

International Chinese School State Significant Development SSD-10260

14 April 2020

Agency Submissions

Number	Submission	Response
The Department of Planning, Industry and Environment		
1	<p>Heritage The RtS is to address the comments made in relation to the impacts of the proposed development on the state heritage item discussed in the NSW Heritage Council and Willoughby Council's submission.</p>	<p>A response to the submission from the NSW Heritage Council and Willoughby Council submissions is provided below.</p>
2	<p>At present, a single vehicle access point is provided to the site from the existing driveway through Council's car park and the intensity of use of the approved office use on the site would be significantly lower than the proposed school use. The proposed use of the site as a school with up to 210 students would rely heavily upon the alteration and ongoing and frequent use of The Avenue by pedestrians and vehicles resulting in an intensity of use which would negatively impact the nature, character and setting of the state heritage item and its use by the broader public.</p>	<p>Willoughby Council have approved the redevelopment of the site from a single storey building to a two-storey building with basement parking. This larger development supports an increase of activity of the Sextons Cottage site and The Avenue and will increase the daytime population of the site.</p> <p>The proposed use of the site is consistent with the Gore Hill Cemetery Plan of Management (POM), which recognises the need for activation of the Cemetery. The increased activity of heritage places enhances a public appreciation and understanding of the place which ensures an ongoing desire to see heritage places retained and conserved. The increased activity is in alignment with the strategic objectives of the Gore Hill Cemetery POM and does not alter the significant fabric, character or setting of the place.</p> <p>By having an educational establishment on the site, a role can be played in encouraging and enabling the youth to actively participate and learn about the importance of heritage conservation and revitalisation. Students will become informed about heritage through deliberate focus in school curricular, and further practical engagement through the school's proximity to the Gore Hill Cemetery will promote greater appreciation of heritage sites. The Schools teaching programs will increase student awareness of the history of the site and will foster student's appreciation and understanding of the history and heritage of the area, which will ultimately contribute to further preservation efforts.</p>
3	<p>The Department considers that the extent of proposed paving for the five 'Kiss and Drop' spaces shown on drawing No. SSD01 and its proposed charcoal colour would significantly alter the appearance and visual consistency of The Avenue resulting in significant impacts on the physical and visual character of the state heritage item. The Department is concerned that the Heritage Impact Statement (HIS) prepared by 'NBRIS Architecture' has not accurately ascertained the extent of new paving proposed and has not therefore provided a proper assessment of heritage impact. The Avenue currently contains a combination of paving, soft gravel</p>	<p>The existing pavers and paving layout dates from the 1970s and is not considered a significant design element of The Avenue.</p> <p>The colour of the new paving has been reconsidered and is now shown in the revised Site Plan. It provides a similar colour material to the existing 1970s paving. The retention of existing paving retains the visual uniformity of paving along the length of The Avenue.</p>

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	and grass in uniform proportions along the majority of its length towards to north. Drawing No. SSD01 incorrectly notates the area of soft gravel and grass adjoining the pedestrian pathway as 'line of existing paving'. The HIS states that proposed works include "re-laying of existing paving". This description is inaccurate as the soft gravel and grass is proposed to be replaced with charcoal coloured paving bricks, resulting in a fully paved area between the school site and Council car park which significantly departs from the character of the ground surface treatment along the remaining length of The Avenue.	The outline of the existing paving is defined by a brick header course where it abuts the new paved area. The new paved area is in an area of gravel with limited seasonal grass growth due to heavy shading and no reticulation. It extends the area of full-width paving at the southern end of The Avenue. The revised Site Plan at Appendix B clarifies the extent of existing and new paving. The landscaped border with existing mature trees is retained between The Avenue and the Council carpark retaining principle design element of The Avenue as a tree-lined boulevard.
4	Further, although indicated on drawing No. SSD01, the EIS has not discussed the proposed paving works to The Avenue in full detail.	Noted. A civil engineering report and sketches are provided for within Appendix F which outline the paving works in further detail.
5	The HIS notes that part 3.3 of the Gore Hill Memorial Cemetery Plan of Management (POM) requires that vehicular access on The Avenue be restricted to maintenance vehicles only and for access across The Avenue to the site's car park (from the existing car park driveway). The HIS then asserts that the vehicular use of the 'Kiss and Drop' area is supported by the POM as it provides access to the site. This is an incorrect interpretation of the POM as the existing access across The Avenue to the site is through the existing 'two way' driveway opposite the site's carpark entrance. The construction of an additional driveway into The Avenue to provide 'one way' access to a new 'Kiss and Drop' area and a 'one way' exit through the existing driveway would introduce new vehicular movements along and through The Avenue, in contrast to the current arrangement where access to the site requires vehicles to traverse across The Avenue. Further, the intensity of use of the 'Kiss and Drop' area during morning and afternoon peaks is at odds with the intent of the POM, which aims to minimise vehicle use and impacts within The Avenue and on the state heritage item. The RtS should include an addendum to the HIS which addresses the above.	<p>The POM Strategy and Action - Infrastructure item 3.3 establishes vehicular access is to be maintained to the Sextons Cottage site. It does not limit this access to a single point or explicitly prohibit development.</p> <p>The POM provides precinct plans for development in the burial areas but no specific guidance for development of The Avenue or Sextons Cottage. It does however explicitly support the increased activation of the cemetery in order to facilitate the ongoing conservation and maintenance of the place.</p> <p>The additional single driveway required for the Kiss and Drop function does not detract from the dominant physical element of the tree-lined boulevard. It is limited to a short length of The Avenue adjacent to Sextons Cottage, Gardener's Shed, Pacific Highway, the Council carpark, Gore Hill Park Sporting Complex and the children's playground. This area is currently the most active area of The Avenue. It is currently subject to regular vehicular traffic and informal carparking.</p> <p>The proposed use of the area is limited to short morning and afternoon drop-off and pick up times which occur on less than 55% of days in the year. This limited use is not considered to at odds with the POM strategic goals to both limit vehicular access and to provide activation of the cemetery to provide financial support for its ongoing conservation.</p>
6	A second building identification sign is shown on drawing No. SSD01 to be constructed adjacent to the pedestrian entrance on The Avenue. The EIS and HIS document one sign only and the second sign facing The Avenue has not been considered in the HIS or EIS with respect to its visual impact to the state heritage item. Further, the sign appears to be located in an area which is currently provided with dense shrubs. Clarification of the number of signs proposed and the potential heritage impact of an additional sign facing the Avenue should be addressed in the RtS. This should include any details of vegetation impact.	<p>The heritage assessment included at Appendix D outlines that both proposed signs will have a negligible heritage impact by not detracting from the heritage significance of the place.</p> <p>An assessment of vegetation impacts from the proposed signage has been provided for within an Arboriculture Statement prepared by Mark Bury at Appendix G. The report outlines that the proposed works will not have any adverse impacts on the existing shrubbery, with the exception of required light pruning when necessary.</p>
7	Loss of Parking Spaces The loss of three parking spaces in the existing car park poses concern given the car park was recently redeveloped to cater for the needs of current and future users of the park and its associated facilities. Although it	The amended development includes the reinstatement of the loss of three car parking spaces as a result of the construction of the kiss and drop road within The Avenue. The development will accordingly not result in the loss of any public car parking spaces but rather the provision of an additional 15 off-

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	<p>is noted that a car park study showed sufficient vacancy during proposed morning and afternoon school peak hours to accommodate expected parking demand generated by the school, the future development of the park and its facilities identified by Council raises concern regarding potential for land use conflict associated with the operation of the school use and the future increased reliance and usage of the car park. In particular, the future sports facility development on the south end of the park adjacent to the car park will create additional demand for car park use throughout the day. Further, the car park study was undertaken soon after the redevelopment and re-opening of the park and oval and may not present accurate current usage rates. The departments shares the concern of council and that in public submissions, that the survey does not accurately reflect current usage of forecast parking demand for the public open space areas.</p>	<p>street parking spaces (five within The Avenue and 10 within the development undercroft parking area). Refer to Appendix C for details of public parking within the site on weekends.</p> <p>In response to the concerns surrounding accuracy of the parking demand, a further parking study was undertaken between the 3rd and 9th of December, inclusive. The results indicate that there is sufficient capacity within the car park to cater for some additional demand. Furthermore, the school will be governed by a Traffic Management Plan which provides the aim of ensuring that the school does not generate additional demanding within the adjoining Council car park. Refer to Appendix C for detailed results of the parking survey and Appendix H for the Traffic Management Plan.</p> <p>The proponent agreed with Council to enter into a Deed of Agreement that will resolve any potential future land use conflicts regarding the future increased reliance on the car park, particularly during the construction of the Gore Hill Indoor Sports Facility. This Deed of Agreement will protect Councils interest in the future development of Gore Hill Oval. The proponent has prepared a temporary Statement of Operation located at Appendix J, which outlines the interim management strategies to be enacted when or if the Gore Hill Oval Carpark becomes unavailable, particularly in relation to the construction of Gore Hill Park Indoor Sports Facility.</p>
8	<p>The future redevelopment and increased use of the park has not been considered in the EIS with respect to the loss of three car spaces and how increased reliance on the car park in the future may impact upon the operation of the school's drop off and pick up operation. The Department notes the EIS has presented the option for use of the five proposed 'Kiss and Drop' spaces by the general public to address the loss of three parking spaces. This is not considered an appropriate solution given the heritage impacts discussed above.</p>	<p>Refer to Item 7 above regarding a Deed of Agreement and a temporary Statement of Operations (Appendix J) to address the future reliance on the car park.</p> <p>The Heritage report prepared by NBRS (refer to Appendix D) demonstrates that increased vehicular activity within the Avenue has acceptable heritage impacts and is consistent with the Gore Hill Cemetery Plan of Management.</p>
9	<p>The RtS should include an assessment of potential parking demand and cumulative impacts associated with the use of the proposed school, existing and proposed facilities in the park. Further, the RtS should include an updated car park study which includes data over two separate weeks outside of school holidays to show the current car park usage rates.</p>	<p>In response to The Departments concern, a further parking study was undertaken between the 3rd and 9th of December, inclusive. Refer to Appendix C for the survey results which indicate sufficient capacity within the Council car park during school pick up and drop off times.</p>
10	<p>Reliance on external open space/play area The EIS recognises the site has limited open space and details the proposed use of Gore Hill Park and oval to address the lack of open space on site. However, it is noted that Council cannot guarantee the continued use of Gore Hill Park and oval for school outdoor play use and that the use of the park and oval by the school may conflict with and unfairly limit the use of the park and oval by public users and other groups.</p> <p>The Department is concerned that despite a number of meetings between Council and the applicant, to date, no agreement has been met with respect to the permanent ongoing use of the park and oval by the school.</p>	<p>Following an open space survey, a Lunchtime Play Management Plan (refer to Appendix I) has been established to prevent any potential adverse impacts on the public use of Gore Hill Oval.</p> <p>We also highlight that the maximum student number for the School has reduced from 210 to 160. Firstly, we highlight that the maximum student number for the School has been reduced from 210 to 160. It should also be noted that following ongoing negotiations with Council since the exhibition period, Council is satisfied and has granted consent for the use of the oval for a period of 5 years.</p> <p>The proponent respects that other schools and organisations have the right to use the oval and ancillary facilities within the Gore Hill recreational area. The School will employ a marshal, who will monitor the level of public usage on Gore Hill Oval prior to lunch breaks in order to identify the most suitable spot to</p>

