

3 July 2020

**Our Ref:**P-19206 (LW/CB)

**Angela Manahan**  
Randwick City Council  
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RANDWICK NSW 2031  
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**DEVELOPMENT APPLICATION****40/2020****Amended/Additional Information****Randwick City Council****10 July 2020****Records Received**

Dear Angela,

**RE: DA/40/2020 - 18-20 STANLEY STREET, RANDWICK (EMANUEL SCHOOL)**

This letter has been prepared by City Plan Strategy & Development (City Plan) on behalf of the applicant Emanuel School to respond to Council's written request for further information (RFI) letter dated 4 May 2020 in relation to the above development application. Appendix 1 of this letter provides a response to each item raised by Council; Appendix 2 provides a response to the issues raised by the Design Excellence Panel and Appendix 3 responds to the issues raised by public submissions.

This letter is to be read in conjunction with the following documentation:

- **Appendix 1** – Response to Council's RFI;
- **Appendix 2** – Response to Design Excellence Panel comments;
- **Appendix 3** – Response to Submissions;
- **Appendix 4**– Traffic response prepared by Traffix;
- **Appendix 5** – Acoustic response prepared by Wilkinson Murray;
- **Appendix 6** – Architectural plans prepared by TKD Architects;
- **Appendix 7** – Architectural Design Statement prepared by TKD Architects;
- **Appendix 8** – Landscape Plans prepared by Context Landscape Architecture.
- **Appendix 9** – Heritage Statement prepared by City Plan Heritage;
- **Appendix 10** – Civil Plans prepared by M+G Consulting;
- **Appendix 11** – Civil Statement prepared by M+G Consulting;
- **Appendix 12** –Structural Statement prepared by M+G Consulting;
- **Appendix 13** – BCA Statement prepared by Design Confidence; and
- **Appendix 14** – Renders prepared by TKD Architects.

We trust the attached is satisfactory for your continued assessment of the development application. Should you have any queries please do not hesitate to contact Lotti Wilkinson (Associate) on 02 8270 3500 or [lottiw@cityplan.com.au](mailto:lottiw@cityplan.com.au).

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Kerr", followed by a long horizontal line.

**Stephen Kerr**  
Executive Director

## Appendix 1: Response to Council's RFI.

Ref	Council Comment	Response
2	<p><b>Bulk and Scale, Visual Impact and Streetscape</b></p> <ul style="list-style-type: none"> <li>Of key concern is the proposed building height, overall bulk and scale, and the minimal setbacks to the street.</li> <li>The design and positioning of the proposed New Adler Building exacerbates its scale, making it appear larger and bulkier than the existing developments. This jars against the predominately two-storey adjacent developments.</li> <li>It is noted that the D+T Building (while 3 storeys) utilises upper level setbacks to reduce the bulk and scale of the building.</li> <li>The proposed building lacks articulation in the façade, which creates blank walls fronting the street. This is not supported.</li> <li>The proposed setbacks from Stanley and Chepstow Streets are not sufficient to adequately screen the development with landscaping.</li> <li>The Design Quality Principles outlined in Schedule 4 of the SEPP are not met. The proposed landscaping does not contribute to the streetscape, nor does it reduce the impacts of the proposed development within the surrounding area.</li> <li>The proposal does not respond to or enhance the positive attributes to the existing surrounding local streetscape.</li> <li>Greater building articulation is required, potentially including breaking the building into two sections to reduce the visual bulk and scale and to preserve view corridors into the site.</li> <li>Greater setbacks are required along the street frontages of the site.</li> </ul>	<ul style="list-style-type: none"> <li>Significant design amendments have been made.</li> <li>The amended design retains and re-uses the existing Adler Building. It maintains the external shell (with new external finishes) and internal structural elements with a second-floor addition and a ground and first floor extension. An open lightweight bridge connection is also proposed to the adjoining D&amp;T building at the second-floor level to allow for student and staff circulation and utilise most of the existing space within the Adler building for classrooms.</li> <li>The amended design purposely locates the bulk and scale away from Chepstow and Stanley Streets, with the second-floor level setback by approximately 5m from Chepstow Street and 7.7m from Stanley Street.</li> <li>The roof of the first level is pitched, similar to the existing Adler building roof, allowing the form to fold back away from the street. The grain and colour of the residential pattern is reflected in the scale of terracotta cladding on the southern and western facades.</li> <li>The amended design provides for articulation within the façade, with the existing openings within the Adler Building enhanced and additional openings in the new built form incorporated.</li> <li>An amended landscape plan has been provided (Appendix 8) which details additional planting between the built form and Chepstow and Stanley Streets. Further to advice from Council and NSW Heritage Council, planters have been carefully selected to grow across the building to provide a soft green edge to the building.</li> <li>The proposed second floor addition has increased setbacks to reduce the visual bulk of the building from neighbouring properties. The façade of the proposed addition includes windows to provide greater articulation and</li> </ul>

