

## RESPONSE TO COUNCIL

TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
<p><b>Strategic Context</b></p>	<p><i>The Environmental Impact Statement has considered the strategic planning framework with assessment provided against the key policies being:</i></p> <ul style="list-style-type: none"> <li>o <i>The Greater Sydney Region Plan – A Metropolis of Three Cities – <b>The proposal is consistent with the GSRP objectives</b> relating to provision of services and infrastructure to meet communities changing needs and schools are identified as essential local infrastructure.</i></li> <li>o <i>North District Plan – <b>The proposal is consistent with the North District Plan</b> planning priority relating to providing services and social infrastructure to meet peoples changing needs. The North District Plan notes that an extra 21,900 students will need to be accommodated in both government and non-government schools in the North District by 2036, with Ku-ring-gai one of the highest projected areas of growth (+5,733).</i></li> <li>o <i>Ku-ring-gai Local Strategic Planning Statement – <b>The proposal is consistent with the infrastructure and social planning priorities</b> of the KLPS. In terms of economic planning priorities, the LSPS highlights that the education sector contributes significantly to the employment and local economy within Ku-ring-gai, with education and training providing for 19% of local employment within Ku-ring-gai. However, one of the key challenges is that while these institutions (private schools) are large employers within Ku-ring-gai, Council needs to manage the impacts of their future growth on the surrounding areas, particularly adjoining residential areas and infrastructure such as roads.</i></li> </ul>	<p>It is noted that the proposal aligns with a number of strategic directions. It is noted that the development has considered its impacts on surrounding residential areas and existing infrastructure and has minimised these to ensure they do not impact on future growth for the area.</p> <p>The proposal does not provide any housing and it is not considered that student accommodation is required to be incorporated as there is no identified need for PLC. Should there be a need identified for on-site housing for students in the future, this could be provided on campus or in close proximity.</p> <p>The proposed development will provide benefits to the local community, as services provided within the GHP will be open to some of the community. It is also considered that many of the students are local residents, and will greatly benefit through the provision of high quality teaching and learning spaces. These benefits have been outlined throughout the EIS.</p>



<b>TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION</b>		
<b>MATTERS RAISED</b>	<b>COMMENTS / REQUESTS</b>	<b>FORMAL RESPONSE</b>
	<ul style="list-style-type: none"> <li>○ <i>Draft Ku-ring-gai Housing Strategy – It is noted that the proposal does not include any dwellings/student accommodation.</i></li> <li>○ <i>Ku-ring-gai Community Strategic Plan – The EIS suggests that the proposal would provide benefits to the wider community through opening some of the proposed facilities for community use. It seems like most of the elements of the proposal (Junior School Classrooms, STEM labs, Health and Wellbeing facilities and the ELC) are either for the exclusive use of students or to be mostly occupied by children of staff. The statements throughout the EIE about benefits to the broader community may be overstated.</i></li> </ul>	
<b>Ku-ring-gai DCP</b>	<i>SEARs includes a requirement to address the relevant planning provisions in the Ku-ring-gai DCP. The EIS (4.23) notes that provisions of the DCP are not applicable to the proposal but as per the requirement of the SEARs, an assessment of the proposal against the relevant provisions of the KDCP has been included in the Compliance Table at Appendix 3. Assessment against the relevant provisions of the KDCP is missing.</i>	A DCP compliance table has been prepared and accompanies this submission which outlines that the development meets the requirements of the Ku-ring-gai DCP. See <b>Attachment J</b> .
<b>Ecologically Sustainable Development</b>	<ul style="list-style-type: none"> <li>▪ <i>Council's response to the draft SEARs encouraged the use of Green Building Council Australia Green Star rating and that for a development of this size and scale it should achieve a minimum 5 star Green Star (buildings) or equivalent.</i></li> <li>▪ <i>The proposal is supported by an ESD Report, which notes that the project will be designed to target an ESD level that is comparable to a 5 star Green Star Design and as built v1.3 Equivalent standard. The objectives of the Environmental Planning and Assessment Act include 'ecologically sustainable development'. Unless there is a good reason not to adopt the Green Star pathway it is recommended that the Department require the use of this system for the design, construction and operation of the development.</i></li> </ul>	The proposed development has been assessed against the Green Star rating to provide insight into the ecological sustainability of the proposed development. The building will require further evaluation once the detailed design phase has been completed. It is not considered that any further information is required to be provided.
<b>Overshadowing Impact</b>	<i>Page 85 of the EIS contains the following statement: As shown in the Shadow Diagrams (Appendix 8), no additional overshadowing of the</i>	Updated shadow diagrams are provided at <b>Attachment A</b> . The Design Report Addendum has also undertaken a thorough analysis



