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Dear Mr McManus,

**Re: Ku-ring-gai Council Submission – Modification 5 to Wahroonga Estate Redevelopment Concept Plan (MP07\_0166 MOD 5) Precinct B Central Church**

I refer to Ku-ring-gai Councils' correspondence with NSW Planning and Infrastructure dated 30 December 2013, relating to the Wahroonga Estate Redevelopment Concept Plan (MPO07\_0166 MOD 5). We write in response to concerns raised by Ku-ring-gai Council in the aforementioned letter, regarding perceived implications of the proposed modification of the Wahroonga Adventist School component of the Concept Plan.

This modification (MP07\_0166 – MOD 5) application seeks to amend and update the approved Concept Plan for the redevelopment of the Wahroonga Estate, in particular Precinct B – Central Church. The modification seeks to translate the concept plan to fully designed buildings that conform to the intended use and which provide the design basis for actual construction. The concept plan was never intended to represent a detailed design. Specifically this modification does not exceed the allocated floorspace but seeks to alter the building form to better suit the needs of the school. While Council is concerned about loss of public open space and amenity, the changes in building footprints have no impact on open space provision within the Central Church Precinct. Elsewhere, the dense bushland on the Estate will still be retained and preserved under the Biodiversity Management Plan for the Wahroonga Estate.

Whilst Planning and Infrastructure shall assess the impacts of this modification on the whole site, it should be noted that this modification is independent to any previous or current modifications on the Estate. Therefore, the impacts of any other modifications have not been discussed in this response. Notwithstanding, MacroPlan Dimasi understands that NSW Planning and Infrastructure will, as always, assess any cumulative impacts of modifications to the Concept Plan to ensure that it meets the overall objectives of the approved Concept Plan.

We have responded to Councils key concerns in Table 1 below. We trust this information is sufficient to allow the Department to conclude assessment of the proposed modification. Please do not hesitate to contact our office if you require anything further.

Yours sincerely,



**Patricia Docherty**  
**Senior Planning Consultant - NSW**

*Table 1: Response to Council Submission*

<b>Council Submission</b>	<b>Response</b>
Cumulative impacts of modifications on the whole site	NSW P&I will take into account any cumulative impacts this modification may have on the concept plan as a whole when making a determination regarding this modification.
Concept plan with all road, parking, pedestrian, approved and pending modifications and as-built information.	This modification seeks to only change the School and Precinct C footprints, although it is inherently connected to the larger Estate, it will not have a significant impact on the rest of the concept plan. Previous modifications have already been through the assessment process and approved by NSW P&I, or are currently being assessed.
Pedestrian and Cycle network diagram	The pedestrian and cycle network remains largely unaltered due to this modification.
Drawing s75W-02– Figure 45(a) Precinct B – Central Church revised	This drawing replicates the ‘Figure 45 - Precinct B: Central Church’ diagram in the Final PPR, which also did not include any section marker indicators.  Please refer to updated drawings S75W-01, S75W-02 and S75W-03 as vehicular and pedestrian access has now been included.
Drawing s75W-04 – Figure 68(A) and 69(A) Site sections	Figure 68(A) – Section 6 in the final PPR (Preferred Project Report) is still current. The section 6 diagram included on drawing S75W-04 is an additional site section. In order to clarify these matters, Figure 68(A) – Section 6 on drawing S75W-04 has been renamed as Figure 68.1 – Section 6a. This section does not have dimensions as the future road reserve has not been fully designed in detail.  Figure 69 (A) – Section 7 on drawing S75W-04 is in the same location as Figure 69 – Section 7 in the Final PPR, but has been expanded to include more of the School and Residential sites.  An additional section has been included to show the section from Fox Valley Road through the site to the bushland. Please refer to drawing S75W-04a.
Architectural Design Statement	Feasibility diagrams included in the Architectural Design statement demonstrate initial consideration given to the Precinct layout. Following feedback from NSW P&I this has been further interrogated through an additional design review process, which looks at the potential broader residential layout in Precinct B. This considers new potential residential building footprints which better support the amenity of the School and future residential uses.  In the initial feasibility study, the location of the APZ had not been accurately established at the time, with ‘best and worse-case’ scenarios shown. Where indicated, non-compliance with the APZ is due to the building footprint encroaching over the APZ line.  ‘Reduced Setbacks’ where noted, indicates minimal setbacks to the road reserve for a particular feasibility option tested in the context (Note: the original Concept Plan layout for the residential sites, when tested for feasibility, also contained several ‘reduced setbacks’).  The single large building footprint in the feasibility options is the result of testing the yield objectives of the Concept Plan (200