		variation to the building. Additionally, the use of parapets and 'expressed floor edges' provides horizontal articulation to the building.
3	<p><b>Amenity</b> <b><i>Proposed Development</i></b></p> <ul style="list-style-type: none"> <li>The proposed classrooms have minimal window openings. The inclusion of more windows may assist in reducing the blank walls along the streetscape and increasing building articulation. It is noted that security and privacy concerns must be factored into this design.</li> </ul> <p><b><i>Neighbouring Sites</i></b></p> <ul style="list-style-type: none"> <li>It is recommended that amended designs be provided which maintain existing view corridors to the heritage items of the site.</li> <li>Elevational shadow diagrams should be provided to demonstrate the potential overshadowing of the adjacent southern properties on Stanley Street.</li> <li>There is potential for visual privacy and overlooking impacts from the proposed elevated terrace and break-out areas. Privacy measures should be incorporated into these areas to ensure no unreasonable impacts arise.</li> </ul>	<ul style="list-style-type: none"> <li>Additional windows have been included to provide greater building articulation and to create visual interest in the facades.</li> <li>The amended design retains the existing views into the site. A lightweight and open bridge link is provided between the proposed Adler Building and the existing D&amp;T Building. This together with the low height of the ground floor extension will ensure the existing views into the site remain in a framed form with minimum interruption hence maintaining the existing visual connection into the site.</li> <li>Elevational shadow diagrams have been provided and demonstrate that no overshadowing is created after 9am in mid-winter or before 3pm. Any additional overshadowing is limited to between 8am and 9am on 21 June to properties at 15, 11 and 11A at Stanley Street only. At 8am the additional shadow cast falls along the northern facades of these properties but by 8:30am the additional shadow cast is restricted to the ground and the front gardens and driveways of these properties. These properties receive direct sunlight from approximately 9am – 5am on 21 June.</li> <li>The proposal results in additional overshadowing to 34 Stanley Street at 4pm on 21 June. Again, the additional overshadowing is limited in duration and the property enjoys sunlight from approximately 8am – 3:30pm.</li> <li>The amended design orientates the breakout space at ground and first floor levels to the northeast and to the centre of the School site. There is limited opportunity for impacts on visual privacy and overlooking.</li> </ul>
4	<p><b>Referral Comments</b></p> <p><b><i>Heritage Significance</i></b> Heritage NSW</p> <ul style="list-style-type: none"> <li>The proposal results in the loss of existing views to the site from Stanley Street. The design should retain the existing visual connection to the site.</li> </ul>	<ul style="list-style-type: none"> <li>Following receipt of the heritage referrals, the project team met twice with the Heritage NSW and Randwick City Council's heritage and planning officers via Zoom on the 19th of May and 1st of June 2020. A number of design options have been explored and presented during these meetings and the amended final design is the result of these discussions. It is noted that there were no objections from both, external and internal referrals, to the demolition of the existing Adler building. The main common concerns of the Heritage NSW and the Council's Heritage Planner are:</li> </ul>

- The relationship between the proposed building and the former Laundry and Aston Lodge is unbalanced - the proposed building is 'domineering'.
- "The proposed breakout area should not project further north from the lines of the classrooms and any possible design amendments to minimise the visual impact of the bulk of the proposed building, on the diminutive former Laundry building, should be investigated".

Council Heritage Planner

- "There are some concerns that the projecting breakout areas at ground and first floor level, with roofed terrace above will impact on the setting and visibility of the front elevation of the former Laundry. If these projections were removed, then the proposed building could better define the northern edge of the courtyard which allows the appreciation of Aston Lodge, the former Chapel building and the former Laundry building from within the site".
- "There is a partial view towards the side elevation of Aston Lodge and the south west corner of the former Chapel from the north in Stanley Street, between the D and T building and the existing Adler building. This view into the site will be blocked by the proposed building and there are some concerns that the ability for the public to appreciate the former Chapel building will be further reduced".
- It is recommended that "a meeting should be held to discuss these issues and any heritage issues raised by the Heritage Council of NSW".

