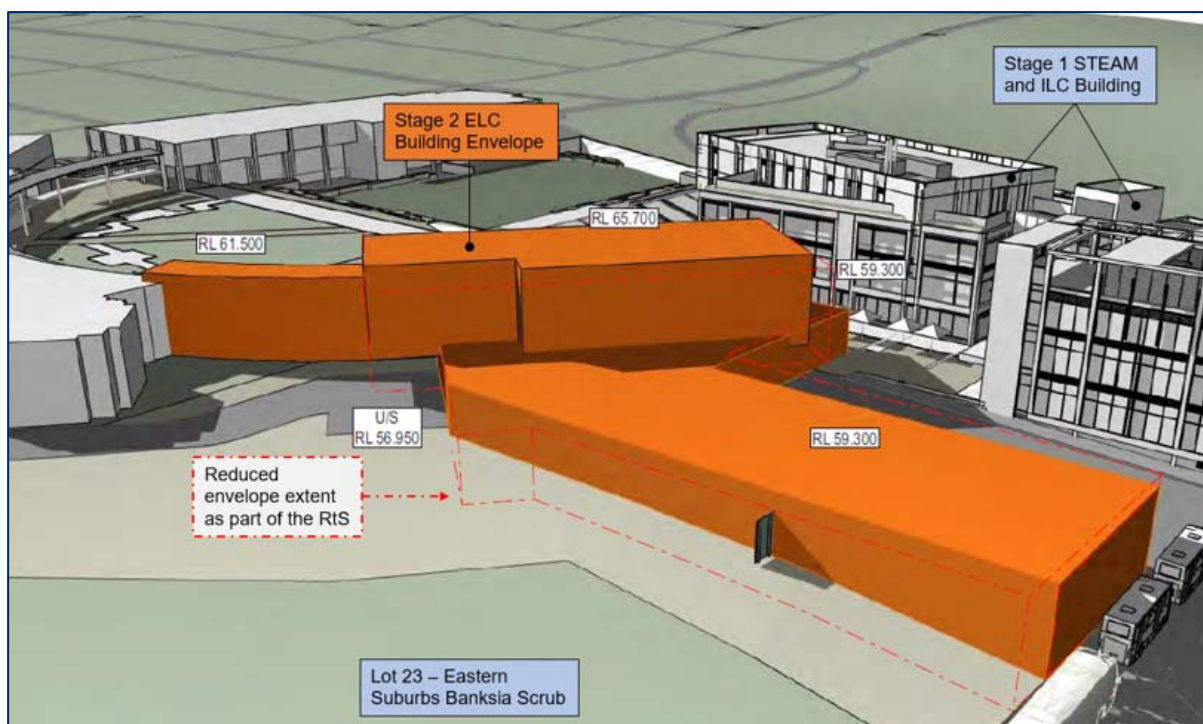


Figure 19 | Stage 2 ELC building envelope – eastern perspective (Source: Applicant's RtS)

2.4 STEAM and ILC building

- 2.4.1 Consent is sought as part of Stage 1 for the construction and operation of a part three-storey and part four-storey STEAM and ILC building (comprised of Stages 1A and 1B). The building would be sited parallel to Baronga Avenue and Queens Park at the south-eastern part of the site.
- 2.4.2 The building is proposed to have a maximum height of 20.7m from natural ground level (RL 70.2) and comprise a total GFA of 7677m². An illustrative perspective of the proposed building viewed from Baronga Avenue is shown in **Figure 20**. The building elevations are shown in **Figure 21** to **Figure 24**.
- 2.4.3 The building would provide a contemporary learning environment and replace ageing building stock with modern facilities for STEAM. Key components of the building would include a 250-seat auditorium, new senior school library, design and technology spaces and outdoor learning terraces. Uses within the building are further detailed in **Table 2**.
- 2.4.4 The external materials and finishes of the building would primarily consist of off-form concrete, brick, masonry screens, timber battens, composite timber and steel and painted steel. The external materials and finishes are shown in **Figure 25**.



Figure 20 | Illustrative perspective of the proposed STEAM and ILC building – view looking south-west from Baronga Avenue (Source: Applicant's RtS)

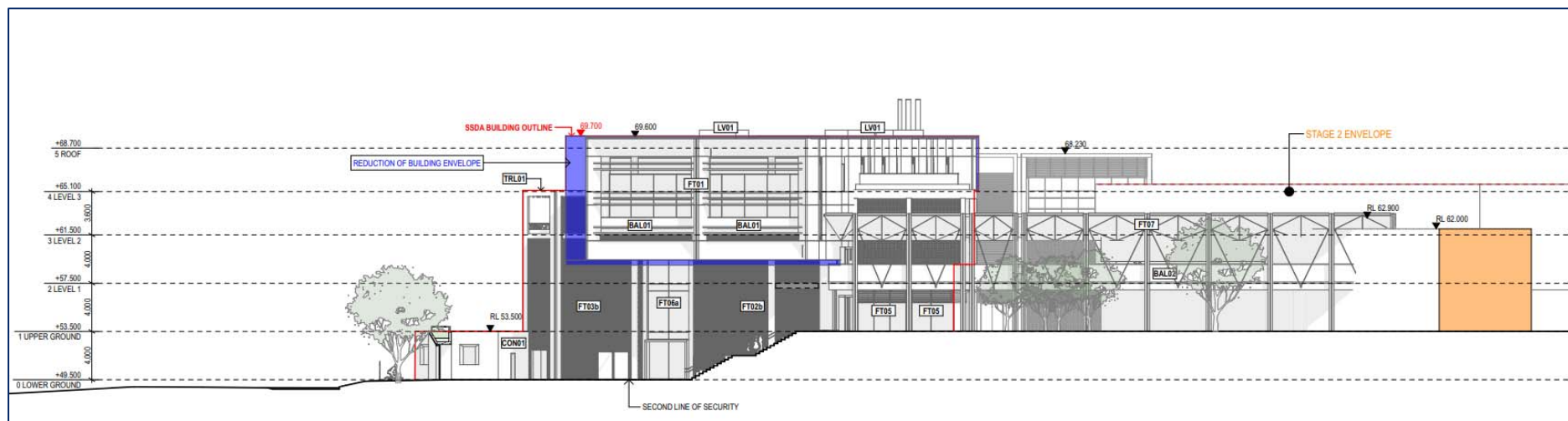


Figure 21 | Northern elevation – Stages 1A and 1B complete (Source: Applicant's SRtS)

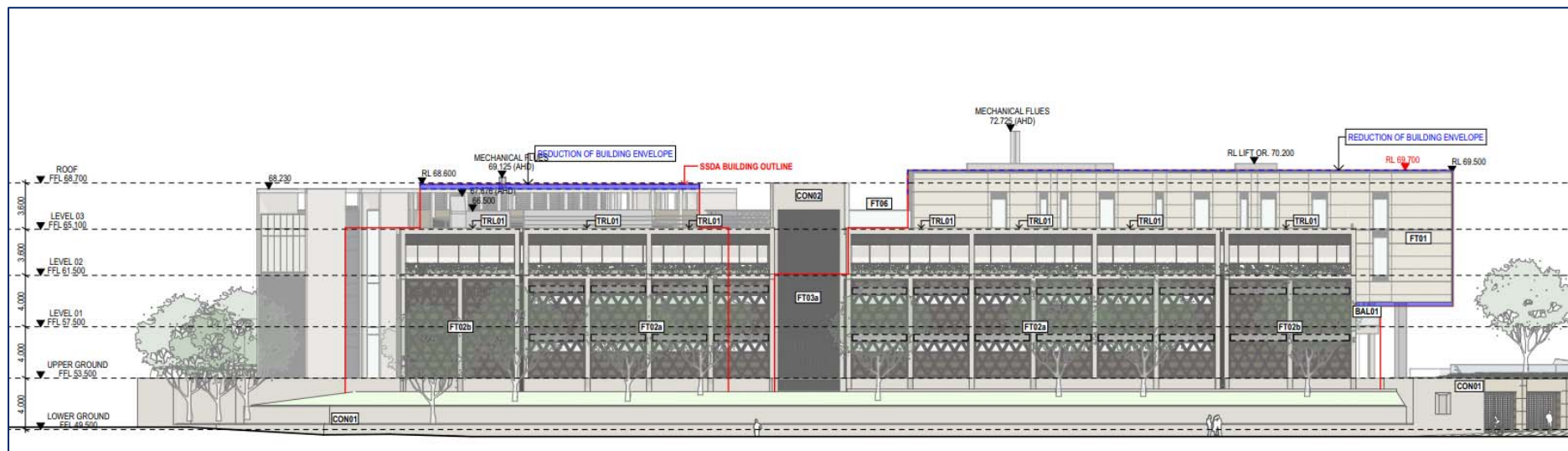


Figure 22 | Eastern elevation – Stages 1A and 1B complete (Source: Applicant's SRtS)

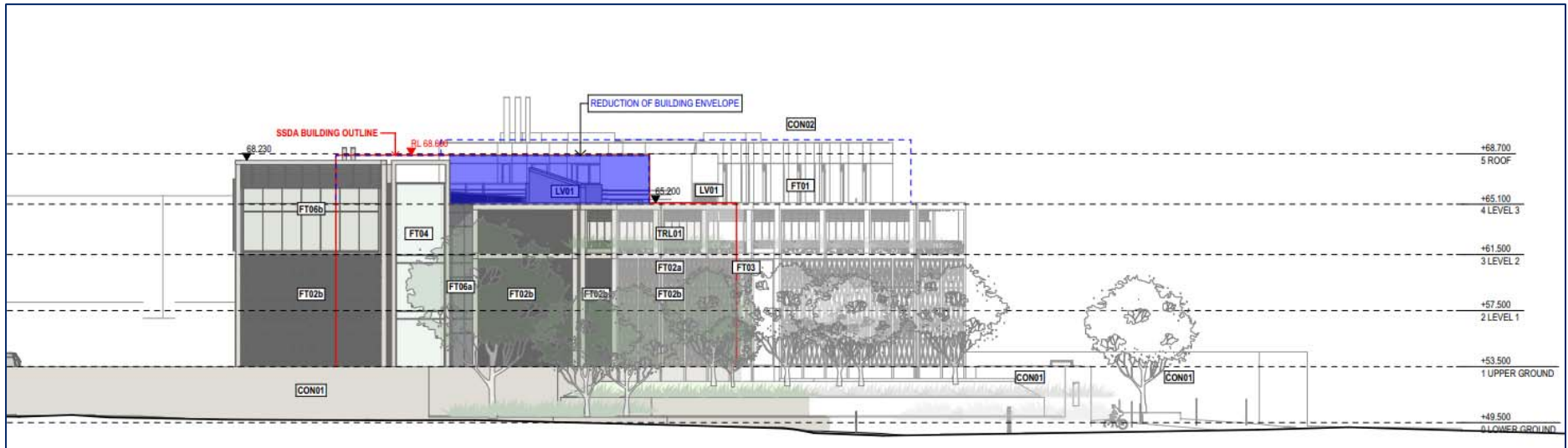


Figure 23 | Southern elevation – Stages 1A and 1B complete (Source: Applicant's SRtS)

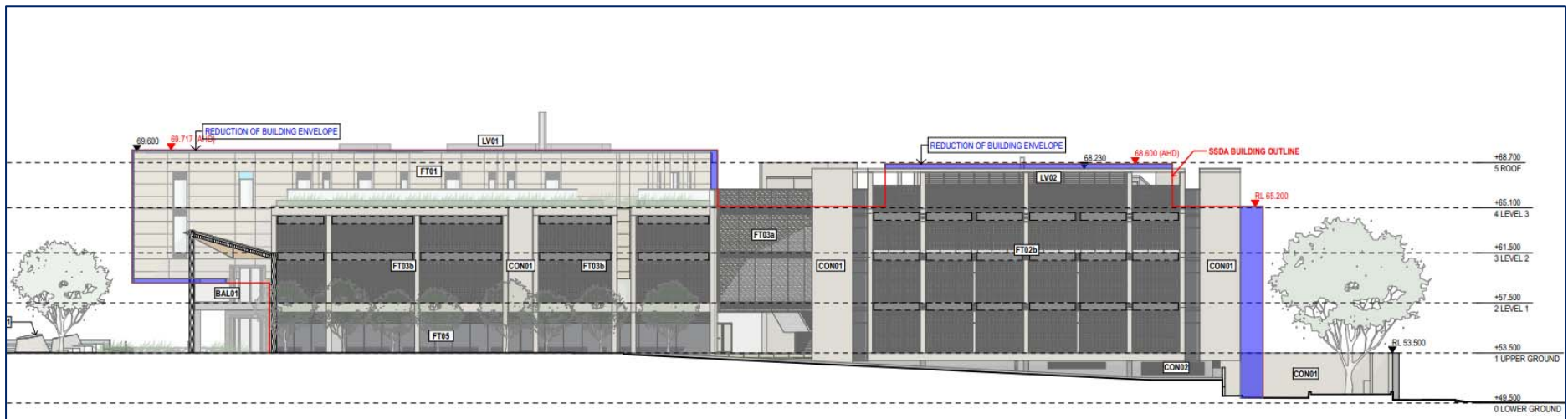


Figure 24 | Western elevation – Stages 1A and 1B complete (Source: Applicant's SRtS)

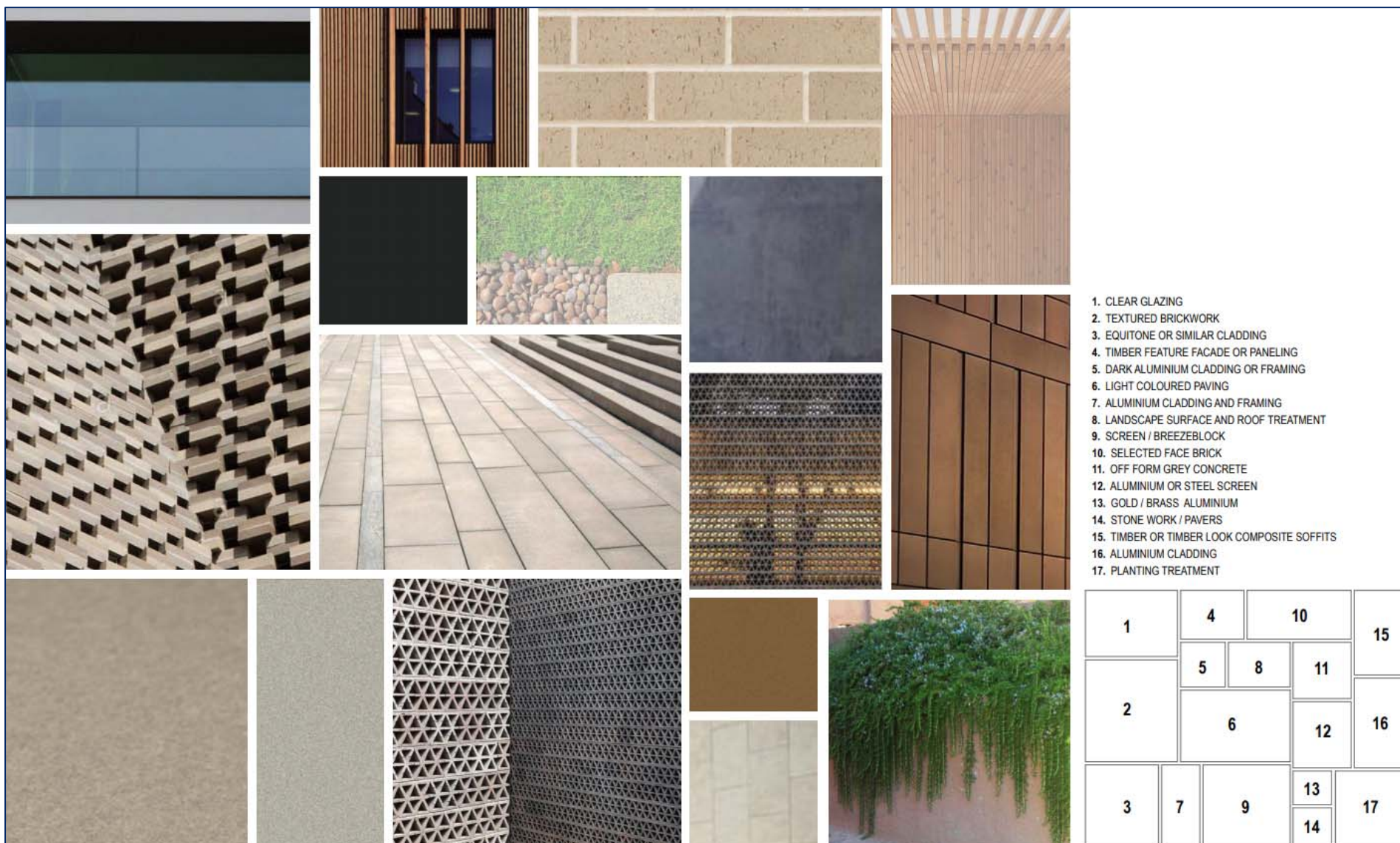


Figure 25 | External finishes – STEAM and ILC building (Source: Applicant's RtS)

2.5 Car parking and DOPU

- 2.5.1 The Concept Proposal (as amended) includes 103 on-site car parking spaces in Stages 1 and 2, being a net overall increase of 19 on-site parking spaces. This includes provision for the replacement of 84 spaces that are proposed to be removed as part of the Stage 1 demolition works.
- 2.5.2 Of the 103 new spaces proposed, a total of 93 spaces would be created in Stage 1 (including the 31 basement spaces in the Stage 1 STEAM and ILC building and 62 at-grade spaces). A further 10 spaces are proposed in Stage 2. All proposed car parking spaces would be accessed from Gate 4.
- 2.5.3 Stage 1 also proposes the construction of an on-site DOPU area for the senior school campus and ELC. Access to the new DOPU area would be from York Road (south) at Gate 4 and would include an internal vehicle queuing area of approximately 240m in length. The proposed on-site DOPU arrangement is shown in **Figure 26**.

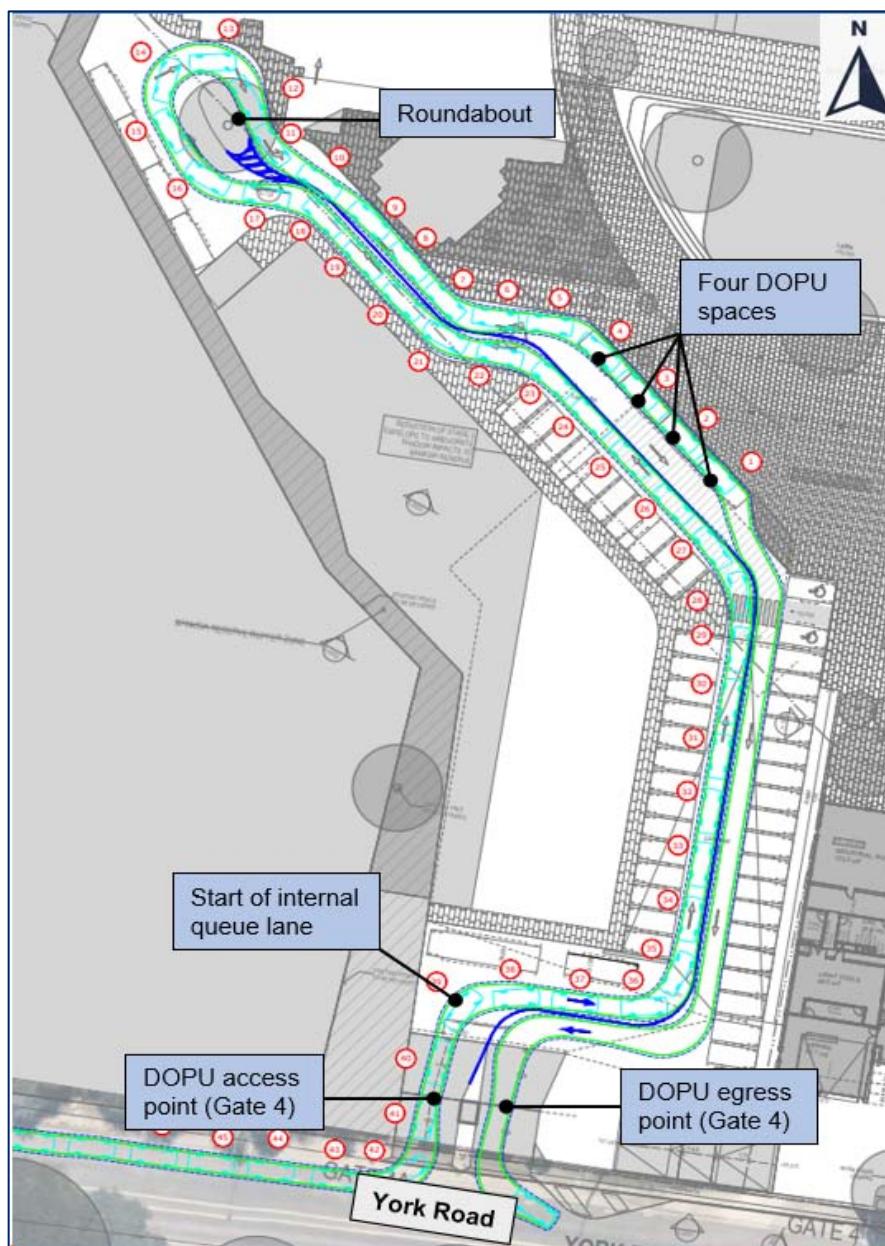


Figure 26 | Proposed on-site DOPU arrangement – senior school (Source: Applicant's RtS)

2.6 Intersection upgrades

2.6.1 Stage 1 proposes the following infrastructure upgrades and infrastructure works:

- construction of a left-turn slip-lane from York Road into Baronga Avenue.
- upgrades to the York Road / Queens Park Road intersection to a seagull intersection.
- upgrades to an existing pedestrian refuge on York Road.

2.6.2 The location of the proposed infrastructure upgrades shown in context to the site is provided at **Figure 27** and are described in detail in **Section 6.2**.



Figure 27 | Proposed road network upgrades (Source: Applicant's RtS)

2.7 Landscaping and recreation areas

2.7.1 Stage 1 proposes the implementation of a comprehensive landscape master plan for the site comprising both hard and soft landscaping, including planting of trees, shrubs, and groundcovers. The landscape master plan (**Figure 28**) incorporates the following key components:

- Central Green which would form the heart of the campus to accommodate outdoor learning, support social spaces and facilitate ceremonial gatherings, assembly and performances.
- active sports centre located in the northern part of the senior school campus that is proposed to replace the two existing outdoor sports courts with three new, multi-purpose sports courts.

- reflection gardens located to the west of the active sports centre that would comprise shaded areas and seating and would be used as teaching zones and for ceremonial gatherings.
- atrium gardens that would be flexible spaces surrounding the STEAM and ILC building, providing connections to the central green and the central path that connects to the other landscape zones of the campus.
- ESBS local native species are proposed to be planted within the VMP area adjacent to Lot 23.

2.7.2 The Concept Proposal also envisages an activated and landscaped rooftop atop of the future ELC building (Stage 2) which would be subject to separate development consent.

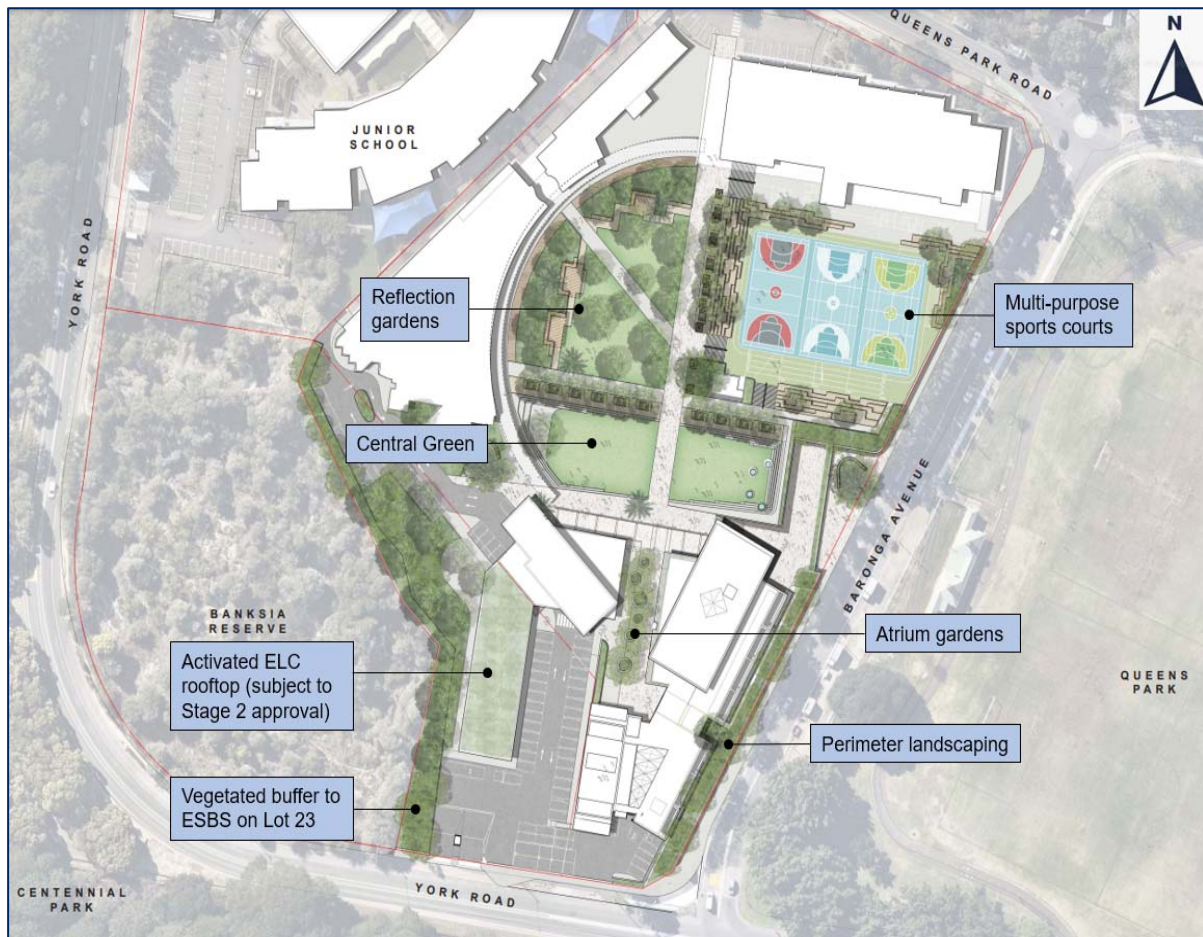


Figure 28 | Landscape master plan (Source: Applicant's SRtS)

2.8 Signage and boundary walls

- 2.8.1 Consent is sought as part of Stage 1 for business identification signs located at Gate 3 (Baronga Avenue frontage) and Gate 4 (York Road frontage). Each sign is proposed to include the school logo and align with the colour scheme of the proposed STEAM and ILC building. The signage zone locations and dimensions are shown in **Figure 29** to **Figure 31**. Indicative signage at Gate 3 fronting Baronga Avenue is shown in **Figure 32**.
- 2.8.2 Stage 1 proposes the construction of new boundary walls along the eastern and southern elevations of the site as a security measure for the campus. The boundary walls would be between 3.5 and five metres in height and are proposed to be constructed of concrete, brick and granite. The boundary wall locations are shown in **Figure 29**.