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	The uncertainty of viable outdoor play area for up to 210 students at EIS stage is of significant concern to the Department.	<p>take the children that will minimally impede on public use. In instances where the Oval and adjacent facilities are too busy, students will be required to stay on site at the school for lunch.</p> <p>Where there are prolonged periods of high public demand, the School proposes to bus the children twice a week to a nearby oval or park such as Naremburn Park for lunch breaks.</p> <p>It should be acknowledged that there are no statutory open space requirements at schools and that the use of public areas for lunch time play is no longer a unique circumstance.</p> <p>In the event that the ICS chooses to use the oval for sporting activities and school related events outside of usual lunchtime hours, bookings will be made accordingly through Willoughby City Council.</p>
11	<p>Open space on site It is understood that the on-site open space is to be used when the park and oval cannot accommodate student play. The size and location of the open space adjoining the Pacific Highway has been highlighted as an issue with respect to the impact of noise and pollution and area per student.</p> <p>The RtS should include an acoustic report prepared by a suitably qualified consultant which assesses noise levels in the proposed area of open space at the times proposed for outdoor use of the area. Any recommendations of the report should be addressed in the RtS.</p>	It is increasingly common for schools to be located on State Roads, and it is recognised that there are amenity implications associated with such circumstances. Notwithstanding this, it is proven recreational spaces are still able to adequately operate in these settings. An acoustic plan prepared by Acoustic Logic outlines that the proposed recreational area will be able to efficiently operate and support student play, but with a reduced amenity. See Appendix E for further details. It will be the responsibility of the school to stage its timetable to manage the use of its open space area.
12	<p>Traffic and Parking TfNSW (RMS) are yet to provide their advice in response to the exhibition of the proposal and have indicated they will provide comment by 7 November 2019. Advice received by the Department will be forwarded as supplementary advice to this request.</p> <p>Notwithstanding the above, Council have highlighted past issues raised by TfNSW (RMS) and the concerns of Council's Traffic Section. The Department requires that the issues raised be addressed, however, it is suggested that any response to issues raised in Council's submission be delayed until TfNSW (RMS) have provided comment.</p>	A response to RMS and Council's Traffic Section is provided below in Items 64 to 69 .
13	<p>Vehicular Access It unclear how the vehicle accessible paved areas that form part of the development, have been or will be constructed to an engineered specification that is consistent with required pavement standards. Details of pavement construction to be provided.</p>	Civil engineering sketches and details have been provided under Appendix F .
14	Owners consent and registration of use of land on title	A Deed of Agreement is currently being entered into between the proponent and Council, which once complete will enact owners' consent.

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	Council has not provided owners consent for works proposed to Council's carpark. Should the proposal be supported, written owner's consent is required in writing prior to the issue of consent.	
15	Legal and ongoing use of land owned or managed by Council Provided details of how the use for access by the school over council owned, or managed land is to be registered on title, including all easements over all relevant lands.	The Deed of Agreement being entered into between Council and the School will address the use and management of land between the parties.
16	Consistency of Plan of Management Provide details of the proposal's consistency with the Gore Hill Park Plan of Management	The purpose of the Gore Hill Park Plan of Management is to encompass changes to the Concept Plan. A review of the proposed development against the PoM shows that the proposal is consistent with the plan and does not impede against any purposes and objectives outlines within the document. The proposed development does not prevent the uses of the land from being achieved under section 2C and is consistent with both the zone and council objectives under section 5b and c. Section 6 of the PoM outlines the performance targets for Gore Hill Park. The proposed development does not interfere with these targets from being achieved. It is noted that Section 4 of the PoM identifies access and safety issues with regard to access to Council's car park from the Pacific Highway. The proposed development contributes to improving this issue and serves a public benefit through the construction of a deceleration lane to the Council car park. This improvement will be particularly beneficial for Stage 2 redevelopment plans of Gore Hill Oval and will generally improve accessibility arrangements to the Park.
17	Provide details of the proposal's consistency with the Gore Hill Memorial Cemetery Plan of Management.	The proposed development and use of the site is consistent with the Gore Hill Memorial Cemetery Plan of Management. The heritage response at Appendix D demonstrates that the proposal is in alignment with the strategic objectives of the Gore Hill Cemetery POM and does not alter the significant fabric, character or setting of the place.
Willoughby City Council		
18	a) Appropriateness of site for proposed use It is acknowledged that finding an appropriate school site has proven to be difficult. The proponent has provided details to this effect. However these difficulties aside, the merit of establishing a school on this particular site must be convincingly established. On that point, Council officers are concerned regarding the appropriateness of a school on this very constrained site located adjacent to an extremely busy State road with an anticipated student number of 210. It is suggested that this site is far from ideal for a school with this number of students. It could be that a lower student maximum number may be more acceptable, however we understand this is not an aspect of the proposal open to negotiation.	In considering the appropriateness of the site, it is important to recognise current redevelopment of Sextons Cottage into a larger building is already altering the physical context and will also provide for an intensified use of the use of the site. The purpose of the building within the Cemetery is to provide on-going revenue for the Northern Metropolitan Cemeteries Trust to support the maintenance of the State heritage listed cemetery. Prior to the Schools involvement, the site had been unleased and on the market for two years, demonstrating that an office use in this location has low desirability and, unlike the proposed school, was not fulfilling its purpose to fund the on-going conservation needs of the heritage listed Cemetery. Schools in dense urban areas are more frequently facing open space constraints due to the increasing unavailability of open space in inner city areas. Accordingly, this is seeing an increase in the movement to 'vertical' schools and while this is not a viable option for the proposed SSDA, a vertical school would still face similar site constraints regarding access, parking and open space to that of the proposed development at 211 Pacific Highway. Accordingly, given the significant growth in St Leonards and