- The loss of the existing view to the site from Stanley Street; and
- The bulk and scale of the new building in the immediate vicinity of the former Laundry Building (currently kindergarten building) and encroachment into the setting of the former Laundry building and to some extent on the setting of Ashton Lodge.
- The amended design comprises alterations and additions to the existing Adler building, and maintains the overall external shell and internal structural elements with a second-floor addition and a ground floor extension to the adjoining D & T building.
- The second-floor addition has been setback substantially from both Stanley Street (approx. 7.7m) and Chepstow Street (approx. 5m) facades of the existing Adler building allowing for the provision of a pitched roof similar to the existing roof form of the building with terracotta roofing. The second-floor addition will raise from the pitched roof of the existing building envelope hence will not alter the setting and existing relationship of the Adler building with the former laundry building or Ashton Lodge. Where the ground floor extension to the adjoining D&T building is proposed, this section has been kept to a minimum height with non-trafficable low-pitched skillion roof to ensure the existing views from Stanley Street into the site has been maintained with minimum interruption above the existing site boundary wall.
- The building includes a light-weight bridge link between the proposed level 2 of the Adler building and level 2 of the recently completed D&T Building, while retaining the character of the view into the campus from Stanley Street. The minimal expression of the bridge link allows for the retention of green views into the heritage core of the school campus from residences to the south along Stanley Street. The profile of the Chapel can be seen against the sky.
- A detailed Heritage Response has been provided by City Plan Heritage (Appendix 9) and confirms "In general, the resultant building will present a more *contemporary than traditional form, but it will have an appropriate scale, bulk and characteristics that will fit well within its mixed traditional and modern context. It will ensure the existing setting and curtilage around the former laundry building and historic core of the site are retained and complemented as well as maintaining a visual connection to the site from Stanley Street*".

### ***Traffic and Parking***

Transport for NSW raised no objections, but recommended the following to Council for inclusion in any determination issued:

- The Applicant shall, both at the detailed designed stage and prior to commencement of the new school operations, conduct a Road Safety Evaluation on all relevant sections of road utilised for bus and private vehicle pickup and drop-off. Appropriate road safety measures and/or traffic management measures shall be implemented based on the outcomes of the RSE.
- Prior to commencement of new school operations, the proponent should provide additional data and the proposed student catchment area to determine the likely demands on the transport network (all modes), with particular regard to bus usage. Data should also be provided on existing and expected patronage by route. This data could be obtained by travel surveys of staff and students (existing and new enrolments). The student catchment area and travel data provided to TfNSW will assist with future service planning.
- As part of the ongoing operation of the school, a detailed Green Travel Plan (GTP), which includes target mode shares for both staff and students to reduce the reliance on private vehicles, shall be prepared. The GTP must be implemented accordingly and updated annually.
- It is recommended that to support and encourage active transport, bicycle parking facilities are provided within the development or close to it. Bicycle Parking should be provided in accordance with AS2890.3.
- The proposed development will generate additional pedestrian movements in the area. Pedestrian safety is to be considered in the vicinity.
- A Construction Pedestrian Traffic Management Plan (CPTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval prior to the issue of a Construction Certificate.

- As detailed in the Traffic Response prepared by Traffix (Appendix 4), we request that these matters be addressed by Council in appropriately worded conditions of consent. Suggested wording for conditions relating to Road Safety Evaluation, Travel Mode Data, Green Travel Plan, Pedestrian Safety and a CPTMP is provided as part of the response.
- With regards to the comments relating to bicycle facilities, the development currently provides 15 bicycle parking spaces for staff and students. Additional on-site bicycle parking will be explored in further detail once a Green Travel Plan has been developed and travel mode targets are determined.

**Development Engineer**

Traffic and Parking Assessment

- The traffic and parking arrangements associated with the current school population havenot been assessed and no increase in student numbers should be considered until the detailed assessment of the current school operation has been completed and found to be supportable.
- Part of the documentation to be provided to Council should include a detailed assessment of the current parking and traffic conditions.