**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p><i>adjoining properties would be created prior to 12pm midday on the Winter solstice. As such, the proposal would effectively maintain three (3) hours of solar access between 9am-12pm on the Winter solstice, thereby complying with KDCP. This statement is flawed for the following reasons: The solar access requirements for a dwelling house are specified in Part 4 of the DCP, these requirements include:</i></p> <ol style="list-style-type: none"> <li><i>3. A building is to be designed and sited to maintain solar access to adjoining properties of at least 4 hours between 9am and 3pm on 21st June to north facing windows and all living areas (family rooms, rumpus, lounge and kitchen) and the principal private open space recreational areas, such as swimming pools and patios.</i></li> <li><i>4. Dwelling design and orientation is to provide at least 4 hours between 9am and 3pm on 21st June to north facing windows and all living areas (family rooms, rumpus, lounge and kitchen) and the principal private open space including swimming pools and patios, to the proposed dwelling.</i></li> <li><i>5. Where shadows cast by existing buildings preclude satisfying the above requirements, sunlight during winter solstice (21st June) should not be reduced by more than 20%. As the proposal predominantly impacts upon windows on the rear (north-western) elevations and rear private open space of adjacent dwelling houses the impacts upon these dwelling houses cannot be properly assessed using the plan view shadow diagrams that have been provided. A more detailed analysis of overshadowing impacts is required. Having regard to the scale of the proposal and the disparity in height between the proposed building and adjacent dwelling house it would be reasonable for the applicant to adopt the requirements of the Land and Environment Court Class 1 Practice Note which are set out below:</i></li> </ol> <p><i>Overshadowing plans are to:</i></p> <ul style="list-style-type: none"> <li><i>▪ be based on true north;</i></li> <li><i>▪ indicate the location and nature of existing and/or proposed fencing, with the shadows projected;</i></li> </ul>	<p>of the impacts of overshadowing to the adjoining residential properties. The results show that 57A Pymble Ave receives 3hrs 28mins of solar access to the private living and open space, while 59B receives 4hrs 2mins of solar at the Winter solstice. This is considered ample solar access, with direct shadowing onto the windows only being impacted at 2pm at the winter solstice. Much of the private open space of both dwellings is oriented to the North, away from the School building, and an analysis against the percentage of open space that is impacted has been undertaken (<b>Attachment B</b>). At 1pm (allowing 4hrs from 9am), 54% of the private open space of 59B Pymble Ave and 85% of the private open space of 57A Pymble avenue are still receiving sunlight.</p> <p>The requirements outlined by Ku-ring-gai Council in relation to 4 hours of access relate to residential developments, and as such is not considered appropriate to be used for a School building, however, the proposed development does not meet this time for one dwellings by 32minutes. On balance, it is considered that the dwelling would still receive ample solar access.</p> <p>An evaluation against the requirements of the KDCP2021 which relate to mixed use developments which align more commonly with the aims and outcomes of the school building, has been undertaken. 8C.1 Solar Access and Daylight outlines that: <i>“Three hours of direct sunlight between 9am and 3pm on 21st June is to be maintained to the living rooms, primary private open spaces and any communal open spaces within residential developments on adjoining sites”</i>. The development provides a minimum 3 hours of sunlight to adjoining developments as demonstrated in the provided solar access diagrams. Furthermore, the 3 hours of solar access aligns with the requirements of the Apartment Design Guide (ADG).</p>



TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION		
MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<ul style="list-style-type: none"> <li>▪ <i>indicate horizontal and vertical impact, including any impact from any substantial wall;</i></li> <li>▪ <i>provide a table of compliance and non-compliance with known criteria (such as a development control plan, a State environmental planning policy or Australian Model Code for Residential Development (AMCORD)); and</i></li> <li>▪ <i>make appropriate allowance for the topography.</i></li> </ul> <p><i>According to the planning principle for solar access (The Benevolent Society v Waverley Council [2010] NSWLEC 1082), the ease with which sunlight access can be protected is inversely proportional to the density of development. There is a reasonable expectation that a dwelling in R2 zone and some of its open space will retain its existing sunlight. Once an adequate analysis of overshadowing impacts has been received the reasonableness of the impact should be considered against the requirements of the DCP and the planning principle.</i></p>	<p>The Architectural Plans (<b>Attachment A</b>) also demonstrate that the existing dwelling houses and rear garden spaces are already overshadowed by the retaining walls and the nearby topography, with some of their open space being overshadowed by the dwelling houses themselves. It is considered that the proposed development ensures adequate solar access to these dwellings. Detailed solar analysis is shown in the Design Report Addendum (<b>Attachment B</b>).</p>
<b>Height and bulk of the building</b>	<p>The proposed building is 5 storeys at the south-eastern elevation and is set back 11.5 metres to 14 metres from the south-eastern boundary. The properties adjoining the south-eastern boundary are mainly two storey dwellings within the R2 Low Density Residential zone. According to Part 2F of the Apartment Design Guide, when there is a change in zoning (in this case from SP2 to R2) building setbacks should be increased. This requirement in the Apartment Design Guide is also consistent with the planning principle regarding development at a zone interface (Seaside Property Developments Pty Ltd v Wyong Shire Council [2004] NSWLEC 117). While the Apartment Design Guide does not apply to the site, however the principles behind the AGD to ensure new development is appropriately scaled and providing amenity to adjoining properties including visual and acoustic privacy and sunlight should be adopted. The development is excessive in scale and is needed for transition in the built form to reflect the adjoining lower density development.</p>	<p>Design amendments have been made to reduce the perceived height of the building (<b>Attachment A and B</b>). The upper level is now setback to the north-east elevation, and the existing scalloped atrium entry has been increased in width and depth to give a greater open area. The recessing of the upper level has significant reduction in overall perception of height, as this is the elevation that experiences the greatest total height due to topography.</p> <p>While the overall scale of the building has been reduced, it is not considered that a building of this scale would alienate students. The proposed building has various spill out spaces and landscaping elements that allow for interaction in and around the built form, to ensure that the junior school students and all students have a positive experience on campus. The proposed building has been designed to be user friendly to all students on the campus, with the overall height of the building not dissimilar to many other schools</p>