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	<p>The much lower impact uses that have existed previously on this site, such as architectural offices, are viewed as far more appropriate when considering the particular constraints presented by the site.</p>	<p>surrounding areas, alternate models of schools need to be considered to meet the strategic direction set out in the North District Plan of making St Leonards a 'Health and Education Precinct'.</p> <p>In response to ongoing negotiations with Council, the Proponent has agreed to reduce the maximum student number of the school from 210 to 160.</p> <p>As demonstrated in the table below, with the proposed enrolment of 160 students, the International Chinese School will remain the smallest mainstream school in the Willoughby Council LGA.</p> <p>Local schools are experiencing significant growth (up to 84%) due to increased high-density residential development in the area. This upward pressure on school enrolments will continue due to plans for increased high-density accommodation. The International Chinese School will provide some relief from enrolment pressure in other local schools.</p> <table border="1" data-bbox="1043 616 1816 1382"> <thead> <tr> <th>School</th> <th>Type</th> <th>Enrolment</th> </tr> </thead> <tbody> <tr> <td>Chatswood High</td> <td>7-12</td> <td>1513</td> </tr> <tr> <td>Chatswood PS</td> <td>K-6</td> <td>1291</td> </tr> <tr> <td>Artarmon PS</td> <td>K-6</td> <td>1175</td> </tr> <tr> <td>St Pius X College</td> <td>5-12</td> <td>1131</td> </tr> <tr> <td>Willoughby PS</td> <td>K-6</td> <td>1046</td> </tr> <tr> <td>Roseville College</td> <td>K-12</td> <td>965</td> </tr> <tr> <td>Willoughby Girls High</td> <td>7-12</td> <td>951</td> </tr> <tr> <td>Cammeray PS</td> <td>K-6</td> <td>920</td> </tr> <tr> <td>Lindfield PS</td> <td>K-6</td> <td>837</td> </tr> <tr> <td>Roseville PS</td> <td>K-6</td> <td>646</td> </tr> <tr> <td>Mercy Catholic College</td> <td>K-6</td> <td>641</td> </tr> <tr> <td>Mowbray PS</td> <td>K-6</td> <td>595</td> </tr> <tr> <td>Anzac Park PS</td> <td>K-6</td> <td>569</td> </tr> <tr> <td>St Thomas Catholic School</td> <td>K-6</td> <td>335</td> </tr> <tr> <td>Our Lady of Deloures</td> <td>K-6</td> <td>310</td> </tr> <tr> <td>International Chinese School</td> <td>K-6</td> <td>160 (proposed)</td> </tr> </tbody> </table>	School	Type	Enrolment	Chatswood High	7-12	1513	Chatswood PS	K-6	1291	Artarmon PS	K-6	1175	St Pius X College	5-12	1131	Willoughby PS	K-6	1046	Roseville College	K-12	965	Willoughby Girls High	7-12	951	Cammeray PS	K-6	920	Lindfield PS	K-6	837	Roseville PS	K-6	646	Mercy Catholic College	K-6	641	Mowbray PS	K-6	595	Anzac Park PS	K-6	569	St Thomas Catholic School	K-6	335	Our Lady of Deloures	K-6	310	International Chinese School	K-6	160 (proposed)
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		<p>In reference to the comment of locating a school adjacent to a state road, it should be acknowledged that there are numerous schools across Sydney that operate on a major road without known adverse implications. Notwithstanding this, an amended acoustic report prepared by Acoustic Logic included at Appendix E outlines the negligible impact of the proposed school's location next to a State Road.</p> <p>Constraints identified regarding use of public open space and traffic and parking have been further discussed in the below responses.</p>
19	<p>b) Proposed works in the public car park Gore Hill Park (the Park) is a Crown Land reserve. It was originally part of a 140 acre parcel dedication for public recreation in 1869, with Willoughby Council as the Trustee.</p> <p>Council has not consented to any works within the public carpark. The Council takes its responsibilities regarding the care and management of the Park seriously, providing as it does an important component of regional Public Open Space. To this end, Council has been involved in significant improvements to the Park, with some work having been carried out and future works identified. The carpark plays an important function for people accessing the Park directly from the Pacific Highway, and for those using current facilities on the western side of the park such as the children's play area, basketball court, amenities and change rooms. Future works (Identified as Stage 2 in the redevelopment of the precinct) will involve a multi-purpose indoor sports facility, which has vehicle access via the Pacific Highway and public carpark.</p>	See Item 21, 22 and 24 below.
20	It is understood that the works proposed in the public car park as part of the SSD are intended to limit adverse impacts within the car park and the Pacific Highway, with regards to the proposed school. Notwithstanding the intentions of the proponent to minimise the impacts of the school use, there is concern with:	<p>It is acknowledged that the proposal involves an intensification of the approved use of the Council car park associated with the implementation of a formalised student set-down / pick-up area within The Avenue. It is however proposed that the intensified use be managed through the implementation of a Traffic Management Plan. Details of this plan are contained within Attachment 4 of Appendix C which provides the following specific objectives:</p> <ul style="list-style-type: none"> • To ensure that formalised student set-down / pick-up arrangements do not unreasonably impede public vehicle access / egress movements within the Council car parking area; • Address potential safety issues associated with the proposed normal daily school start and finish traffic operations; and • Maximise the efficiency of the set-down / pick-up area, thereby ensuring that parking demand associated with student set-down / pick-up does not occur within the adjoining Council car parking area. <p>Further to the above, the application in its amended form, facilitates the following public domain improvements:</p>

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		<ul style="list-style-type: none"> • The construction of a dedicated deceleration lane within the eastbound Pacific Highway carriageway specifically servicing the Council car park, thereby improving the existing level of safety and efficiency with which motorists are able to access the car park; • An increase in the off-street passenger vehicle parking yield of 40% over and above that currently facilitated by the Council car park, through the following measures: <ul style="list-style-type: none"> - The provision of five additional off-street parking spaces within The Avenue which will be available for public use on weekday evenings and weekends; and - The provision of a further 10 off-street parking spaces within the development undercroft parking area which will be available for coaches and ground staff affiliated with the use of Gore Hill Oval during weekday evenings and weekends. <p>It is expected that the proposal will result in substantial public benefit during the peak operational periods of the Gore Hill Oval (being weekend evenings and weekends). Furthermore, the amended development plans provide for the reinstatement of the three public parking spaces within Council car parking area.</p> <p>An additional temporary Statement of Operations is included at Appendix J. This document outlines the temporary management strategies which will apply to minimise the impact of school related traffic in the event where there is temporary closure of the public parking area.</p> <p>It should also be noted that a phone survey of the other schools in Willoughby found that none of the schools provided on-site car parking for parent drop offs. The proposed approach is therefore consistent with that adopted for the other schools in Willoughby. It is further noted that Willoughby Council does not provide explicit requirements for off-street set-down / pick-up infrastructure to be provided. The off-street parking requirements prescribed within Council's Development Control Plan are exceeded by the proposed on-site basement parking provision.</p>
21	<ul style="list-style-type: none"> • Reliance on the public carpark (which primarily serves Gore Hill Oval and Park) to access the proposed new drop off arrangement in The Avenue • The loss of three regular use car spaces, easily accessible and visible as part of the car park, to provide a second access point to serve the proposed school. 	<p>It is acknowledged that the proposal involves an intensification of the approved use of the Council car park associated with the implementation of a formalised student set-down / pick-up area within The Avenue. The use of the Council car park will be managed through the implementation of a Traffic Management Plan. Details of this plan are contained within Attachment 4 of Appendix C which provides the following specific objectives:</p> <ul style="list-style-type: none"> • To ensure that formalised student set-down / pick-up arrangements do not unreasonably impede public vehicle access / egress movements within the Council car parking area; • Address potential safety issues associated with the proposed normal daily school start and finish traffic operations; and • Maximise the efficiency of the set-down / pick-up area, thereby ensuring that parking demand associated with student set-down / pick-up does not occur within the adjoining Council car parking area. <p>Further to the above, the application in its amended form, facilitates the following public domain improvements:</p>

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22	<p>The replacement of the three valuable public assets (car spaces) with a less valuable public outcome - being restricted use, less accessible and visible car spaces the subject of a more complicated arrangement. This involves lease agreements and guaranteed rights of access for vehicles both in terms of The Avenue as well as parking offered on-site.</p>	<p>The amended development plans provide for the reinstatement of the three public parking spaces within Council car parking area.</p> <p>The development will accordingly not result in the loss of any public car parking spaces but rather the provision of an additional 15 off-street parking spaces (five within The Avenue and 10 within the development undercroft parking area).</p> <p>It is acknowledged that the use of the abovementioned 15 additional off-street parking spaces will necessitate the implementation of lease agreements and guaranteed rights of access. A deed of agreement is currently being entered into between Council and the Proponent and the details of this will be provided to the Department prior to determination.</p>
23	<p>The impact on vegetation, including the root zone of adjacent trees, by constructing a second access to The Avenue to serve the proposed school. The survival of vegetation in this area, being the Gore Hill Park precinct next to a State Heritage Item, is considered an important consideration and should not be jeopardised.</p>	<p>An Arboriculture assessment prepared by Mark Bury Consulting has been provided for at Appendix G. Investigations indicate that the proposed construction methodology of the second access driveway is acceptable and will not cause any adverse impacts to the root zones of vegetation along the second entry.</p>

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24	For Council Officers, it is crucial that the primary purpose of the car park be recognized – to support the use of existing and future recreational infrastructure, and not in support of any one particular use. In addition, Council may consider other recreational uses, or a reorganization of this land in the future to support recreational uses in the City of Willoughby and the region and require flexibility in that objective.	<p>The proponent understands Council's concern on this matter; however, the school does not seek to limit the car park accessibility for its own use. To that end, offset parking of 3 parking spaces is proposed in addition to 15 additional spaces offered for public use on weekends.</p> <p>As outlined in Item 21 and a Traffic Management Plan prepared by the applicant included at Appendix H, the car park will primarily be used for access to the kiss and drop road, and parents requiring parking stay are to use the Gore Hill Upper Carparking Area when necessary. The public car park will therefore only be subject to additional vehicular patronage during school pick up and drop off periods. Accordingly, the car park will be primarily of 'public use'. Notwithstanding this, a further car park study has been conducted by Stanbury Traffic Planning and is included at Appendix C. The results from this study demonstrate that the council car park has sufficient capacity during school drop off and pick up times to cater for some additional demand.</p>
25	<p>c) Issues raised by Council's Traffic Section</p> <p>Following detailed consideration of the documentation made available in the exhibition, Council's Traffic Section have raised the following issues with this application.</p> <p>i. The volume of traffic, including other non-school uses, entering the public carpark and the impact on the Pacific Highway of potential backed up cars.</p>	<p>Following subsequent liaison with Roads & Maritime Services' officers, the application has been amended to provide for a deceleration lane to service the Council car parking area. The provision of such infrastructure is envisaged not only reduce the potential for impacts of the application on adjoining public road traffic flow during school start and finish period but also provide significant public benefit with respect to the existing and future operational demands of the Gore Hill Oval precinct outside of the operational periods of the school.</p> <p>It should further be acknowledged that the school is proposed to be strictly governed by an Traffic Management Plan which provides for the primary aim of maximising the efficiency of student set-down / pick-up during school start and finish times and thus, minimising the potential impact on the operational performance of the Council car park and the adjoining Pacific Highway. The Traffic Management Plan, which has been developed in consultation with the proponent, provides a series of site-specific operational management measures to achieve the abovementioned primary objective, including, but not limited to, the following:</p> <ul style="list-style-type: none"> • The staggering of school start and finish times; • The supervision of student set-down / pick-up activity within The Avenue; • The requirement for students to be set-down / picked-up within The Avenue and not the Council car park; and • The establishment of operational management measures to ensure that parent visitations of the school are undertaken outside of school start and finish periods.
26	ii. Use of the Gore Hill park carpark as a means to facilitate entry/exit movements to the school pick-up/drop-off area. Potential for vehicle conflict and not enough carparking spaces to accommodate peak demand periods, particularly in PM with high potential for competing demand for spaces.	Please see responses in Issues 21 and 25 . Further details are provided for within Appendix C .