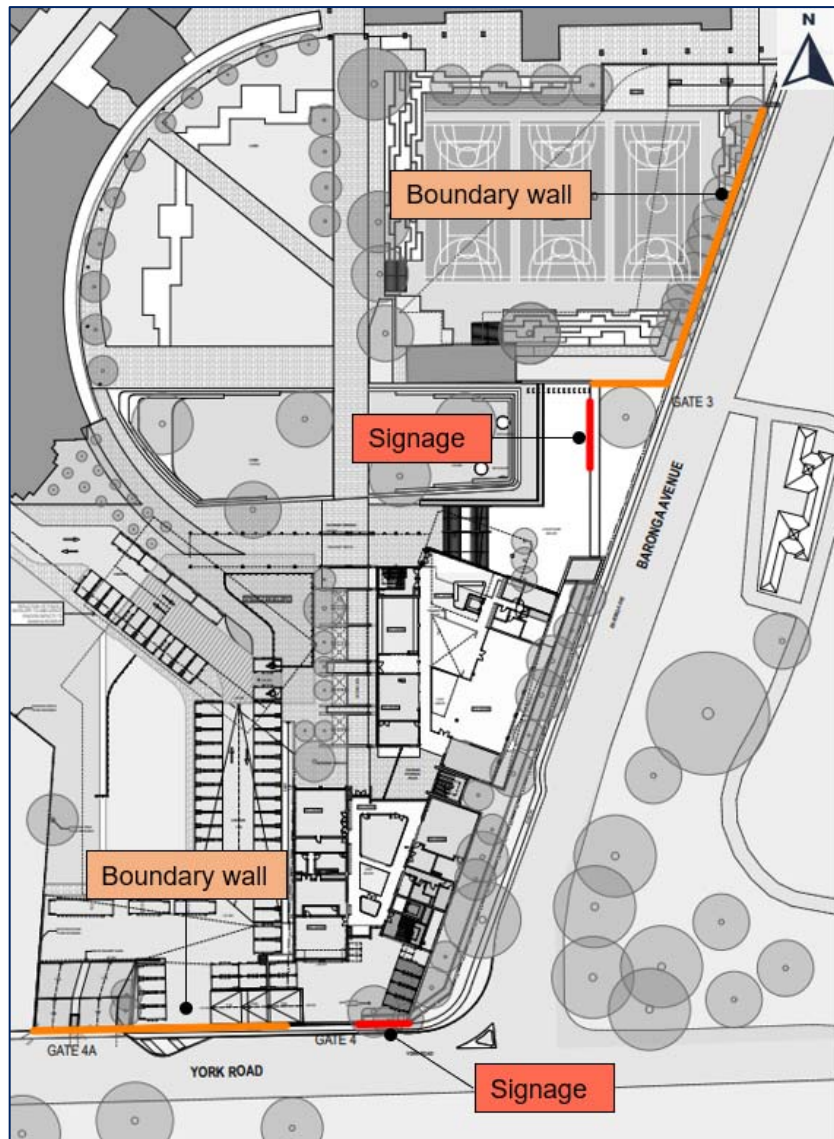


Figure 29 | Proposed signage and boundary walls (Source: Applicant's SRtS)

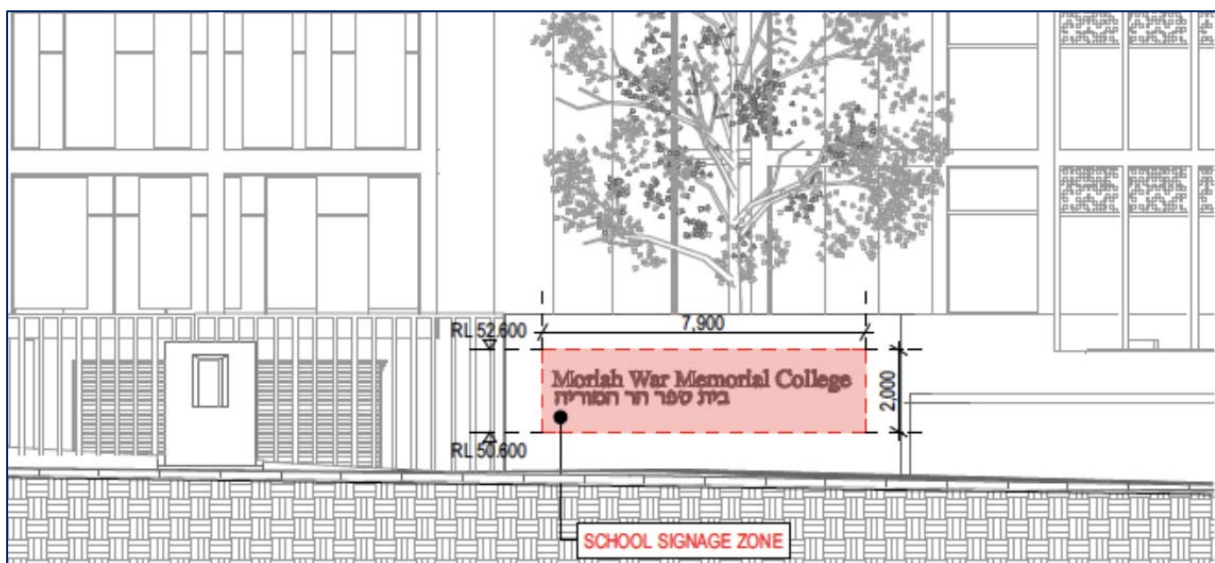


Figure 30 | Proposed signage zone – eastern elevation (Baronga Avenue) (Source: Applicant's SRtS)

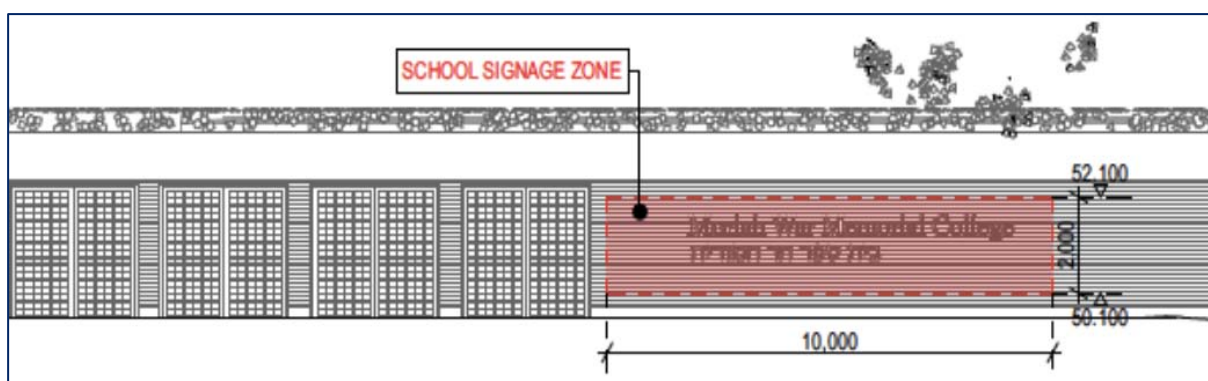


Figure 31 | Proposed signage zone – southern elevation (York Road) (Source: Applicant's SRtS)

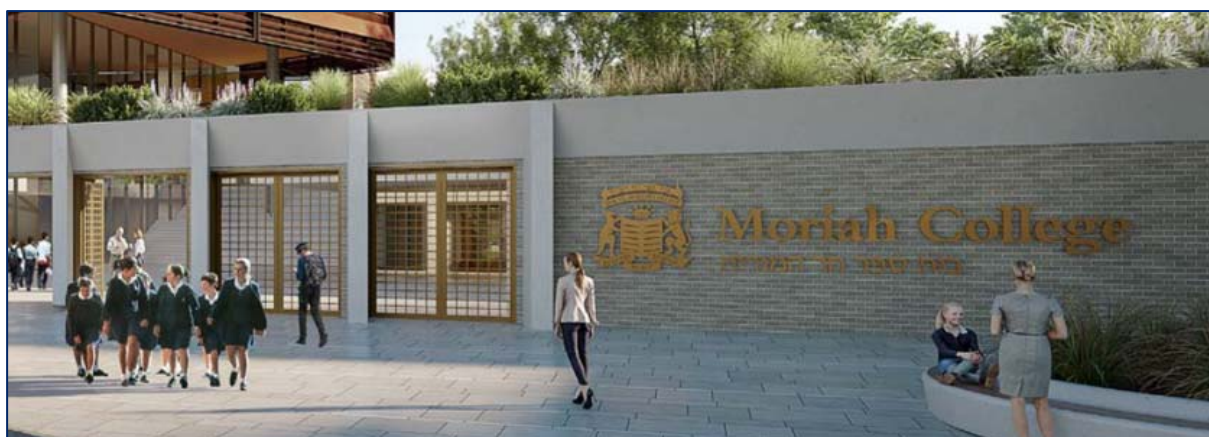


Figure 32 | Indicative signage Baronga Avenue near Gate 3 (Source: Applicant's EIS)

2.9 Student population

- 2.9.1 The Concept Proposal seeks to increase the approved student population by an additional 290 students, increasing the school's approved population from 1680 to 1970 students (a 17 per cent increase of the approved student population). The proposed increase in the school population would occur in a staged manner over a 15-year period and would comprise an additional 50 ELC students and 240 K-12 students.
- 2.9.2 Stage 1 seeks consent for an additional 160 K-12 students, which would increase the school's approved population to 1840 students (representing a 9.5 per cent increase of the approved student population) and is proposed to be completed by 2023. Any further increase of the student population would be subject to future DAs.
- 2.9.3 An additional 90 students (comprising 50 ELC students and 40 K-12 students) would be sought in Stage 2, to be completed by 2030. The remaining 40 K-12 students (from the additional 290 students proposed under the Concept Proposal) would be sought in subsequent stages (subject to future development assessment), to be completed by 2036 and is referred to as the 'ultimate stage'.
- 2.9.4 The proposed staged increase in the student population is outlined in **Table 4**.

Table 4 | Staged increase in the student population proposed under the Concept Proposal

Student group	Approved	Stage 1 (2023)	Stage 2 (2030)	Ultimate (2036)
ELC	80	80	130	130
K-12	1600	1760	1800	1840
Total students	1680	1840	1930	1970

3 Strategic context

- 3.1.1 The Applicant's Environmental Impact Statement (EIS) states that the proposed redevelopment and upgrade of the senior school campus and ELC is required to meet contemporary and evolving learning and educational standards.
- 3.1.2 The EIS describes the existing senior school campus as containing numerous dilapidated assets which have reached the end of their practical lifespan and require extensive maintenance. The proposal seeks to replace these assets with high quality, flexible spaces to suit contemporary teaching methodologies and technologies, without the need to expand the campus or develop new facilities at an alternate location.
- 3.1.3 The Department considers that the proposal is appropriate for the site as is consistent with the:
- NSW Premier's Priorities, as it would provide new and improved teaching and education facilities.
 - Greater Sydney Region Plan, A Metropolis of Three Cities, as it proposes the development of new educational infrastructure and provides for the continued shared use of facilities with the community to meet the growing needs of Sydney.
 - Eastern City District Plan, as it would provide additional and contemporary school infrastructure on the site of an existing educational establishment.
 - NSW Future Transport Strategy 2056, as it would support the ongoing provision of an existing education facility in a highly accessible location that is close to public transport.
 - State Infrastructure Strategy 2018 – 2038, as it would provide new facilities to support the demand for increased student enrolments in the non-government school's sector.
- 3.1.4 The Concept Proposal would facilitate future development that would provide a direct investment of approximately \$81.7 million, which would support 250 future jobs including 224 future construction jobs and 26 future operational jobs.
- 3.1.5 Stage 1 would generate a direct investment of approximately \$62.7 million, which would support 157 jobs including 140 construction jobs and 17 operational jobs.

4 Statutory context

4.1 State significant development

- 4.1.1 The proposal is SSD under section 4.36 (development declared SSD) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as the development is for the purpose of alterations and additions to an existing school with a CIV of more than \$20 million under clause 15(2) of Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP).
- 4.1.2 In accordance with clause 8A of the SRD SEPP and section 4.5 of the EP&A Act, the Independent Planning Commission (Commission) is the consent authority as Council has made an objection to the proposal and more than 50 public submissions were received by way of objection.

4.2 Permissibility

- 4.2.1 The site is located in the SP2 Infrastructure zone (Educational Establishment) under the WLEP. 'Educational establishments' (schools) are permissible with development consent in the SP2 zone. The Commission may therefore determine the carrying out of the development.

4.3 Other approvals

- 4.3.1 Under section 4.41 of the EP&A Act, a number of other approvals are integrated into the SSD approval process, and consequently are not required to be separately obtained for the proposal.
- 4.3.2 Under section 4.42 of the EP&A Act, a number of further approvals are required, but must be substantially consistent with any development consent for the application (e.g. approvals for any works under the *Roads Act 1993*).
- 4.3.3 The Department has consulted with the relevant public authorities responsible for integrated and other approvals, considered their advice in its assessment of the application, and included suitable conditions in the recommended conditions of consent (**Appendix C**).

4.4 Mandatory matters for consideration

4.4.1 Environmental planning instruments

- 4.4.1 Under Section 4.15 of the EP&A Act, the consent authority is required to take into consideration any environmental planning instrument (EPI) that is of relevance to the development the subject of the application. Therefore, the assessment report must include a copy of, or reference to, the provisions of any EPIs that substantially govern the project and that have been considered in the assessment of the proposal.
- 4.4.2 The Department has undertaken a detailed assessment of these EPIs in **Appendix B** and it is satisfied the application is consistent with the requirements of the EPIs.

4.4.2 Objects of the EP&A Act

- 4.4.3 The objects of the EP&A Act are the underpinning principles upon which the assessment is conducted. The statutory powers in the EP&A Act (such as the power to grant consent) are to be

understood as powers to advance the objects of the legislation, and limits on those powers are set by reference to those objects. Therefore, in making an assessment, the objects should be considered to the extent they are relevant. A response to the objects of the EP&A Act is provided in **Table 5**.

Table 5 | Response to the objects of section 1.3 of the EP&A Act

Objects of the EP&A Act	Consideration
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,	The proposal would provide for improved teaching and learning outcomes through the development of new, purpose-built and modern learning spaces.
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The proposal includes measures to deliver ecologically sustainable development (ESD), as detailed in Section 4.4.3 .
(c) to promote the orderly and economic use and development of land,	The proposal is considered an orderly and economic use of the land as it would provide for the redevelopment of an existing school on land that is appropriately zoned for educational uses. The merits of the proposal are considered in Section 6 .
(d) to promote the delivery and maintenance of affordable housing,	Not applicable.
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	<p>The establishment of a vegetated buffer to manage existing ESBS on the site to mitigate impacts and provide for the ongoing protection of the critical EEC on adjoining Lot 23.</p> <p>The buffer area would be managed by the Applicant as part of a VMP proposed as part of the application to manage direct and indirect impacts of the development.</p>
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	The proposal would have a negligible impact on the built and cultural heritage, including Aboriginal cultural heritage (see Section 6).

(g) to promote good design and amenity of the built environment,	The buildings would have a contemporary functional design that would integrate with the surrounding built environment. Consideration of the proposal against the Design Quality Principles set out in the Education SEPP is provided in Appendix B .
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The proposal would promote proper construction and maintenance of buildings, subject to the recommended conditions of consent.
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	The Department publicly exhibited the proposal which included consultation with Council and other public authorities and consideration of the responses received (Section 5 and 6).
(j) to provide increased opportunity for community participation in environmental planning and assessment.	The Department publicly exhibited the proposal which included notifying adjoining and surrounding landowners and placing a notice in the local newspapers. The EIS was made accessible at Council's offices and the NSW Service Centre during the exhibition period and was made available on the Department's website.

4.4.3 Ecologically sustainable development

4.4.4 The EP&A Act adopts the definition of ESD found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD requires the effective integration of economic and environmental considerations in decision-making processes and that ESD can be achieved through the implementation of:

- the precautionary principle.
- inter-generational equity.
- conservation of biological diversity and ecological integrity.
- improved valuation, pricing and incentive mechanisms.

4.4.5 The proposal includes the following ESD initiatives and sustainability measures to achieve a minimum 4-Star Green Star rating or equivalent, which can be achieved through the implementation of:

- energy conservation measures, including insulation and design elements to optimise the use of natural light and ventilation, sun shading, automated lighting control and energy efficient appliances.
- water conservation measures, including use of water efficient fixtures, rainwater capture and reuse and a closed loop sprinkler system.

- selection of suitable materials that meet the relevant design guidelines that are robust and durable.
- passive solar heating and cooling included as part of the development design.

4.4.6 The Department has considered the proposal in relation to the ESD principles. The precautionary and inter-generational equity principles have been applied in the decision-making process via a thorough and rigorous assessment of the environmental impacts of the development.

4.4.7 Overall, the proposal is consistent with ESD principles and the Department is satisfied the proposed sustainability initiatives will encourage ESD, in accordance with the objects of the EP&A Act.

4.4.4 Environmental Planning and Assessment Regulation 2000

4.4.8 Subject to any other references to compliance with the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) cited in this report, the requirements for Notification (Part 6, Division 6) and Fees (Part 15, Division 1AA) have been complied with.

4.4.5 Planning Secretary's Environmental Assessment Requirements

4.4.9 The EIS is compliant with the Planning Secretary's Environmental Assessment Requirements (SEARs) and is sufficient to enable an adequate consideration and assessment of the proposal for determination purposes.

4.4.6 Section 4.15(1) matters for consideration

4.4.10 The matters for consideration under section 4.15(1) of the EP&A Act that apply to SSD in accordance with section 4.40 of the EP&A Act are addressed in **Table 6**.

Table 6 | Section 4.15(1) Matters for Consideration

Section 4.15(1) Evaluation	Consideration
(a)(i) any environmental planning instrument	Satisfactorily complies. The Department's consideration of the relevant EPIs is provided in Appendix B .
(a)(ii) any proposed instrument	Satisfactorily complies. The Department's consideration of the relevant draft EPIs is provided in Appendix B .
(a)(iii) any development control plan	Under clause 11 of the SRD SEPP, development control plans (DCPs) do not apply to SSD. Notwithstanding, the objectives of the Waverley Development Control Plan 2012 (WDCP) are considered in Section 6 .
(a)(iia) any planning agreement that has been entered into or any draft planning agreement that a developer has offered to enter into	Not applicable.

Section 4.15(1) Evaluation	Consideration
(a)(iv) the regulations	The relevant requirements of the EP&A Regulation have been met including the procedures relating to DAs, public participation and preparation of an EIS.
(b) the likely impacts of that development including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	The likely impacts of the development have been appropriately mitigated or conditioned as discussed in Section 6 .
(c) the suitability of the site for the development	The site is suitable for the development as discussed in Section 3, 4 and 6 .
(d) any submissions	The Department considered submissions received during the exhibition period as discussed in Sections 5 and 6 .
(e) the public interest	The proposal is in the public interest as discussed in Section 6.7 .

4.5 Biodiversity Conservation Act 2016

- 4.5.1 Section 7.9(2) of the *Biodiversity Conservation Act 2016* requires all applications for SSD to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.
- 4.5.2 The Applicant submitted a BDAR waiver request as part of the EIS. The Environment, Energy and Science Group (EESG) of the Department reviewed the request and was unable to conclude that the development is not likely to have any significant impact on biodiversity values.
- 4.5.3 Accordingly, EESG advised the Department that the application must be accompanied by a BDAR.
- 4.5.4 A BDAR was submitted as part of the RtS. Impacts on biodiversity are discussed in further detail in **Section 6.5**.

5 Engagement

5.1 Department's engagement

- 5.1.1 In accordance with Schedule 1 of the EP&A Act and Part 6, Division 6 of the EP&A Regulation, the Department publicly exhibited the application from 21 November 2019 until 18 December 2019 (28 days). The application was made publicly available on the Department's website, at the NSW Service Centre and at Waverley Council's offices.
- 5.1.2 The Department placed a public exhibition notice in the Wentworth Courier on 20 November 2019 and notified landholders and relevant public authorities in writing. Representatives of the Department also visited the site in July 2020 to provide an informed assessment of the proposal.
- 5.1.3 The Department has considered the comments raised in the public authority and public submissions during the assessment of the application. The submissions received are summarised in the following sections of this report.

5.2 Summary of submissions

- 5.2.1 A summary of the submissions received is provided in **Table 7**. Copies of the submissions may be viewed at **Appendix A**.

Table 7 | Summary of submissions

Submitters	Number	Position
Public Authorities	5	
Waverley Council	1	Object
Randwick City Council	1	
Transport for NSW	1	
Environment, Energy and Science Group	1	Comment
Heritage NSW	1	
Special Interest Groups	2	
Queens Park Residents	1	Object
Centennial Park and Moore Park Trust	1	Comment
Community	314	
	168	Support
	141	Object
	5	Comment

5.3 Public authority submissions

- 5.3.1 A summary of the issues raised in the submissions received from public authorities is provided in **Table 8**. Copies of the submissions may be viewed at **Appendix A**.

Table 8 | Summary of public authority submissions to the EIS exhibition

Waverley Council (Council)

Council objected to the application due to the proposal's potential impacts on the operation of the surrounding road network and available on-street car parking provisions. Council provided the following comments and recommendations:

Traffic and transport

- students and staff should be proactively encouraged to make use of public transport and active transport modes to reduce private vehicle usage.
- any increase of the school population should be staged to ensure impacts are managed.
- additional bicycle parking, lockers and storage areas should be provided.
- a Green Travel Plan (GTP) should be prepared to address current and future transport initiatives and a revised travel questionnaire should be undertaken to accurately reflect existing travel patterns to inform future travel and transport initiatives.
- opportunities to increase AM bus travel mode share should be undertaken in consultation with Council and the STA, and increased shuttle bus services should be provided between the school and the Bondi Junction interchange.
- the proposed road network and intersection improvements are supported, subject to design amendments.

Built form and urban design

- exceedance of the WLEP height control is not supported as it is inconsistent with the desired future character of the site and surrounding area and would have visual and overshadowing impacts on Queens Park and Centennial Park.
- the building facade should be further articulated, or further consideration given to reduce the horizontal appearance of the building.
- the building should comply with the National Construction Code and ensure adequate fire safety provisions are incorporated as part of the design.
- further detail should be provided on the new security wall, including materials and treatments to be used and potential for further landscaping to provide screening.

Heritage

- reorientation of the STEAM and ILC building in an east-west alignment should be considered to reduce impacts on visual links between Centennial Park and Queens Park, which have significant natural and parkland settings. Alternatively, a front setback of the fourth floor would reduce the bulk of the building when viewed from Baronga Avenue.

Tree retention and landscaping

- trees proposed to be retained should be protected during demolition and construction.
- an amended Landscape Plan should be prepared that is consistent with the WDCP in relation to proposed plant species, quantum of plantings and deep soil provisions.

-
- an updated VMP should be prepared to address areas of remnant ESBS on the site.

Other matters

- a Site Audit Statement should be provided prior to the granting of consent to confirm that the site is suitable, or can be made suitable for, its intended use from a contamination perspective.
- a detailed acoustic assessment should be prepared, prior to the issue of a Construction Certificate, to address the impacts of mechanical plant and the public address and school bell system.
- a detailed Construction Noise Management Plan should be prepared.
- consistency with ESD measures set out in the WLEP should be demonstrated.
- further information should be provided regarding on-site waste management and recycling.
- impacts on the public domain and public infrastructure should be minimised and improvements made to existing road pavement and footpaths, kerb and guttering, street lighting and landscaping, where possible.
- the PoM for the school should be updated to remove or modify additional events that are out-of-core activities and to reflect the approved ELC student population.

Randwick City Council

Randwick City Council acknowledged in its submission that the site falls outside of the Randwick City LGA. Notwithstanding, the following comments were provided on the application given the site's close proximity to the LGA boundary:

- the new DOPU area is supported as it would reduce vehicle queuing on York Road.
- an off-road cycleway along Darley Road linking York Road and Carrington Road is planned for construction in 2020 and would provide an opportunity to promote cycling as a mode of transport for students and staff.
- a Construction Traffic and Pedestrian Management Plan (CTPMP) should be prepared to ensure safety is maintained and impacts on surrounding residents are mitigated.
- construction vehicles should use York Road and Oxford Street as both an arrival and departure route rather than using Darley Road which is a local residential road.

Transport for NSW (TfNSW)

TfNSW provided the following comments and recommendations:

- any modifications made to the surrounding road network or existing intersections should be reviewed by the State Transit Authority of NSW to ensure bus operations are not impacted.
 - a comprehensive GTP be prepared including initiatives to increase walking and cycling.
 - a detailed CTPMP should be prepared that provide details on the proposed staging of construction works, construction vehicle access routes and number of construction vehicle movements, construction hours, site access arrangements and traffic control measures.
-

Environment, Energy and Science Group (EESG)

EESG provided the following comments and recommendations:

- the application must be accompanied by a BDAR to address potential impacts on biodiversity, including impacts on remnant areas of critically endangered ESBS and microchiropteran bat species.
- the BDAR should consider any conditions from previous development approvals relating to the protection of remnant and adjoining ESBS and assess how the application complies with these conditions.
- species of local provenance from the ESBS native vegetation community should be used to landscape the VMP area adjacent to Lot 23 in DP 879582 and in Lot 1 in DP 701512.
- invasive tree species on the site should be removed to protect the ESBS and an ongoing weed management and maintenance plan for the site should be established.
- a comprehensive Landscape Plan should be prepared.
- the recommendations included in the Aboriginal Cultural Heritage Assessment Report (ACHAR) should be implemented as conditions of consent.

Heritage NSW

Heritage NSW advised that the site is located in proximity to a listed SHR item, referred to as 'Centennial Park, Moore Park and Queens Park' (Item No. 01384). Heritage NSW provided the following recommendations to address impacts on the listed SHR item:

- all excavation works be limited to areas of existing buildings.
- new landscaped elements be introduced along Barong Avenue and York Road to reduce the visual impact of the proposed new STEAM and ILC building.
- a landscape maintenance plan be prepared and implemented to ensure new vegetation is maintained.
- consultation be undertaken with relevant local and State government agencies to address impacts to locally listed heritage items.

5.4 Public submissions

- 5.4.1 A summary of the issues raised in the submissions received from by public in objection to the proposal is provided in **Table 9**. Those matters raised by the public in support of the proposal is summarised in paragraph **5.4.2**. Copies of the submissions may be viewed at **Appendix A**.

Table 9 | Summary of the public submissions in objection to the proposal

Issue	Proportion of objections (%)
Traffic and parking	98%
<ul style="list-style-type: none">• traffic congestion would worsen across the surrounding road network from increased student and staff numbers.	

Issue	Proportion of objections (%)
<ul style="list-style-type: none"> a significant volume of school-generated traffic use the residential road network in proximity to the school in order to avoid congested areas (i.e. rat-running), particularly within the Queens Park residential area. there are limited on-street car parking spaces available to residences and demand in the locality would increase due to the proposal. the school does not enforce its existing Traffic, Transport and Parking Plan and students currently use on-street parking spaces within the Queens Park residential area. the additional traffic would increase safety risks to pedestrians and cyclists. 	
Increase in student population <ul style="list-style-type: none"> any increase in the school population would worsen traffic impacts currently experienced in the local area. the size of the site is not conducive to a further increase in the school population. 	71%
Visual impacts and overshadowing <ul style="list-style-type: none"> the size, scale and location of the new school building would impact on views from within Queens Park. The new school building would overshadow parts of Queens Park which would limit solar access to park users and existing trees. 	63%
Impacts on Queens Park amenity <ul style="list-style-type: none"> the height of the building is out of character for the parklands setting. the siting and bulk of the proposal would adversely impact the amenity of Queens Park. several windows overlook the park and its users. the proposal represents an overdevelopment of the site given the context of the locality. 	63%
Lack of community use of school facilities <ul style="list-style-type: none"> the school's facilities, including the pool, are not made available for community use. 	53%
Air quality <ul style="list-style-type: none"> increased traffic generation would impact on air quality in the locality. 	50%
Biodiversity <ul style="list-style-type: none"> the proposal would limit solar access to ESBS species on Lot 23. ESBS plant species have been removed from the site previously. 	38%
Noise <ul style="list-style-type: none"> out-of-hours events are frequent and go late into the evenings which create noise impacts for nearby residents. 	31%

Issue	Proportion of objections (%)
<ul style="list-style-type: none"> increased traffic generation on the surrounding residential streets would increase road traffic noise. 	
Security <ul style="list-style-type: none"> the security presence at the school is imposing for users of Queens Park and nearby residents and the addition of high security walls would add to the school's imposing nature. 	14%
Heritage <ul style="list-style-type: none"> the new built form elements of the proposal would not be in keeping with the landscape conservation areas. 	0.5%

5.4.2 Of the 168 submissions received in support of the proposal, the following key matters were raised:

- the redevelopment and expansion of the school would ensure that students are provided with modern, high quality and adaptive teaching spaces that are technology-focused.
- the increase in the school's student population would be staged in order to manage any associated impacts.
- the roadwork improvements have been designed to improve traffic flow and alleviate congestion across the surrounding road network.
- the new internal DOPU area for the senior school campus would ensure that school-generated traffic is contained within the site and is taken off local roads.
- the GTP will generate a modal shift away from private car use and encourage sustainable travel measures.
- the campus redevelopment maximises spatial resources and leverages more opportunities for students to enjoy enhanced open space and play areas.

5.5 Response to submissions

5.5.1 Following the exhibition of the application, the Department placed copies of all submissions received on its website and requested the Applicant provide a response to the issues raised. The Department also identified additional issues and sought clarification from the Applicant in relation to the following:

- updated shadow diagrams should be provided to correct discrepancies in the EIS.
- further detail should be provided to demonstrate that an options analysis was undertaken as part of the design of the proposed STEAM and ILC building, including options to reduce massing along the eastern boundary adjacent to Queens Park.
- the BDAR should identify relevant biodiversity-related conditions required under past development approvals relating to the ongoing protection of the ESBS adjoining the site and assess the impact of any overshadowing to the ESBS.
- the Transport and Accessibility Impact Assessment (TAIA) should be updated to include bicycles as a future estimated mode of transport and the GTP should be updated to include and promote increased bicycle usage.

5.5.2 On 26 June 2020, the Applicant provided a RtS which included a BDAR and an amended proposal (**Appendix A**). The RtS addressed the issues raised during the exhibition to the EIS and proposed the following amendments:

- reduction of the Stage 2 building envelope to ensure no overshadowing of the ESBS.
- minor reduction of the height of the STEAM and ILC building and minor changes to the facade materiality at the building's southern and eastern elevations.
- revised internal layout of the STEAM and ILC building to improve its functionality.
- relocation of the driveway off York Road (Gate 4) to the west and the associated security gate relocated further north within the boundary of the site.
- provision of a left-turn slip-lane from York Road into Baronga Avenue.
- an additional 52 bicycle parking spaces.
- an updated landscape planting schedule to include additional native plant species.

5.6 Submissions to RtS

- 5.6.1 The RtS was notified to Council, relevant public authorities and community members who made a submission on the EIS. A copy of the RtS was placed on the Department's website.
- 5.6.2 An additional 36 submissions were received from the public on the RtS, including 34 submissions by way of an objection and two submissions providing comment. Two submissions were received from special interest groups, one of which was an objection.
- 5.6.3 The public submissions reiterated the concerns previously raised on the EIS in relation to traffic and car parking, visual impacts, residential amenity and increased student population. Additional concerns were raised in relation to the VMP and BDAR submitted as part of the RtS.
- 5.6.4 An additional six submissions were received from public authorities. A summary of the issues raised by public authorities is provided in **Table 10** and copies may be viewed at **Appendix A**.