	<p>apartments) within the context of the site constraints, the requirements of SEPP 65, and apartment mix etc.</p> <p>Solar access for the feasibility options has been considered in relation to the requirements of SEPP 65, and has been applied consistently for each option.</p> <p>Diagram 4 is a site section taken through Stage 1 of the School which is the centre of the site. This diagram has been included in the part of the Architectural Design Statement discussing the Middle School, which is Stage 1. Diagram 5 shows an aerial view of the site with all stages and reflects the site section represented in Diagram 4 taken through Stage 1.</p> <p>The separation shown on the diagrams indicates separation requirements for future residential development in relation to SEPP 65 (as noted in the Legend at the top of the drawing). This would be subject to a further design review at the development application stage.</p>
Building Footprints	<p>Building footprints respond to the requirements of the built form of the School buildings, as the original Concept Plan was indicative only. This was addressed in the Architectural Design Statement prepared by Stanton Dahl Architects, which discusses the choice of building footprints in more detail. NSW Planning and Infrastructure has always anticipated that refined building designs would come forward,</p> <p>Specifically, the purpose of the modification is to remove any confusion regarding compliance with previously annotated building footprints and configurations for intended development located within the Central Church precinct. This modification does not seek any additional floor space.</p> <p>The need for modifications to indicative footprints is essential to respond to the detailed design requirements of the site and the layout of the adjoining road. These necessary modifications have been anticipated for some time. The DP&amp;I Director General's Environmental Assessment Report of MP07_0166 dated March 2010 states:</p> <p><i>"It is recommended that a further assessment requirement apply to any Concept Plan approval issued indicating that the building footprints are indicative only and to be finalised through detailed assessment of project or development applications" (Pg. 17 Para 2).</i></p> <p>This statement clearly outlines that the building footprints originally used in the Concept Plan are indicative, and that during the development application stage for each project further assessment of these are necessary, which largely negates the concerns Council has with regard to modifying building footprints.</p>
Site boundaries	<p>Site boundaries have been modified due to the realignment of the road to ensure that an existing easement is not negatively impacted. APZ requirements for buildings were to be met as the School required an indoor multi-purpose facility.</p>
Playing Fields & Open Space	<p>The visual connection to the playing fields from the school campus site is stronger than in the previous Concept Plan. The provision of open space on the school site is adequate for the purposes of the School and will be further addressed at the development application stage. They do not encroach or impact the protected bushland.</p>

	<p>The reduced street frontage while minimal (75% of original) will be advantageous in increasing student safety. The playing field location reflects the APZ requirements of the site. The distance from the School to the Playing fields remains unchanged by this modification.</p>
Basement Parking	<p>Basement parking is a requirement of the Concept Plan. It will still allow deep soil planting to the north western edge of the school. Most of the landscaping for the school will be grass and as such the basement should not impede on this provision.</p> <p>The encroachment into the front setback by the basement parking is a small zone of underground rain water tanks and on-site detention tanks.</p>
Parking and Traffic	<p>Traffic flow is outlined in the Vehicle Movement Diagram that was submitted with the modification.</p> <p>The layout and road width allows for buses to pick up and drop off on Fox Valley Road outside the school.</p> <p>The Deed of Agreement for road work is currently being reviewed for finalisation and as such more detailed information regarding traffic cannot be determined.</p>
Residential	<p>The residential development, indicated in Precinct B Central Church on the Concept Plan, will be designed after the State Significant Development Application for the K-12 School is assessed.</p> <p>Access to future residential buildings in Precinct B, is indicated on drawing S75W-02. Open space for a pedestrian spine is still accommodated along the School boundary with the adjoining residential land, as it is in the approved Concept Plan. Access to and between these buildings will also be considered in future detailed design of the residential development. The new access road off Fox Valley Road still serves the residential land and internal road.</p> <p>Increased opportunities for deep soil landscaping at the south west of the residential site are brought about by the removal of the shared access driveway off the lane between the existing church and school. Deep soil areas outside of the School basement footprint can support planting along the north western boundary of the school site and between the school and residential buildings. This is shown in the revised Concept Plan - Precinct B Plan.</p> <p>Residential development in Precinct B will be designed in coming years and will meet relevant design requirements (currently SEPP 65). This accommodation will support the number of dwellings approved for Precinct B in the Concept Plan and all relevant design requirements, such as building separation distance, will be considered during the design phase.</p>
Other	<p>Other concerns that Council raised reflect issues that will be further explored and detailed at the design and development application phase and shall be assessed in the State Significant Development Application, which will be formally submitted after this modification is determined.</p>