Number	Submission	Response
27	iii. Inability of the drop-off/pick-up area site to adequately accommodate vehicle movements in excess of 12.5m in length (for example, a service vehicle).	<p>Due to the small student numbers and scale of the school, the drop off and pick up area will only be accommodating vehicles up to and including 8.8m long Medium Rigid Vehicle (MRV) movements and accordingly, there is no need for the requirement to accommodate a 12.5m vehicle.</p> <p>In order to assess the ability of the proposed amended circulation areas to accommodate heavy vehicles, a series of swept path plans have been prepared by this Practice, copies of which are contained within Attachment 2 of Appendix C. These plans indicate that vehicles up to and including MRVs are capable of servicing the site in a safe and efficient manner. Further details of this issue are discussed in Appendix C.</p> <p>It should be acknowledged at this point that the approved commercial building within the site could be expected to generate a regular requirement for servicing by MRVs, for which no arrangements are formalised.</p>
28	iv. Lack of disabled carpark facilities.	A single disabled parking space, providing dimensions appropriately in accordance with the relevant requirements of the Australian Standard for <i>Parking Facilities Part 2: Off-Street Parking for People with Disabilities</i> (AS2890.2:2018), is contained within the development undercroft parking area.
29	v. Pedestrian access from southern side of Pacific Highway to the school.	<p>Signalised pedestrian crossings are provided over Pacific Highway in the immediate proximity of the site as follows:</p> <ul style="list-style-type: none"> • At Greenwich Road less than 150m to the west of the site; and • At Reserve Road / Berry Road approximately 200m to the east of the site. <p>The Traffic Management Plan (refer to Attachment 4 contained within Appendix C) provides operational management measures for pedestrian movements to / from the school, whereby all pedestrian crossing movements over Pacific Highway are to occur via the abovementioned signalised crossings.</p>
30	vi. Queue lengths for left turn vehicles into the site and potential for impact on Pacific Highway traffic flow.	See response to Item 25 .
31	vii. General impact on Pacific Highway (being a State Road).	Pacific Highway is under the care and control of Roads & Maritime Services, who have undertaken assessment of the application and provided comments within a letter to NSW Department of Planning Industry and Environment dated 7 November 2019. Comments in response to this item are contained within Items 64-69 and further details are provided within Appendix C .
32	<p>d) Department of Transport (RMS) issues</p> <p>Willoughby Council has not been provided with correspondence from the Department of Transport (formerly RMS, now DoT). It is noted in the Environmental Impact Statement prepared by Ethos Urban, that the Department of Transport (DoT) has previously identified a number of issues, many consistent with issues raised by Council's Traffic Section. It is noted that DoT requested a deceleration lane to be provided on the Pacific Highway, for access to the site with this deceleration lane being constructed within the property at no cost to the DoT.</p>	<p>Following discussions with the RMS, The Applicant has proposed to construct a deceleration lane on the eastbound carriageway of the Pacific Highway (Refer to response of Item 56).</p> <p>A response to the RMS submission is made below at Items 64 to 69.</p>

Number	Submission	Response
	<p>It is also understood the proponent has deemed the deceleration lane as not required. Council is concerned regarding the impacts of the proposal on the Pacific Highway and this requirement from the DoT. It is considered that these access issues may be a clear example of this site being inappropriate for the proposed school use.</p> <p>Further comment from the Department of Transport, on the above issue and the overall application at exhibition stage, would be a crucial consideration in any assessment of this application. The functionality of the Pacific Highway cannot be understated.</p>	
33	<p>e) Heritage In terms of heritage impact of the proposal, the following points are noted: (i) The proposed 'kiss and drop' area in The Avenue is considered detrimental to the cultural landscape and visual significance of the original "Carriageway" The central spine connecting all precincts of the Cemetery. The continued use of The Avenue for regular vehicular movements which would be involved with the school notwithstanding the use of removable bollards is considered contrary to the heritage values of the Cemetery. It is also noted that the existing traffic on The Avenue is of an extremely limited nature originally designed to provide access for mourners to gravesites. The marking and signage required on The Avenue to identify the 5 drop off and pick up spaces is also considered to have an adverse heritage outcome on the cultural landscape of The Avenue.</p>	<p>It should be recognised that the redevelopment of the Sextons Cottage into a two-storey office building as well as the broader redevelopment of Gore Hill Park has altered the context of the site by creating a more active environment within the Avenue. Accordingly, the Avenue no longer serves a 'limited use' and the proposed development is fitting within the context of the changing nature and use of the Avenue and its surrounds.</p> <p>Gore Hill Memorial Cemetery POM (4.3.3) requires the installation of removable bollards to restrict vehicular movements to the area of the Sextons Cottage site. The bollards are of a sympathetic design to the heritage values of the site and do not interrupt views along The Avenue.</p> <p>The Avenue was designed for vehicular and pedestrian access being a roadway through the site from at least 1901 when it was gravelled and from 1930 when it was bituminised.</p> <p>There is no marking required on the paving of the kiss and drop spaces.</p> <p>By having an educational establishment on the site, a role can be played in encouraging and enabling the youth to actively participate and learn about the importance of heritage conservation and revitalisation. Students will become informed about heritage through deliberate focus in school curricular, and further practical engagement through the school's proximity to the Gore Hill Cemetery will promote greater appreciation of heritage sites. The Schools teaching programs will increase student awareness of the history of the site and will foster student's appreciation and understanding of the history and heritage of the area, which will ultimately contribute to further preservation efforts.</p>
34	<p>(ii) Whilst the provision of a new security fence has a heritage impact; this can be mitigated by being screened by hedging, dark recessive colour, and being an open palisade fence will allow views through the fence to the landscaped setting of the building and Cemetery.</p>	<p>The height of the security fencing to the Sextons Cottage site is 2.1m in an open palisade style. The fence will be installed behind and within the dense perimeter planting of the site. The proposed colour is dark and recessive.</p> <p>Views from The Avenue to the Sextons Cottage site are also lined with dense shrubbery behind the perimeter brick wall. The Willoughby Council approved 2 storey building currently under construction will remain visible from The Avenue and not be obscured by the addition of a security fence. The fence will neither contribute to, nor detract from, the significance of the place</p>
35	<p>(iii) Whilst the proposed internal works to the existing commercial building do not present heritage impact to the Cemetery, the change of use to the school is considered to have potential adverse heritage impact given the</p>	<p>The Avenue is not included in the State registered curtilage of the Gore Hill Memorial Cemetery and a discussion of its cultural or landscape significance does not form part of the Statement of Significance or Assessment Criteria.</p>

Number	Submission	Response
	above concern of traffic movements re "the kiss and drop" proposal in The Avenue and the physical works required to create the new driveway access and the compatibility of this work with the cultural, physical and visual character of the existing State Heritage Item.	<p>Despite this, the importance of The Avenue as the unifying visual element of the cemetery and an important component of the place is acknowledged and the design of the minor adaptation at its southern end has been designed accordingly.</p> <p>The construction of the kiss and drop area does not involve the removal of significant landscape elements.</p>
36	iv) The impact of increased traffic on the existing paving in The Avenue, and the future implication regarding repairing and reinforcing this road. It should be noted that the existing traffic on The Avenue is of an extremely limited nature originally designed to provide access for mourners to gravesites and related services.	<p>The proposed location of the kiss and drop zone covers a small portion of the broader carriageway being 25 metres in length.</p> <p>The physical works required to create the new driveway do not involve the removal of any existing trees or impact upon the existing 1970s red brick paving of The Avenue.</p> <p>The existing paving which has been damaged by uncontrolled vehicle movements, tree roots and subsidence will be lifted and re-laid to provide a smooth and regular paved surface to continue pedestrian movement through the Cemetery. The remainder of the paving with the Cemetery will be protected from regular vehicle movements through the installation of removable bollards in accordance with the Gore Hill Plan of Management.</p> <p>The new paving system of the kiss and drop area has been engineered so as not to interfere with the root zone of established trees and allow room for trees to continue to grow over The Avenue with permeable paving and engineered substrate such that the existing trees between The Avenue and the council carpark are not detrimentally impacted by the proposed works. A paving header-course will be used to define the outline of the existing paving. The infill of permeable paver is carefully designed to allow trafficable paving over the root zone of the surrounding trees.</p>
37	<p>a) Recreational value of on-site open space The recreational value of the on-site triangular shaped open space adjacent the Pacific Highway is questioned due to its size, shape and location next to the Pacific Highway (with issues of air and noise pollution).</p>	<p>During initial meetings with Council, it was requested that the school avoids using the oval during peak hour usage times and the school has committed to doing so as outlined within the plan of management. It is acknowledged that open space is a challenge, however the proposed non-peak usage of Gore Hill Oval and staying on site when necessary is a reasonable and appropriate solution for use of open space. It will be the responsibility of the School, to stage its timetable to manage the use of its own open space area. It is becoming increasingly known that schools are challenged by open space requirements, and accordingly, the use of council and or public facilities for lunch time play is no longer a unique circumstance.</p> <p>Furthermore, it is increasingly common for schools to be located on State Roads, and is it recognised that there are amenity implications associated with such circumstances. Notwithstanding amenity implications, it is proven that recreational spaces are still able to adequately operate in these settings. An acoustic plan prepared by Acoustic Logic outlines that it is not unusual for noise levels to exceed compliance in such settings and that the school's recreational area will be able to efficiently operate and support student play, but with a reduced amenity. The Acoustic Plan is included at Appendix E.</p>
38	<p>b) Reliance on Gore Hill Oval and surrounds for recreational purposes</p>	<p>Following an open space survey, an Operational Management Plan has been established in conjunction with Willoughby City Council to prevent adverse impacts on the public use of Gore Hill Oval. Notably, the School has structured student playtime to be conducted outside of the oval's busiest hours between</p>