Table 10 | Summary of public authority submissions to the RtS exhibition

Waverley Council

Council's response to the RtS provided the following comments and recommendations:

- further detail should be provided to demonstrate how the modal shift targets outlined in the GTP will be measured and implemented to support the proposed growth in student and staff numbers.
- a condition of consent should be included to stagger the school's population increase to the year 2036 and subject to the satisfactory implementation of the GTP.
- further detail should be provided in relation to the proposed scheduling and daily capacity of shuttle bus services between Bondi Junction and the school.
- the height of the proposed new building extending above the established tree canopy within Queens Park and Centennial Park surrounds is not supported and reorientation of the Stage 1B building to an east-west alignment should be further explored.
- lower boundary walls are preferred that incorporate landscaping to soften the visual presentation to the streetscape.

- further tree plantings should be incorporated to screen any metal fencing, security lighting and CCTV cameras.
- out-of-core hours activities identified in the PoM that are not ancillary to school use or extend beyond 10pm are not supported.
- conditions of consent should be included to address outstanding concerns relating to emissions reduction targets, waste management procedures and public domain upgrades.

Randwick City Council

Randwick City Council was satisfied with the two per cent cycling target outlined in the GTP and requested that the alternate departure route for construction traffic shown in the CPTMP only be implemented with the prior approval of Council.

Transport for NSW (TfNSW)

TfNSW recommended that a Road Safety Audit be undertaken by an independent road safety auditor for the proposed improvement of the existing pedestrian crossing on Baronga Avenue.

EESG

EESG provided the following comments and recommendations on the RtS:

Previous development consents and approvals

- the requirements of previous development consent conditions imposed to protect areas of remnant and adjoining ESBS should be reinstated as part of the SSD proposal. This includes a 3m-10m wide vegetated buffer to the ESBS on Lot 23, which was required to compensate previous clearing and loss of ESBS carried out by the Applicant under development consent LD 282/00 and approved by Waverley Council on 22 May 2001.
- LD 282/00 was determined to be a controlled action under the EPBC Act and therefore the site is also subject to conditions imposed by the Commonwealth government under EPBC 2002/575 (in effect to 28 October 2052). The conditions require the provision of a vegetated buffer no less than 3m in width to the ESBS on Lot 23.
- it was recommended that any structures and hard surfaces that currently encroach within the buffer area be removed as part of the SSD proposal.

Vegetation Management

- the VMP should have no bearing on the ongoing management of Lot 23, which is land that is owned and managed by the CPMP Trust and is subject to a separate VMP.
- a revised VMP that applies only to land under the ownership of the Applicant, and that is consistent with the objectives and methods of the VMP for Lot 23, should be prepared prior to the issue of a construction certificate and endorsed by EESG, Council and the CPMP Trust.
- any revegetation of the VMP area must be undertaken by suitably qualified bush regenerators with experience in restoring and maintaining ESBS vegetation communities and comprise plants that are of local ESBS provenance.

Other matters

- the BDAR should be revised to detail ecological surveying efforts for the endangered Maroubra Woodland Snail.
- site landscaping, including areas adjacent to the VMP should comprise local native species including ESBS, be consistent with the requirements of previous development approvals and provide sufficient space for trees to grow to maturity.
- a pre-clearance survey for native fauna should be undertaken by a suitably qualified ecologist and a qualified licensed wildlife handler should be present during any vegetation clearing.

Heritage Council of NSW

The Heritage Council of NSW recommended the proposal adopt an unexpected finds procedure to manage any unanticipated historical archaeological finds or relics during the proposed works. It was further advised that the perimeter landscape treatment and plantation to Baronga Avenue is considered acceptable to mitigate visual impacts of the proposal from the listed SHR item 'Centennial Park, Moore Park and Queens Park' (Item no. 01384).

Heritage NSW

Heritage NSW provided no further comments on the RtS and noted that the Applicant has agreed for the recommendations in the ACHAR to form part of the conditions of consent.

5.7 Supplementary RtS

- 5.7.1 The Department reviewed the RtS and requested the Applicant provide a further response to the issues raised in the submissions on the RtS as part of a Supplementary RtS (SRtS).
- 5.7.2 The Department also identified additional issues and sought clarification from the Applicant in relation to the following:
- any proposed traffic management measures that are proposed to ensure queuing along York Road does not occur as a result of the security procedures carried out at Gate 4.
 - the TAIA should be updated to provide further intersection analysis for the school's AM and PM peak periods.
 - the existing on-site car parking provisions should be accurately reflected in the TAIA.
 - an updated visual analysis should be prepared for the amended proposal.
 - confirmation if trees T5, T8, T9 and T10 are to be retained as part of the amended proposal.
 - confirmation if any of the existing development consents that currently apply to the site are sought to be surrendered as part of the proposal.
- 5.7.3 The Department also requested the Applicant address the recommendations of its independent traffic consultant as part of the SRtS, including:
- clarification of the adopted background growth rates for the modelled road network.
 - the model be widened to include the Darley Road / York Road / Avoca Street intersection and pedestrian crossing on Baronga Avenue.

- the York Road / Baronga Avenue geometry be adjusted to remove the short turning lane.
- model development scenarios for each stage of the Concept Proposal in circumstances where aspirational mode shift targets are not achieved to demonstrate impacts on intersection performance and to inform the required staging of intersection upgrades.

5.7.4 On 14 December 2020, the Applicant provided a SRtS and an amended proposal (**Appendix A**) that addressed the issues raised during the exhibition of the RtS.

5.7.5 The SRtS proposed amendments to the site layout to accommodate a 3-10m wide vegetated buffer to the adjoining ESBS on Lot 23 that would be managed as part of a VMP. The buffer is established to assist with managing direct and indirect impacts of the proposal and to ensure that the Concept Proposal and Stage 1 comply with the conditions of consent issued by Waverley Council under LD 282/00 and the Commonwealth Government under EPBC 2002/575. The buffer area is shown on the site layout plans in **Figure 15** **Figure 16** (Section 2.2).

5.7.6 The SRtS also proposed the following amendments:

- removal of existing infrastructure within the proposed VMP area, including:
 - part of a timber deck connected to the ELC building.
 - relocation of a shade structure in the ELC outdoor play area.
 - minor reduction of ELC open space area and removal of artificial sports turf on the senior school campus (**Figure 33**).
- relocation of the driveway at York Road (Gate 4) approximately 9m to the east.
- reconfiguration of the parking area located to the north-west of the existing ELC and moving it approximately 3m to the east to accommodate the buffer area.
- revised landscape planting strategy to incorporate ESBS species, where appropriate.

5.7.7 No amendments were proposed to the built form of the STEAM and ILC building or to the dimensions of the Stages 1 and 2 building envelopes as part of the SRtS.



Figure 33 | Infrastructure to be removed from the VMP area (red hatching) (Source: Applicant's SRtS)

5.8 Submissions to Supplementary RtS

- 5.8.1 The SRtS was notified to Council, EESG and the CPMP Trust and a copy was placed on the Department's website. A summary of the responses received by public authorities is provided in **Table 11**. Copies of the submissions may be viewed at **Appendix A**.

Table 11 | Summary of public authority submissions to the SRtS

Waverley Council

Waverley Council provided the following comments and recommendations on the SRtS :

- Noted the applicant's position that the new STEAM building will be partially screened from various views and that the height of the new building can be accepted if it meets the statutory requirements under the relevant EPIs.
- a consistent face-brick finish should be used along the boundary walls that present to York Road and Baronga Avenue.
- out-of-core hours activities identified in the PoM (event No. 53, 63 and 86) are not ancillary to school use and are not supported.
- the ESBS planting list in the amended VMP is inconsistent with the requirements of the WDCP.
- the amended landscape plans do not satisfy the WDCP which requires a minimum 90 per cent of native species plantings for areas adjacent to remnant bushland and is required to include the entire campus, not only the VMP area.
- the position is maintained that improvements and refurbishment of the surrounding public domain is warranted.

EESG

EESG provided comments and recommendations primarily in response to the amended VMP and recommended that the document be further amended to:

- address actions required under active development consents previously issued by the Commonwealth and State governments relating to the conservation and management of remnant ESBS on the site.
- include conservation and management measures for the Maroubra Woodland Snail.
- ensure bush regeneration works are undertaken only by a suitably qualified bush regenerator with experience in restoring and maintaining ESBS.
- ensure the VMP area is managed, maintained and monitored in perpetuity.

CPMP Trust

The CPMP Trust advised that it was satisfied that the concerns raised were adequately addressed in the SRtS.

6 Assessment

6.1.1 The Department has considered the Applicant's EIS, RtS, SRtS and the issues raised in submissions in its assessment of the proposal. The Department considered the key assessment issues associated with the proposal are:

- traffic and parking.
- built form and urban design.
- visual impact.
- biodiversity.

6.1.2 The key issues are discussed in **Sections 6.2 to 6.5**. Other issues considered during the assessment are discussed in **Section 6.6**.

6.2 Traffic and parking

6.2.1 The EIS included a Transport and Accessibility Impact Assessment (TAIA) that considered the anticipated traffic implications of the proposed development and increase in student population. The EIS also included a Preliminary CTPMP that considered the potential impacts of construction activities on existing traffic conditions, pedestrians and cyclists.

6.2.2 The TAIA and Preliminary CTPMP were revised as part of the RtS and SRtS in response to matters raised by the Department and submissions received from Council, TfNSW and the public. The Department's assessment has relied on the amended TAIA submitted with the SRtS (dated 12 November 2020) and the amended preliminary CTPMP submitted with the RtS (dated 29 April 2020).

6.2.3 The Department's traffic assessment has considered both the construction and operational stages of the Concept Proposal in its entirety and the Stage 1 development in isolation.

Existing road network

6.2.4 Vehicle access to the site is provided from three adjoining roads. These include:

- York Road: a regional road connecting Oxford Street and Syd Einfeld Drive to the north with Darley Road and Avoca Street to the south.
- Queens Park Road: a local road connecting Victoria Road and Bronte Road to the east with York Road to the west.
- Baronga Avenue: a local road connecting Queens Park Road to the north and Baronga Avenue to the south.

6.2.5 Key intersections in proximity to the site that were assessed in the TAIA include:

- York Road / Queens Park Road (priority-controlled).
- Queens Park Road / Baronga Avenue (roundabout).
- York Road / Baronga Avenue (priority-controlled).
- York Road / Darley Road / Avoca Street (signalised).

6.2.6 The surrounding road network and key intersections assessed in the TAIA are shown in **Figure 34**.

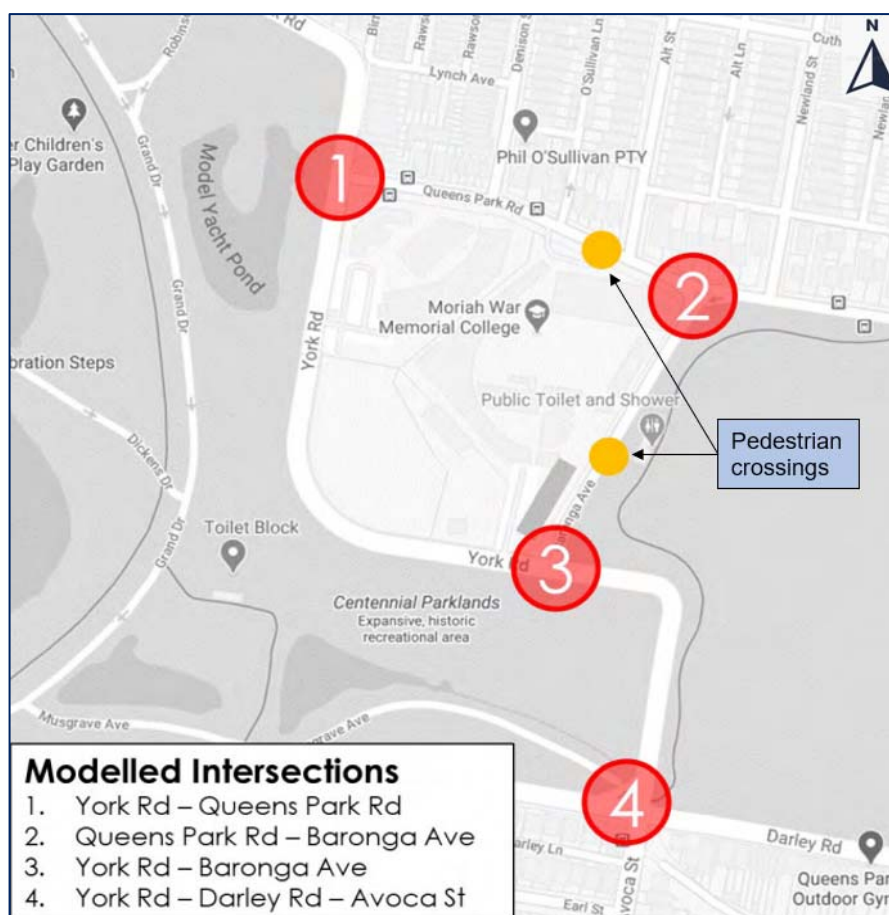


Figure 34 | Surrounding road network and modelled intersections (Source: Applicant's SRtS)

Existing travel modes

6.2.7 Existing travel modes were determined based on a travel questionnaire distributed to staff and parents in June 2019. The questionnaire was completed by 86 per cent of primary school students (or parents), 58 per cent of senior school students (or parents) and 26 per cent of staff. Existing staff and student travel modes are summarised in **Table 12**.

Table 12 | Summary of staff and student travel modes (Source: Applicant's SRtS)

Travel mode	Staff	ELC	Primary students		Senior students	
			Arrival	Departure	Arrival	Departure
Car	271 (95%)	78 (98%)	512 (86%)	339 (57%)	575 (67%)	302 (35%)
Walk	3 (1%)	2 (2%)	12 (2%)	6 (1%)	9 (1%)	17 (2%)
School bus	0 (0%)	0 (0%)	65 (11%)	232 (39%)	267 (31%)	525 (61%)
Public bus	9 (3%)	0 (0%)	6 (1%)	18 (3%)	9 (1%)	17 (2%)
Train	3 (1%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
Total	286	80	595	595	860	861

6.2.8 The average car occupancy rates were established in response to the travel questionnaire, which indicated the total number of persons per vehicle as follows:

- 2.6 persons per vehicle for staff.
- 2.65 persons per vehicle for primary students.
- 2.65 persons per vehicle for senior students.
- 1.37 persons per vehicle for ELC students.

6.2.9 The school's peak travel periods are between 7:30am and 8:30am for morning arrivals (AM peak) and 3pm and 4pm for afternoon departures (PM peak).

Existing traffic volumes

6.2.10 The Applicant conducted a traffic survey during school term in June 2019 between 7am and 9am and 2pm and 4pm to determine the existing AM and PM peak traffic volumes generated by the school. The traffic survey was carried out at the school access gates (Gates 1, 2 and 4) and at the York Road and Baronga Avenue DOPU areas.

6.2.11 The traffic survey indicated that the site generates approximately 1151 trips and 648 trips during the AM and PM peak periods, respectively. The following two-way vehicle movements were recorded:

- Gate 1: 618 trips (AM peak) and 313 trips (PM peak).
- Gate 2: 33 trips (AM peak) and 15 trips (PM peak).
- Gate 4: 165 trips (AM peak) and 97 trips (PM peak).
- York Road (on-street): 177 trips (AM peak) and 166 trips (PM peak).
- Baronga Avenue (on-street): 158 trips (AM peak) and 57 trips (PM peak).

6.2.12 Minimal trips would be generated outside of the school's typical peak periods, with the exception of the ELC pick-up activities which generally occurs between 4:30pm and 6pm which is outside of the school's typical PM peak.

Existing intersection performance

6.2.13 The TAIA submitted with the EIS (and revised with the RtS) was informed by traffic counts carried out in June 2019 at the following intersections:

- York Road / Queens Park Road (priority-controlled).
- Queens Park Road / Baronga Avenue (roundabout).
- York Road / Baronga Avenue (priority-controlled).

6.2.14 Following submission of the RtS, the Department procured an independent traffic consultant to peer review the adequacy of the Applicant's traffic model. The independent consultant recommended that the scope of the modelled road network be widened to include the York Road / Darley Road / Avoca Street intersection (shown as intersection '4' in **Figure 34**) and for development scenarios to be modelled where the aspirational mode shift targets are not achieved.

6.2.15 In response to these recommendations and at the request of the Department, the Applicant undertook further traffic counts at the York Road / Darley Road / Avoca Street intersection in October 2020. The TAIA was amended in the SRtS to account for this intersection within the modelled road network.

6.2.16 The TAIA relied on Level of Service (LoS) as a quantitative measure in assessing the performance for key intersections. The LoS ranges from A to F as follows:

- LoS A to B: good operation, with acceptable delays and spare capacity.
- LoS C to D: satisfactory performance, though nearing operational capacity.
- LoS E to F: at capacity, with unacceptable delay and requiring additional capacity.

6.2.17 The traffic modelling provided in the SRtS indicates that the intersections near the site are currently operating at or near capacity during the AM and PM peak periods (except the Queens Park Road / Baronga Avenue intersection, which currently operates at LoS A). Existing intersection performance including the LoS, average vehicle delays and queue lengths are summarised in **Table 13**.

Table 13 | Existing performance of key intersections

Intersection	Control	AM peak			PM peak		
		Average delay (seconds)	LoS	Queue length (m)	Average delay (seconds)	LoS	Queue length (m)
York Road / Queens Park Road	Priority	65	E	27	39	C	7
Queens Park Road / Baronga Avenue	Roundabout	13	A	72	10	A	30
York Road / Baronga Avenue	Priority	46	D	109	61	E	117
York Road / Darley Road / Avoca Street	Signals	55	D	266	48	D	218

Existing car parking

6.2.18 The school currently provides 185 on-site car parking spaces, of which 158 are staff spaces. The remaining spaces are for school visitors (i.e. parents), school-owned vehicles and for the DOPU of ELC students. There are no on-site car parking provisions for senior school students. Existing on-site car parking arrangements are detailed in **Table 14** and shown in **Figure 11**.

6.2.19 There are limited opportunities for on-street parking during the school's operating hours, due to on-street parking restrictions that apply to the surrounding road network.

Table 14 | Existing on-site car parking provisions

Car parking area	Staff parking	School vehicles	Visitor parking	ELC parking	Total spaces
Gate 1 York Road (west)	72	4	5	0	81
Gate 2 Queens Park Road	18	0	2	0	20
Gate 4 York Road (south)	68	3	0	13	84
Total spaces	158	7	7	13	185

Existing DOPU

- 6.2.20 The school has separate DOPU areas for the primary school, senior school and ELC. Any vehicle that seeks access to the site is required to display a pre-registered number on their vehicle to the gate security. Unregistered vehicles are not permitted access to the site.
- 6.2.21 The DOPU area for the primary school is accessed from York Road (west) via Gate 1 and consists of an internal loop road approximately 350m in length which caters for around 48 vehicles (**Figure 35**).
- 6.2.22 The DOPU area for the senior school is an indented parking area on the northern side of York Road directly west of Gate 4. The DOPU area is external to the site and has a queuing capacity for four to five vehicles. DOPU activities are carried out at the front of queue and queues on approach are stored in the shoulder lane along the left-hand side of York Road. A queuing space of approximately 200m is provided within the shoulder lane (**Figure 36**).
- 6.2.23 An indented parking area with a queuing space of approximately 155m is located along the western side of Baronga Avenue is used for school bus DOPU activities (Figure 37).
- 6.2.24 All DOPU activities associated with the ELC are carried out within the designated internal car parking area accessed from York Road (south) via Gate 4. 13 spaces are allocated for the ELC's DOPU between 7am and 6pm. The ELC car parking and DOPU area is shown in **Figure 11**.

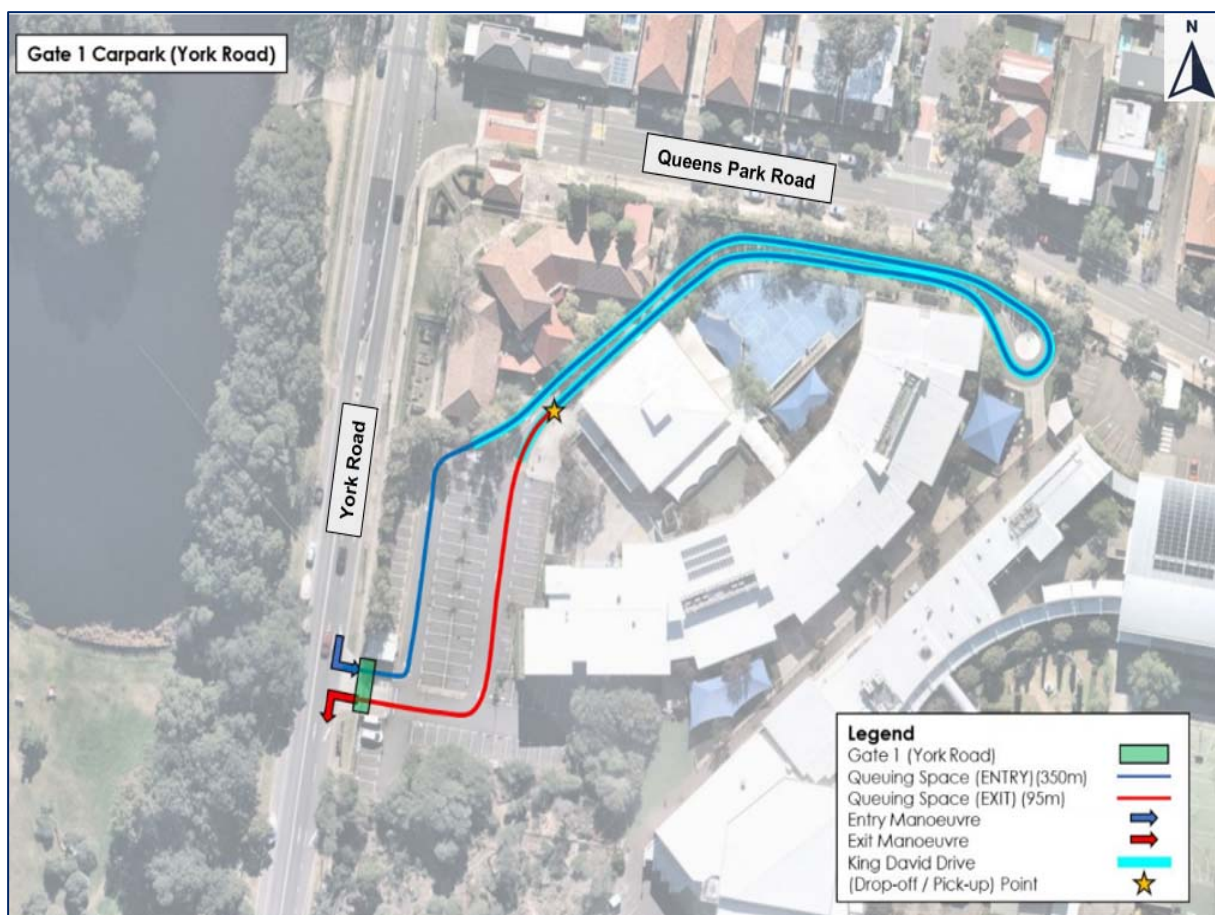


Figure 35 | Primary school DOPU arrangement (Base source: Applicant's SRtS)

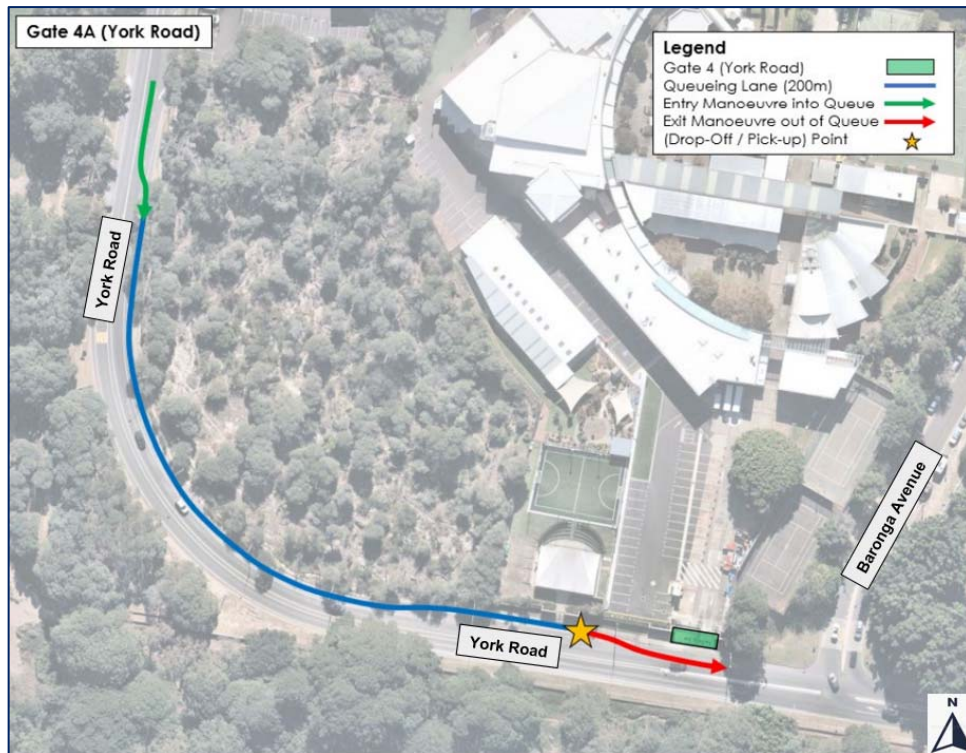


Figure 36 | Senior school DOPU arrangement (Base source: Applicant's SRtS)

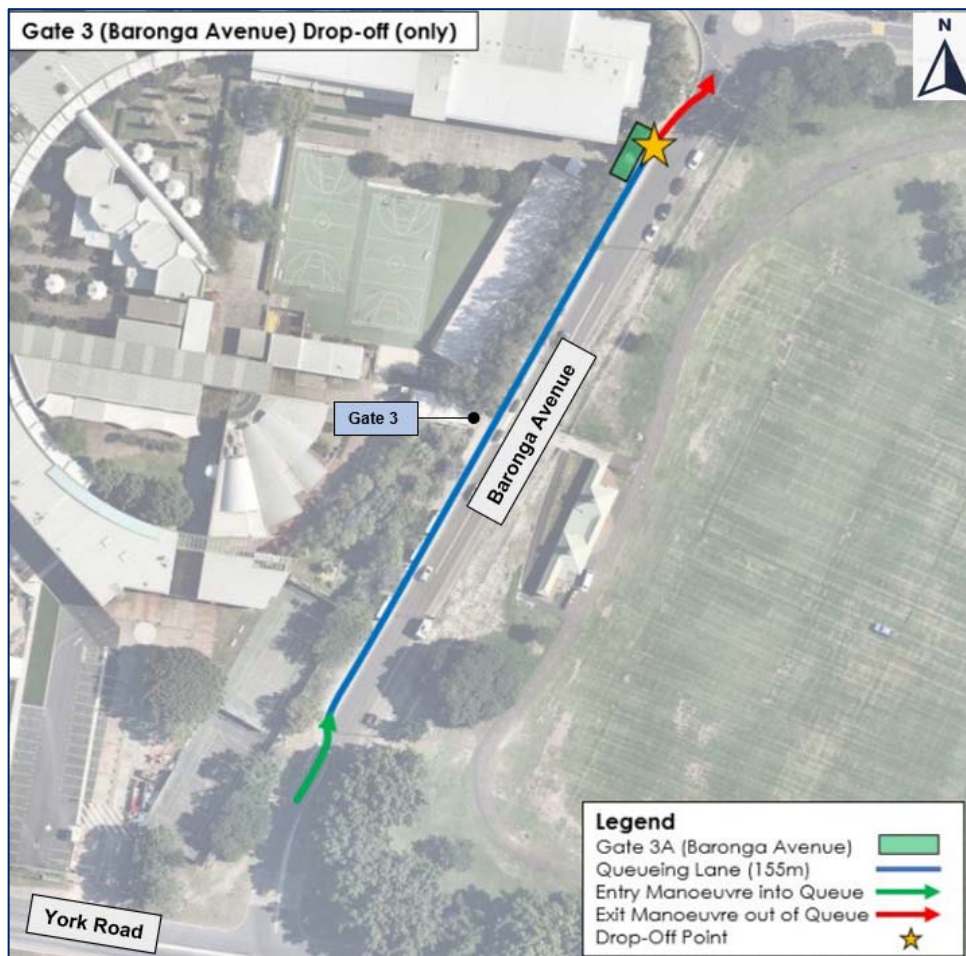


Figure 37 | School bus DOPU arrangement (Base source: Applicant's SRtS)

Construction traffic and parking

Concept Proposal

- 6.2.25 A Preliminary CTPMP was submitted with the EIS and amended with the RtS. The CTPMP assessed the potential construction traffic and parking impacts and set out specific management and mitigation measures.
- 6.2.26 Detailed construction traffic and parking arrangements for development anticipated under the Concept Proposal were not provided in the CTPMP and would be set out in future DAs for the detailed design and construction of future stages.
- 6.2.27 The Department is satisfied that the anticipated construction traffic and parking impacts in future stages could be satisfactorily managed and mitigated, subject to the Department's recommended conditions for Stage 1, discussed in paragraphs **6.2.40** to **6.2.42**.
- 6.2.28 Further, the Department has recommended conditions for any future DAs to address potential construction traffic impacts at the subsequent development stages. Any future DA that proposes demolition or any built form elements would be required to include a Preliminary CTPMP and a Construction Worker Transport Strategy (CWTS). The CWTS is discussed in further detail in paragraph **6.2.42**.