- A comprehensive response is provided in the Traffic Response prepared by Traffix (Appendix 4).
- Reference should be made to the TIA report (Reference: 19.191r01v05, dated 24 January 2020) and more specifically Section 7, where SIDRA intersection modelling was undertaken for the existing school with a population of 60 early learning centre students, 827 students and 138 staff.
- In relation to parking, an on-street parking survey was conducted on Monday 15 June 2020 on a normal school day during the morning (6:00am to 10:00am) and afternoon (2:00pm to 6:00pm) peak periods at 15-minute intervals. This survey comprised a number of streets which were of a particular concern to local residents.
- The surveys confirmed approximately 10-11% free capacity in the survey area during morning and afternoon peak periods, representing approximately 45 car parking spaces. The additional student capacity proposed as part of this development application (33 additional students proposed from existing school numbers) will result in demand for an additional seven spaces which can easily be accommodated within the streets surrounding the school.
- The surveys were also undertaken during the COVID pandemic which has seen a large number of workers working from home, more staff and students opting to drive to school, more traffic movements due to parent drop offs and pickups avoiding the use of public transport. Overall trips away from home have also decreased generally. It is expected that once conditions begin to normalise post-COVID, the availability of parking within the area will improve above current levels.
- More than two years ago now the school implemented a programme to manage drop-off and pick-up referred to as 'go with the flow'. It is relevant to note that the school population during this period was only marginally less (827) than the total school population sought in this development application (860) and that Council has received no formal complaints regarding school parking, traffic or congestion since the implementation of the go with the flow' scheme.



5	<b>Submissions and Community Feedback</b> <ul style="list-style-type: none"> <li>A significant number of community submissions have been received. Council echo the comments made regarding traffic and parking issues and note that the proposal in its current form is inconsistent with the objectives of the SP2 zone and is therefore not in the public interest, given the significant adverse impact likely to occur. Council recommends mediation in this instance.</li> </ul>	<ul style="list-style-type: none"> <li>Our responses to the community submissions are provided in Appendix 3. Unfortunately, due to COVID-19 and the restrictions placed on face-to-face meetings, mediation with the local community has not occurred.</li> </ul>
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## Appendix 2: Response to Design Excellence Panel Comments

Please refer to the Design Statement prepared by TKD Architects which is provided at Appendix 7 for a comprehensive response to the Panel's comments.

Ref	DEP Comment	Response
1	<b>Context and Neighbourhood Context</b> <ul style="list-style-type: none"> <li>The area has low scale residential character, with building height ranging between 1 and 3 storeys. The D+T Building, to the east of the site, is 3 storeys in height.</li> <li>The campus slopes considerably down towards the north with the New Adler Building being located along the highest boundary of the campus.</li> <li>The heritage conservation designation has been assigned due to its general character of small scaled and finely detailed brick residences.</li> </ul>	<ul style="list-style-type: none"> <li>The revised design proposes the retention of the existing Adler building form which does not allow for increased setbacks at ground level, however the addition of Level 2 has been substantially set back from the street and is articulated as a different element in form and material to the lower floors. The existing building has been reclad in terracotta panels and metal cladding to eliminate any sense of the former 1970's pale texture brick façade. The upper level is clad in a dark metal wall cladding system that is distinct from the lower levels and introduces an articulated form that is recessive gives priority to the lower levels with new warm terracotta cladding.</li> <li>The form of the existing Adler building is retained and transformed with the addition of a new skin of terracotta panel cladding that wraps up over the remaining portion of the pitched roof. This retention keeps a familiar form, yet transforms it with a new material that is of high quality and commensurate with the fine detailing of the adjacent residential buildings.</li> </ul>
2	<b>Scale and Built Form</b> <ul style="list-style-type: none"> <li>It is noted that no height or FSR controls apply to the site; the Panel will therefore consider the proposed design on a merit basis.</li> </ul>	<ul style="list-style-type: none"> <li>The revised design has further considered the impact on the surrounding context and has been modified to better relate to the finely detailed small scaled brick residences through the introduction of a substantial setback at Level 2 and articulation of this level as a darker more recessive metal clad element that is read as a roof type element rather than solid masonry of the</li> </ul>