Number	Submission	Response
	<p>It is understood that the times specified for school use of Gore Hill Park are intended to have minimal impact on other users.</p> <p>Gore Hill Park represents valuable regional open space that is intended to be available to the public at all times and only available to groups on a limited basis by a controlled booking process - intended to be fair and open to all users.</p> <p>It is to be expected that a number of existing and potential schools, as well as other groups, will seek to utilise this recreational infrastructure particularly considering that St Leonards has been identified as a new Health and Education Precinct as part of the St Leonards Crows Nest Planned Precinct work.</p> <p>Continued permanent bookings for one user at a specific time of the day may not be able to be guaranteed long term.</p>	<p>12 and 2, as to not clash unfavourably with lunch time sports and public recreational uses. Furthermore, the duty teacher will take students to areas in minimal use as to not disrupt public activities. The proponent respects that other schools and organisations have the right to use the oval and ancillary facilities within the Gore Hill recreational area. In these instances, students will be taken to a less busy portion of the oval or alternatively when required, stay on site at the school for lunch.</p> <p>In the event that the ICS chooses to use the oval for sporting activities and school related events outside of usual lunchtime hours, bookings will be made accordingly through Willoughby City Council. A Lunch Time Management Plan prepared by the proponent for a detailed strategy of the use of Gore Hill Oval and surrounds is included at Appendix I.</p> <p>Following ongoing discussions with Council, The School is accepting a 5-year time limited consent. This will allow for DPIE and Council to evaluate the School's use of Gore Hill Oval over time, and if necessary, make this space available for another use should that be required in the future.</p>
39	<p>c) Traffic Issues</p> <p>Access and Internal Circulation</p> <p>i. Concerns exist with the use of the public car park as access to the development. Further information is to be provided on what process is planned to be followed to enable 'right of carriageway' and future care and control issues associated with ingress/egress roadways to be imposed on Crown Land adjacent to the proposed School.</p>	<p>Investigations into the existing easement over the Avenue are being undertaken by the proponent. A Traffic Management Plan includes measures to ensure that traffic is managed appropriately (refer to details within Appendix H.)</p>
40	<p>ii. The proposal, by virtue of the ingress, reduces the number of car parking spaces within the western row of the public carpark by 3. The carpark occupancy surveys undertaken as part of the proponents Traffic Report (the Report) were undertaken during construction of the Gore Hill Oval upgrade works in April/May 2019. It is considered that the figures provided in Table 2, Page 23 of the Report, significantly underrepresent the use of the carpark during peak times, particularly in the PM, which, it is further considered, will significantly impact the joint use of the carpark area for school pick-ups and afternoon use of the oval facilities. Any reduction of the existing carpark numbers means the car parking required as a result of the Gore Hill recreation facility falls below the expected number of spaces (37 spaces is the minimum number of spaces required as part of the Gore Hill Oval facility). Further carpark surveys by the proponent are considered necessary to validate any reduction in the number of car park spaces based on PM use.</p>	<p>See response to Items 21 and 22 with respect to the reinstatement of the originally proposed deleted parking spaces within the Council car park and the proposed provision of new public parking infrastructure over and above that currently available within the immediate precinct.</p> <p>In response to Council's concern, a further week of parking demand surveys were undertaken of the Council car park, between the 3rd and 9th of December, inclusive. Findings from this survey demonstrate that there is capacity within Council car park during the proposed peak school start and finish periods. Further details of the survey findings are included within Appendix C.</p>
41	<p>iii. The proposed ingress roadway connecting The Avenue to the existing public carpark, as shown on the submitted plan (refer Appendix 1 Drawing SSD01 -07) has a width of 4m. The egress shows only a width of 3m. The swept path diagrams submitted as part of Appendix 2, sheets A4 & A5,</p>	<p>It has previously been stated that the largest vehicle anticipated to service the site is an 8.8m long MRV. Swept path plans contained within Appendix 2 of the August 2019 Parking & Traffic Impact Assessment (Sheets 4 and 5) demonstrate that MRVs are capable of being accommodated within the proposed and existing ingress and egress roadways servicing The Avenue, respectively.</p>

Number	Submission	Response
	<p>show ingress swept path, however they do not show the swept path for egress other than travel line and direction. If the proposed access and internal circulation is supported, the egress roadway needs to be widened to 4m to accommodate swept path requirements for medium rigid vehicles (assumed 12.5m, this needs to be clarified by proponent in terms of what length constitutes a MRV) and swept path diagram is required to substantiate that this width is enough. Based on submitted plans it is considered by Council Officer's that a 12.5m long vehicle will not be able to access the proposed ingress/egress roadways. It should be noted that any additional width has heritage implications.</p>	<p>Notwithstanding the above, the amended architectural plans provide for the widening of the egress roadway connecting The Avenue to the Council car park to provide a minimum width of 4m. Additional swept path plans has been prepared to reflect the movement of MRVs to and from The Avenue reflecting the amended development plans, copies of which are contained within Appendix C for reference.</p> <p>Details on the heritage impact of the road widening are included within the Heritage Impact Statement prepared by NBRIS at Appendix D.</p>
42	<p>iv. Further clarification required on the difference between plans shown as A 1 and A2 in Appendix 2. Plans show swept path movements for 899 Passenger Vehicle Manoeuvring Specifications but it is not clear what the difference is between the two plans.</p>	<p>Sheet A1 Illustrates B99 vehicles manoeuvring through the set-down/pick up space while sheet A2 illustrates B99 vehicles manoeuvring through the circulation aisle adjacent to the set-down/pick-up spaces. Updated swept path plans that reflect the movement of B99 passenger vehicles to and from the Avenue in respect of the amended development plans are contained within Attachment 2 of Appendix C.</p>
43	<p>v. It is stated on Page 13 of the Report that '... The safety and efficiency of access/egress movements have also been observed to be assisted by the following: ... The provision of approximately 90m of sight distance between the egress driveway and approaching eastbound public road traffic flow within Pacific Highway thereby exceeding the minimum requirements of Clause 3.2.4(a) of AS2890.2004 with respect of the applicable speed limit of 60kmlhr ... '. This is not supported as site inspections/surveys undertaken by Council Officers indicate sight distance of only 50m for approaching eastbound public road traffic flow on the Pacific Highway, well below the minimum SSD outlined in 3.2.4 AS2890.1 :2004. Further information is required on how required sight distance for vehicles exiting onto Pacific Highway at the existing entry/exit will be achieved.</p>	<p>It is acknowledged that the extent of sight distance between the car park egress driveway and approaching eastbound traffic within Pacific Highway is somewhat limited by the following:</p> <ul style="list-style-type: none"> • The variable horizontal alignment of Pacific Highway to the west of the driveway; and • The prevalence of hedging vegetation along the northern side of Pacific Highway situated immediately to the east of The Avenue. <p>Whilst the Pacific Highway alignment cannot readily be altered, the existing hedging vegetation is proposed to be removed as part of the now proposed deceleration lane works. It is expected that the removal of this vegetation will result in a desirable sight distance requirement of 83m being achieved. This is consistent with Clause 3.2.4 (a) of the Australian Standard for <i>Parking Facilities Part 1: Off-Street Parking</i> (AS2890.1:2004) which specifies that a driveway connecting with a frontage road governed by a sign posted speed limit of 60km/h is required to provide a minimum and desirable sight distance of 65m and 83m, respectively. Further details on site distance are provided for within Attachment 3 of Appendix C.</p>
44	<p>vi. There are concerns regarding the impact of school pick ups on the operation of the public carpark. During the school peak AM and PM periods, there will be a steady stream of vehicles through the parking area, travelling to and from the pick up zone. This will have a major impact on vehicles currently using the car park, as they will have difficulties leaving parking bays, due to the stream of vehicles. As practice around all schools indicates, the waiting times associated with parents picking up children in PM period is on average 15 minutes prior to school finish time and the ability for the carpark area to accommodate predicted demand, 65 trips in peak hour period, with only 37 spaces available at any one time, will have significant potential to block access for vehicles. It is noted in the Report, refer page 20, that an Operational Management Plan (OMP), is proposed to be put in place that places the responsibility on school staff to manage</p>	<p>See responses to Issues 21 and 25 and the Traffic Management Plan contained within Attachment 4 of Appendix C.</p>