Stage 1

- 6.2.29 The anticipated timeframe to complete Stage 1 works is 37 months and is proposed to be carried out between the hours of 7am to 6pm Monday to Friday and 8am to 5pm on Saturday. Construction activities would be scheduled outside of school terms, where possible, to minimise impacts on school operations.
- 6.2.30 Stage 1 works are expected to generate a maximum of ten construction vehicle movements per hour (two-way) during peak construction activities (i.e. bulk excavation, construction and fit-out). All construction activities would be carried out by vehicles no larger than a 12.5m long heavy rigid vehicle. The Preliminary CTPMP found that the anticipated low number of construction vehicle movements could be accommodated in the surrounding road network and would not impact on existing traffic conditions or the operation of key intersections.
- 6.2.31 Three alternate construction vehicle routes are identified in the CTPMP that provide the shortest distances to and from the arterial road network and minimise construction traffic using local streets. The potential construction vehicle arrival and departure routes are shown in **Figure 38**.

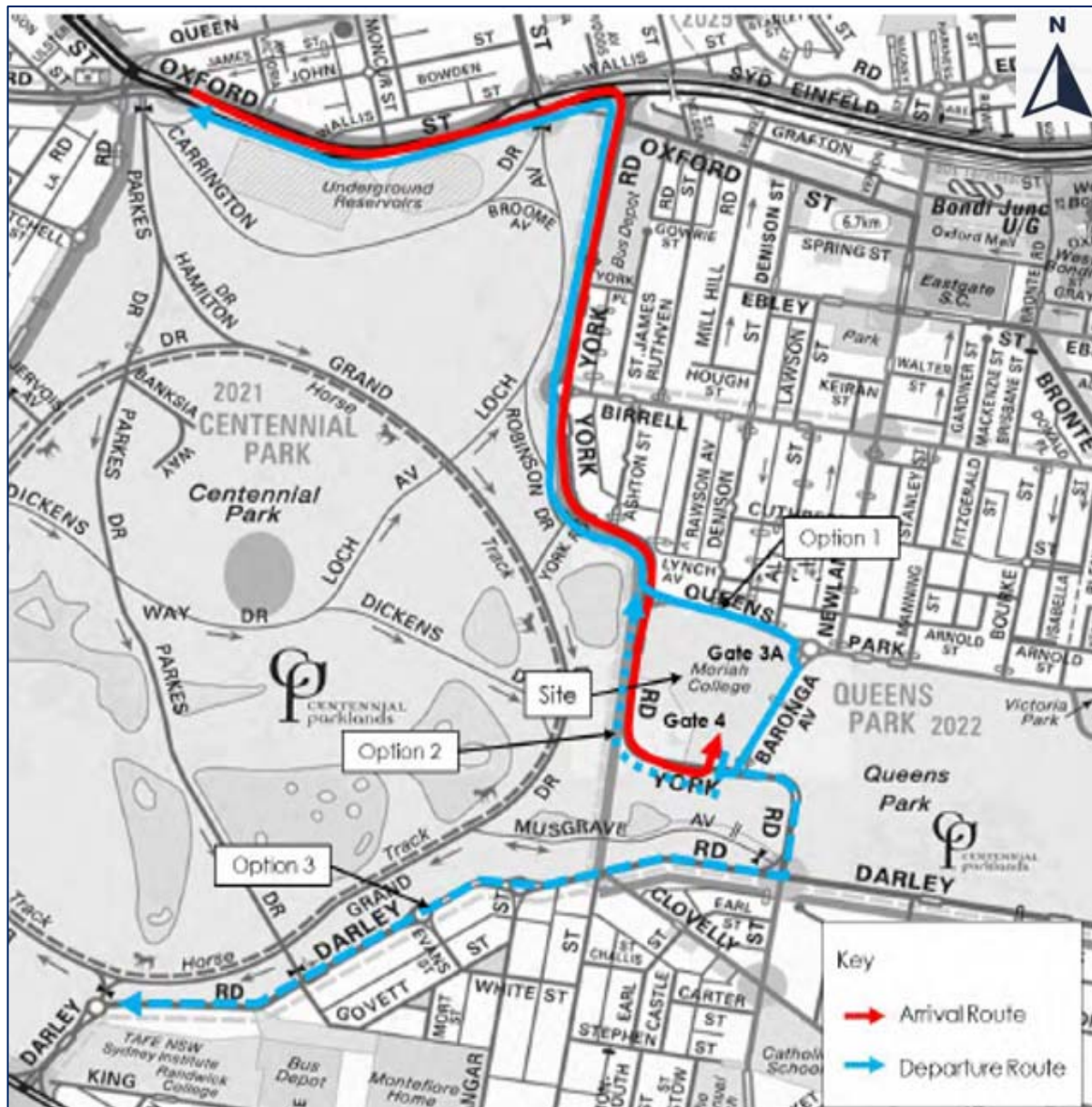


Figure 38 | Construction vehicle routes (Source: Applicant's RtS)

- 6.2.32 Construction vehicle access for the initial site demolition works is proposed from Baronga Avenue (Gate 3A) for a period of approximately four months. For most works, construction vehicles are proposed to access the site from York Road (Gate 4). No queuing or marshalling would occur on the surrounding road network.
- 6.2.33 Pedestrian and cycle access would be maintained throughout construction and there would be no changes to existing public transport operations. Further, no on-street work zones are proposed as all loading and unloading activities would be undertaken wholly within the site.
- 6.2.34 No on-site parking is proposed for construction workers and all workers would be encouraged to use public transport. The preliminary CTPMP states that construction activities that occur outside of school hours (i.e. during school holidays) may allow construction workers to use the on-site car parking areas, subject to consultation with the school.

6.2.35 The Preliminary CTPMP recommended the following measures to limit the construction traffic and parking impacts generated during the Stage 1 works:

- implementation of a Traffic Control Plan which was included as part of the preliminary CTPMP.
- prohibiting construction vehicle access or departures from the site during the school's peak DOPU times (i.e. between 8am and 9:30am and between 2pm and 4:30pm).
- use of designated construction vehicle routes to and from the site.
- ensuring that all loading and unloading activities are undertaken on-site and only during the approved construction hours.
- measures to encourage workers to use public transport:
 - an on-site tool drop-off and storage facility.
 - displaying public transport timetables within the worksite.
- implementing protocols for heavy vehicle drivers to ensure the safety of motorists, pedestrians and cyclists.

Submissions

6.2.36 TfNSW and Randwick City Council recommended the Applicant be required to prepare a detailed CTPMP, prior to the issue of a Construction Certificate, that details the construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control measures for each construction stage. Randwick City Council also recommended that construction vehicles use York Road and Oxford Street rather than Darley Road, to reduce impacts on the local community.

6.2.37 The public submissions raised concerns in response to construction traffic volumes, the use of residential roads by construction vehicles, and the impact of construction workers using the limited supply of available on-street parking within the local road network.

6.2.38 Waverley Council did not raise any concerns in relation to construction traffic and parking.

Department's consideration

6.2.39 The Department accepts the findings of the Preliminary CTPMP that the Stage 1 construction traffic could be accommodated within the surrounding road network and would not adversely impact on the road network conditions, subject to the implementation of the proposed measures listed in paragraph **6.2.35**. The Department also accepts that pedestrian and cyclist access would be maintained during construction and that there would be no significant impacts on public transport operations.

6.2.40 The Department has recommended a condition requiring the Applicant to prepare a detailed CTPMP in consultation with Waverley Council, Randwick City Council and TfNSW, prior to the commencement of construction. The CTPMP is to ensure road safety and network efficiency is maintained during construction. The Department has also recommended a condition requiring the Applicant to prepare a Driver Code of Conduct to minimise road traffic noise and ensure drivers use only the approved construction traffic routes.

6.2.41 The Department acknowledges the concerns raised in the public submissions in relation to construction workers using on-street parking spaces in the surrounding area. The Applicant proposes to encourage workers to use public transport and providing an on-site tool drop-off facility. While these measures are supported, the Department considers that construction workers are likely travel to and from the site via private vehicle and would require parking options.

6.2.42 Accordingly, the Department has recommended a condition requiring the Applicant to prepare a CWTS, prior to the commencement of construction, which is to include:

- detailed arrangements to minimise the car parking demand for construction workers in the locality, including within the Queens Park residential area.
- options to secure off-site car parking on a temporary basis (such as a leasing arrangement) for the duration of construction, where practicable.
- arrangements to effectively manage and monitor construction parking issues that may occur once works have commenced.

6.2.43 In summary, the Department is satisfied that the construction traffic and parking impacts associated with Stage 1 can be appropriately managed and mitigated, subject to recommended conditions including preparation of a detailed CTPMP, CWTS and Driver Code of Conduct.

Operational traffic

6.2.44 The TAIA submitted with the EIS included an assessment of potential operational traffic impacts of the Concept Proposal and Stage 1. The TAIA assessed the safety, efficiency and capacity of the local road network and was revised as part of the RtS and SRtS to address the issues raised in the submissions.

6.2.45 The Department's independent traffic consultant recommended amendments to the methodology and scope of the Applicant's traffic modelling in the TAIA, including the:

- scope be widened to account for the York Road / Darley Road / Avoca Street intersection and the pedestrian crossing (zebra) on Baronga Avenue.
- adopted background growth rates and traffic distribution be clarified.
- scenarios be modelled where the full Concept Proposal at 2036 (i.e. ultimate stage) is reached with and without intersection upgrades and aspirational mode shift targets being met.

6.2.46 The Applicant submitted a revised TAIA with the SRtS that addressed these recommendations.

Concept Proposal

6.2.47 The Concept Proposal seeks consent to increase the school's population from 1680 to 1970 students. The additional 290 student enrolments are to be staged over a 15-year period, as follows:

- 160 additional K-12 students at Stage 1 completion (2023).
- 40 additional K-12 students and 50 additional ELC students at Stage 2 completion (2030).
- 40 additional K-12 students at 2036 (the 'ultimate stage' representing the maximum capacity).

6.2.48 The corresponding increase in peak hour vehicle movements were determined in the TAIA as follows:

- Stage 1 completion (2023): 107 vehicles per hour (vph) (AM peak) and 71vph (PM peak).
- Stage 2 completion (2030): 62vph (AM peak) and 32vph (PM peak).
- Ultimate stage (2036): 27vph (AM peak) and 18vph (PM peak).

6.2.49 Overall, the Concept Proposal would be expected to generate an additional 196vph and 121vph during the school's AM and PM peak periods, respectively. The increase in peak hour vehicle movements were determined based on the existing staff and student travel modes (**Table 12**) with no modal shifts. The anticipated peak hour vehicle movements accounted for additional staff, proportionate to the increase in student numbers for each stage.

- 6.2.50 The TAIA used SIDRA modelling to assess the operational traffic impacts at key intersections for each stage of the Concept Proposal to 2036. Future background traffic growth was applied to the model using data from the Sydney Strategic Traffic Forecasting Model (RMS).
- 6.2.51 The Applicant's traffic model assumed that there would be no infrastructure upgrades to the surrounding road network or modal shifts to 2036. Results of the intersection analysis for each stage of the Concept Proposal to 2036 (AM and PM peak) are shown in **Table 15** and **Table 16**.

Table 15 | Intersection analysis (2036 AM peak) – without road network improvements or travel mode shifts (Source: Applicant's SRtS)

Intersection	Control	Future 2036 – No Development			Future 2036 – Stage 1			Future 2036 – Stages 1 + 2			Future 2036 – Ultimate school capacity		
		Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)
York Road / Queens Park Road	Priority	102	F	37	122	F	43	139	F	48	146	F	50
Queens Park Road / Baronga Avenue	Roundabout	14	A	94	12	A	76	14	A	94	14	A	93
York Road / Baronga Avenue	Priority	169	F	364	440	F	621	363	F	621	411	F	621
York Road / Darley Road / Avoca Street	Signalised	109	F	408	185	F	586	191	F	606	191	F	609

Table 16 | Intersection analysis (2036 PM peak) – without road network improvements or travel mode shifts (Source: Applicant's SRtS)

Intersection	Control	Future 2036 – No Development			Future 2036 – Stage 1			Future 2036 – Stages 1 + 2			Future 2036 – Ultimate school capacity		
		Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)
York Road / Queens Park Road	Priority	104	F	15	122	F	16	130	F	17	136	F	18
Queens Park Road / Baronga Avenue	Roundabout	9	A	22	10	A	22	10	A	22	10	A	22
York Road / Baronga Avenue	Priority	691	F	621	928	F	621	1002	F	621	1076	F	621
York Road / Darley Road / Avoca Street	Signalised	94	F	368	95	F	371	96	F	371	97	F	372

6.2.52 As shown in **Table 15** and **Table 16**, the Applicant's traffic modelling demonstrated that background traffic growth alone would result in three of the four key intersections operating at a LoS F by 2036 (AM and PM peak) without any increase in the approved student population. There would also be significant delays and queue lengths at the intersections of York Road / Baronga Avenue and York Road / Darley Road / Avoca Street. Only the Queens Park Road / Baronga Avenue intersection would continue to operate at a satisfactorily LoS A at 2036.

6.2.53 Each stage of the Concept Proposal and proposed increase in the student population would have a progressive impact on the key intersections. The Applicant therefore committed to the following travel management and mitigation measures as part of the Concept Proposal:

- road network upgrades at two of the nearest intersections.
- implementation of a Green Travel Plan (GTP) to facilitate a 10 per cent modal shift away from private car use.
- staggered arrival and departure times for each year group and the ELC.

The proposed travel management and traffic mitigation measures are described in further detail in paragraphs **6.2.54** to **6.2.58**.

6.2.54 Road network upgrades are proposed to improve intersection capacity, efficiency and performance, including:

- upgrades to the York Road / Queens Park Road intersection to a seagull intersection (refer paragraph **6.2.55**).
- provision of a left-turn slip-lane from York Road into Baronga Avenue (refer paragraph **6.2.56**).

6.2.55 The TAIA recommended the York Road / Queens Park Road intersection be augmented into a seagull intersection treatment to facilitate right-turn movements from Queens Park Road into York Road in stages. Firstly, vehicles using Queens Park Road (westbound) would give way to southbound traffic on York Road before moving into a new merge lane that would be established in the centre of York Road. Vehicles would then merge with the northbound traffic on York Road when it is safe to do so. A concept layout of the proposed intersection upgrade is shown in **Figure 39**.

6.2.56 The TAIA's traffic model indicated that the York Road / Baronga Avenue would operate at LoS F at all future stages of the Concept Proposal, which is attributed to right-turn vehicle movements from York Road into Baronga Avenue. Only limited road network upgrades could occur at this intersection due to existing site constraints and, therefore, recommended the provision of a left-turn slip lane from York Road (eastbound) turning into Baronga Avenue. A concept layout of the proposed left-turn slip lane with an estimated left-turn storage capacity of 46m is shown in **Figure 40**.



Figure 39 | Concept seagull intersection – York Road / Queens Park Road (Source: Applicant's RtS)

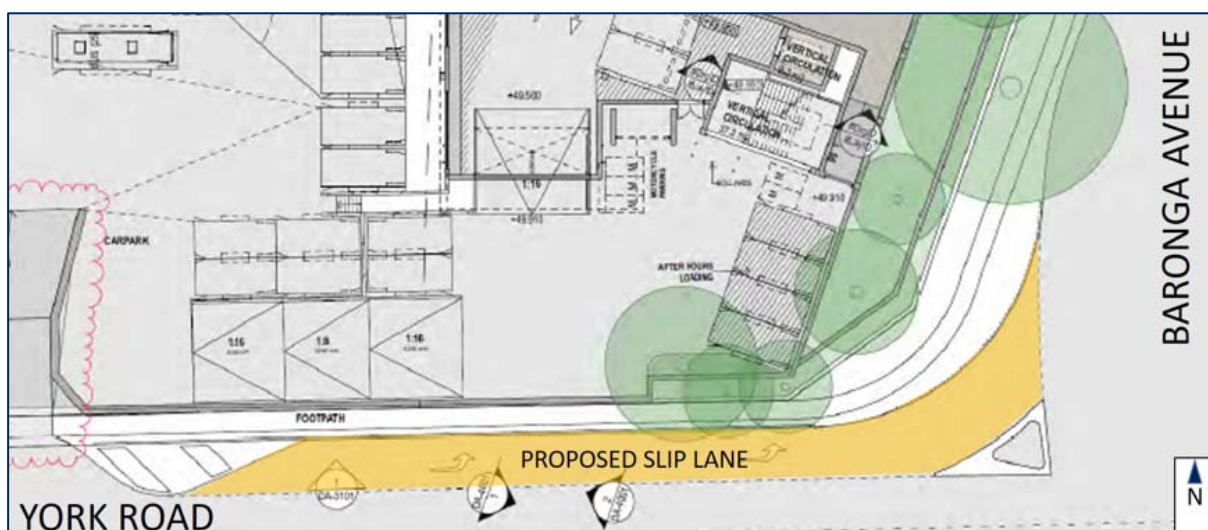


Figure 40 | Concept left-turn slip lane – York Road into Baronga Avenue (Source: Applicant's SRtS)

6.2.57 The TAIA was accompanied by a GTP which set out numerous measures and strategies to be introduced by the Applicant to encourage sustainable travel and to facilitate a 10 per cent modal shift away from private car use, including:

- the introduction of strict car parking policies to manage staff parking allocation.
- provision of a carpool system and register to reduce single private vehicle car trips.
- provision of public transport timetables, car share vehicle locations and cycle maps on noticeboards to ensure staff are aware of alternate transport options.
- walking/cycling groups to promote walking and use of bicycles for staff and students.
- enhanced bicycle repair tools and end-of-trip facilities.
- activities and promotions to encourage staff and students to use public transport.
- improved cycle infrastructure surrounding the school.
- improved wayfinding signage from the surrounding local road network.
- provision of additional school bus services and more frequent services to/from the school in consultation with TfNSW.

6.2.58 At present, primary and secondary school start and finish times are staggered. The Applicant proposes to further stagger start and finish times for each year group and the ELC to help alleviate congestion during peak periods.

6.2.59 The TAIA included the results of SIDRA modelling that accounted for the proposed traffic mitigation measures, including the proposed intersection upgrades and a 10 per cent modal shift away from private car use. The modelling results at each stage of the Concept Proposal to 2036 (AM and PM peak) are shown in **Table 17** and **Table 18** and are summarised below:

- the Queens Park Road / Baronga Avenue intersection would operate at an acceptable LoS A or B at each stage of the Concept Proposal.
- the York Road / Queens Park Road intersection would operate at a LoS F during peak times at each stage of the Concept Proposal unless the intersection is upgraded and a 10 per cent modal shift is achieved, in which case it would operate at an acceptable LoS A or B.
- the York Road / Baronga Avenue intersection would operate at LoS F during peak periods at each stage of the Concept Proposal, regardless of the intersection upgrade or a 10 per cent modal shift. However, there would be a significant improvement to average vehicle delay and queue length should the left-turn slip lane be introduced and a 10 per cent modal shift is achieved.
- the York Road / Darley Road / Avoca Street intersection is nearing capacity at a LoS D and would deteriorate to a LoS F in 2036 due to background traffic growth alone. The average delay at this intersection would be only three to four seconds longer during peak times with the proposed development at 2036 (ultimate stage) compared to background traffic growth only (i.e. without the proposed development). This is attributed to the assumed directional distribution of trips to/from the school (i.e. most arriving/departing from/to the north and east).

6.2.60 The capacity issues at the York Road / Darley Road / Avoca Street intersection were attributed to the poor performance of other key intersections closer to the site. Improving the capacity of this intersection was identified as an essential component in addressing the congestion issues across the broader local road network and the operation of other key intersections closer to the site.

Table 17 | Intersection analysis at 2036 (AM peak) – with road network improvements and travel mode shifts (Source: Applicant's SRtS)

Intersection	Control	Future 2036 – No Development			Future 2036 – Stage 1 + 2 + Ultimate (no improvements)			Future 2036 – Stage 1 + 2 + Ultimate (with intersection upgrade only)			Future 2036 – Stage 1 + 2 + Ultimate (with 10% modal shift + intersection upgrades)		
		Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)
York Road / Queens Park Road	Priority	102	F	37	146	F	50	18	B	45	14	A	38
Queens Park Road / Baronga Avenue	Roundabout	14	A	94	14	A	93	14	A	94	15	B	104
York Road / Baronga Avenue	Priority	169	F	364	411	F	621	162	F	323	154	F	405
York Road / Darley Road / Avoca Street	Signalised	109	F	408	191	F	609	126	F	408	113	F	408

Table 18 | Intersection analysis at 2036 (PM peak) – with road network improvements and travel mode shifts (Source: Applicant's SRtS)

Intersection	Control	Future 2036 – No Development			Future 2036 – Stage 1 + 2 + Ultimate – no improvements			Future 2036 – Stage 1 + 2 + Ultimate (with intersection upgrade only)			Future 2036 – Stage 1 + 2 + Ultimate (with 10% modal shift + intersection upgrades)		
		Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)
York Road / Queens Park Road	Priority	104	F	15	136	F	18	13	A	12	12	A	11
Queens Park Road / Baronga Avenue	Roundabout	9	A	22	10	A	22	11	A	36	11	A	32
York Road / Baronga Avenue	Priority	691	F	621	1076	F	621	279	F	323	240	F	323
York Road / Darley Road / Avoca Street	Signalised	94	F	368	97	F	372	97	F	371	94	F	368

6.2.61 The TAIA assessed the anticipated queue lengths at the proposed left-turn slip lane from York Road into Baronga Avenue, to determine whether the estimated storage length of 46m would accommodate traffic generated by the development at 2036 during peak periods. The assessment is outlined in **Table 19**.

Table 19 | Anticipated queue length (AM and PM peak) at the York Road left-turn slip lane to Baronga Avenue at 2036 (ultimate stage) (Source: Applicant's SRtS)

Scenario	York Road left-turn slip lane – 95 th percentile queue length	
	AM Peak	PM Peak
Future 2036 – Stage 1 + 2 + Ultimate (with intersection upgrade only)	74m	11m
Future 2036 – Stage 1 + 2 + Ultimate (with intersection upgrade and 10% modal shift)	37m	10m

6.2.62 As indicated in **Table 19**, the anticipated queue length at 2036 (ultimate stage of the Concept Proposal) would exceed the left-turn storage capacity in the AM peak, if 10 per cent modal shift is not achieved.

6.2.63 However, with a 10 per cent modal shift, the resulting queue length is anticipated to reach 37m and would be adequately accommodated. The TAIA noted that during peak periods, most vehicles using the left-turn slip lane would be school-generated traffic exiting the internal DOPU area at Gate 4. Any overflow queue would be contained on-site and would not impact on through-traffic using York Road.

Stage 1

6.2.64 The Department's assessment of the operational traffic impacts generated by the Concept Proposal included both Stage 1 and the subsequent development stages in full operation (see paragraphs **6.2.47** to **6.2.63**). The Department has also assessed the potential operational traffic impacts that would be generated by Stage 1 in isolation.

6.2.65 Results of the intersection analysis for Stage 1 only to 2023 (AM and PM peak, including background traffic growth) is shown in **Table 20** and **Table 21**. For the Stage 1 assessment, the TAIA considered scenarios both with and without intersection upgrades and 10 per cent modal shift. The traffic modelling for Stage 1 demonstrated that:

- without the Stage 1 proposal at 2023, there would be capacity constraints at each intersection except for the Queens Park Road / Baronga Avenue intersection.
- the proposed intersection upgrades would ensure the road network could accommodate traffic generated by the Stage 1 development at 2023 and without a 10 per cent modal shift, except for the York Road / Darley Road / Avoca Street intersection which would operate at a LoS E.
- the intersection upgrades in conjunction with a 10 per cent modal shift would ensure each intersection operates at a satisfactory LoS A or LoS B, except for the York Road / Darley Road / Avoca Street intersection which would operate at a LoS E.

Table 20 | Intersection analysis for Stage 1 (2023 AM peak) – with and without road network improvements and travel mode shifts (Source: Applicant's SRtS)

Intersection	Control	Future 2023 – No Development			Future 2023 – Stage 1 – no improvements			Future 2023 – Stage 1 (with intersection upgrade only)			Future 2023 – Stage 1 (with 10% modal shift + intersection upgrades)		
		Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)
York Road / Queens Park Road	Priority	69	E	28	81	F	31	13	A	31	12	A	28
Queens Park Road / Baronga Avenue	Roundabout	13	A	91	13	A	91	13	A	91	13	A	91
York Road / Baronga Avenue	Priority	29	B	196	73	F	243	14	A	277	10	A	177
York Road / Darley Road / Avoca Street	Signals	60	E	308	63	E	315	65	E	307	60	E	308

Table 21 | Intersection analysis for Stage 1 (2023 PM peak) – with and without road network improvements and travel mode shifts (Source: Applicant's SRtS)

Intersection	Control	Future 2023 – No Development			Future 2023 – Stage 1 – no improvements			Future 2023 – Stage 1 (with intersection upgrade only)			Future 2023 – Stage 1 (with 10% modal shift + intersection upgrades)		
		Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)	Average Delay (s)	LoS	Queue Length (m)
York Road / Queens Park Road	Priority	39	C	7	53	D	9	11	A	9	10	A	8
Queens Park Road / Baronga Avenue	Roundabout	10	A	30	10	A	27	11	A	35	11	A	32
York Road / Baronga Avenue	Priority	61	E	117	366	F	545	14	A	34	16	B	41
York Road / Darley Road / Avoca Street	Signals	48	D	218	65	E	298	65	E	299	66	E	329

Submissions

- 6.2.66 Council's primary objection to the proposal related to increased traffic generation and on-street car parking demand on the surrounding road network. Council's submission on the EIS advised that the growth of the school was not supported unless it could be demonstrated that there would be no additional impact of traffic on the surrounding road network.
- 6.2.67 Council's submission supported the proposed intersection upgrades (subject to detailed design), however, this should not be the sole solution to alleviating traffic impacts on the surrounding road network. Council recommended any increase in the school's population only be permitted subject to implementation of the GTP and a verified 10 per cent modal shift away from private car use.
- 6.2.68 Council's submission on the RtS requested the Applicant demonstrate how the modal shift targets outlined in the GTP would be measured and implemented, to support the proposed growth in student and staff numbers. A condition of consent was recommended to stagger the school's population increase to the year 2036 subject to the satisfactory implementation of the GTP.
- 6.2.69 TfNSW recommended any modifications made to the surrounding road network or existing intersections be reviewed by the State Transit Authority of NSW to ensure bus operations are not impacted. Further the GTP should outline initiatives to encourage sustainable travel modes.
- 6.2.70 The public and special interest group submissions objecting to the proposal were primarily concerned about traffic impacts generated by the proposed increase in student population. Issues included increased traffic congestion, increased use of the residential road network in Queens Park and reduced on-street parking availability.
- 6.2.71 Submissions received from the public in support of the proposal considered the proposed DOPU arrangement for the senior school and ELC would improve traffic flows on the surrounding road network as vehicles would be able to queue on-site, rather than along the shoulder lane of York Road.

Department's consideration

- 6.2.72 The Department acknowledges the traffic concerns raised by Council and public submissions and considers that every effort should be made by the Applicant to address the potential traffic impacts generated by the Concept Proposal and Stage 1 development.

Concept Proposal

- 6.2.73 The Department accepts the findings of the TAIA which indicated that the performance of key intersections at 2036 (ultimate stage) is reliant on the proposed intersection upgrades in combination with a 10 per cent modal shift away from private car use.
- 6.2.74 The Department has recommended a condition requiring the Applicant to submit detailed design plans to Council's satisfaction for infrastructure upgrades at the Queens Park Road / York Road intersection (seagull intersection) and at the York Road / Baronga Avenue intersection (left-turn slip lane) prior to the operation of Stage 1. This would ensure that no increase in the student population is permitted until the intersection upgrades are completed. The intersection upgrades are required to be designed in consultation with TfNSW to ensure there would be no impacts to existing public bus operations.
- 6.2.75 The Department has recommended a condition requiring the Applicant to submit to the Secretary the results of an independent audit to verify the success of the travel demand measures provided in the GTP, prior to any increase in the student population beyond Stage 1. The condition would ensure the school's approved population does not exceed more than 1840 students (or an additional 160

students overall) unless it is demonstrated that a 10 per cent modal shift away from private car use is achieved.

6.2.76 The Department has also recommended conditions for any future stage DAs that propose to increase the student population must include:

- a detailed assessment of the traffic and transport impacts during construction and operation including the functioning of school DOPU areas.
- the results of an independent audit to verify the success of the GTP and 10 per cent modal shift.
- an updated GTP including the measures to further reduce private car use.
- an Operational Transport and Access Management Plan (OTAMP).
- a Road Safety Audit.