	<ul style="list-style-type: none"> <li>▪ The New Adler Building appears to overwhelm the corner of the site and should consider the introduction of setbacks to offset the three-storey height.</li> <li>▪ The transition between the New Adler Building and the kindergarten should be improved.</li> <li>▪ Greater articulation of the New Adler Building should be undertaken to reflect the fine-grain residential form neighbouring the site.</li> <li>▪ Consider a 'lighter bridge link' in order to retain some of the character of the view into green space from surrounding residential properties.</li> <li>▪ Consider realigning new buildings along Chepstow Street, to 'reinforce the western green edge of the heritage buildings' and retain the views of the green heritage core. Additional building bulk and scale can be better accommodated along Chepstow Street, where less fine-grain buildings are present.</li> </ul>	<p>lower levels. The form of the existing Adler building is retained and transformed with the addition of a new skin of terracotta panel cladding that wraps up over the remaining portion of the pitched roof. This retention keeps a familiar form, yet transforms it with a new material that is of high quality and commensurate with the fine detailing of the adjacent residential buildings.</p> <ul style="list-style-type: none"> <li>▪ The building purposefully holds the corner of the site in its existing location and makes a complementary connection to the recently completed buildings of the school. Beyond the northern façade of the Adler building, a level access with ramp and stair provide a gentle transition to the Kindergarten building.</li> <li>▪ The building includes a light bridge link between the proposed level 2 of the Adler building and level 2 of the recently completed Design and Technology Building, while retaining the character of the view into the campus from Stanley street.</li> </ul>
3	<p><b>Density</b></p> <ul style="list-style-type: none"> <li>▪ As no FSR controls apply to the site, the Panel will consider the proposed density on a merit basis.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The floor area of the development is a response to educational need and the additional floorspace is required to address shortfalls in teaching space of the current school. The form of the revised design has considered concerns raised relating to bulk and scale through the introduction of varied forms and additional setbacks at higher levels.</li> </ul>
4	<p><b>Sustainability</b></p> <ul style="list-style-type: none"> <li>▪ The Panel recognises efforts to improve sustainability, such as windows allowing cross-ventilation, photovoltaics on the roof and the commitment to rainwater storage, capture and re-use.</li> <li>▪ It is recommended that all bathrooms on external walls have external operable windows.</li> <li>▪ Sun-shading and weather protection should be provided to suit orientation.</li> <li>▪ Details on the operation of windows in the teaching spaces is desired.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Horizontal blades along the North-eastern façade provide sun shading to the breakout spaces. Awnings to level 1 and 2 windows along Chepstow Street provide sun shading for afternoon sun.</li> <li>▪ Cross ventilation is provided to all teaching spaces with operable windows.</li> <li>▪ Toilets and amenities in the existing building have perimeter windows and these will be retained, although modified and replaced with new windows.</li> <li>▪ Sun shading is provided to all windows</li> <li>▪ PV cells are included on the roof</li> <li>▪ Rainwater reuse remains part of the design proposal.</li> </ul>

5	<b>Landscape</b> <ul style="list-style-type: none"> <li>Indication of how rainwater will be captured from hard surfaces should be provided.</li> <li>A wider setback should be implemented along Chepstow and Stanley Streets to allow for planting of more large scaled trees.</li> </ul>	<ul style="list-style-type: none"> <li>Rainwater will be captured on site from hard surfaces with slabs to fall to existing and new drainage pits, diverting water into an OSD/infiltration tank under the Imaginarium.</li> <li>Opportunities for additional tree and climber planting within the existing setbacks have been explored. The landscape plans illustrate three trees within the Chepstow Street setback and three Lacy Tree Fern trees along the Stanley Street setback. The tree planting will be complemented by climbers, shrubs and groundcovers to help green the building's façade.</li> </ul>
6	<b>Amenity</b> <ul style="list-style-type: none"> <li>"The Panel suggests that an additional door be provided in the classroom at Level 2, south of the core, to provide additional flexibility in circulation".</li> <li>"Overshadowing diagram elevations for shadows on Stanley Street for 8am to 9am should be provided to confirm shadow impacts on those buildings".</li> </ul>	<ul style="list-style-type: none"> <li>The existing Adler building is being retained which leads to internal planning changes, however key ideas of the original design have been retained – a large central stair, large classrooms on the western perimeter and new breakout zones on the northeast corner.</li> <li>Shadow diagrams for Stanley Street for 8am-9am are provided at Appendix 6.</li> </ul>
7	<b>Safety</b> <ul style="list-style-type: none"> <li>"A driveway is indicated on ground level between the New Adler Building and the D+T Building. It is not clear if this will remain in use for vehicles. This use of this driveway should be clarified as it may present a hazard".</li> </ul>	<ul style="list-style-type: none"> <li>A gate adjacent to the Adler building will remain, however the existing driveway will no longer be used for vehicle access.</li> </ul>
9	<b>Aesthetics</b> <ul style="list-style-type: none"> <li>The New Adler Buildings must incorporate articulation and more fine-grained materiality.</li> <li>The security requirements of the building are acknowledged, but the New Adler Building must respond to its environment. High windows are suggested as a way to incorporate both values.</li> </ul>	<ul style="list-style-type: none"> <li>The revised design has reconsidered the articulation and massing of the building when viewed from the street and is no longer monolithic. Through retention of the existing building form and transforming its pitched roof form, the new design retains a familiar form and adds new learning space in a separately articulated upper storey. The revised design also introduces materials that while fresh and contemporary have a better relationship to the fine grain brickwork of the adjacent residential developments. The external faces have greater numbers of windows and façade articulation and modulation.</li> </ul>