Number	Submission	Response
	safety issues associated with the proposed normal daily school start and finish traffic operations. Concerns are raised with development of an OMP and its impact away from the proposed set-down/pickup area. A draft OMP will be required prior to consideration of any approval of the proposal for Council Officer's review.	
45	vii. There is also concern that difficulties associated with accessing the car park and drop off area may result in parents relying on drop offs and u-turns in surrounding streets - either on the opposite side of the Pacific Highway or in Reserve Road.	The primary aim of the Traffic Management Plan (see Attachment 4 of Appendix C) is to maximise the efficiency of the student set-down / pick-up activity such that the school operations are wholly contained within The Avenue. It is not envisaged that the development will result in undesirable movements within the surrounding public road network incorporating satisfactory implementation of the specific site operational management measures contained within the Traffic Management Plan.
46	Parking viii. The basement car parking area shows provision for 7 staff spaces, 3 visitor (including 1 disabled) and 1 shared space, total 11 spaces. Provision is also made for 1 turn area space. Only 4 of the designated 12 spaces (including turn area) meet the minimum standard for User Class 1 car parking, as per 2.4.1 AS2890.1 :2004. The aisle width is also minimum width 5.8m. Concerns are raised in regard to this high rate of "small car" spaces. Further details are required as to how this issue will be managed to prevent larger cars affecting access, particularly if the area is open to the public out of school hours.	The undercroft parking area is existing and approved under DA 2014/301 for use in a similar manner to that proposed. The parking area is primarily to provide a private use and accordingly largely accommodate everyday users whom will be aware of the specific manoeuvring requirements. Further details regarding parking demonstrate compliance with S2890.1:2004 and AS2890.6:2009 and are included within Appendix C . Swept path diagrams were prepared in the August 2019 Parking and Traffic Impact Assessment and are included in Appendix C .
47	ix. Drop off/pick up area within The Avenue does not include any provision for disabled access. This needs to be considered and outlined on the plan.	One disabled parking visitor space is provided for within the basement car park and can access the school via the internal AS1428.1 compliant lift.
48	x. It is stated on Page 19 of the Report that '... The abovementioned set-down/pick up and approach queuing capacity of 10 vehicles represents approximately one parent vehicle per 20 students', with a formalised set-down pick up area with a length of 30m, accommodating at least five (5) vehicles at any one time. This is considered to be well short of what is required for a school with 210 students. Investigations by Council Officers at existing primary schools within Willoughby LGA which include Artarmon Public School and Mowbray Public School, while accommodating slightly larger student numbers, show pick up/ drop off/ on-street parking areas catering for over 10-15 vehicles (60m-90m). The assessment based on '... experience of other educational establishments as well as other Local Government requirements ... suggesting an average ... demand rate of 1 vehicle per 30 students ...' is, it is considered, understated, particularly for public schools based within Willoughby LGA. As highlighted in comments below, as it is an existing school that is relocating, the estimates used should be compared with actual data from the existing school, including either surveys of student travel to school or counts of vehicle drop offs and pick-ups. Further information is required in relation to the existing school and set-down/pick-up zone lengths, and if less, then substantiated with information based on other similar sized schools where available.	<p>This Practice understands that Artarmon Public and Mowbray Public Schools accommodate student populations of 1175 and 595 students, respectively, being more than 7.0 and 3.5 times greater than the proposed school student population, which has been reduced from 210 to 160. This factor alone indicates that comparison of the existing schools with the proposed school is unreasonable. Notwithstanding this, Council's assertion that the above schools provide a maximum set-down / pick-up capacity of 15 vehicles compares favourably with the proposed set-down / pick-up capacity of 10 vehicles when considering the reduced population of the proposed school.</p> <p>The proposed school is to be strictly governed by a Traffic Management Plan which provides for the primary aim of maximising the efficiency of student set-down / pick-up during school start and finish times. Details of this traffic management plan are contained within Attachment 4 of Appendix C.</p>

Number	Submission	Response
49	<p>Existing transport conditions</p> <p>xi. As highlighted on Page 25 of the Report, '... Clearway restrictions apply along the eastbound kerb-side travel lane during the morning peak (6.00am – 10:00am) on weekdays to facilitate 3 unobstructed traffic lanes' A site inspection undertaken by Council Officer's on the eastbound section of the Pacific Highway (week prior to school holiday period) showed high traffic flow on the eastbound kerbside lane. In terms of occupancy rate in each lane, while slightly lower than adjacent centre and median travel lanes, it is not considered ... significantly reduced. ... as highlighted on page 25 of the Report. An additional 65 left-in turning movements during the peak AM period (8.00am - 9.00am) will significantly impact on through traffic on this section of the Pacific Highway.</p>	<p>Lane by lane traffic surveys have been undertaken immediately adjacent to the site. The results show that the Pacific Highway kerb-side land accommodates between 10-15% of the total eastbound carriageway traffic demands during the weekday morning peak period. This demand in conjunction with the moderate projected peak hourly inbound traffic demands associated with the development are such that the impacts on trailing public road traffic flow is anticipated to be negligible.</p> <p>Notwithstanding the above findings and following subsequent liaison with Roads & Maritime Services' officers, the application has been amended to provide for a deceleration lane to service the Council car parking area. Further details on the proposed deceleration land and survey findings can be found in Appendix C.</p>
50	<p>A major concern is the potential queuing within the public carpark area and onto Pacific Highway, which has potential to occur I coincide with weekday morning and afternoon peak periods. Any parking manoeuvre undertaken on any of the car spaces located on the eastern side of the carpark, located close to the entry/access, will have significant impact on vehicles entering the carpark, creating potential queuing during peak periods. Also, any increase in left-in movements will severely impact visibility for drivers exiting the car park, noting the sight distance issues mentioned previously. The argument put forward on Page 36 of the Report that '... the detector data establishes that the eastbound kerb-side travel lane accommodates significantly lower demands compared to the adjoining centre and median travel lanes such that a deceleration lane servicing the Council carpark access roadway is not considered to be warranted ...', is not supported. RMS comments and concurrence is required on this issue</p>	<p>Refer to responses contained within Items 48 and 49</p>
51	<p>xii. Council is progressing with a shared pedestrian bike path along Pacific Highway, east side of road. The pedestrian access via Pacific Highway to the proposed school should be designed and constructed to support safe and efficient operation of this shared path. This means very good sight distance for school users and shared path users at potential intersection/ conflict points in all directions. This will also need to be incorporated at the driveway, with a greater consideration of management due to the higher vehicle generation should the school proceed.</p>	<p>In response to a requirement raised by Roads & Maritime Services, pedestrian access to / from the school is now proposed to be sought solely via The Avenue. The originally proposed access gate to the northern Pacific Highway footpath is proposed to be locked under normal operation and only utilised in the event of emergency. The set-back and splayed nature of the existing heritage gates connecting The Avenue with the northern Pacific Highway footpath is considered to provide appropriate and safe connectivity to the public road path. Further details are provided for within amended architectural plans at Appendix B.</p>
52	<p>xiii. Advice is required as to whether there is bus transport proposed (i.e. use of buses for school trips). If so, information is required as to how these vehicles will be managed. The site does not accommodate in any way, access for vehicles in excess 12.5m, so further information is required on what activities require access by vehicles over 12.5m and how this will be managed. Same concerns raised in regard to any service vehicle over and above Service Vehicle length as outlined in 2890.1 :2004.</p>	<p>The school does not propose to provide a regular special school bus service, however there may be occasions when one or more mini-buses may specifically be chartered for class excursions. It is expected that this irregular bus activity is to comprise mini-buses, which provide dimensions and manoeuvring capabilities similar to SRV's. We note that there are two bus zones within 150m of the School, one on the Pacific Highway and the other on Reserve Road. Refer to Issue 6 contained within Appendix C with respect to the proposed utilisations of buses.</p>

Number	Submission	Response
	<p>Note that a Transit Lane is in operation which reduces parking opportunities on Pacific Highway. Furthermore, RMS may extend the parking restrictions (introduce longer time frames of no parking/ stopping/ clearway/ transit lane on both sides of Pacific Highway over time. It is on this basis that Council Officers cannot support on street provision/ use by this vehicle type.</p> <p>In addition, Council Officers do not support shared bus use of off street car parking in the public car park.</p>	
53	<p>xiv. Concerns are raised in term of school bus usage by students accessing the school westbound. While bus stops are located within 400m walking distance on the southern side of the school, access to signalised pedestrian crossing facilities, located at the intersection of Pacific Highway/Berry Road and Pacific Highway/Greenwich Road, extend beyond 400m creating potential for crossings to be undertaken across travel lanes seeking refuge on centre concrete median. Further discussions required with RMS on warrant for pedestrian fencing along this section of Pacific Highway. It is noted that this is a possible consideration by the proponent as highlighted on Page 37 of the Report.</p>	<p>Students accessing bus services operating along the southern side of Pacific Highway are to be directed to utilise bus stops situated to the east of Berry Road and the north of Greenwich Road. Pedestrian desire lines between the school and these stops are facilitated with signalised pedestrian crossings over Pacific Highway. Specific management measures in this regard are contained within the Traffic Management Plan provided within Attachment 4 of Appendix C.</p> <p>The Roads & Maritime Services have provided advice with respect to the application with its letter to the Department of Planning, Industry & Environment dated 7 November 2019. No requirement was provided within this correspondence for the provision of pedestrian fencing.</p>
54	<p>Projected Transport Conditions</p> <p>xv. In terms of 'Trip Assignment' as highlighted on Page 33 of the Report, Council Officers do not support the 40/40/20 trip assignment as outlined. If the proposal links the existing school enrolment numbers to the proposed school then information should be available on where students live and the proximity and travel direction to the school. While some assumptions can be made on small percentage of new enrolments, it is not accepted that the split accurately represents the distribution and trip assignment for students at the school. Further information required based on this scenario with revised SIDRA analysis. Further discussion on the LoS assigned to each of the intersections highlighted in Table 6 (Page 34 of the Report) is then required with RMS based on review of the existing student locations and the impact this will have on the proposal.</p>	<p>Response to comments regarding trip assignment have been included within Appendix C under Issue 26.</p>

Number	Submission	Response
55	<p>Green Travel Plan</p> <p>xvi. The assumption is that the submitted Green Travel Plan ('the Plan') will impose a number of targets. The Plan aims to encourage the use of alternative transport choices to single car use and encourage a shift towards public transport, cycling and walking through the implementation of the measures contained within Section 3.2 of the Plan. The assumptions contained in Report are all based on vehicular trips. While on Page 5 of the Plan it is stated that '... The Green Travel Plan will capitalise on the availability of described sustainable transport options such that modal share which does not involve a private vehicle is expected to be relatively high ...' and further reference is made to bus, train, pedestrian infrastructure, cycle routes and car share, no measurements are put against the travel modes that warrant consideration of any parking and/or traffic generation discounts.</p> <p>xvii. There is conflicting data contained in Table 2, Page 14 of Green Travel Plan. It is stated that '... Table 2 below provides a comparison of St Leonards journey to work data between 2006 and 2011 as published by the Australian Bureau of Statistics' The heading contained within Table 2 then refers to '... TABLE 2 2016 JO URNEY TO WORK DATA. ...' The table needs to be adjusted to reflect the right dates/year.</p> <p>xviii. In accordance with current Council approaches to car share, any provision for car share spaces have to be made on site, and not rely on provision of such spaces on street located a 5 minute walk away (which would also involve the loss of public car spaces).</p>	<p>Typographical errors contained within page 14 of the Green Travel Plan have been amended and an updated version is attached as Attachment 9 of Appendix C for reference.</p> <p>The proposed development does not propose car share spaces. The Green Travel Plan simply makes reference to the existing car share pods within walking distance of the subject site, which may be utilised by school staff. Council does not require car share parking spaces to be provided for schools and any reliance of existing pods is likely to be extremely minor given the limited number of staff (12). The proposed on-site parking provision of 10 spaces, exceeds the minimum Council requirement of six spaces based on <i>Willoughby Development Control Plan 2016</i>.</p>
56	<p>4) Recommended conditions if approval was granted As outlined above, it is considered that there are fundamental concerns regarding this development application. Furthermore, it is considered that this application and site fail on site specific issues.</p> <p>Notwithstanding, an Attachment is provided containing recommended conditions if any approval was to be granted for this development application. In particular the following condition should be noted:</p> <p><i>"Time Limit of Consent The use of the premises as an educational establishment shall cease after a period of 3 years from the date of commencement of use of the premises in accordance with this consent.</i></p> <p><i>The applicant is to advise Council in writing of the date on which the use commences within a period of 14 days from that commencement date. (Reason: Ensure Compliance)"</i></p>	<p>In discussions with Council, the School and Willoughby City Council have agreed to a 5-year time limit on its consent.</p>