6.2.77 Despite the recommended conditions outlined in paragraphs **6.2.74** and **6.2.75**, the Department accepts that even with the intersection upgrades and a 10 per cent modal shift, two of the four key intersections assessed in the TAIA would continue to experience high levels of delay and operate at a LoS F at 2036. The existing capacity constraints at the York Road / Darley Road / Avoca Street intersection is identified as having a considerable impact on the functioning of the broader road network and the intersections closer to the site. The improved operation and additional capacity at this intersection is recognised as critical in enabling the proposed maximum student capacity under the Concept Proposal to be realised.

6.2.78 The TAIA demonstrated that the average vehicle delay at the York Road / Darley Road / Avoca Street intersection would be only four seconds longer with the proposed development at 2036 (ultimate stage) compared to background traffic growth alone (i.e. without the proposed development). The TAIA concluded that the capacity issues at the York Road / Darley Road / Avoca Street intersection is an existing issue that needs to be addressed by Council. The Department agrees with the TAIA in this regard and finds that the minor increase in delay that would be generated by the Concept Proposal does not warrant the Applicant being solely responsible for upgrading the intersection.

6.2.79 The Department has recommended a condition requiring the Applicant pay a section 7.12 development contribution to Council, in accordance with the Waverley Council Development Contributions Plan 2006 (Contributions Plan). Funds collected under the Contributions Plan are used by Council to undertake works listed in the Waverley Long Term Financial Plan, including local roadworks and intersection upgrades. The Department notes that it would be at Council's discretion whether it chooses to attribute funding received via the Contributions Plan toward capacity improvements at the York Road / Darley Road / Avoca Street intersection.

6.2.80 The Department considers the existing senior school DOPU arrangements carried out on York Road is a contributing factor to the traffic congestion and road safety concerns raised in the submissions. This is directly attributed to the limited storage capacity of the indented parking area on York Road, which was not designed to cater for the volume of traffic currently generated by the school.

6.2.81 The Department considers that the new on-site DOPU area for the senior school campus and ELC would assist in improving traffic flow and road safety as DOPU activities would be shifted away from York Road and approximately 240m of queuing storage would be established on the site to accommodate school-generated traffic (shown in **Figure 26**). The Department therefore supports the new DOPU arrangement for the senior school and ELC proposed under the Concept Proposal.

- 6.2.82 In response to the issues raised relating to increased traffic on the surrounding residential road network and particularly throughout the Queens Park residential area, the Department considers that this is a local traffic matter that should be further investigated by Council in consultation with the local community and TfNSW. Potential options for Council to address these impacts include the installation of Local Area Traffic Management measures which are designed to influence driver behaviour (e.g. traffic calming devices).
- 6.2.83 In summary, the Department acknowledges that the full operation of the Concept Proposal would likely result in increased traffic congestion and LoS impacts at key intersections. However, the intersection upgrades and aspirational modal shifts proposed by the Applicant would ensure that the road network could accommodate Stage 1 on an initial basis. Further detailed traffic assessment and an independent audit to verify the success of the GTP would be required as part of any future development stages that propose to increase the student population.
- 6.2.84 On balance, the Department considers the operational traffic impacts generated by the Concept Proposal would be acceptable, subject to the implementation of mitigation and management measures required by the recommended conditions of consent.

Stage 1

- 6.2.85 The Department is satisfied that, subject to the completion of the proposed intersection upgrades, the Applicant's traffic modelling demonstrated that the surrounding road network could accommodate the Stage 1 development without significantly impacting on existing traffic conditions. The Department has recommended a condition of consent to this effect (refer paragraph **6.2.74**) which requires the intersection upgrades to be completed prior to the operation of Stage 1.
- 6.2.86 The Department understands that, in managing the anticipated traffic impacts of the Stage 1 development, an ideal scenario would involve both the intersection upgrades occurring in conjunction with a 10 per cent modal shift away from private car use. The Department has therefore recommended a condition requiring a detailed GTP be prepared in consultation with Council and TfNSW, prior to the issue of the Stage 1 construction certificate. The GTP is required to set out specific tools and actions to achieve the desired mode share targets and measures that would promote and support its future implementation.
- 6.2.87 To further encourage the use of sustainable travel modes, the Department has recommended a condition requiring the Applicant to prepare design details for secure bicycle parking and end-of-trip facilities for staff within the Stage 1 STEAM and ILC building. This includes the provision of 160 secure bicycle parking spaces.
- 6.2.88 To manage and mitigate any traffic impacts of the Stage 1 development, the Department has recommended a condition requiring the Applicant to prepare an OTAMP in consultation with Council and TfNSW. The OTAMP must be prepared prior to the occupation of Stage 1 and is required to address the following:
- staggered start and finish times for different year groups.
 - operational management procedures of the school DOPU areas, including the use of traffic controllers.
 - measures to deter ELC parents and senior school staff from accessing the site in peak periods.
 - bus access and management arrangements.

- include a monitoring and review program.

6.2.89 In summary, the Department is satisfied that the Stage 1 development and the associated increase in the student population (160 students) can be adequately accommodated within the surrounding road network, subject to implementation of the recommended conditions.

Car parking

6.2.90 A total of 103 new car parking spaces are proposed under the Concept Proposal, which would replace the existing 84 spaces that are proposed to be demolished in Stage 1. The 103 new spaces would include:

- 93 spaces in Stage 1, comprising:
 - 31 spaces in the lower ground (basement) level of the STEAM and ILC building.
 - 62 at-grade spaces.
- 10 at-grade spaces in Stage 2.

6.2.91 Of the 103 new spaces proposed as part of the Concept Proposal, 83 spaces would be allocated to school staff and 20 spaces would be allocated to the ELC (including four spaces for ELC staff and 16 spaces for the ELC DOPU).

6.2.92 The TAIA acknowledged that there is limited on-street parking availability during school hours. To address the impacts of reduced on-street parking supply due to the operation of the school, the Applicant proposed to enforce the existing Traffic, Transport and Parking (TTP) Plan, which restricts the use of on-street parking for parents and students across the surrounding road network, including within the Queens Park residential area.

Concept Proposal

School parking

6.2.93 The TAIA acknowledged that there are no parking rates for schools under the WDCP. Therefore, its assessment relied on the existing ratio of on-site car parking spaces relative to the number of staff in determining an appropriate number of spaces for the full operation of the Concept Proposal.

6.2.94 Based on the existing on-site car parking provision of 155 spaces for 276 staff (minus three staff spaces for the 10 existing ELC staff), the school currently provides an on-site parking provision of 0.56 spaces per staff member. To maintain the existing ratio of on-site car parking spaces relative to the total number of staff, an additional 15 staff spaces would be required to accommodate the 26 additional school staff proposed under the Concept Proposal.

6.2.95 The Concept Proposal would result in delivery of 83 spaces allocated to school staff. This includes 15 additional spaces plus 68 existing spaces allocated to staff which will be relocated and reconfigured at the Gate 4 carpark. Accordingly, the existing ratio of on-site car parking spaces relative to the number of staff would be maintained as part of the Concept Proposal.

ELC parking

6.2.96 In relation to the ELC parking provisions, the TAIA acknowledged that the WDCP requires applications for centre-based child care facilities to comply with the provisions of the Child Care Planning Guideline (DPIE, 2017) (CCPG). The CCPG outlines a rate of 1 space per 4 children to be provided in the

absence of a parking rate provided in a Council DCP. The ELC's maximum population proposed under the Concept Proposal would include 130 children and 13 staff. Accordingly, a total of 33 spaces are required to comply with the CCPG.

- 6.2.97 The TAIA noted that Amendment 5 of the WDCP (effective prior to 1 November 2018) provided a parking rate for child care centres of 1 space per 4 staff plus 1 space per 8 children. Based on these rates, the ELC would require only 20 spaces, comprising 16 drop-off spaces and four staff spaces.
- 6.2.98 The TAIA considered that the lesser car parking requirement for the ELC (required under the former WDCP provisions) is appropriate as it would encourage the use of sustainable travel modes. Further, the existing ELC operations are based on the former WDCP parking provisions and operates satisfactorily. On this basis, the Concept Proposal proposed parking spaces for the ELC consistent with the former WDCP requirements and the existing site allocation.

Stage 1

- 6.2.99 The Department's assessment of the Stage 1 parking requirements has been undertaken as part of the assessment of the Concept Proposal in full operation in paragraphs **6.2.90** to **6.2.98**.

Submissions

- 6.2.100 Council's submission on the EIS raised concern in relation to the impacts of on-street car parking demand that would be generated by the proposed increased student population. Council recommended the Applicant take a proactive approach to encouraging students and staff to make use of sustainable travel modes and commit to a genuine and achievable GTP to alleviate the demand for on-street parking across the surrounding road network.
- 6.2.101 The submissions received from the public and special interest groups raised concerns in relation to the limited supply of available on-street car parking spaces for residences during school hours and noted that this demand would increase as a result of the proposed increase in the student population. Several public submissions raised concerns that the school's existing TTP Plan is poorly enforced and observed that parents and students regularly use on-street parking across the surrounding residential road network.

Department's consideration

- 6.2.102 The Department considers the proposed car parking provisions and allocation between school staff and ELC staff is acceptable, noting that the existing overall ratio of on-site car parking spaces, relative to overall number of staff, would be maintained as part of the Concept Proposal with a commitment from the Applicant to deliver initiatives to manage staff parking demand as part of its GTP (see paragraph **6.2.57**).
- 6.2.103 To address the concerns raised by Council and the public in relation to on-street parking availability and demand, the Department has recommended a condition requiring the Applicant prepare a detailed GTP as part of Stage 1 that sets out specific tools and actions to achieve the desired mode share targets and encourage a shift away from private car use (see paragraph **6.2.86**). An independent audit to verify the success of the GTP is recommended prior to any increase in the student population beyond Stage 1 (see paragraph **6.2.75**). The Department considers the successful implementation of the GTP would reduce the demand for both on-site and on-street parking.
- 6.2.104 A total of 160 bicycle parking spaces are proposed to be delivered as part of Stage 1, which is in excess of the WDCP requirement of 108 spaces for the proposed school population. The Department

considers that the adequate supply of bicycle parking spaces would encourage additional staff to cycle to and from the site.

6.2.105 The Department also notes that students, parents and staff are currently obliged to comply with the school's TTP Plan, which includes restrictions on the use of on-street parking in the surrounding residential road network. It is the Applicant's ongoing responsibility to enforce the TTP Plan.

6.2.106 The Department is satisfied that the car parking provisions proposed as part of the Concept Proposal are acceptable and that the school's existing TTP Plan would address the issues raised in response to on-street parking availability and demand.

6.3 Built form and urban design

Building height, bulk and scale

Concept Proposal

6.3.1 The maximum height of the building envelopes proposed under the Concept Proposal are as follows:

- STEAM and ILC building envelope (Stage 1): 20.7m.
- ELC building envelope (Stage 2): 11.6m.

6.3.2 The site is subject to a maximum height of building control of 8.5m under clause 4.3 of the WLEP, as shown in **Figure 41**. The existing buildings on the site are generally one to two storeys in height.



Figure 41 | Height of buildings map (Source: WLEP)

- 6.3.3 The building envelopes sought as part of the Concept Proposal contravene the WLEP development standard, as indicated in **Table 22**.

Table 22 | Maximum height of the proposed building envelopes and WLEP exceedance

Building envelope	WLEP height control	Maximum height	Exceedance
STEAM and ILC building envelope (Stage 1)	8.5m	20.7m	+ 12.2m
ELC building envelope (Stage 2)	8.5m	11.6m	+ 3.1m

- 6.3.4 The Concept Proposal seeks consent for 9203.8m² of additional GFA on the campus which would be contained wholly within the proposed building envelopes, including:
- STEAM and ILC building envelope (Stage 1): 7677m².
 - ELC building envelope (Stage 2): 1526.8m².
- 6.3.5 Overall, the additional GFA sought as part of the Concept Proposal would increase the site's GFA to approximately 18,656m² across the primary and senior school campuses, resulting in a FSR of 0.41:1. The site is subject to a maximum FSR of 0.5:1 under clause 4.4 of the WLEP and would comply with the development standard.
- 6.3.6 The building envelopes were amended as part of the RtS to address concerns raised by Council and the public, including the:
- Stage 1 building envelope was further setback from Baronga Avenue.
 - Stage 2 building envelope was further setback to the south and west to ensure no overshadowing of the ESBS on Lot 23.

The proposed building envelopes are illustrated in **Figure 17 Figure 19 (Section 2.3)**.

- 6.3.7 The EIS stated that a variation request under clause 4.6 of the WLEP would generally be required to vary the height of buildings development standard. However, the Education SEPP applies to the proposal, which enables consent to be granted for development that is for the purpose of a school that is SSD, despite contravening a development standard imposed another EPI.
- 6.3.8 The EIS justified the proposed exceedance of the WLEP height of buildings control and argued strict compliance is unreasonable and unnecessary, on the basis that the proposal:
- would be appropriately setback from residential areas and arterial roads.
 - would be visible from Queens Park and surrounding streets but would either be framed or significantly screened by existing vegetation and therefore provide a contributory element to local visual quality.
 - would be visible only from isolated locations within Centennial Park.
 - allows for greater provision of high-quality on-site open space and play areas for students.
 - provides for social infrastructure that would accommodate projected population growth.
- 6.3.9 The EIS considered the proposal would meet the objectives of the SP2 Infrastructure Zone and be consistent with the objectives of clause 4.3 of the WLEP (height of buildings). In summary, the EIS

argued environmental planning grounds to justify contravening the height of building development standard as it would:

- provide for the logical and co-ordinated redevelopment of an existing school campus.
- not impact on the amenity of any residential land uses in terms of overshadowing or privacy.
- replace a number of dilapidated school buildings that are nearing the end of their life span.
- improve the physical appearance of the site through high-quality architectural design that is modern and responsive to site context and constraints.
- not result in unacceptable impacts on views from the surrounding locality, including from Queens Park and Centennial Park.
- enable redevelopment of the school that is of an appropriate scale and on land that is zoned for the purpose of an educational establishment.

Stage 1

- 6.3.10 The EIS included an Architectural Design Statement (ADS) and detailed architectural plans and drawings for the Stage 1 STEAM and ILC building. The proposed building is a part three-storey and part four-storey structure sited at the south-eastern extent of the site adjacent to Queens Park.
- 6.3.11 The building is proposed to be constructed to a maximum height of 20.7m above natural ground level (RL 70.2) and would be wholly contained within the Stage 1 building envelope that is proposed as part of the Concept Proposal. The EIS noted that the proposed building has been designed to establish a civic presence and contribute to a new main entry for the school campus from Baronga Avenue.
- 6.3.12 The building elevations are illustrated in **Figure 21** to **Figure 24 (Section 2.4)**. Long section profiles of the proposed Stage 1 building that show the maximum height of the building in context to the WLEP building height control is provided in **Figure 42** and **Figure 43**.
- 6.3.13 The ADS described the design of the Stage 1 building as being articulated through interconnecting forms and stepped back from Baronga Avenue to reduce its overall scale, particularly when viewed from Queens Park.
- 6.3.14 The Stage 1 building was amended as part of the RtS in response to the issues raised by Council and the local community. The following amendments were made to the proposed building to address the potential impacts on the surrounding natural and built environments and users of Queens Park:
- an overall reduction in the bulk of the eastern facade, including a further setback of the mechanical plant on Level 4 to create a more recessive appearance and to minimise overshadowing of existing mature trees in Queens Park.
 - clearer separation of forms to reduce the overall scale of the building when viewed from Baronga Avenue and adjacent Queens Park.
 - clearer articulation of the built form and amendments to the facade treatment to reduce the perception of scale at the York Road elevation.

The design amendments to the Stage 1 building are shown in **Figure 44** and **Figure 45**.

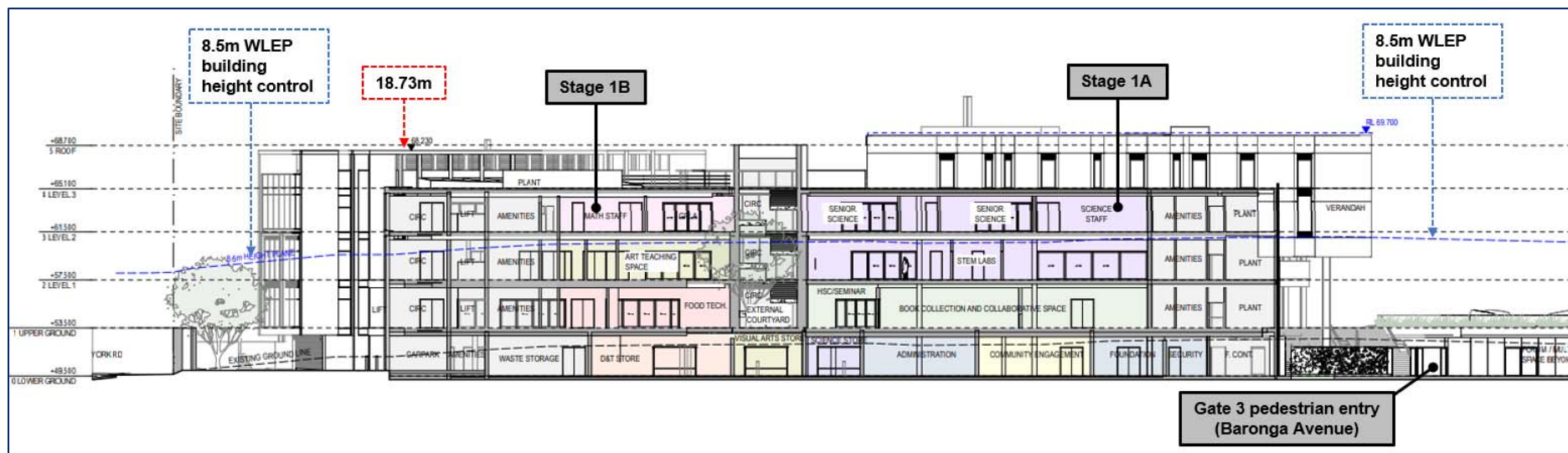


Figure 42 | Long section – eastern profile (Base source: Applicant's RtS)

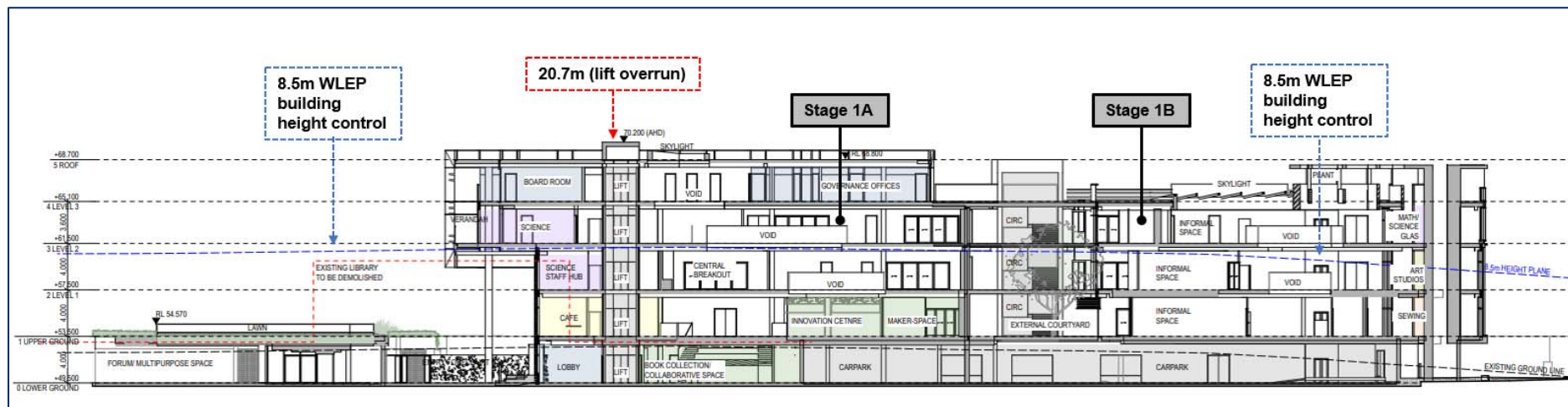


Figure 43 | Long section – western profile (Base source: Applicant's RtS)

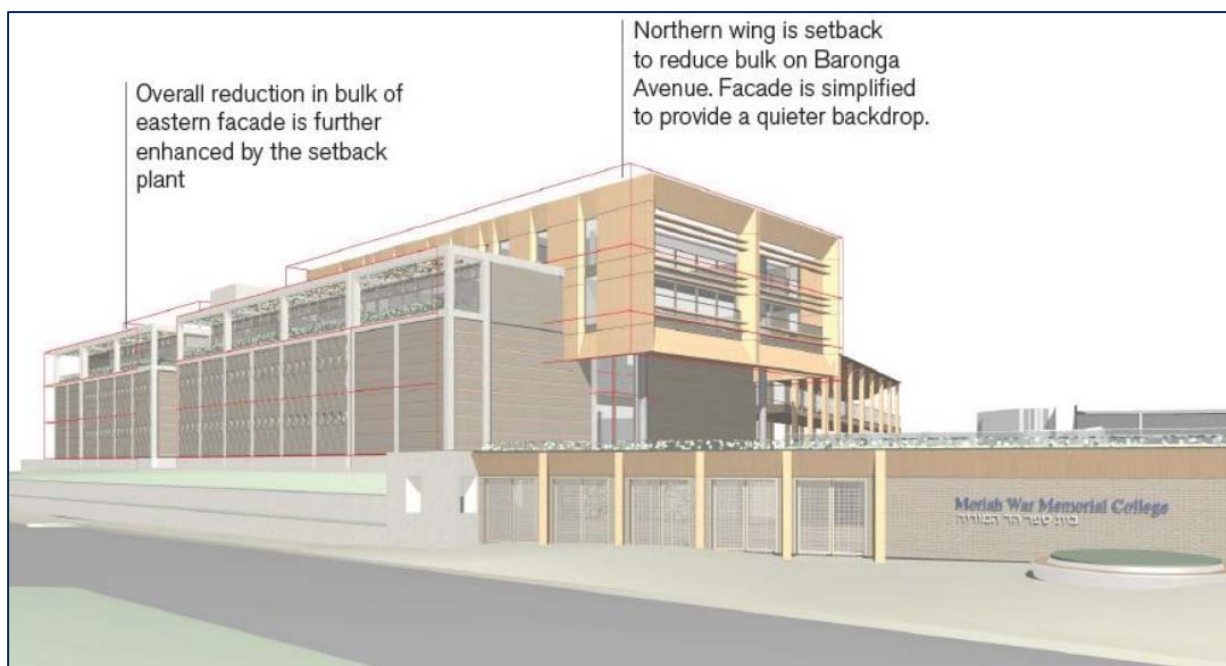


Figure 44 | Stage 1 building viewed from Baronga Avenue – design changes noted and red line indicates original EIS proposal (Source: Applicant's RtS)

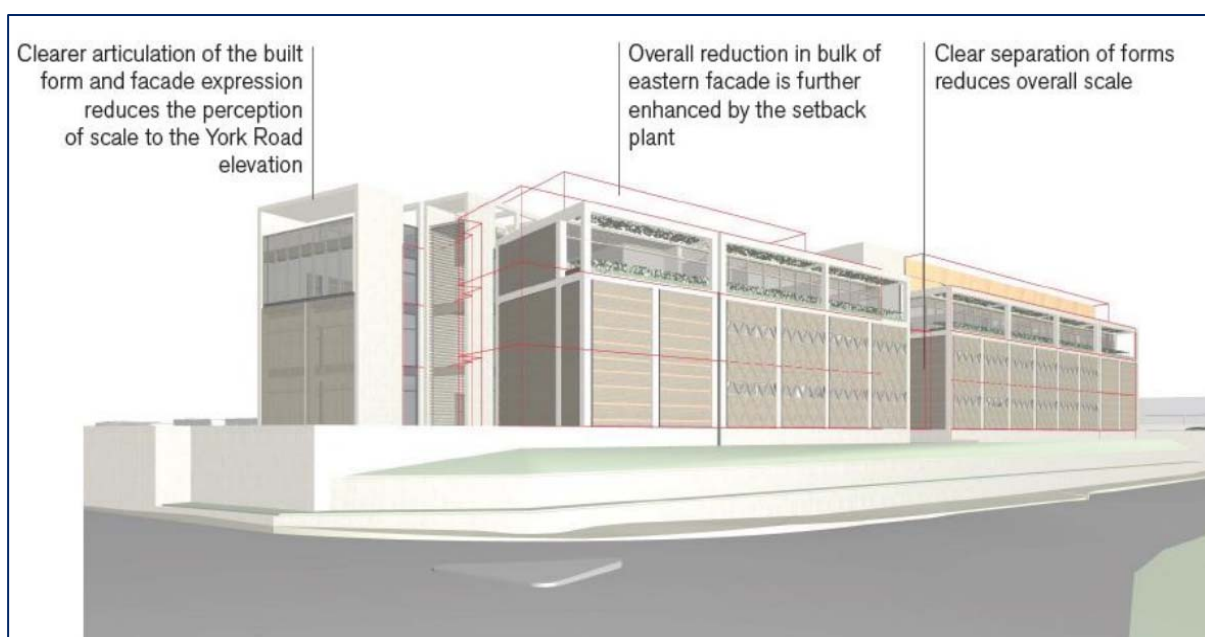


Figure 45 | Stage 1 building viewed from the junction of York Road and Baronga Avenue – design changes noted and red line indicates original EIS proposal (Source: Applicant's RtS)

Submissions

- 6.3.15 Council did not support the exceedance of the WLEP height control as it was considered inconsistent with the desired future character of the site and surrounding area and impacts Queens Park and Centennial Park in terms of visual impacts and overshadowing.

- 6.3.16 Council requested reorientation of the Stage 1 building in an east-west alignment to reduce impact on the visual links between Centennial Park and Queens Park. Alternatively, it was recommended the fourth level be further set back to reduce the bulk of the building when viewed from Baronga Avenue.
- 6.3.17 Council's submission on the RtS reiterated its concerns and did not support the proposed built form extending above the established tree canopy in Queens Park and Centennial Park. It was also requested that the Stage 1B component of the building be reoriented to an east-west alignment to reduce the bulk of the building when viewed from Baronga Avenue.
- 6.3.18 Public and special interest group submissions raised concerns relating to the size, scale and location of the proposed Stage 1 building in context to the surrounding locality. In particular, concerns were raised in response to the impacts of overshadowing in parts of Queens Park which would have reduced solar access for park users and existing trees.

Department's consideration

- 6.3.19 The Department considered the dimensions and configuration of both the Stage 1 and Stage 2 building envelopes sought under the Concept Proposal and the built form of the proposed Stage 1 STEAM and ILC building constructed in its entirety (i.e. Stages 1A and 1B complete). The Department has carefully considered the issues raised in the submissions received from Council, the public and special interest groups.
- 6.3.20 Provisions of the Education SEPP apply to the proposal and, therefore, the development standards under the WLEP do not apply, as discussed in paragraph 6.3.7. Regardless, the Department has considered the merits of the proposal in determining whether the proposed building envelopes and the Stage 1 built form would be appropriate for the site and its surrounding context.

Concept Proposal

- 6.3.21 The Department has carefully considered the Applicant's justification for contravening the WLEP height of buildings development standard, as set out in paragraphs 6.3.8 and 6.3.9. The Department's assessment concludes that the height and scale of the Stage 1 and Stage 2 building envelopes could be supported as:
- it is demonstrated that any future built form contained within the proposed building envelopes would not result in an unacceptable impact on views, privacy and solar access from surrounding residential locations and would not overshadow areas of native vegetation and ESBS on Lot 23.
 - reducing the proposed height of the building envelopes may result in future built form that is of greater bulk and scale, which would potentially reduce the open space provisions available for students across the campus.
 - the building envelopes would provide for future built form that would be for the purpose of a school and is therefore consistent with objectives of the applicable land use zone (SP2 Infrastructure), being development for the purpose of an educational establishment.
 - contemporary schools that involve new or redeveloped built form in established urban environments commonly provide for buildings that are in excess 8.5m in height. Further, the Education SEPP provides for new school buildings, or alterations to existing school buildings, to be constructed to a maximum height of four-storeys or 22m as complying development (subject to compliance with other complying development provisions).

- 6.3.22 On balance, the Department considers that strict compliance with the WLEP height of buildings development standard is unnecessary and unreasonable and finds that there are sufficient environmental planning grounds to justify contravening the development standard, for the reasons set out in paragraph **6.3.21**.
- 6.3.23 The Department has recommended a condition requiring all future built form to be contained wholly within the proposed building envelopes. The condition would ensure that any future built form does not impact on residential amenity, disrupt views, reduce solar access for users of Queens Park or overshadow native vegetation on Lot 23. The Department has recommended a condition requiring all future DAs for any new built form to include a comprehensive assessment of amenity impacts including solar access, visual privacy and view loss.