### Appendix 3: Response to Public Submissions

Further to the review of public submissions received during the notification period, the key concerns are as categorised as below:

Issues Raised	Response																											
<p><b>Parking</b></p> <ul style="list-style-type: none"><li>▪ The proposal will impact resident car parking, especially with increased student/teacher numbers.</li><li>▪ There is inadequate parking for residents in surrounding areas, teachers, students, parents and visitors.</li><li>▪ On-site car parking for teachers/students/parents must be increased (existing number is deficient), as residents require the available onstreet parking.</li><li>▪ The capacity use of on-street car parking renders streets into one-way lanes, which is dangerous for all road users, especially with fast-moving cars.</li><li>▪ Does not meet parking requirements for staff as per Randwick DCP.</li></ul>	<ul style="list-style-type: none"><li>▪ Refer earlier response to Development Engineer's response and to the comprehensive response provided by Traffix at Appendix 4.</li><li>▪ Due to the extent of built form across the existing school site, additional on-site car parking cannot be provided.</li></ul>																											
<p><b>Student Numbers</b></p> <ul style="list-style-type: none"><li>▪ The school has breached the consent conditions of DA/181/2009 regarding student numbers, resulting in impacts on amenity, congestion, traffic, pedestrian safety and parking.</li><li>▪ The proposal suggests an unreasonable intensification of use at the site, especially given the student age group in Randwick is growing at a slower rate than in Greater Sydney.</li></ul>	<ul style="list-style-type: none"><li>▪ The School has had a gradual increase in student population, refer to the table below. As demonstrated below, the growth in student population has been tailing off since 2018.</li></ul> <table><tr><th>Year</th><th>ELC</th><th>K to Year 12</th></tr><tr><td>2014</td><td>60</td><td>729</td></tr><tr><td>2015</td><td>60</td><td>752</td></tr><tr><td>2016</td><td>60</td><td>777</td></tr><tr><td>2017</td><td>60</td><td>806</td></tr><tr><td>2018</td><td>60</td><td>827</td></tr><tr><td>2019</td><td>60</td><td>829</td></tr><tr><td>2020 (current)</td><td>60</td><td>827</td></tr><tr><td>Proposed</td><td>60</td><td>860</td></tr></table>	Year	ELC	K to Year 12	2014	60	729	2015	60	752	2016	60	777	2017	60	806	2018	60	827	2019	60	829	2020 (current)	60	827	Proposed	60	860
Year	ELC	K to Year 12																										
2014	60	729																										
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Proposed	60	860																										

	<ul style="list-style-type: none"> <li>▪ This development application seeks to regularise the student population and provide an increase in 33 students (from the 2020 population) to align with the School's projected future population.</li> <li>▪ The School proposes a maximum student enrolment of 920 students which has been carefully considered having regard to population and enrolment forecasts. The School does not anticipate there will be an increase in current staff numbers at the school to support the minor increase in student numbers.</li> </ul>
<p><b>Traffic</b></p> <ul style="list-style-type: none"> <li>▪ Existing congestion on the local road network caused by the school has not been considered. Consider especially the impacts on Monmouth, Stanley, Chepstow and Stephen Streets.</li> <li>▪ Concern regarding increased traffic impacts on students walking to other local schools and general safety.</li> <li>▪ An increase in student numbers will exacerbate existing congestion.</li> <li>▪ No Traffic Management Plan is provided.</li> </ul>	<ul style="list-style-type: none"> <li>▪ SIDRA intersection modelling has been undertaken and the results of this modelling are included within the Traffic Impact Assessment submitted with the Development Application. The modelling confirms that the key surrounding intersections all generally operate with Level of Service (LoS) A, with the exception of Avoca/Stanley Street in the afternoon peak period that operates with a LoS B. The modelling demonstrates that the intersections operate at satisfactory levels of performance (LoS D is deemed unsatisfactory) with the current student population of 887 and staff population of 138 full time equivalent (FTE).</li> <li>▪ The additional student numbers will result in an additional 18 vehicle trips in the morning peak period and eight vehicle trips during the afternoon peak period. These trips would be distributed across the surrounding intersections and would have a negligible impact on the performance of the intersections, resulting in no change to their current LoS.</li> </ul> <p>To reduce the reliance on private vehicles for staff and students and to supplement the existing school initiatives including the go with the flow programme, a Green Travel Plan will be prepared by the School to promote the use of sustainable transport modes.</p> <ul style="list-style-type: none"> <li>▪ An Operational Transport and Access Management Plan (OTAMP) will also be prepared by the School to ensure measures for pedestrian safety are maximised. The OATMP will likely include a detailed review of pedestrian analysis, pick-up and drop-off management arrangements, bus/coaches and service vehicle management and additional traffic management measures.</li> </ul>

