

Mrs Jane Hughes
Business Manager
210 Headland Road
Dee Why New South Wales 2099

11/08/2020

Dear Mrs Hughes

St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291)
Response to Submissions

The exhibition of the development application including the Environmental Impact Statement (EIS) for the above proposal ended on 29 July 2020. All submissions received by the Department during the exhibition of the proposal are available on the Department's website at:

<https://www.planningportal.nsw.gov.au/major-projects/project/11006>.

In accordance with clause 85A of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation), the Planning Secretary requires the Applicant to respond to all issues raised in the community submissions and public authority advice in a Response to Submissions Report (RTS). Where necessary, technical supporting documents must be revised.

The Department has also undertaken a detailed assessment of the proposal and identified key issues in **Attachment 1**, that are required to be addressed in the RTS and updated technical supporting documents.

Any late submissions received from public agencies will be forwarded on by the Department and it will be appreciated if you can address the matters raised in those submissions in the RTS.

Note that under clause 113(7) of the EP&A Regulation, the days occurring between the date of this letter and the date on which your response to submissions is received by the Planning Secretary are not included in the deemed refusal period.

If you have any questions, please contact David Way, who can be contacted on 8275 1324 or at david.way@planning.nsw.gov.au.

Yours sincerely



Karen Harragon
Director, Social And Infrastructure Assessments
Social & Infrastructure Assessments

as delegate for the Planning Secretary

Attachment 1

Traffic and parking Impacts and assessment

- The Department notes that Transport for NSW (TfNSW) have raised concerns regarding the increase in pedestrian / vehicle conflicts associated with the Harbord Road driveway providing access to the senior school campus at 800 Pittwater Road. The Department agrees with the above concern. Noting the proposed change of use of the premises, the Department requires you to:
 - investigate the feasibility of an alternative access point to the site, including the closure of the Harbour Road driveway. Or
 - demonstrate that the existing driveway can operate safely in the future ameliorating the identified risks.
- Provide further clarification regarding the information provided in the submitted traffic report including:
 - analysis and information to address the potential impacts due to queuing of vehicles utilising the proposed pick-up and drop-off areas.
 - further reasons and / or analysis to justify that the impacts on the local traffic network would reduce as a result of the proposed change of use to a school.
 - an updated traffic modelling with appropriate peak hour factors as requested by TfNSW.
 - an assessment of the impacts of cumulative parking demands, including after school hours uses, as well as during the proposed Stage 2 operations which would concurrently occur with the commercial use at 800 Pittwater Road.
 - estimates of trip generation of each development stage.
 - an assessment of the proposed traffic impact on the existing junior campus at 210 Headland Road, caused by the change in the current student mix between the senior and junior campuses (i.e. increase of primary school students in the existing campus).
- The submitted Green Travel Plan (GTP) shows that about 94% of the staff currently utilise private vehicles for commuting to the school. It is anticipated that this would reduce to 90% in the future, upon implementation of the GTP. However, the Department considers that the 90% target comprises a very high percentage of private vehicle usage. Consequently, a Workplace Travel Plan (WTP) needs to be prepared and submitted with the RTS. The WTP must provide a description of the meaningful details or incentives to encourage the use of more sustainable travel modes. The WTP should include:
 - objectives and targets (i.e. site-specific, measurable, achievable and timeframes for implementation) to define the direction and purpose of the WTP.
 - actions to help achieve the objectives.
 - measures to promote and support the implementation of the plan.
 - a process for monitoring and review of the WTP at regular intervals.
- Further clarification should be provided regarding the function of the current School Traffic Management Plan (STMP) in achieving the proposed targets within the GTP.
- A further transport pattern survey for both staff and students should be conducted to determine the future travel demands and the adequacy of existing and future transport infrastructure. The results of this survey should be incorporated, as appropriate, into any amendments to the STMP and Green Travel Plan as well as the WTP.

- Further evidence should be provided to adequately demonstrate:
 - that a heavy rigid vehicle can adequately manoeuvre within the car parking areas, to ensure potential conflicts between construction vehicles associated with the development of St Luke's College Senior Campus and operational vehicles which may be associated with the operation of the St Luke's Senior Campus and adjacent commercial uses are minimised.
 - that 25 parking spaces within the site at 800 Pittwater Road are sufficient to cater for 600 senior students, given that there are limited opportunities to park on the nearby streets.

Built form and building design

- Prior to the lodgement of the EIS, the State Design Review Panel recommended the reduction in the use of transparent materials such as plexiglass or acrylic material. The design of the fence along Pittwater Road incorporates an acrylic material on top. The RTS should justify that the use of the material responds appropriately to the previous State Design Review Panel comments.
- The Department concurs with the comments from Northern Beaches Council (Council) regarding the provision of a second elevator to connect the two sites and the revision to the roofline at 800 Pittwater Road, and considers that this should be addressed in the RTS.
- The details of the condition and capacity of the pedestrian path from the senior campus to Headland Road must be provided to demonstrate that it would satisfactorily cater as a walking path for the senior school students.

Staging and Community use

- The RTS must include a detailed schedule or a table which clearly identifies the proposed works in each of the development stages and the proposed student numbers / staff numbers within the campuses (including the existing campus) at the completion of each development stage.
- The EIS indicates that the sports centre at No.224 Headland Road would be made available for use by local schools and sporting groups. In this regard, details of the extent and frequency of out-of-hours community use, including weekend use of the proposed building should be provided. Based on the extent of the use, the EIS should assess the impacts of the community use on the surrounding built environment (in terms of traffic and noise). This assessment should include, but not be limited to, consideration and management strategies for noise impacts and traffic impacts associated with the proposed use of the school facilities by the community in the evenings or the weekends.
- Provide an assessment of the likely use of the building by the school community and other groups during out-of-school hours or the weekends. The assessment must include details of the likely number of users, frequency of use, noise and traffic impacts with associated management strategies.

Biodiversity

- The EIS indicates that the proposal would have impacts on the Stony Creek Botanic Gardens. It is unclear whether this is in relation to indirect, direct or prescribed impacts. If direct impacts are intended, confirmation of the extent of these impacts and that appropriate landowner consents have been obtained must be provided.

- The RTS must include additional information regarding the assessment of impacts on the microbat habitat as requested by the public authorities.