Stage 1

- 6.3.24 The Department notes that the maximum height of the Stage 1 building would be constructed to a maximum height of 20.7m (RL 70.2) above natural ground level at the lift overrun. However, the building's eastern elevation when viewed from Baronga Avenue and from within Queens Park would present a maximum building height of 18.7m (RL 68.2). This is reflected in the long section profiles in **Figure 42** and **Figure 43**.
- 6.3.25 The Department does not consider that a redesign of the Stage 1 building in terms of its siting and orientation is required as there would be no direct impacts on the amenity of any surrounding residential receivers with regards to visual impacts, privacy and overshadowing. Government Architect NSW (GANSW) provided general support for the campus redevelopment and the built form design as originally proposed in the EIS. No concerns were raised by GANSW in relation to the siting and orientation of the Stage 1 building.
- 6.3.26 The Department's position in relation to the contravention of WLEP height of buildings control (see paragraph **6.3.22**) is also relevant for the Stage 1 built form. Accordingly, the Department finds that there are sufficient environmental planning grounds to justify the Stage 1 STEAM and ILC building contravening the development standard, for the reasons set out in paragraph **6.3.21**.
- 6.3.27 The Department has considered the merits of the proposed Stage 1 building and concludes that its built form would not result in unacceptable impact on the character of the surrounding locality. The Department recognises the need to upgrade the existing school facilities, while retaining adequate on-site open space provisions and recreational areas for students. On balance, the proposed height and scale of the Stage 1 STEAM and ILC building is considered appropriate, having regard to the surrounding development and site constraints.

Urban design

- 6.3.28 The Department's urban design assessment considered the overall site master plan sought under the Concept Proposal and the materials and finishes of the Stage 1 building.

Concept Proposal

- 6.3.29 The ADS submitted with the EIS proposed a new site master plan for the campus, which builds on the original campus design and key principles established in the school's 1994 master plan.
- 6.3.30 The ADS noted new structures, including demountable buildings, have been introduced to the campus and eroded the clarity of the school's original master plan. The new master plan for the site provides:

- greater connections between the surrounding parkland areas and the school campus through a 'green connector' which is created by siting new buildings on the campus so that the school's open space areas are physically and visually connected to Queens Park and Centennial Park.
- the creation of a clear identity and entry point for the senior school and provision of a community forum that could be used for formal and informal events.
- high visibility to adjacent learning areas that have excellent solar access and connections to the external environment.
- greater landscape connectivity across the campus through outdoor learning and high quality passive and active recreation areas.
- a diversity of high quality, flexible learning spaces that are designed to suit contemporary teaching methodologies and technologies and meet the requirements of the school's pedagogies.

6.3.31 Fundamental to the design and landscape concept of the new site master plan is the establishment of the 'green connector' which would enable both the school community and the wider community to gain a greater sense of open space and an appreciation of how the campus sits within its landscaped context. The conceptual 'green connector' would establish a new identity for the site master plan and is shown in **Figure 46**.

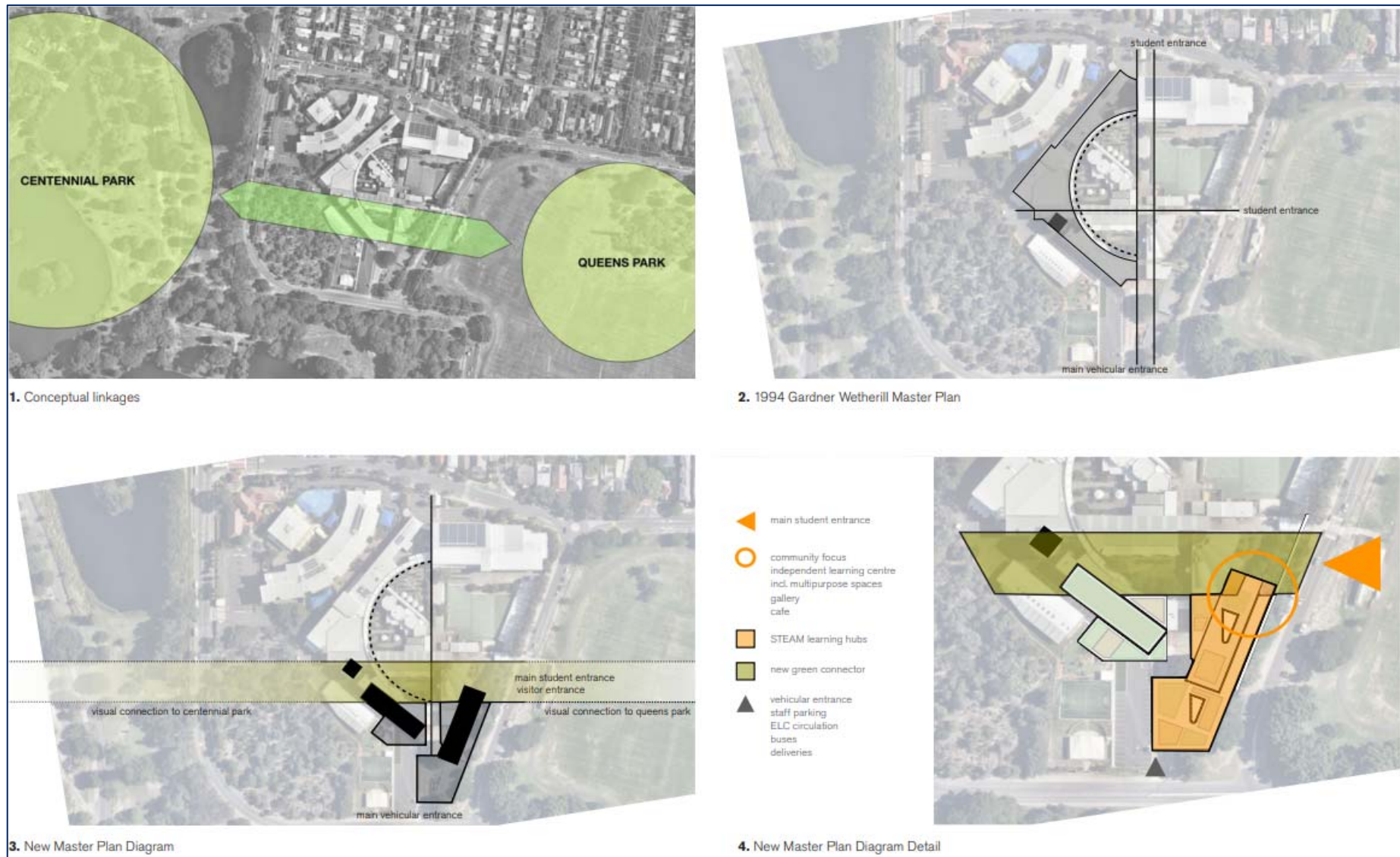


Figure 46 | Conceptual linkages and Green Connector under the proposed site master plan (Source: Applicant's RtS)

- 6.3.32 The EIS addressed the Design Quality Principles for schools under Schedule 4 of the Education SEPP and the GANSW's Design Guide for Schools. The EIS concluded that design of the campus would respond to its existing context and surrounding development and is supported by a landscape concept plan that would complement the existing and future character of the campus.
- 6.3.33 GANSW's comments on the EIS provided general support for the campus design. However, it was recommended that the proposal:
- further enhance the green connection between Queens Park and Centennial Park through the school site through native tree species plantings that are reflective of those found in the Centennial Parklands.
 - soften the periphery boundary walls through further landscaping.
 - express the unique cultural character of the campus (i.e. Aboriginal and Jewish histories) in the site's architecture (form and materials) and landscaping (species selection).

Stage 1

- 6.3.34 The Applicant proposes the external materials for the Stage 1 building would be of a neutral palette for walls, roofing, pavement and screens which are in keeping with the existing school buildings to be retained on the site. The Stage 1 building would be constructed of off-form concrete with rendered masonry face brick and a neutral toned finished aluminum framing. The external materials and finishes are shown in **Figure 25**.

Submissions

- 6.3.35 Council supported the creation of a public forecourt and main entrance from Baronga Avenue and the attempt to create a greater connection between the neighbouring parks and the campus in general. Council also supported the creation of two distinct forms (Stages 1A and 1B) of the STEAM and ILC building, however it recommended building facades be further articulated to reduce the horizontal appearance of the building and for additional vegetation to screen the new boundary walls.
- 6.3.36 Many of the concerns raised in public submissions regarding the built form of the development related to the height, bulk and scale of the Stage 1 building and did not specifically raise issues with materials or finishes.

Department's consideration

- 6.3.37 The Department considers the proposed site master plan, including the establishment of a 'green connector' would respond well with the site and its surrounding context by creating visual connections between the site and adjacent parklands.
- 6.3.38 The Department finds the proposed external materials and finishes of the Stage 1 building are appropriate in their context and would interact well with the retained buildings on the site.
- 6.3.39 The Department has assessed the proposal in accordance with the design quality principles set out in Schedule 4 of the Education SEPP (see **Appendix B**) and does not raise any concerns in relation to urban design.

Concept Proposal

This aerial map illustrates the study area for the Centennial Park project. A dashed line marks a 1km radius around the park. The map shows the layout of Centennial Park, including its various ponds and green spaces. A red area, labeled 'The site', is located within the park, near the intersection of York Road and Queen's Park Road. Queens Park is also visible to the southeast of the study area. The map includes a north arrow in the top right corner and labels for various streets and landmarks within the 1km radius.

6.4.2 The VIA noted that the buildings proposed under the Concept Proposal would be visible from the lower lying parts of Queens Park but mostly screened by the surrounding topography and existing vegetation. Similarly, the proposed buildings would not be visible from the majority of the surrounding suburban residential areas, including the Queens Park Heritage Conservation Area.

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Figure 48 | Existing view within Queens Park (without development) – looking west (Source: Applicant's SRtS)

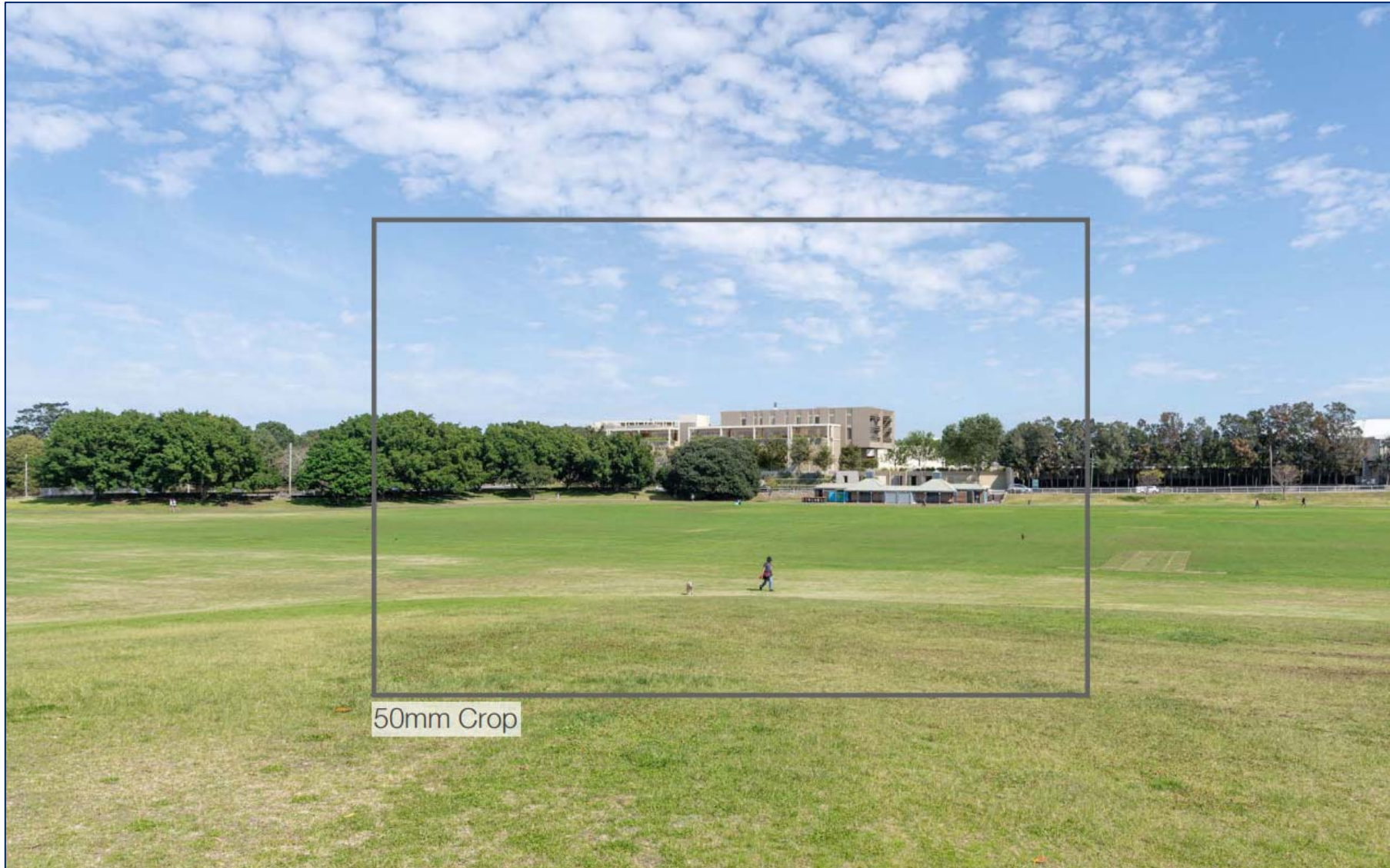


Figure 49 | Indicative view within Queens Park (with development) – looking west (Source: Applicant's SRtS)

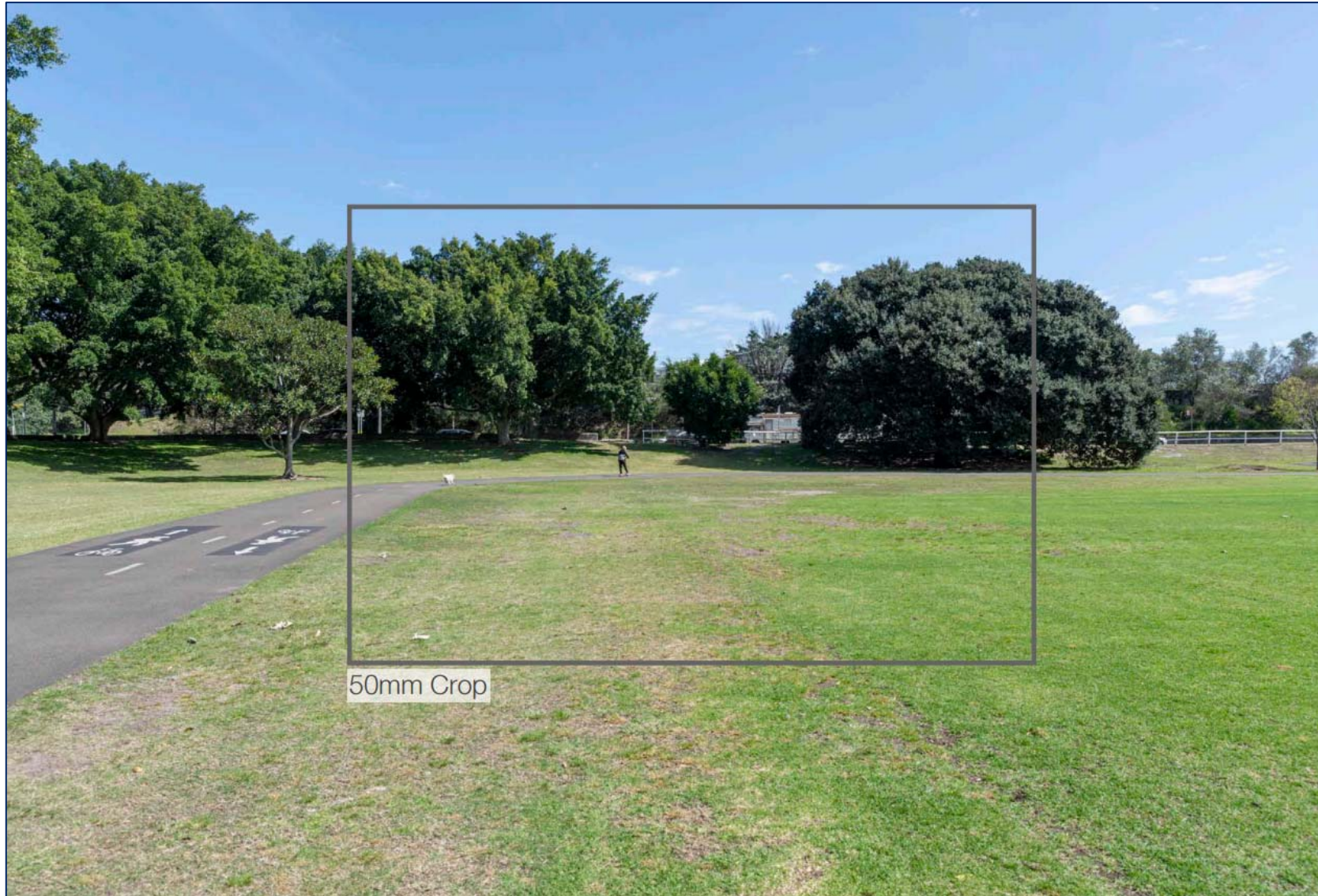


Figure 50 | Existing view within Queens Park (without development) – looking north-west (Source: Applicant's SRtS)

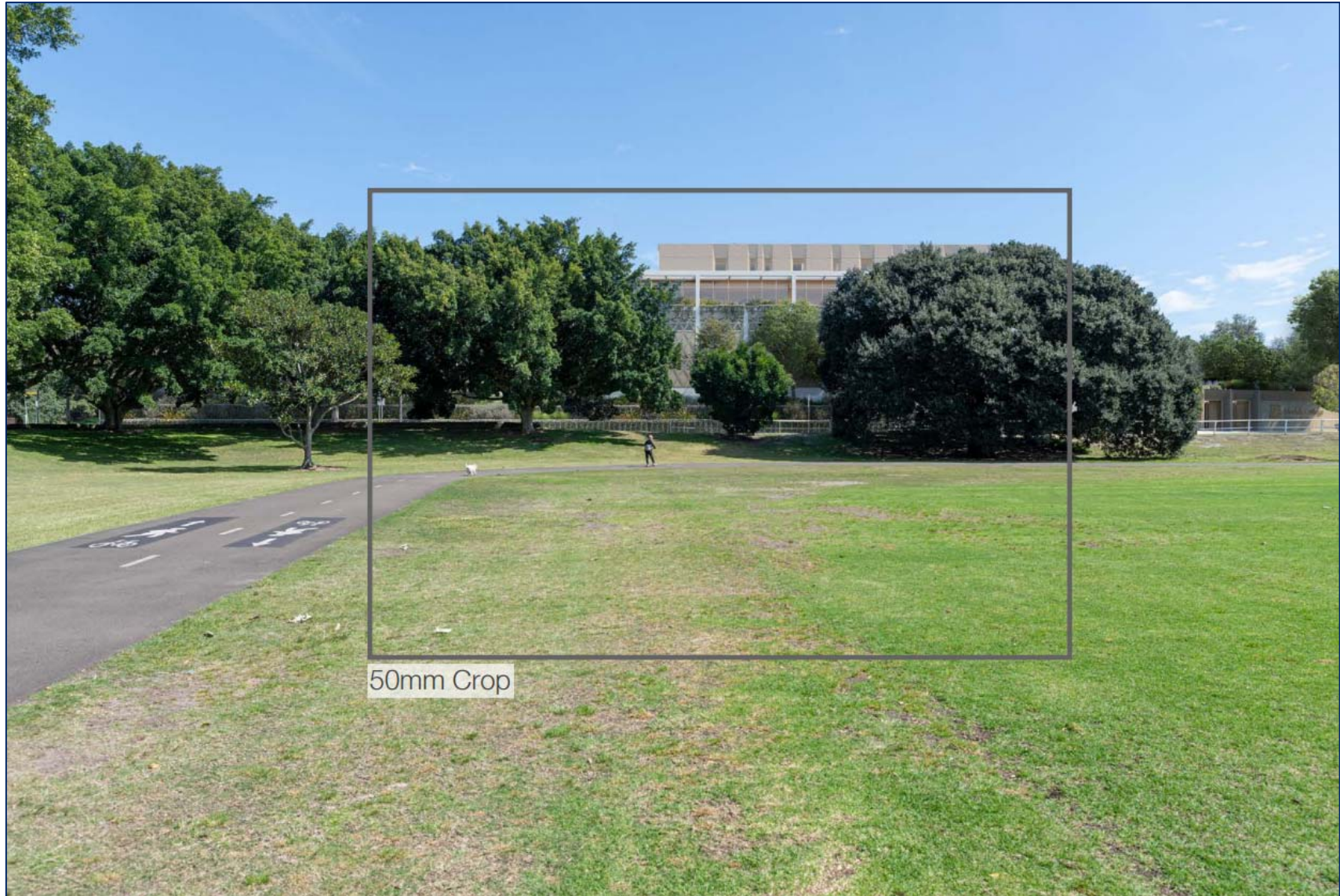


Figure 51 | Indicative view within Queens Park (with development) – looking west (Source: Applicant's SRtS)

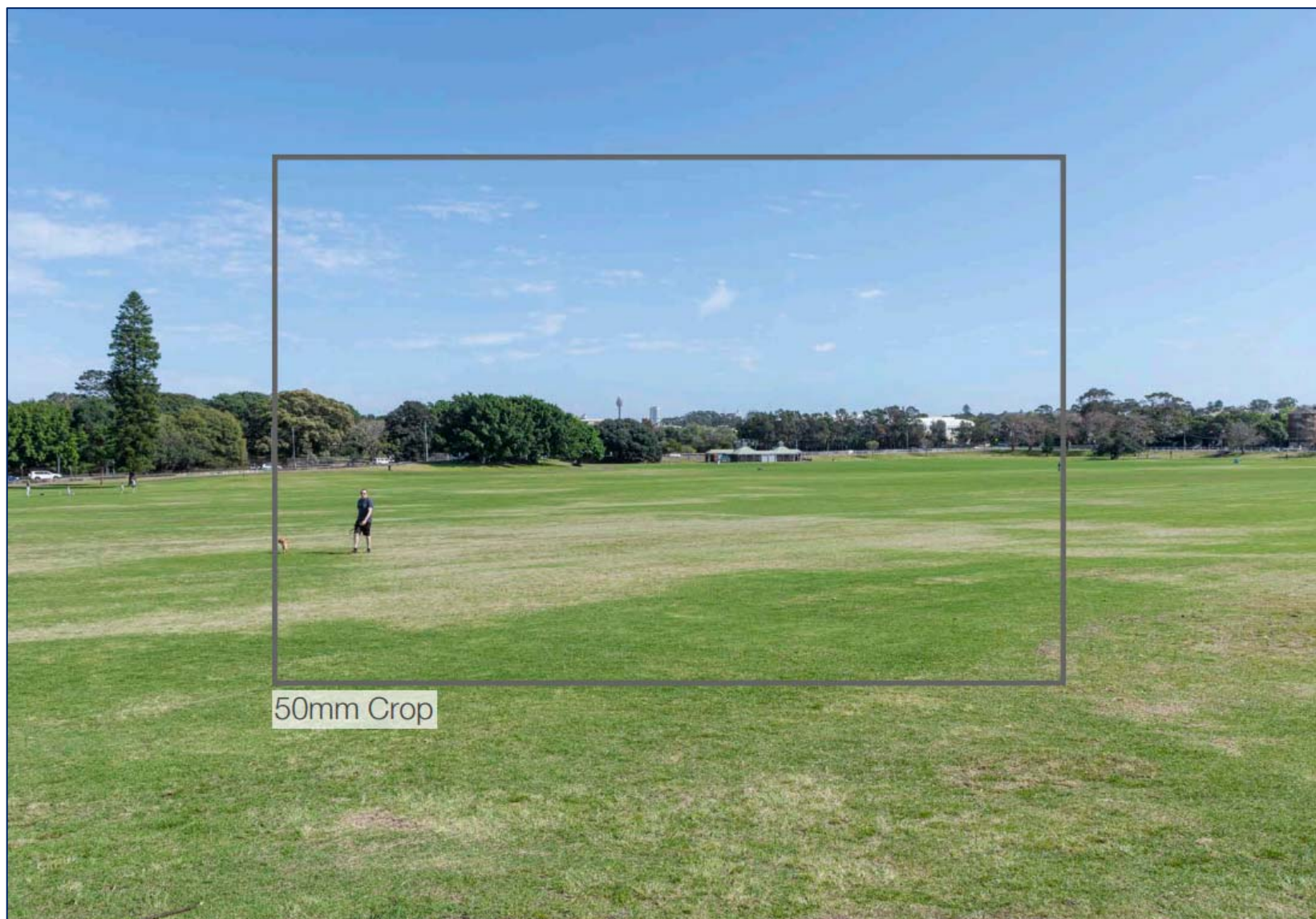


Figure 52 | Existing view within Queens Park (without development) – looking west (Source: Applicant's SRtS)

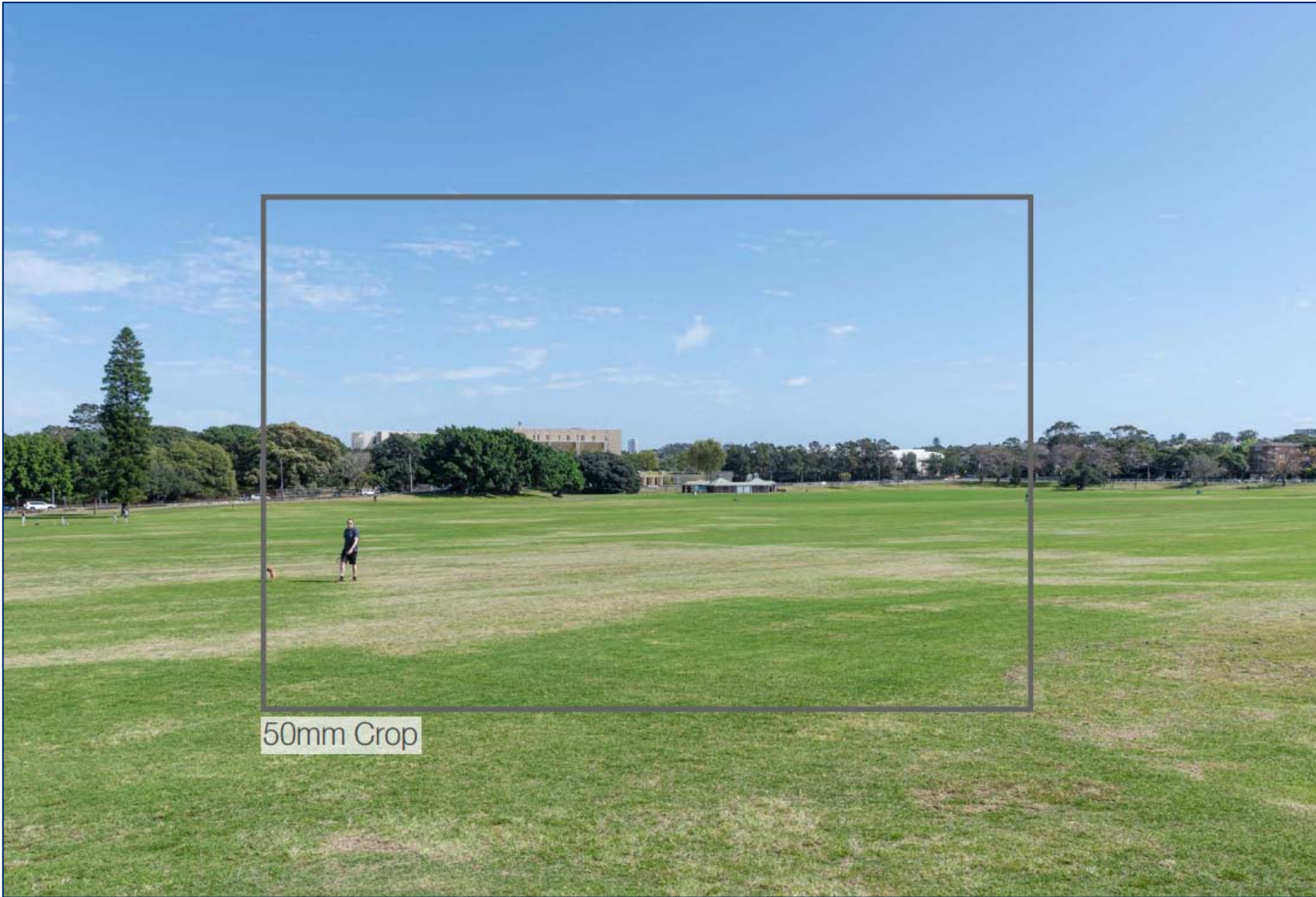


Figure 53 | Indicative view within Queens Park (with development) – looking north-west (Source: Applicant's SRtS)

6.4.4 The VIA provided with the EIS concluded the following in relation to views from Queens Park:

- the development would create a new built element on the skyline.
- in both close and distant views, the built form would be screened to differing degrees by existing vegetation along the boundaries of the park and adjacent to the western edge of the school site.
- the Stage 1 building would be substantially screened by vegetation in views from the south-east with the screening effect increasing with movement to the south towards York Road and Darley Road.
- from the central-western and north-western edges of the park, the Stage 1 building would form a substantial new skyline element in the view, with its lower portions screened by existing vegetation along the frontage to Baronga Avenue.
- from more distant views from the eastern edges of the park, the developed site would form a small built horizon component in expansive views that include both built and vegetated horizons.

6.4.5 The VIA also concluded that the proposal would be unlikely to be visible from Centennial Park, noting that if the development was visible at all, it would form a very small built component in expansive views from very restricted portions of elevated land near the north-eastern boundary of the park.