### Built Form

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| <ul style="list-style-type: none"> <li>Proposed building height, bulk, scale and design does not respect/is not consistent with existing streetscape and surrounding areas.</li> <li>Proposed building will increase shadow in the area and reduce solar access for several adjacent and nearby properties.</li> <li>Lack of greenery near the school reduces visual amenity and shade, especially with increasing built form and hardscaping.</li> <li>Proposed new building should have a greater setback to allow tree planting, improved solar access and better integration with nearby residences.</li> <li>Ongoing developments are affecting residential amenity.</li> </ul> | <ul style="list-style-type: none"> <li>The amended design includes the adaption of the existing Adler Building and maintains the overall external shell and internal structural elements with a second-floor addition and a ground floor extension.</li> <li>The amended design comprises alterations and additions to the existing Adler Building, and maintains the overall external shell and internal structural elements with a second-floor addition and a ground floor extension to the adjoining D&amp;T building. An open lightweight bridge connection is also proposed to the adjoining D&amp;T building at the second-floor level to allow for egress and utilise most of the existing space within the Adler building for classrooms rather than wasting space for the required second egress stairs.</li> <li>The amended design purposefully locates the bulk and scale away from Chepstow and Stanley Streets, with the second-floor level setback by approximately 5m from Chepstow Street and 7.7m from Stanley Street.</li> <li>The amended design provides for articulation within the façade, with the existing openings within the Adler Building enhanced and additional openings in the new built form incorporated.</li> <li>An amended landscape plan has been provided (Appendix 8) which details additional planting between the built form and Chepstow and Stanley Streets. Planters are proposed to grow across the building to provide a soft green edge to the building.</li> <li>The proposed second floor addition has increased setbacks to reduce the visual bulk of the building from neighbouring properties. The façade of the proposed addition uses windows to provide greater articulation and variation to the building. Additionally, the use of parapets and 'expressed floor edges' provides horizontal articulation to the building.</li> <li>Elevational shadow diagrams have been provided and demonstrate there is very little additional overshadowing caused as a result of the proposal. Additional overshadowing is limited to between 8am and 9am on 21 June to properties at 15, 11 and 11A at Stanley Street only. At 8am the additional shadow cast falls along the northern facades of these properties but by 8:30am the additional shadow cast is restricted to the ground and the front gardens and driveways of these properties. These</li> </ul> |
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	<p>properties receive direct sunlight from approximately 9am – 5am on 21 June.</p> <ul style="list-style-type: none"> <li>▪ The proposal results in additional overshadowing to 34 Stanley Street at 4pm on 21 June. Again, the additional overshadowing is limited in duration and the property enjoys sunlight from approximately 8am – 3:30pm.</li> </ul>
<p><b>Traffic Report</b></p> <ul style="list-style-type: none"> <li>▪ Revised traffic report should be submitted to address concerns such as student numbers, local road network congestion and parking and to consider recent developments in the area which increase population.</li> <li>▪ Did not consider external events held on the school grounds which use on-street parking, nor did it consider school activities outside of school hours.</li> <li>▪ Consider Market Street, Ethne Street and Astolat Street in report.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The TIA together with the Traffic Response letter prepared by Traffix addresses concerns relating to congestion, traffic and parking.</li> <li>▪ The school conducts out of hours school activities on an infrequent basis that generally involve a minor proportion of the existing school population. In the lead up to any out of hours school activities, the school will continue to undertake 'letter drops' for the neighbouring properties that provide the following information: <ul style="list-style-type: none"> <li>▫ Date and time of the event;</li> <li>▫ Description of the event;</li> <li>▫ Expected times of additional volumes of traffic in the area;</li> <li>▫ Outline of measures taken to mitigate the impact of additional traffic;</li> <li>▫ Contact details of event organiser or link to website for further information; and</li> <li>▫ School contact information.</li> </ul> </li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>▪ Proposal will adversely impact on both the North Randwick Heritage Conservation Area and the State-heritage listed school site, especially regarding views, materiality and scale.</li> <li>▪ Heritage report does not consider visual impacts on North Randwick Heritage Conservation Area.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Meetings were held with Heritage NSW and Council's heritage planner, in which an appropriate design outcome was determined. Refer to the heritage response provided above in Appendix 2 and to the addendum to the Heritage Impact Statement at Appendix 9 for further detail.</li> </ul>
<p><b>Community Consultation</b></p> <ul style="list-style-type: none"> <li>▪ No community consultation has occurred.</li> <li>▪ Condition 11 of Consent for DA/181/2009 required community surveys to inform traffic and parking considerations. This has not been undertaken.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Community consultation has been undertaken in accordance with the public notification policy contained in the Randwick DCP. Unfortunately, due to COVID-19 and the restrictions placed on face-to-face meetings, additional consultation in the form of mediation was not possible.</li> </ul>