Number	Submission	Response
	The provision of this time limit of consent will enable an assessment to occur of the impacts on the proposed use after three years and allow the opportunity for a more appropriate site to be identified.	
57	It is also noted the Environmental Impact Statement prepared by Ethos Urban on behalf of the proponent, states that on the issue of contributions, "The International Chinese School will pay any contributions required by Willoughby City Council." No further detail has been provided. If approval was to be granted, Council would request further discussion regarding what contributions may be appropriate in the form of a voluntary planning agreement.	This is noted and the applicant will be open to further discussions in regard to entering into a voluntary planning agreement with Council.
NSW Heritage Council		
58	<p>Built Heritage Use</p> <p>The proposal seeks to change the use of the site of the former Sexton Cottage within Gore Hill Cemetery from 'office premises' to 'school'. The HIS argues that the proposed use of 'school' supports the ongoing active use of the place and provides for the increased public interface with the heritage item and the ongoing management and maintenance of heritage fabric within the lease area. Whilst it is acknowledged that the proposed use will lead to the ongoing use of the area, the proposed use is not conducive to the nature, character and the setting of the heritage item.</p> <p>The proposed use will introduce changes to built-up spaces within the areas of heritage value both within and outside the State listed curtilage. With the use of the subject site as the primary school, the volume of traffic, both vehicular and pedestrian, will substantially increase and will adversely impact the heritage item whose inherent character and significance lies in the tranquillity and the peaceful nature of the site and not on the numbers of people visiting it.</p> <p>The proposed use will also require associated works within the subject site which will have adverse impact on the heritage values of the site as discussed in the section below.</p>	<p>The Gore Hill Cemetery Plan of Management describes the strategic directions for the management of the place.</p> <p>The Strategies and Actions include 5 core areas:</p> <ul style="list-style-type: none"> - Heritage - Landscape - Infrastructure - Community and Stakeholders - Finance and Management <p>The POM states that all key areas are of equal importance.</p> <p>The Heritage Management of the places recognises the need for activation of the Cemetery to provide financial support for its ongoing management and conservation. These uses are not defined in the POM but suggestions include regular events, tours, movies, educational activities, etc. All resulting in increased activity across the cemetery as a whole (POM 4.2 and 4.4).</p> <p>The POM provides guidelines for the development and management of burial precincts within the cemetery (noting that the cemetery has been closed to burials since the 1970's). The defined precincts do not include Sextons Cottage or The Avenue. The proposal does not seek to alter the nature, character and setting of the Cemetery precincts as identified in the Plan of Management (POM).</p> <p>The use of Sextons Cottage as a commercial site was established under the <i>Gore Hill Memorial Cemetery Act 1986</i>. The new <i>Cemeteries and Crematoria Act 2013</i>, transfers provisions (Schedule 5, Part 4) relating to Gore Hill Memorial Cemetery as follows:</p> <p>1) <i>The trustees may maintain the dwelling erected on the cemetery land at the commencement of this Act and may, from time to time, repair, rebuild or replace it.</i></p> <p>2) <i>The trustees may use the dwelling, or permit it to be used, for such purposes and subject to such terms and conditions as the Minister may approve in writing.</i></p>

Number	Submission	Response
		<p><i>(3) A reference in this section to the dwelling erected on the cemetery land at the commencement of this Act includes a reference to that dwelling as repaired, rebuilt or replaced from time to time under this section.</i></p> <p>The use and development of the Sextons cottage site is not defined in the Plan of Management with the exception of retaining vehicular access across The Avenue. The Northern Suburbs Cemeteries Trust supports the use a school.</p> <p>Willoughby Council have approved the redevelopment of the site from a single storey building to a two storey building with basement parking. This larger development supports an increase of activity of the Sextons Cottage site and The Avenue and will increase the daytime population of the site.</p>
59	<p>Associated works The central avenue, historically known as The Carriageway, which runs from Westbourne Street in the north to the Pacific Highway in the south provides a distinctive character to the Gore Hill Cemetery. Proposed works that include 'kiss and drop' area within The Avenue/ Carriageway, which will be demarcated by the removable bollards and new ground finishing, will have an unacceptable impact on both the physical and visual character of the heritage item.</p> <p>The new use will also require an installation of a new security fencing inset from the boundary of the subject site. It is noted that information provided in the architectural drawings and the landscape plans show discrepancy between the type of fencing proposed, however it is understood that the fencing will be 2.1m high. Whilst the dense vegetation along the Pacific Way will mitigate the visual impact from the extra fencing, the views to the heritage site from The Avenue, along The Avenue and the views out from the subject site will be adversely affected by the proposed fencing. In addition, the proposed regular daily use of the public playground across The Avenue by the school children will mean increased pedestrian traffic from the subject site through the Avenue which will have adverse impact on the heritage values of the site.</p> <p>Based on the above, the proposed use of the subject site as the primary school is considered to have significant adverse impact on the State Heritage Listed values of the site and is therefore not supported on heritage grounds. If the development application is approved by the Department of Planning, Industry & Environment, a condition is recommended to relocate the proposed 'Kiss and Drop' facility from The Avenue to the lesser significant area to the north east towards the Council's carpark.</p>	<p>The Gore Hill Memorial Cemetery Plan of Management establishes the requirement for bollards to be placed across The Avenue in order to restrict traffic to the area of Sextons cottage (POM Infrastructure 3.3).</p> <p>The bollards chosen are sympathetic to the overall setting of the place, are removable and do not obscure views along The Avenue.</p> <p>The proposal has been revised to construct the kiss and drop area in a paver to match the colour of the existing rather than to define the area previously grassed. There is already an area of more recent paving at the southern end of The Avenue which extends across its entire width. The layout of the grass and paving along the entire length of The Avenue dates from the 1970s.</p> <p>The height of the security fencing to the Sextons Cottage site is 2.1m in an open palisade style. The fence will be installed behind and within the dense perimeter planting of the site. The proposed colour is dark and recessive.</p> <p>Views from The Avenue to the Sextons Cottage site are also lined with dense shrubbery behind the perimeter brick wall. The Willoughby Council approved 2 storeys building currently under construction will remain visible from The Avenue and not be obscured by the addition of a security fence. The fence will neither contribute to, nor detract from, the significance of the place.</p> <p>The increased activity of heritage places enhances a public appreciation and understanding of the place which ensures an ongoing desire to see heritage places retained and conserved.</p> <p>The increased activity is in alignment with the strategic objectives of the Gore Hill Cemetery POM and does not alter the significant fabric, character or setting of the place.</p>
60	Archaeology	Noted. The project would comply at all times with the s146 of the Heritage Act at all times.

Number	Submission	Response
	It is noted that the application would not affect any of the areas of the cemetery previously used for burials. Therefore, the disturbance of any archaeological 'relics' within the meaning of the NSW Heritage Act, 1977, is unlikely. It is noted that if 'relics' were to be found that notification of the Heritage Council of NSW would be required under s146 of the Heritage Act, 1977, which is not suspended by the operation of the SSD provisions of the EPA Act.	
NSW Office of Environment and Heritage		
61	Aboriginal Cultural Heritage If the Department determines to grant approval, EES recommends that any conditions recommended by the Aboriginal Cultural Heritage Assessment Report prepared by Coast History and Heritage dated August 2019 be included as conditions of consent.	Noted.
62	Biodiversity A Biodiversity Development Assessment Report (BOAR) waiver was approved by OEH on 3 June 2019	Noted.
NSW Environment Protection Authority		
63	Based on the information provided, the proposal does not require an Environment Protection Licence under the Protection of the Environment Operations Act 1997. The proposal is not being undertaken by or on behalf of a NSW public authority, and the EPA is not the appropriate regulatory authority for the proposal. The EPA has no further comments on the proposal.	Noted.
NSW Roads and Maritime Services		
64	Roads and Maritime requests a deceleration lane to be provided for access arrangement to the site on Pacific Highway. The deceleration lane should be constructed wholly within the property boundary and dedicated as public road at no cost to Roads and Maritime. A concept plan should be provided for review, with the design requirements to be in accordance with AUSTRROADS and other Australian Codes of Practice.	The amended development plans provide for a deceleration lane to service left turn movements from Pacific Highway eastbound carriageway to the Council car park. The deceleration lane is proposed to provide a total length of approximately 35m including taper, which is slightly less than the desirable length of 50m specified by Austroads' <i>Guide to Road Design Part 4A: Unsignalised and Signalised Intersections</i> . Further details on the proposed length of the deceleration lane are included in Appendix C .
65	Roads and Maritime request further information around the heritage items that would be located within the deceleration lane. Roads and Maritime also request further information in regard to the relocation of heritage items.	There are no heritage items located within the deceleration lane and no items of heritage significance will require relocation.
66	Roads and Maritime request that there is no school pedestrian entry onto the Pacific Highway because Roads and Maritime do not support school	The amended development scheme removes the originally proposed pedestrian access between the school and the northern Pacific Highway footpath. All pedestrian access associated with normal school operation is now sought solely via The Avenue. Amended plans are contained within Appendix B .