Stage 1

6.4.6 Visual impacts of the Stage 1 built form have been considered as part of the Concept Proposal in full operation (refer paragraphs 6.4.1 to 6.4.5).

Submissions

6.4.7 As outlined in paragraph 6.3.16, Council's submission on the EIS requested that the reorientation of the Stage 1 building to an east-west alignment be considered to reduce impact on the visual links between Centennial Park and Queens Park.

6.4.8 The Heritage Council of NSW acknowledged in its submission on the EIS that the proposed works would be located to the south-eastern part of the site, limiting its visual impact to a comparatively isolated section. Further, the design takes advantage of the existing topographical slope to reduce the visual impact.

6.4.9 Public submissions raised concern that the size, scale and location of the Stage 1 building would impact on views and particularly for users of Queens Park.

Department's consideration

6.4.10 The Department has considered the issues raised by Council and the public regarding the potential visual impacts of the Stage 1 built form. The built form would invariably be a new element of the skyline when viewed from Queens Park, with a greater impact closer to the western boundary of the park.

6.4.11 The Stage 1 built form would obstruct distant views of a portion of the skyline of the Sydney CBD from the eastern part of Queens Park. The Department has reviewed the established planning principle for impacts on public domain views established in *Rose Bay Marina Pty Ltd vs Woollahra Municipal Council & Anr* [2013] NSWLEC 1046. A comprehensive investigation and analysis of the proposal against the planning principle is unnecessary because:

- the obstruction would be minor when viewed from the locations in Queens Park that are currently provided a view of the CBD skyline.
- there does not appear to be any significance attached to the view of the CBD skyline that would otherwise be altered.
- when viewed from a distance in Queens Park, the CBD skyline would be obstructed by existing mature vegetation and would not be considered an iconic or important view.
- visual impacts to the CBD skyline itself were not specifically raised as a key issue of concern in the submissions.

6.4.12 The Department notes that built form elements of the existing school are currently visible from various locations within Queens Park, though these are largely obstructed by existing mature tree plantings within the surrounding parklands and along the boundaries of the school site.

6.4.13 The Department also notes that the Heritage Council of NSW did not raise concerns in its submissions on the EIS and RtS in response to the visual impact of the proposal from the listed SHR item 'Centennial Park, Moore Park and Queens Park' (Item no. 01384).

6.4.14 The Applicant proposes to remove a number of trees to enable the construction of the Stage 1 building and would provide compensatory and additional tree plantings to partially screen the appearance of the first two levels of the new building from various viewpoints in Queens Park. The Department acknowledges the upper levels of the Stage 1 building are likely to still impact on view lines from certain locations within Queens Park.

6.4.15 The Department's assessment finds the visual impact of the proposal to be acceptable as:

- it would not obstruct any significant or important views.
- it would not obstruct or impact on views from the surrounding residential areas.
- landscaping and additional tree plantings would partially screen the Stage 1 building to reduce its visual impact from within Queens Park.
- the built form would achieve a high standard of design and architectural merit and was generally supported by the GANSW.
- the height and scale of the development is considered appropriate for the site, despite the contravention of the WLEP height of buildings development standard, as discussed in paragraph **6.3.21**.

6.4.16 The Department acknowledges that built form within the Stage 2 building envelope does not form part of this application and the specific visual impact is unknown. However, the Department notes that the Stage 2 building envelope is proposed at a lower height than the Stage 1 building envelope, and its position on the western side of the Stage 1 STEAM and ILC building would likely result in the Stage 2 built form not being visible from most locations in Queens Park.

6.4.17 The Stage 2 built form would likely be visible from certain locations in Centennial Park. The Department has recommended a condition requiring all future DAs for any new built form to include a comprehensive assessment of amenity impacts, including view loss.

6.5 Biodiversity

- 6.5.1 A BDAR was submitted with the RtS which provided an assessment of the likely impacts on biodiversity, including potential impacts on any threatened species or populations. Measures to avoid, minimise and mitigate biodiversity impacts of the proposal were provided as part of the BDAR.
- 6.5.2 A VMP was also submitted with the RtS which provided guidance on the revegetation, regeneration and management of vegetation on the site, including areas of existing ESBS. The VMP also assessed the potential direct and indirect impacts to existing vegetation on the site and adjacent areas of remnant bushland on Lot 23, including areas of ESBS.
- 6.5.3 The BDAR and VMP were amended as part of the SRtS to address matters raised in the submissions received from Council, EESG and the CPMP Trust. The proposal was amended as part of the SRtS to ensure the documents demonstrated compliance and consistency with the various development consents and approvals that apply to the site, including those previously issued by the Commonwealth government, the Department and Council. This is discussed further in paragraph 5.7.5.
- 6.5.4 The amended VMP acknowledged that a separate VMP prepared by WSP in 2018 (on behalf of the CPMP Trust) applies to Lot 23. Accordingly, the Applicant's VMP submitted with the SRtS related only to land in ownership of the Applicant and within the boundaries of the school site. The VMP area, including two distinct management zones that apply to the site, is shown in **Figure 54**. The management zones are discussed further in paragraph 6.5.17.



Figure 54 | VMP area on the site (Source: Applicant's SRtS)

6.5.5 A vegetation survey carried out as part of the BDAR identified two Plant Community Types (PCT) on the site, including:

- PCT 1778 – 0.51ha of Smooth-barked Apple – Coast Banksia / Cheese Tree open forest on sandstone slopes on the foreshores of the drowned river valleys of Sydney.
- PCT 1061 – 0.12ha of Old-man Banksia, She-oak, Red Bloodwood Heathland on Coastal Sands (ESBS).

The location of PCTs across the site are shown in **Figure 55**.

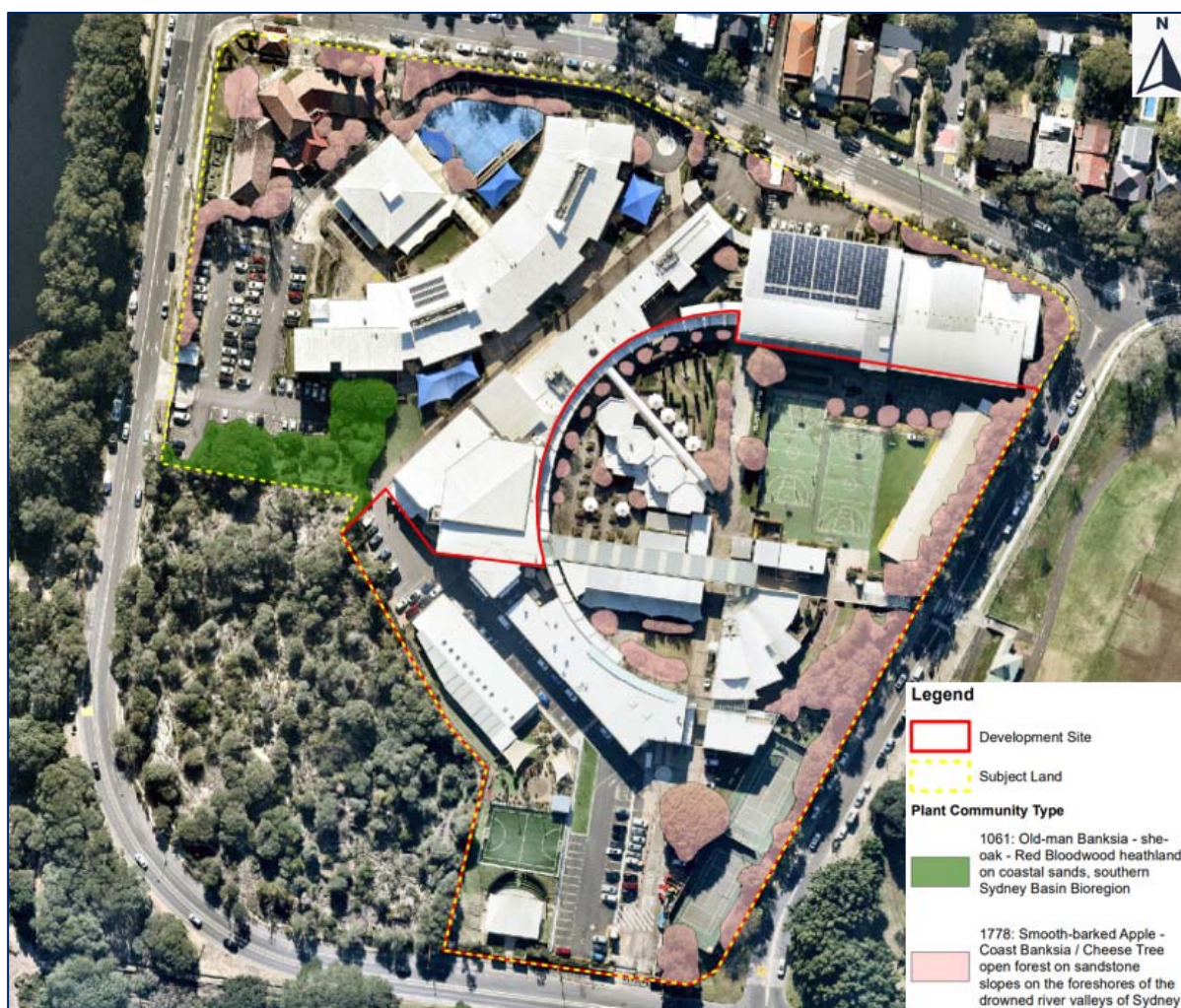


Figure 55 | Plant community types on the site (Source: Applicant's SRtS)

Concept Proposal

6.5.6 The Concept Proposal seeks to remove 0.09 ha of PCT 1778 vegetation which does not contain any threatened ecological communities. No removal of PCT 1061 vegetation (comprising ESBS) is proposed.

6.5.7 The BDAR indicated that two flora species and 18 fauna species were predicted for the site using the Biodiversity Assessment Method (BAM) calculator. Of these, no species were retained for further assessment due to the scarcity of habitat constraint and none were recorded during field surveys. This included targeted surveys carried out for the endangered Maroubra Woodland Snail.

- 6.5.8 Direct impacts associated with the Concept Proposal identified in the BDAR include the loss of vegetation and species habitat from the site. The BDAR asserted that the Concept Proposal avoids and minimises direct impacts on biodiversity by locating the proposed building envelopes on areas of the site that are predominately cleared of native vegetation.
- 6.5.9 The BDAR considered that potential indirect impacts of the Concept Proposal on areas of ESBS may occur from construction activities causing sediment run-off, edge effects, dust, litter, transporting of weeds and pathogens, shading, altered drainage and run-off regimes and hybridization with native species not of local provenance. Accordingly, the BDAR detailed a range of mitigation measures, including:
- weed management.
 - delineation of clearing.
 - tree protection measures.
 - pre-clearance fauna surveys.
 - erosion and sedimentation control measures.
- 6.5.10 Based on the limited amount of PCT vegetation to be cleared (0.09 ha) and the vegetation integrity score, the BDAR concluded that biodiversity offsets would not be required for the Concept Proposal.
- 6.5.11 The existing ESBS on and adjacent to the site was considered a serious and irreversible impact entity that warranted further consideration to evaluate the nature of potential impacts. The BDAR determined that the full operation of the Concept Proposal is unlikely to result in significant and irreversible impact to the ESBS, on the basis that:
- the proposed re-establishment of the VMP area (buffer zone) would assist in protecting the existing ESBS on Lot 23.
 - the building envelopes have been sited to limit clearing and avoid direct impacts on ESBS.
 - there would be no changes to groundwater, surface water patterns and soil disturbance that may otherwise impact on the ESBS.
 - appropriate mitigation measures would be implemented during construction to protect the existing ESBS on and adjacent to the site.
 - the proposal is unlikely to result in the use of fertilisers, herbicides or other chemicals or pollutants which may harm or inhibit the growth of species in areas of retained ESBS.
 - the extent of ESBS is currently fragmented and the proposal would not contribute to further fragmentation.

Stage 1

- 6.5.12 The Department's assessment of biodiversity impacts associated with the clearing of vegetation in Stage 1 has been considered as part of the assessment of the Concept Proposal in full operation in paragraphs **6.5.5** to **6.5.11**.
- 6.5.13 A key component of Stage 1 involves the reinstatement of a 3-10m wide buffer adjacent to Lot 23 to mitigate potential indirect impacts of the development on areas of adjacent ESBS. The buffer was proposed by the Applicant as part of its amended proposal submitted with the SRtS. The buffer is proposed to be managed in accordance with the amended VMP prepared as part of the application.

6.5.14 The buffer to Lot 23 is also proposed to ensure the development complies with the conditions of previous consents and approvals issued by the Commonwealth Government, NSW Government and Council. The conditions are enforced under the following:

- LD 282/00 issued by Council on 22 May 2001.
- EPBC 2002/575 issued by the Commonwealth Government on 25 October 2002.
- EPBC 2004/1676 issued by the Commonwealth Government on 20 August 2004.
- DA 446-10-2003 issued by the Minister for Infrastructure and Planning on 21 October 2004.

6.5.15 The amended VMP submitted with the SRtS proposed to revegetate the VMP area (shown in **Figure 55**) in accordance with the requirements of the existing consents and approvals, including:

- the provision of a vegetated buffer along the boundary to Lot 23 at a width of no less than 3m.
- measures to prevent grass from other landscaped areas of the site entering the buffer zone.
- no structures to be erected on the site which would cast shadow to Lot 23.

6.5.16 The alignment and width of the buffer to Lot 23 (required under EPBC 2002/575) is identified in the VMP prepared by Urban Bushland Management Consultants (2002) and is shown in **Figure 56**.

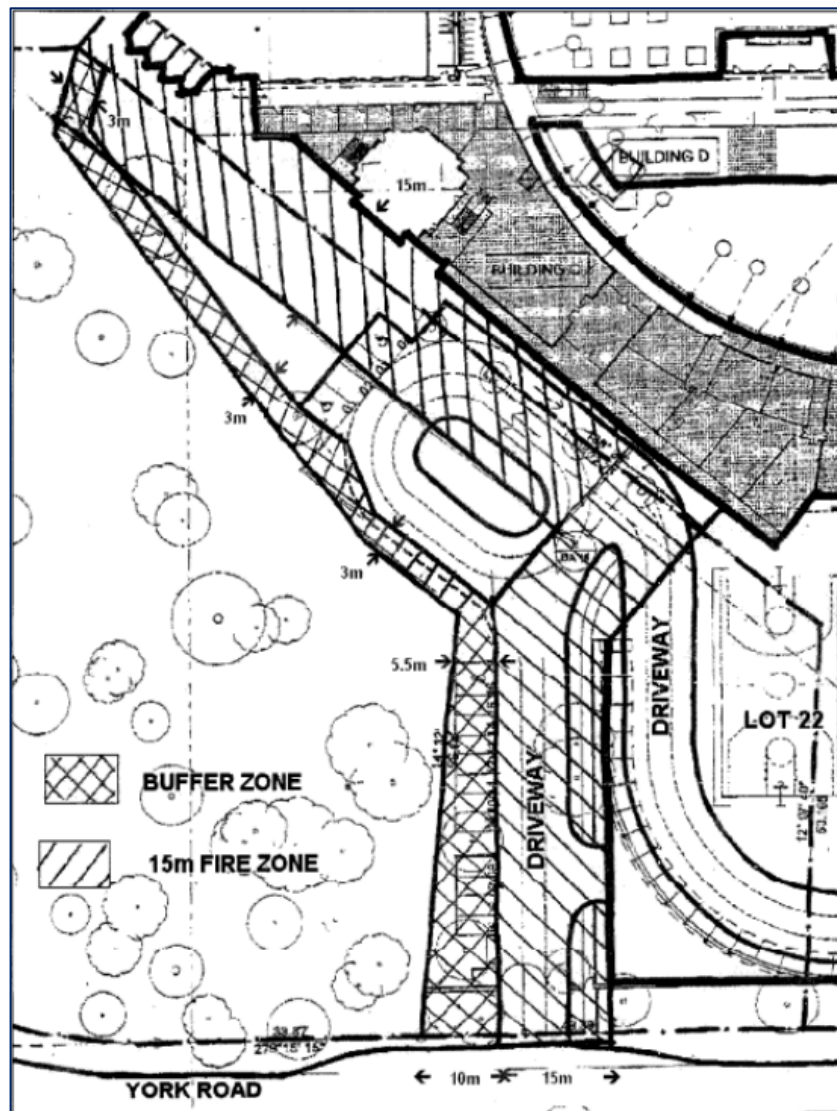


Figure 56 | Buffer required adjacent to Lot 23 under EPBC 2002/575 (Source: Applicant's SRtS)

6.5.17 The VMP prepared by the Applicant and submitted as part of the SRtS included two distinct management zones (shown in **Figure 54**), including:

- Zone 1: comprising a cluster of existing ESBS species on Lot 1 (the primary school campus) required to be protected under EPBC 2004/1676.
- Zone 2: comprising land on Lot 22 (senior school campus) required to be protected under EPBC 2002/575 and is proposed to be reinstated as part of the Stage 1 development.

6.5.18 To facilitate reinstatement of the buffer area and to ensure compliance with existing conditions under previous approvals, the Applicant proposes to remove the existing school infrastructure within the buffer to Lot 23 (Zone 1) as part of Stage 1. This is discussed in further detail in paragraph **5.7.6** and is shown in **Figure 33**.

Submissions

6.5.19 EESG provided detailed submissions on the EIS, RtS and SRtS in relation to biodiversity (see **Section 5**). The key issues raised by EESG related to the preparation of a BDAR, the protection of native vegetation and ESBS from direct and indirect impacts of the development, compliance with previous consents and approvals, pre-clearance fauna surveys and measures to protect the endangered Maroubra Woodland Snail.

6.5.20 EESG reviewed the VMP submitted with the SRtS, and recommended the Applicant be required to amend the VMP to ensure that it:

- confirms the requirements of EPBC 2004/1676 relating to the protection of existing ESBS on the site (management Zone 1) are addressed.
- demonstrates that the proposed planting densities are representative of the ESBS vegetation community.
- includes the requirement for compensatory tree hollows to be provided, should pre-clearance surveys identify fauna using hollows in the existing VMP area.
- includes conservation and management measures for the Maroubra Woodland Snail.
- confirms the document would be managed, maintained and monitored in perpetuity.

6.5.21 Council's submission on the EIS recommended landscaping and plantings across the site address the WDCP requirements, including a minimum 90 per cent of native species plantings to be located in areas adjacent to remnant bushland.

6.5.22 The submissions received from the public raised concerns that the proposal would limit solar access to ESBS on Lot 23 and noted that the Applicant had previously cleared areas of ESBS from the site as part of previous DAs.

Department's consideration

6.5.23 The Department is satisfied with the findings of the amended BDAR which considered that the full operation of the Concept Proposal would not result in a significant and irreversible impact to the critically endangered ESBS, for the reasons set out in paragraph **6.5.11**. Further, the Department is satisfied that the dimensions of the proposed building envelopes would ensure that any future built form in Stages 1 and 2 would not overshadow areas of ESBS on Lot 23.

6.5.24 The Department is satisfied that the amended VMP submitted with the SRtS would manage any direct and indirect impacts of the proposal on existing native vegetation and ESBS in the established VMP

area and on adjoining Lot 23. Notwithstanding, the Department has recommended the matters raised by EESG (see paragraph **6.5.20**) be addressed as conditions of consent, including the requirement for a revised VMP prior to the commencement of Stage 1 construction.

- 6.5.25 The Department has recommended conditions of consent requiring the Applicant to manage and mitigate potential impacts on vegetation within the VMP area and on Lot 23 during construction and operation of Stage 1, by undertaking the following:
- preparation of a Construction Soil and Water Management Plan that sets out specific controls to protect areas of ESBS including stormwater diversion, preventing stockpiling from within 10m of Lot 23 and monitoring site boundaries to avoid the build-up of sediment.
 - preparation of final designs for a stormwater management system that directs stormwater from impervious surfaces away from both the VMP area and Lot 23.
 - implementation of sediment and erosion controls during construction that would ensure sediment and run-off does not enter the VMP area and Lot 23.
- 6.5.26 The Department notes the Applicant retrospectively carried out works in contravention of certain conditions imposed under previous DAs. The Applicant has sought to address this matter by submitting an amended proposal as part of the SRtS that included the establishment of a 3-10m vegetated buffer to Lot 23 and the removal of existing school infrastructure from within the buffer area.
- 6.5.27 Accordingly, the Department has recommended a condition requiring the Applicant to modify the existing development consents that relate to the ELC, prior to the commencement of Stage 1 works. The condition is recommended to ensure the Applicant complies with the existing consents and approvals that relate to the site and to avoid any inconsistencies between the conditions of previous approvals and the recommended conditions of consent for the Concept Proposal and Stage 1 development.
- 6.5.28 On balance, the Department is satisfied that the non-compliances with the previous development consents and approvals would be addressed as part of Stage 1. Further, through the establishment of the VMP area and recommended conditions, the potential impacts of the proposal on Lot 23 and established ESBS would be adequately mitigated and managed.

6.6 Other issues

- 6.6.1 The Department's consideration of other issues is provided at **Table 23**.

Table 23 | Summary of other issues

Issue	Findings	Department's consideration and recommendations
Contamination	<ul style="list-style-type: none"> • The EIS included a Preliminary Site Investigation (PSI) that assessed the potential for contamination from current and historical activities. • The PSI was prepared in accordance with the requirements 	<ul style="list-style-type: none"> • The Department is satisfied the site would be suitable for its ongoing use as an educational establishment, in accordance with SEPP 55, subject to compliance with the recommended conditions.

Issue	Findings	Department's consideration and recommendations
	<p>of State Environmental Planning Policy No 55 – Remediation of Land (SEPP 55).</p> <ul style="list-style-type: none"> The PSI did not identify any contamination that would preclude the redevelopment of the site. It was, however, recommended that a Detailed Site Investigation (DSI) be undertaken following the demolition of site buildings. Council recommended an EPA accredited Site Auditor be engaged to provide a Site Audit Statement to confirm that the site is suitable for its intended use. The RtS committed to further investigations as part of a DSI, including soil sampling from the site, which would be undertaken once the demolition of site buildings is complete. 	<p>Concept Proposal</p> <ul style="list-style-type: none"> The Department has recommended a condition requiring future DAs for demolition or new built form include a DSI, including requirements for a Remedial Action Plan (RAP), where necessary. <p>Stage 1</p> <ul style="list-style-type: none"> The Department has recommended a condition requiring the Applicant undertake a DSI at the completion of demolition to confirm the full nature and extent of any contamination. Should the DSI identify that remediation is required, a RAP is to be prepared and approved by an EPA accredited Site Auditor. The Department has also recommended the preparation of an unexpected finds protocol to form part of a Construction Environmental Management Plan to manage any unexpected contaminants during construction.
<p>Noise and vibration</p>	<ul style="list-style-type: none"> The EIS included a Noise and Vibration Impact Assessment (NVIA) that detailed the results of noise monitoring to determine the existing background and ambient noise levels and to establish appropriate noise criteria during construction and operation of the development. The NVIA identified the nearest sensitive receivers to include the residential areas of Queens Park and Randwick and public recreation 	<ul style="list-style-type: none"> The Department is satisfied that construction and operational noise impacts to the surrounding sensitive receivers would be appropriately managed and mitigated, subject to compliance with the recommended conditions. <p>Concept Proposal</p> <ul style="list-style-type: none"> The Department has recommended a condition that requires future DAs that propose demolition or built form works to be accompanied by a

Issue	Findings	Department's consideration and recommendations
	<p>areas including Queens Park and Centennial Park.</p> <p>Construction Noise</p> <ul style="list-style-type: none"> The NVIA assessed construction noise and vibration impacts and established appropriate noise management levels (NMLs) for the site in accordance with the EPA's Interim Construction Noise Guideline (ICNG). The assessment was based on typical plant and machinery that would be used during construction. Construction noise levels would meet the established NMLs at the nearest residential receivers. However, the criteria would be exceeded for users of Queens Park and Centennial Park. The NVIA therefore recommended standard construction noise management and mitigation measures be implemented as part of a Construction Noise and Vibration Management Plan (CNVMP). No concerns were raised by Council in relation to construction and vibration noise impacts. <p>Operational Noise</p> <ul style="list-style-type: none"> Operational noise sources would include the use of mechanical plant, use of the public address system, use of the lecture theatre outside of core hours, playground noise and road traffic noise. The NVIA established project noise trigger levels (PNTLs) at the nearest residential receivers in accordance with the Noise Policy for Industry (NPI). The NVA concluded that the anticipated operational noise impacts 	<p>NVIA, to assess the noise generating sources and activities during construction and operation.</p> <p>Stage 1</p> <ul style="list-style-type: none"> The Department considers that the construction noise and vibration impacts of the Stage 1 development would meet the NMLs at sensitive receivers, subject to the preparation and implementation of a CNVMP. The Department has recommended a condition requiring the Applicant to prepare the CNVMP prior to the commencement of Stage 1 construction and to detail noise mitigation measures to achieve compliance with the ICNG. The Department considers that the operation of Stage 1 would meet the noise limits set out in the NPI with minimal impact on the surrounding receivers. The Department has recommended a condition requiring the Applicant to prepare an updated Plan of Management (PoM) to the satisfaction of Council. The PoM must include measures to minimise noise impacts on any sensitive residential receivers during out-of-hours events, including the preparation of an acoustic management plan.