	<ul style="list-style-type: none"> <li>Pursuant to the requirements of Condition 11, a comprehensive Traffic Management Plan was prepared and submitted to Council in April 2011.</li> </ul>
<b>Noise</b> <ul style="list-style-type: none"> <li>Increase in student numbers will increase noise impacts on nearby areas.</li> <li>Building design does not reduce the noise generated by students (i.e. unenclosed terraces/balconies).</li> </ul>	<ul style="list-style-type: none"> <li>The amended design locates the outdoor terrace areas at ground and first away from the adjoining residential streets and towards the centre of the School site.</li> <li>As confirmed in the Acoustic Response prepared by Wilkinson Murray at Appendix 5, the proposed elevated walkway and increase in student numbers will have minimal impacts on the nearby residences.</li> </ul>
<b>Master Planning</b> <ul style="list-style-type: none"> <li>Lack of overall strategic planning for growth adversely impacts the community and surrounding area.</li> <li>Masterplan for the school should be shared with the community.</li> </ul>	<ul style="list-style-type: none"> <li>The School has completed all development works associated with its previous masterplan (DA/181/2009). The School has identified an additional opportunity which was not contemplated under the previous masterplan to redevelop the existing Adler Building in the southwestern corner of the site. The proposed redevelopment of the Adler Building and landscaping works will provide contemporary, high quality and flexible indoor and outdoor learning spaces improving the overall quality of the learning facilities provided at the school, without greatly increasing the student capacity. The new building will also assist the School to decant parts of their main school campus in order to allow them to upgrade and improve their facilities.</li> <li>There are no further works envisaged for the School site at this stage.</li> </ul>
<b>Construction</b> <ul style="list-style-type: none"> <li>Ongoing construction causes amenity impacts for residents.</li> <li>The existing parking situation cannot provide for additional parking for contractors during construction. While the SEE states they will use public transport, the need to carry tools etc. leads to the belief that tradesman will use personal cars.</li> </ul>	<ul style="list-style-type: none"> <li>The conditions of consent will detail requirements for construction hours, construction noise and construction movements.</li> </ul>
<b>Active Transport</b> <ul style="list-style-type: none"> <li>The school should prepare an Active Transport Plan/Green Travel Plan to encourage staff, students, parents and visitors to use green and active transport to arrive and depart from the school.</li> </ul>	<ul style="list-style-type: none"> <li>A Green Travel Plan will be developed prior to the issue of an Occupation Certificate.</li> </ul>
<b>School Buses</b>	<ul style="list-style-type: none"> <li>As discussed above, an OATMP will also be prepared by the School to ensure measures for pedestrian safety are maximised. The OATMP will</li> </ul>



- School buses currently travel through the local road network, reducing safety for cars and pedestrians and amenity for residents.
- Appropriate bus bays, bus pick up and drop off areas are not provided in line with the RTA Guide for Traffic Generating Developments.

likely include a detailed review of pedestrian analysis, pick-up and drop-off management arrangements, bus/coaches and service vehicle management and additional traffic management measures.