Number	Submission	Response
	zones on classified roads on road safety and efficiency grounds. Amended plans should be resubmitted to Roads and Maritime.	
67	Roads and Maritime require further information clearly specifying the agreement and shared use of Councils carpark for access to the school.	A Deed of Agreement is currently being entered into between the proponent and Council, which once complete will enact owners consent.
68	The submitted swept path plans for egress of the council carpark onto the Pacific Highway are not acceptable. Roads and Maritime request amended plans clearly showing that Medium Rigid Vehicles can safely enter and exit the carpark via the kerbside lane of the Pacific Highway.	Amended swept paths have been prepared and attached as Attachment 3 of Appendix C to reflect the amended development design, including the proposed deceleration lane. These swept path plans illustrate that MRVs are capable of entering the Council car park access driveway from the deceleration lane thereby not impacting trailing through eastbound Pacific Highway traffic flow. Further details are contained within the traffic response at Appendix C .
69	The redundant driveway on the Pacific Highway boundary shall be removed and replaced with kerb and gutter to match existing. The plans need to be amended accordingly.	The amended architectural plans provide for the removal of the redundant gutter crossing servicing the connection of Pacific Highway and The Avenue.

Public Submissions

Number	Issue/Topic	Response
70	<p>Heritage Submissions raised concerns with:</p> <ul style="list-style-type: none"> • Location of the proposed development within a heritage site of cultural and historically significant • Interference with the operation of the Avenue; • The Cemeteries Trust is supposed to protect and maintain the Cemetery and not allow for the intrusion and eroding of its importance for future 	<p>The existing two storey structure on the site was approved by Willoughby City Council under a separate DA. Accordingly, this approval as well as the redevelopment of Gore Hill Oval has encouraged a more active environment within the Avenue.</p> <p>The heritage response in Item 2 and 58 as well as further details in Appendix D demonstrates that the proposed development will have an acceptable heritage impact and will remain consistent with the Gore Hill Memorial Cemetery Plan of Management. The proposed development does not seek to alter to the setting, culture and heritage of the Avenue.</p> <p>The purpose of redeveloping Sextons Cottage is to provide a source of revenue for the Northern Cemeteries Trust for the ongoing maintenance and management of the Gore Hill Cemetery. Accordingly, the tenure of the site of the school over a long-term ground lease will ensure appropriate maintenance and enhance preservation efforts of the heritage item.</p> <p>We highlight that the School has received a letter of support from the Northern Cemeteries Trust for the establishment of a school on the site.</p>
71	Appropriateness of site for a school	Please see response to Item 18 .
72	Insufficient open space	Please see response to Item 37 .

Number	Issue/Topic	Response
73	<p>Traffic and Parking</p> <p>Submission's raised concern with:</p> <ul style="list-style-type: none"> • Congestion within the car park; • Queuing onto the Pacific Highway; • Inaccurate survey responses • Carpark capacity; • Service vehicles accessing the kiss and drop road; • Cumulative impacts on the surrounding road network; • U-turns in the adjoining side streets; • Provision of buses; • Sightlines. 	<p>The amended development includes the construction of a deceleration lane to service left turn movements from the Pacific Highway eastbound carriageway to the Council car park (Refer to Item 21 and 64). The deceleration lane will improve the existing level of safety and efficiency in which motorists are able to access the car park.</p> <p>In response to the submissions received, further surveys of the Council car park were undertaken by Stanbury Traffic Planning between the 3rd and 9th of December 2019, inclusive. The survey results contained within Appendix C outline that the car park has sufficient capacity during school pick up and drop off periods and accordingly, public use will not be disrupted. The school will be governed by a strict Traffic Plan of Management (refer to Appendix H) which primarily aims to reduce any adverse impacts on the adjacent car park as well as create a fast drop off and pick up system within the kiss and ride area.</p> <p>The school does not propose to provide a regular special school bus service, however there may be occasions when one or more mini-buses may specifically be chartered for class excursions. It is expected that this irregular bus activity is to comprise mini-buses, which provide dimensions and manoeuvring capabilities similar to SRV's. Refer to Issue 6 contained within Appendix C with the respect the proposed utilisations of buses.</p> <p>Service vehicles will be able to access the Avenue as outlined in response to Item 27. Service vehicles such as garbage collection will access the site outside of school operating hours as to not disrupt the use of the Avenue for student pick up and drop off, as well as the ongoing operation of the council car park.</p> <p>Please see response to Item 43 regarding sightlines.</p> <p>A traffic response at Appendix C indicates that the school's ongoing operation will have a negligible effect on the surrounding road network.</p>
74	Loss of Parking	See response to Item 21 and 22 in relation to reinstatement of parking and use of the sites parking during weekends.
75	Vegetation impacts	No tree's will be lost from the construction of the kiss and drop road. An arborist report at Appendix G outlines that the construction of the road will have no adverse impacts on the existing site vegetation.
76	<p>Provision of toilets</p> <p>Submissions raised concerns with:</p> <ul style="list-style-type: none"> - Insufficient amenity/toilets; and - Use of public toilets on Gore Hill Oval will be unfair on public users. 	The School has a Lunchtime Play Management Plan (refer to Appendix I) which ensures that all students must use toilets on site before utilising Gore Hill Oval. No students will be permitted to use the public toilets during play time and under no circumstance will the school be relying on the use of the public toilets at Gore Hill Park for everyday use and operation of the School.
77	<p>Use of Gore Hill Recreational Areas</p> <ul style="list-style-type: none"> - Dominance of a public area by a private user; - Over utilisation; - Student safety in accessing Gore Hill Oval form school. 	Refer to Item 10 and the Lunchtime Play Management Plan at Appendix I for details on the appropriate use of Gore Hill Oval. It should be highlighted that the Plan of Management has been prepared with the primary intent to not disrupt public use, and when necessary, students will stay on site for lunch time play.

Number	Issue/Topic	Response
78	The proposed development will not cater for the local area, is only for a specific demographic and is not open to all local students of any religion or language.	<p>The schools name 'International Chinese School' refers to the global focus on a bilingual educational program. The School does not enrol students from overseas and is open to enrolments from any religion, nationality and demographic. While the School is proposed to relocate from Chatswood to St Leonards, the School will be able to cater for additional local students, particularly as the school has capacity to grows to 160 students.</p> <p>It should be highlighted that currently 89% of students enrolled come from the local area with 37% from the Willoughby LGA and 52% from adjoining council areas including Lane Cove and North Sydney. Accordingly, the proposed school will provide placement for local families within St Leonards and surrounds.</p>
80	<p>Pedestrian safety</p> <ul style="list-style-type: none"> • Students disembarking buses and walking to school; and • Walking to and from gore hill oval for lunch time play. 	<p>Item 51 outlines that the proposed development has been amended so that pedestrian access can only be sought solely via the Avenue as to improve pedestrian safety.</p> <p>The Lunchtime Management Plan at Appendix I outlines appropriate procedures to move students to and from the school and Gore Hill Oval in an appropriate manner. Students will be under the supervision of duty staff at all times.</p>
81	Owners consent	A Deed of Agreement is currently being entered into between the proponent and Council, which once complete will enact owners consent.
84	Residential amenity impacts	The proposed SSDA will have negligible impact on the surrounding residential amenity of the area and will not disrupt the surrounding character or setting of the area. The school will not impose any visual or acoustic impacts on surrounding residents and as outlined in Appendix C , traffic generated by the school will have no adverse impacts on the surrounding road network.
85	<p>Design of the existing structure</p> <ul style="list-style-type: none"> • Bulk and scale of the school; and • Setbacks and height are inconsistent with the area 	The existing structure on the site was approved by Willoughby City Council under DA-2014/301 and accordingly this comment is not a matter to be addressed as part of this SSDA.
86	Inability of more appropriate uses to use the site including the Royal North Shore Hospital and TAFE NSW.	<p>Prior to the school's involvement, the site had been unleased and on the market for two years, demonstrating no interest from the RNSH or TAFE for tenure of the site. Further, the long vacancy at the site indicates that the use of an office in this location has low desirability and, unlike the proposed development, was not fulfilling its purpose to fund ongoing conservation needs of the heritage listed cemetery.</p> <p>It should be noted that in the instance that the RNSH or TAFE were to occupy the site, traffic and parking constraints would still pose the same implications to that of the proposed development.</p>
87	Inconsistencies with the St Leonards and Crows Nest Plan 2036.	The proposed development is consistent with the strategic direction of the St Leonards and Crow's Nest Plan 2036 which recognises the areas importance as a 'Health and Education Precinct' as formed under the North District Plan.

Number	Issue/Topic	Response
88	Acoustic impacts in relation to: <ul style="list-style-type: none"> • Noise impacts on the surrounding areas as a result of the school's operation; and • Noise pollution impacts on the school's operation from the Pacific Highway 	An acoustic report prepared by Acoustic Logic demonstrates the following: <ul style="list-style-type: none"> • The noise generated from the operation of the school will have a negligible impact on the surrounding amenity of workers and residents; and • The School and its on-site recreational areas adjacent to a busy State Road will be able to efficiently operate and support student learning and play, but with a reduced amenity.
89	Unwarranted State Significance	Regardless of the size or scale of the school, Schedule 1 of State Environmental Planning Policy (State and Regional Development) 2011 states that development for the purpose of a new school (regardless of the capital investment value) is State Significant Development.