Issue	Findings	Department's consideration and recommendations
	<p>would meet the PNTLs at the nearest sensitive receivers.</p> <ul style="list-style-type: none"> • Council requested further noise assessment be carried out once the location of the mechanical plant and the public address and school bell system were finalised. • Operational noise impacts were also raised as an issue of concern in the public submissions. 	
Aboriginal heritage	<ul style="list-style-type: none"> • The EIS included an Aboriginal Cultural Heritage Assessment Report (ACHAR) which determined there are no registered Aboriginal objects or archaeological sites in the subject area. However, it was acknowledged that there are existing landscape features with the potential for Aboriginal objects or archaeological deposits. • The ACHAR recommended an Archaeological Research Design and Methodology (ARDM) be prepared for the sub-surface investigation of the identified landscape features. • Archaeological monitoring and test excavations were also recommended to be undertaken according to the developed ARDM, which should be designed to correspond with the demolition and construction phases. • Registered Aboriginal Parties (RAPs) were consulted during preparation of the ACHAR and did not identify any cultural heritage values at the site and indicated support for the ACHAR's recommendations. • Heritage NSW's submission on the RtS advised that the recommendations in the ACHAR should be established as conditions of consent. 	<ul style="list-style-type: none"> • The Department acknowledges that there are no registered Aboriginal objects or archaeological sites in the subject area and that the RAPs did not raise any concerns in response to impact on Aboriginal heritage as a result of the proposal. • Notwithstanding, the Department notes that the ACHAR considered there to be the potential for subsurface Aboriginal objects and archaeological resources within the existing landscape features. Additional investigation in the form of subsurface testing is therefore required. <p>Concept Proposal</p> <ul style="list-style-type: none"> • The Department has recommended a condition requiring future DAs for demolition or new built form to be accompanied by an ACHAR. <p>Stage 1</p> <ul style="list-style-type: none"> • The Department has recommended a condition requiring archaeological monitoring and sub-surface test excavations be undertaken prior to the commencement of

Issue	Findings	Department's consideration and recommendations
		<p>construction and in accordance with an ARDM.</p> <ul style="list-style-type: none"> The Department is satisfied that should any Aboriginal objects be uncovered during the further subsurface investigations appropriate actions would be taken, based on implementation of the ACHAR recommendations. Further, the Department has recommended the Construction Environmental Management Plan include an unexpected finds protocol for any Aboriginal objects or deposits.
Heritage	<ul style="list-style-type: none"> The site is located in the Remnant Bushland LCA (C57) under Schedule 5 of the WLEP. The site is also located near several heritage conservation areas and items that are listed on the NSW State Heritage Register and under Schedule 5 of the WLEP. The EIS included a Heritage Impact Statement (HIS) that found the buildings proposed for demolition do not contribute to the landscape significance of the site. Further, the siting of new buildings would have an acceptable level of impact on the existing significant views from Queens Park and Centennial Park. The proposed new buildings would have no visual impacts from the Queens Park Heritage Conservation Area (HCA) or the North Randwick HCA. The HIS concluded that the proposal would be acceptable from a heritage perspective. 	<ul style="list-style-type: none"> The Department is satisfied the proposal would not result in a significant or unacceptable impact to the heritage significance of the site or the surrounding LCAs and HCAs, subject to compliance with the recommended conditions. <p>Concept Proposal</p> <ul style="list-style-type: none"> The Department has recommended a condition requiring all future DAs for demolition or new built form to be accompanied by a HIS. <p>Stage 1</p> <ul style="list-style-type: none"> The Department is satisfied the height and scale of Stage 1 buildings would not have an unacceptable impact on the visual relationships between Centennial Park and Queens Park. Potential impacts would be mitigated through the implementation of a landscape master plan, including perimeter

Issue	Findings	Department's consideration and recommendations
	<ul style="list-style-type: none"> • Council raised concern with the design of the development and requested the Stage 1B component of the STEAM and ILC building be reoriented to an east-west alignment and the bulk of the building be reduced. • Heritage NSW recommended new landscaped elements be provided along Barong Avenue and York Road to reduce the visual impact of the Stage 1 building. 	<p>plantings to soften the visual impact of the proposal from the surrounding LCAs and HCAs.</p>
Stormwater management	<ul style="list-style-type: none"> • The EIS included a Stormwater Report (amended as part of the RtS) that reviewed the adequacy of the site's stormwater management measures. • The Stormwater Report noted that the proposal would not result in any increase in impervious area. Therefore, it would be unlikely there would be an increase in stormwater flows from the site when compared to the existing scenario. • It concluded that the stormwater drainage regime for the site avoids any stormwater impacts to downstream properties through the use of an on-site stormwater detention system, stormwater quality improvement devices and sediment and erosion control measures. • Council was satisfied with the approach to stormwater management and recommended detailed plans be prepared as a condition of consent. • EESG raised concerns that stormwater run-off from the 	<ul style="list-style-type: none"> • The Department is satisfied that full operation of the Concept Proposal would not result in additional impermeable surfaces. • The existing stormwater management measures and provisions for on-site detention of stormwater would ensure surface flows are appropriately managed. • Further, the Department is satisfied that the quantity and quality of stormwater flows discharged from the site would meet Council's standards. <p>Concept Proposal</p> <ul style="list-style-type: none"> • The Department has recommended a condition requiring for all future DAs for demolition or new built form to include a detailed stormwater management report and associated plans. <p>Stage 1</p> <ul style="list-style-type: none"> • The Department has recommended a condition requiring the preparation of a Construction Soil and Water

Issue	Findings	Department's consideration and recommendations
	<p>developed site could indirectly impact on the ESBS within and adjacent to the site.</p>	<p>Management Plan. The Plan is to include controls to divert all stormwater away from Lot 23 during construction.</p> <ul style="list-style-type: none"> The Department has also recommended a condition requiring the Applicant to design an operational stormwater management system for the development in accordance with the conceptual design in the RtS.
<p>Out-of-hours events</p>	<ul style="list-style-type: none"> The EIS stated that out-of-hours events at the site would continue to be managed in accordance with the school's existing PoM that is overseen by the Moriah Community Consultative Committee. Council recommended the PoM be amended so that committee meetings are not held at Council's offices and the role of Council to mediate on decisions is removed. The PoM was amended accordingly as part of the RtS. Council further requested a number of events be removed from the PoM as they are not considered ancillary activities to the school use. The public submissions raised concerns with out-of-hours events contributing to traffic and parking impacts. 	<ul style="list-style-type: none"> The Department is satisfied that the out-of-hours events at the site would continue to be managed in accordance with the established PoM and through the recommended conditions. <p>Concept Proposal</p> <ul style="list-style-type: none"> The Department has recommended a condition requiring future DAs to include an updated Out of Hours Event Management Plan (OHEMP), where relevant. <p>Stage 1</p> <ul style="list-style-type: none"> The Department acknowledges that additional management measures are required to address the potential impacts of out-of-hours events on the local road network and residential amenity. The Department has recommended a condition requiring the preparation of an OHEMP in consultation with Council. The OHEMP is required to include:

Issue	Findings	Department's consideration and recommendations
		<ul style="list-style-type: none"> ○ the number of attendees, time and duration. ○ measures to encourage the use of sustainable travel modes including public transport. ○ measures to minimise noise impacts on sensitive residential receivers, including preparation of an acoustic management plan. • The Department has also recommended a condition requiring the preparation of a Community Communication Strategy to ensure local residents are informed of the out-of-hours use of the site and mechanisms to provide feedback to the Applicant.
Bicycle parking and end of trip facilities (EOTFs)	<ul style="list-style-type: none"> • The proposal submitted as part of the EIS included provision for 108 bicycle parking spaces. This was increased to 160 bicycle parking spaces as part of the RtS to address concerns raised by Council and in the public submissions. • The TAIA concluded the proposal is compliant with the WDCP, which requires the provision of 108 bicycle spaces for the increased student and staff population proposed under the Concept Proposal. 	<ul style="list-style-type: none"> • The Department is satisfied that the Concept Proposal and Stage 1 would provide adequate bicycle parking provisions for the proposed increased student population. <p>Concept Proposal</p> <ul style="list-style-type: none"> • The Department notes that bicycle parking and EOTFs proposed under the Concept Proposal would be provided in Stage 1. <p>Stage 1</p> <ul style="list-style-type: none"> • The Department has recommended a condition requiring the Applicant to prepare detailed designs for bicycle parking and EOTFs. This includes a minimum provision of 160 secure bicycle parking spaces that

Issue	Findings	Department's consideration and recommendations
		are in accordance with the relevant Australian Standards.
Landscaping	<ul style="list-style-type: none"> The EIS included a landscape master plan (amended in the RtS and SRTS) which would predominantly be delivered as part of Stage 1. The Concept Proposal also envisages an activated and landscaped rooftop atop the future ELC building (Stage 2) which would be subject to a separate DA. EESG recommended that the landscape master plan be amended to include additional ESBS species across the site. Council considered that the landscape master plan did not address the requirements of the WDCP, which requires a minimum 90 per cent of native species plantings for areas adjacent to remnant bushland. Further, Council considered that the plan should include the entire school campus, rather than only the VMP area. The Applicant advised that plantings across the site as part of Stage 1 could not be restricted only to ESBS species as: <ul style="list-style-type: none"> such species predominantly comprise low wooded shrubs and would not provide mature canopy cover required for outdoor educational spaces. the need to provide cultural plantings across the site. 	<p>Concept Proposal</p> <ul style="list-style-type: none"> The Department has recommended a condition requiring future DAs to include a detailed landscaping plan. <p>Stage 1</p> <ul style="list-style-type: none"> The Department has considered the concerns raised by EESG and Council and the comments provided by the Applicant and considers refinement of the landscape master plan and planting schedule are necessary. The Department has therefore recommended a condition requiring the preparation of a final Landscaping Plan in consultation with Council and EESG which prioritises the planting of ESBS species across the site, where possible.

Issue	Findings	Department's consideration and recommendations
	<ul style="list-style-type: none"> the relative commercial unavailability of such species. 	
Development contributions	<ul style="list-style-type: none"> Section 7.12 of the EP&A Act provides for a consent authority to impose, as a condition of development consent, a requirement for the Applicant to pay a fixed levy. The proposal requires a development contribution at a rate of 1% of the cost of the development in accordance with the Contributions Plan. 	<p>Concept Proposal</p> <ul style="list-style-type: none"> Development contributions for future stages under the Concept Proposal would be levied by the relevant consent authority as part of the relevant DA. <p>Stage 1</p> <ul style="list-style-type: none"> The Department has recommended a condition that requires the Applicant pay a development contribution to Council, prior to the commencement of works. The amount payable should be levied in accordance with the Contributions Plan.

6.7 Public interest

- 6.7.1 The Department considers that the proposal would benefit the community as it would provide significantly improved school facilities, including contemporary teaching and learning facilities with adaptable and collaborative learning spaces that would improve educational outcomes for students.
- 6.7.2 The Department is satisfied that the proposal is consistent with objectives of the applicable land use zone (SP2 Infrastructure) as it is development for the purpose of an educational establishment on an existing school site. In addition, the Concept Proposal would provide a direct investment of approximately \$81.7 million, which would support up to 250 jobs including 224 construction jobs and 26 operational jobs.
- 6.7.3 On balance, the Department is satisfied the proposal would have an acceptable environmental impact, subject to recommended conditions of consent.

6.8 Summary of Department's consideration of submissions

6.8.1 The Department's consideration of the issues raised in submissions is summarised in **Table 24**.

Table 24 | Department's consideration of key issues raised in submissions

Issue raised	Department's consideration
Traffic and parking	<p>The Department considers that the full operation of the Concept Proposal at 2036 would result in increased traffic congestion and LoS impacts at key intersections without the provision of intersection upgrades and modal shift away from private car use to sustainable travel modes.</p> <p>The intersection upgrades and aspirational modal shift (10 per cent) proposed by the Applicant would ensure that the road network could accommodate the Stage 1 development. Further detailed traffic assessment would be required to address the anticipated traffic and parking impacts of future development stages where an increase in the student population beyond Stage 1 is sought.</p> <p>The Department considers that every effort should be made by the Applicant to address impacts on the capacity and efficiency of the surrounding road network, through intensive and verifiable travel demand management measures.</p> <p>The Department has therefore recommended a condition requiring the success of the GTP, including the 10 per cent modal shift away from private car, to be verified through an independent audit prior to any increase in the student population beyond Stage 1. In addition, intersection upgrades to the surrounding road network are required to be completed to the satisfaction of Council, prior to the commencement of operation of Stage 1 (see Section 6.2).</p>
Built form and urban design	<p>The Department considers proposed building envelopes would accommodate future built form that would not result in significant or unacceptable impacts on existing views, privacy and solar access or overshadow areas of the critically endangered ESBS.</p> <p>The Department is satisfied that the design of the Stage 1 STEAM and ILC building is appropriate in the context of the existing school campus and the surrounding parklands.</p> <p>A condition is recommended requiring the design of the Stage 2 built form to include an assessment of impacts on amenity, including solar access, visual privacy and view loss as part of a future DA (see Section 6.3).</p>
Visual impact	<p>The Department considers the visual impacts of the proposal would be satisfactory, as the built form would not obstruct significant or important views or impact on views from any of the surrounding residential areas.</p>

Issue raised	Department's consideration
	<p>Landscaping and new tree plantings would partially screen views of the proposed Stage 1 building from within Queens Park.</p> <p>The Department also considers that the visual impact of any Stage 2 built form would be mitigated given the location of the building envelope is positioned centrally within the site and on the western side of the Stage 1 building, which would therefore restrict views of any future built form from within Queens Park (see Section 6.4).</p>
Overshadowing	<p>The Department considers the proposed Stage 1 building and the Stage 2 building envelope would not have an unacceptable impact in terms of overshadowing, noting that there would be no shadow cast to Lot 23 and areas of existing ESBS.</p>
Biodiversity	<p>The Department is satisfied that the full operation of the Concept Proposal would not result in a significant and irreversible impact to the critically endangered ESBS. Further, the Department is satisfied that the amended VMP submitted as part of the application would manage any direct and indirect impacts of the proposal on existing native vegetation.</p> <p>The Department recognises that the Applicant has retrospectively carried out works on the site that are in contravention of conditions imposed by previously approved DAs. The Department is satisfied that the non-compliances with the previous development consents and approvals would be addressed as part Stage 1 through the establishment of a 3-10m buffer to Lot 23 and the removal of existing school infrastructure within the associated buffer area (see Section 6.5).</p>
Noise and vibration	<p>The Department considers that the noise and vibration impacts during construction and operation of the development can be adequately mitigated or managed through the recommended conditions (see Section 6.5.23).</p>
Increase in student numbers	<p>The Department has carefully considered the issues raised in the public submissions regarding the potential traffic and amenity impacts associated with increased student and staff numbers.</p> <p>The Department considers the Applicant has proposed adequate traffic and travel demand management and mitigation measures to allow a staged increase in the student population in Stage 1.</p> <p>To address the concerns raised in the submissions, the Department has required the success of the GTP in achieving a 10 per cent modal shift away from cars to be verified through an independent audit, prior to further increase in the student population (see Section 6.2).</p>

7 Evaluation

- 7.1.1 The Department has reviewed the Environmental Impact Statement (EIS), Response to Submissions (RtS), Supplementary RtS (SRtS) and assessed the merits of the proposal, taking into consideration advice from the public authorities, including Waverley Council and concerns raised in the community submissions. Issues raised have been considered and environmental issues associated with the proposal have been addressed. The Department concludes that any the impacts of the proposal could be appropriately managed and mitigated through the recommended conditions of consent. Consequently, the Department considers the development is in the public interest and should be approved, subject to conditions.
- 7.1.2 The proposed redevelopment of Moriah College would provide improved teaching and learning outcomes through the development of new, purpose-built and modern educational facilities that would replace existing, dilapidated assets to meet contemporary and evolving educational standards.
- 7.1.3 The proposal is consistent with the objects of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the vision of the Eastern City District Plan, as it would provide additional and contemporary school infrastructure on the site of an existing educational establishment to meet the growing needs of Sydney.
- 7.1.4 The EIS was publicly exhibited for 28 days between 21 November 2019 and 18 December 2019. The Department received a total of 321 submissions, comprising five from public authorities (including an objection from Waverley Council), 314 individual public submissions (including 141 objections) and two submissions from special interest groups (including one objection).
- 7.1.5 The Applicant submitted a RtS including an amended proposal on 26 June 2020, which included a minor reduction to the height of the Stage 1 building, reduced massing of the Stage 2 building envelope, relocation of the Gate 4 driveway, intersection upgrades and additional bicycle parking.
- 7.1.6 The RtS was publicly exhibited for 15 days between 6 and 20 July 2020. The Department received a total of 44 additional submissions comprising six from public authorities (including comments from Waverley Council), 36 individual public submissions (including 34 objections) and two submissions from special interest groups (including one objection).
- 7.1.7 The Applicant submitted a SRtS on 14 December 2020, which included further amendments including provision of a vegetated buffer to the Eastern Suburbs Banksia Scrub (ESBS) on Lot 23 and removal of school infrastructure within the buffer, further relocation of the Gate 4 driveway, relocation of the car parking area to the north-west of the existing Early Learning Centre and an amended landscape planting strategy.
- 7.1.8 The Department has considered the merits of the proposal in accordance with section 4.15(1) of the EP&A Act, the principles of ecologically sustainable development, and issues raised in submissions.
- 7.1.9 The Department identified the key issues to be traffic and parking, built form and urban design, visual impact and biodiversity impacts. The Department has concluded that:
- the surrounding road network could accommodate the Stage 1 development, subject to conditions requiring intersection upgrades to be completed and a modal shift away from private car use to be achieved.

- further detailed traffic assessment would be required to address the anticipated traffic and parking impacts of future development stages where further increases in the student population is sought.
- the proposed building envelopes under the Concept Proposal would facilitate future built form on the site that would not result in an unacceptable impact on existing views, privacy and solar access or overshadow areas of the critically endangered Eastern Suburbs Banksia Scrub (ESBS) on and adjoining the site.
- the height and scale of the proposed Stage 1 building would not have an unacceptable impact on the character of the surrounding locality and the Applicant's justification for the variation of the height of buildings control in the Waverley Local Environmental Plan 2012 are considered acceptable.
- the visual impact of the Stage 1 building is acceptable as it would not obstruct any significant or important views or have an unacceptable impact on views from the surrounding residential and public domain areas. Further, landscaping and new tree plantings would partially screen views of the Stage 1 building from within Queens Park.
- direct and indirect impacts to the critically endangered ESBS would be appropriately managed and mitigated through the establishment of a vegetated buffer to Lot 23 and the removal of existing school infrastructure from within the buffer area as part of Stage 1. The vegetated buffer would be managed as part of a Vegetation Management Plan (VMP) and supported by a landscape master plan for the site.

7.1.10 The Department concludes the impacts of the development are acceptable and can be appropriately mitigated through the implementation of the recommended conditions of consent.

7.1.11 The application is referred to the Independent Planning Commission as Waverley Council objected to the proposal and more than 50 public submissions by way of objection were received in response to exhibition of the application.

7.1.12 This assessment report is hereby presented to the Independent Planning Commission to determine the application.

Prepared by:




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Recommended by:



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Appendices

Appendix A – List of Referenced Documents

The following supporting documents and supporting information to this assessment report can be found on the Department's website as follows.

1. Environmental Impact Statement
<https://www.planningportal.nsw.gov.au/major-projects/project/14741>
2. Submissions
<https://www.planningportal.nsw.gov.au/major-projects/project/14741>
3. Response to Submissions, including amending proposal
<https://www.planningportal.nsw.gov.au/major-projects/project/14741>
4. Supplementary Response to Submissions, including amending proposal
<https://www.planningportal.nsw.gov.au/major-projects/project/14741>
5. Department's Independent Traffic Peer Review
<https://www.planningportal.nsw.gov.au/major-projects/project/14741>

Appendix B – Statutory Considerations

ENVIRONMENTAL PLANNING INSTRUMENTS (EPIs)

To satisfy the requirements of section 4.15(a)(i) of the EP&A Act, this report includes references to the provisions of the EPIs that govern the carrying out of the project and have been taken into consideration in the Department's environmental assessment.

EPIs considered as part of the assessment of the proposal are:

- State Environmental Planning Policy (State & Regional Development) 2011
- State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017
- State Environmental Planning Policy No. 55 – Remediation of Land
- State Environmental Planning Policy No. 64 – Advertising and Signage
- Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities)
- Draft State Environmental Planning Policy (Remediation of Land)
- Waverley Local Environmental Plan 2012.

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)

The aims of the SRD SEPP are to identify SSD, State significant infrastructure (SSI), critical SSI and to confer functions on regional planning panels to determine development applications. Consideration of the relevant sections of the SRD SEPP is provided in **Table B1**.

Table B1 | SRD SEPP compliance table

Relevant Sections	Consideration and Comments	Complies
3 Aims of Policy The aims of this Policy are as follows: (a) to identify development that is State significant development	The proposed development is identified as SSD.	Yes
8 Declaration of State significant development: section 4.36 (1) Development is declared to be State significant development for the purposes of the Act if: a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and b) the development is specified in Schedule 1 or 2.	The proposed development is permissible with development consent and is development specified under Schedule 1.	Yes

Schedule 1 State significant development — general (clause 8 (1)).	The proposal comprises development that has a CIV of more than \$20 million for the purpose of alterations or additions to an existing school.	Yes
15 Educational Establishments (2) Development that has a capital investment value (CIV) of more than \$20 million for the purpose of alterations or additions to an existing school.		

State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 (Education SEPP)

The Education SEPP aims to simplify and standardise the approval process for schools, TAFEs, universities and childcare centres while minimising impacts on surrounding areas and improving the quality of the facilities. The Education SEPP includes planning rules for where these developments can be built, which development standards can apply and constructions requirements. The application has been assessed against the relevant provisions of the Education SEPP.

Clause 42 of the Education SEPP provides for development consent to be granted for development for the purpose of a school that is SSD, even though the development would contravene a development standard imposed by this or any other EPI under which the consent is granted. The proposed building envelopes sought as part of the Concept Proposal and the Stage 1 built form contravene the height of buildings development standard in the Waverley Local Environmental Plan 2014. The Department concludes that there are sufficient environmental planning grounds to justify the exceedance of the height control.

Clause 57 of the Education SEPP requires development that will result in an educational establishment being able to accommodate 50 or more additional students to be referred to the Transport for NSW (TfNSW). The application was referred to TfNSW in accordance with this clause, and the Department has taken into consideration the submissions received from TfNSW in its assessment of the proposal.

Clause 35(6)(a) requires that the design quality of the development should be evaluated in accordance with the design quality principles set out in Schedule 4. An assessment of the development against the design principles is provided in **Table B2**.

Table B2 | Consideration of the design quality principles

Design Principles	Response
Context, built form and landscape	<p>The siting, design and materials proposed as part of the Stage 1 built form have regard to the existing school campus and surrounding streetscape.</p> <p>While the proposed building envelopes sought as part of the Concept Proposal exceed the maximum height of buildings control in the WLEP, the Department finds that there are sufficient environmental planning grounds to justify contravening the development standard.</p>

Design Principles	Response
	<p>The proposal includes extensive new landscaping (including new tree planting and replacement plantings) which would provide a high level of amenity to the school and surrounding locality.</p>
Sustainable, efficient and durable	<p>The proposal has been designed with consideration of ecologically sustainable development (ESD) principles. The Applicant is targeting measures to achieve the equivalency of a 4-Star Green Star rating for the Stage 1 component.</p> <p>Bicycle parking is proposed in excess of Council's DCP requirements and end of trip facilities are incorporated within the Stage 1 building to encourage sustainable travel modes.</p>
Accessible and inclusive	<p>The EIS included an Access Review that assessed the proposal against the requirements of the National Construction Code (Volume 1, 2019), Disability (Access to Premises) Standards 2010 and the applicable Australian Standards for access and mobility. The Access Review concluded that the proposal can achieve compliance with the relevant statutory requirements.</p> <p>The Department has recommended a condition requiring all future development applications to include a Disability Access Review to certify that the development complies with the relevant accessibility requirements.</p>
Health and safety	<p>Crime Prevention Through Environmental Design Principles (CPTED) were considered as part of the Concept Proposal and the Stage 1 design, operation and management of the school to ensure a high level of safety and security for students, staff and visitors.</p>
Amenity	<p>The proposed school redevelopment has been designed to provide engaging spaces that are accessible and have access to sunlight, natural ventilation and provide visual and acoustic privacy.</p> <p>The proposal would not have a significant or unacceptable impact on the amenity of surrounding residences by way of reduced solar access, visual privacy, view loss and light spill. Further, and recommended conditions would ensure noise and vibration impacts during construction and operation are appropriately managed and mitigated.</p>
Whole of life, flexible, adaptable	<p>The proposed school facilities would be flexible and provide open plan and a variety of spaces that could be adapted to suit a wide range of uses and changing needs.</p>

Design Principles	Response
Aesthetics	The Stage 1 built form has been sited away from the Queens Park residential area and would respond positively to the site and surrounding neighbourhood. The Department considers the potential visual impacts from Queens Park to be acceptable given the context of the site and surrounds.

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)

SEPP 55 aims to ensure that potential contamination issues are considered in the determination of a development application.

The EIS included a Preliminary Site Investigation (PSI) that did not identify any contamination which would preclude the redevelopment of the site. As the subsoils under the buildings to be demolished could not be investigated, the PSI recommended that a detailed soil assessment be undertaken at the site once the demolition of the buildings was completed.

The Department has recommended a condition requiring the Applicant conduct a Detailed Site Investigation (DSI) at the completion of demolition to confirm the full nature and extent of any contamination. Should the DSI identify that remediation works are required, a Remedial Action Plan would need to be prepared and approved by an EPA accredited Site Auditor. The Department has recommended conditions requiring the preparation of an unexpected finds protocol to ensure measures are in place should any contamination be uncovered during site works.

The Department is satisfied that, subject to compliance with the recommend conditions, the site would be suitable for its ongoing use as an educational establishment, in accordance with SEPP 55.

State Environmental Planning Policy No. 64 – Advertising and Signage (SEPP 64)

SEPP 64 applies to all signage that can be displayed with or without development consent under another EPI and is visible from any public place or public reserve.

The proposal includes the provision of two business identification signs. Under clause 8 of SEPP 64, development consent must not be granted to an application to display signage unless the consent authority is satisfied that the signage is consistent with the objectives of SEPP 64 and with the assessment criteria specified in Schedule 1 of the SEPP. Consistency of the proposed signage against the SEPP 64 assessment criteria is demonstrated in **Table B3**.

Table B3 | SEPP 64 compliance

Relevant sections	Department' s consideration	Compliance
1 Character of the area		
Is the proposal compatible with the existing or desired future character of	The proposed signage is compatible with the surrounding locality and is	Yes

Relevant sections	Department’ s consideration	Compliance
the area or locality in which it is proposed to be located?	representative of signage typical for an educational establishment. The scale, location and colours of the signage are not expected to detract from the character of the area. There is no established signage theme within this locality.	
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?		
2 Special areas		
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	The proposal would not detract from the amenity or visual quality of any listed areas including surrounding landscape conservation areas.	Yes
3 Views and vistas		
Does the proposal obscure or compromise important views?	The proposal would not obscure or compromise important views, dominate the skyline or impact on the viewing rights of other advertisers.	Yes
Does the proposal dominate the skyline and reduce the quality of vistas?		
Does the proposal respect the viewing rights of other advertisers?		
4 Streetscape, setting or landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The scale, proportion and form of the proposed signs are considered to be in context with the surrounding streetscape and would not detract from the landscape features of the surrounding parklands. Further, the proposed signage would replace a number of existing business identification signs that are located on the existing perimeter walls.	Yes
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?		
Does the proposal reduce clutter by rationalising and simplifying existing advertising?		

Relevant sections	Department' s consideration	Compliance
Does the proposal screen unsightliness?	The proposed signage would add a visual break in the masonry perimeter walls. The creeping plants proposed on the perimeter walls around the signage would be maintained by the school.	
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?		
Does the proposal require ongoing vegetation management?		
5 Site and building		
Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The proposal is considered to be compatible with the scale and proportion of the existing site buildings.	Yes
Does the proposal respect important features of the site or building, or both?		
Does the proposal show innovation and imagination in its relationship to the site or building, or both?		
6 Associated devices and logos with advertisements and advertising structures		
Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	The proposed signage includes the school logo which is considered an integral and acceptable part of the signage.	Yes
7 Illumination		
Would illumination result in unacceptable glare?	The proposed signage would not be illuminated. Therefore, the proposal would not result in unacceptable glare or affect the safety of pedestrians, vehicles or aircraft.	Yes
Would illumination affect safety for pedestrians, vehicles or aircraft?		
Would illumination detract from the amenity of any residence or other form of accommodation?		

Relevant sections	Department' s consideration	Compliance
Can the intensity of the illumination be adjusted, if necessary?		
Is the illumination subject to a curfew?		
8 Safety		
Would the proposal reduce the safety for any public road?	The proposed design and location of signage is not expected to have an adverse impact on the safety of any public road, reduce the safety for pedestrians or bicyclists or obscure sightlines from any public area.	Yes
Would the proposal reduce the safety for pedestrians or bicyclists?		
Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?		

Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities) (Draft Education SEPP)

The Draft Education SEPP will retain the overarching objectives of the Education SEPP to facilitate the effective delivery of educational establishments and child care facilities across the State.

The provisions of the Draft Education SEPP aim to improve the operation, efficiency and usability of the Education SEPP and to streamline the planning pathway for schools, TAFEs and universities that seek to build new facilities and improve existing ones. The Explanation of Intended Effects (EIE) was exhibited from 20 November 2020 to 17 December 2020 and proposes changes to the threshold triggers for SSD under the SRD SEPP, specifically for schools and tertiary institutions.

The Department is satisfied that the proposal is generally consistent with the objectives of the Draft Education SEPP and would continue to meet the requirements for SSD in accordance with the EIE.

Draft State Environmental Planning Policy (Remediation of Land) (Draft Remediation SEPP)

The Draft Remediation SEPP will retain the overarching objective of SEPP 55 promoting the remediation of contaminated land to reduce the risk of potential harm to human health or the environment.

Additionally, the provisions of the Draft Remediation SEPP will require all remediation work that is to be carried out without development consent, to be reviewed and certified by a certified contaminated land consultant, categorise remediation work based on the scale, risk and complexity of the work and require environmental management plans relating to post-remediation management of sites or ongoing operation, maintenance and management of on-site remediation measures to be provided to Council.

The Department is satisfied that the proposal will be consistent with the objectives of the Draft Remediation SEPP, subject to compliance with the recommend conditions.

Waverley Local Environmental Plan 2012 (WLEP)

The WLEP provides a planning framework that promotes and co-ordinates a range of land uses, while enhancing and preserving the natural environment in the Waverley local government area.

The Department concludes the development is generally consistent with the relevant provisions of the WLEP. Consideration of the relevant clauses of the WLEP is provided in **Table B4**.

Table B4 | Consideration of the WLEP

Relevant clause	Consideration
Clause 2.3 Zone objectives and Land Use Table	<p>The site is zoned SP2 Infrastructure (Educational Establishment). Development for the purpose of an educational establishment is permissible with consent in the SP2 zone.</p> <p>The proposal is consistent with the objectives of the SP2 zone as it provides for school infrastructure and related uses.</p>
Clause 2.7 Demolition requires development consent	<p>The proposal involves the demolition of several existing school buildings and structures on the site. Development consent for these works is sought as part of this application.</p>
Clause 4.3 Height of buildings	<p>The Stage 1 building has a maximum building height of 20.7m which exceeds the 8.5m height of buildings control.</p> <p>However, the Education SEPP enables consent to be granted for development that is for the purpose of a school that is SSD, despite contravening a development standard imposed by another EPI.</p> <p>The Department's assessment concludes that strict compliance with the clause is unnecessary and unreasonable and finds that there are sufficient environmental planning grounds to justify the height exceedance. The Department considers that the proposal built form is appropriate in its context and would result in minimal environmental and amenity impacts.</p>
Clause 4.4 Floor space ratio	<p>The building envelope proposed under the Concept Proposal has a maximum floor space ratio of 0.39:1 which complies with the development standard of 0.5:1 for the site.</p>

Relevant clause	Consideration
Clause 5.10 Heritage Conservation	The Department is satisfied the proposal would have no impact on the Former Tram Shed (Item No. I428) located at the north-western part of the site on the primary school campus. Further, the proposal would not impact on the surrounding heritage conservation areas.
Clause 7.2 Earthworks	<p>Excavation would be required to construct the lower ground and basement car parking level of the Stage 1 building. Earthworks would also be required to establish site levels and building pads for the future Stage 2 building.</p> <p>The Department is satisfied the extent of proposed earthworks would not have a detrimental impact on drainage patterns and soil stability at the site or adjoining properties, subject to the recommended conditions.</p>

Other policies

In accordance with clause 11 of the SRD SEPP, Development Control Plans do not apply to SSD. Notwithstanding, the objectives of relevant controls under the Waverley Development Control Plan 2012, where relevant, were considered in **Section 6**.

Appendix C – Recommended Instrument of Consent

The recommended instrument of consent can be found on the Department's website as follows:

<https://www.planningportal.nsw.gov.au/major-projects/project/14741>

Appendix D – Independent Traffic Peer Review

The Department's Independent Traffic Peer Review can be found on the Department's website as follows:

<https://www.planningportal.nsw.gov.au/major-projects/project/14741>