**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p>Principle 1 (context, built form and landscape) of the design quality principles under State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 states schools should be designed to respond to and enhance the positive qualities of their setting, landscape and heritage, including Aboriginal cultural heritage. The design and spatial organisation of buildings and the spaces between them should be informed by site conditions such as topography, orientation and climate. Principle 5 (amenity) requires schools to provide pleasant and engaging spaces that are accessible for a wide range of educational, informal and community activities, while also considering the amenity of adjacent development and the local neighbourhood; and Principle 7 (aesthetics) indicates school buildings and their landscape setting should be aesthetically pleasing by achieving a built form that has good proportions and a balanced composition of elements. Schools should respond to positive elements from the site and surrounding neighbourhood and have a positive impact on the quality and character of a neighbourhood. The built form should respond to the existing or desired future context, particularly, positive elements from the site and surrounding neighbourhood and have a positive impact on the quality and sense of identity of the neighbourhood.</p> <p>The proposal does not achieve the design quality principles as it is excessive in height and scale at the south-eastern (rear) elevation and results in overbearing visual and overshadowing impacts upon adjoining dwelling houses as seem above in Figure 1. Given the building is adjacent to a low density residential zone, the built form of the development should better relate to the context and be designed to avoid overshadowing by appropriate stepping of the building form and additional side setbacks at the upper levels.</p>	<p>across NSW. The building is designed to integrate into the school campus in its existing form and into the future.</p> <p>The proposed design has a minimum setback of 11.5m in the lower mainly outdoor areas and a 19.2m setback for the upper levels. In reference to the Apartment Design Guide and setbacks between two different zones, the ADG recommends increasing setback 3m from the recommended setback which for 5-8 storeys is 18m between habitable rooms/balconies, 12m between habitable and non-habitable rooms and 9m between non habitable rooms. These are only conditions that are recommended to ensure the best outcomes for buildings in terms of visual privacy and sunlight. The current largest setback provided at 19.5m is only 1.5m less than the largest recommended setback at 21m. As demonstrated in the Design Report Addendum (<b>Attachment B</b>), there are no inappropriate impacts on overlooking or solar access and as such the setbacks are considered suitable in this instance.</p> <p>The principles under the <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (TI SEPP), were addressed within the original EIS documentation. In particular, the proposal is considered of high quality design, that is in keeping with the surrounding context being both the residential and surrounding school campus. The SDRP has provided positive commentary on the design, and it is considered that there are no impacts to the amenity of adjoining residential dwellings. Specifically the proposal addresses the following principles:</p> <p>Principle 1 – Context, built form and landscape: the proposed is of a high quality design, with landscaping integrated around the building, and continuing onto the buildings façade. Extensive</p>



<b>TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION</b>		
<b>MATTERS RAISED</b>	<b>COMMENTS / REQUESTS</b>	<b>FORMAL RESPONSE</b>
		<p>consultation with local indigenous elders has ensured that the landscaping and enhance the connection to Country.</p> <p>Principle 5 – Amenity: The proposed building provides a high quality learning environment, providing substantial benefits and much needed educational space to the existing school. As outlined in the EIS, there are no undue amenity impacts to the nearby residential receivers with regards to noise, solar access, overshadowing or privacy.</p> <p>Principle 7 – Aesthetics: Extensive design development has been undertaken, and the proposed architectural design is considered to positively contribute to the built environment through its detailed façade, additional greening of the building, and its colour palette which reflects the blue gum high forest being the traditional landscape for the area.</p>
<b>Childcare Assessment Table</b>	Page 2-17 of the Childcare Planning Guideline Assessment Table references an incorrect address.	This appears to be a formatting error. The table heading should read: <i>“Child Care Planning Guideline Assessment Table Built Form Approval for Grey House Precinct, Pymble Ladies College 20 Avon Road, Pymble (Lot 1 DP 69541)”</i>
<b>Traffic and parking</b>	<p><b>Part 4.2 Crash History</b></p> <p>Unclear why the crash history on Avon Road and intersection Avon/Pymble/Everton was not considered.</p>	<p>According to the Centre for Road Safety <i>“Crash and casualty statistics – LGA Review”</i> there are no reported crashes on that specific intersection that are within the database available to the public. See <b>Figure 1</b> below for the most recent mapping of the area:</p>



<b>TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION</b>		
<b>MATTERS RAISED</b>	<b>COMMENTS / REQUESTS</b>	<b>FORMAL RESPONSE</b>
		<div style="border: 1px solid black; padding: 5px;"> <p><b>Figure 1: Crash Casualty Statistics – LGA Review Map</b> (<i>TfNSW Road Safety, 2022</i>)</p> <p>Stantec note that crashes not included in TfNSW’s data may be due to the following reasons:</p> <ul style="list-style-type: none"> <li>- Crashes were not reported to the police</li> <li>- Did not involve at least one person being injured, killed or at least one motor vehicle being towed away.</li> </ul> <p>Council will need to provide more detailed crash data if they would like it included in the TIA.</p> <p><small>*To be noted: Crash data was collected from 2016-2020</small></p> </div>
	<p><b>Part 8.2 Proposed parking Provision</b></p> <p><i>“The College proposes to utilise the existing swim school spaces located in the Centenary Car Park. In order to accommodate an accessible space and its adjacent shared bay, two existing spaces will need to be replaced and result in a total of 37 parking spaces. This will provide 37 parking spaces (including one accessible space) for the ELC to be used during drop-off and pick-up.”</i></p>	<p>The 37 parking spaces will be shared between the existing Learn to Swim programs and the ELC. These are existing parking spaces that are located in a boom-gated area within the Centenary Car Park and are currently used exclusively by the Learn to Swim users.</p> <p>The Learn to Swim operates in the morning from 9:00am to 12:00pm and in the afternoon from 3:30pm to 6:00pm Monday to Saturday. The morning learn to swim programme is open to the wider</p>





TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION		
MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p><i>Drop-off for the ELC is expected to be between 7:00-7:30am whilst pick-up will be between 6:00- 6:30pm. This will allow the ELC to operate in parallel with the OSHC and allow for working parents to drop-off/ pick-up their children before/after work. However, it is noted that drop-off and pick-up for ELCs are typically spread throughout several hours, particularly in the afternoon where there is an after-school and after-work peak."</i></p> <p>How does this work with co-curricular activities within the College grounds that take place between 6:30am to 8:00am and 3:00pm to 6:30pm Monday to Friday – is there a conflict, or are different areas used for the drop-off/pick up? Recent traffic counts in surrounding streets indicate that the AM peak occurs at 7am-8am, so there will likely be a cumulative impact to surrounding local roads by non-staff arrivals/departures to the ELC. This issue needs to be addressed.</p>	<p>community whilst the afternoon programme is only open to College students, thus not requiring separate parking.</p> <p>The ELC will open from 7am with peak drop-off expected to occur between 7:00am to 8:00am. As such, overlap between the ELC and Aquatic Centre use is not expected to be an issue in the morning.</p> <p>In the afternoon, peak pick-up for the ELC is expected to occur between 4:30pm to 6:30pm. Seeing as the afternoon Learn to Swim programme is only open to College students, the parking demand is not expected to be significant, as most College students will already be on campus. However, there will be a demand for parking at the end of each Learn to Swim programme where students are being picked up by parents/ guardians. Nonetheless, normal school time will be over and majority of the spaces within the Centenary Car Park, which has a capacity of 212 parking spaces (excluding the 37 spaces within the boom-gated area proposed to be shared between the ELC and the aquatic centre in the morning periods), will be available for use.</p> <p>As such, there are no major issues with the shared use of the parking spaces between the ELC and the aquatic centre. It is considered the most appropriate response to ensure there are no additional impacts on biodiversity and the majority of the land can be utilised for practical learning and outdoor play space across the campus.</p>
	<p><b>Part 8.4 Overall Parking Impact</b></p> <p>In Section 3, Proposed Development, it is indicated that staff demand for ELC places could be upwards of 60 children. In this section though the impression given is that the wider community will be the main users, by the fact that in this section of the traffic impact assessment staff are not</p>	<p>Section 3 of the EIS states <i>"It is anticipated that a significant proportion of the ELC places would be occupied by children of staff at the College."</i> It then states that <i>"The intention would be for the ELC, Dance Academy and OSHC holiday care program, to be available for use by the broader community."</i></p>





**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p>mentioned as the users. Presumably staff could park in their allocated spaces and walk their children to the ELC without needing to use the Centenary Car Park.</p> <p>This is later clarified in Section 9.1 (TRAFFIC GENERATION), where it is noted that the number of children enrolled at the ELC who would contribute to additional traffic is expected to be less than 90 children due to the premise that the main intention of the ELC is to provide an on-campus early learning/child care centre for staff and based on staff survey results it is assumed that 42 children from staff members would be enrolled and would therefore not generate additional traffic.</p> <p>Notionally, this should also reduce the parking demand in the Centenary car park as presumably staff could park in their allocated spaces and walk their children to the ELC without needing to use the Centenary Car Park. This has not been considered but should be clarified.</p>	<p>The primary reason for setting up the ELC is to allow the College to provide early learning services for staff members who have children. This will, in turn, allow the College to retain many of its staff members who, otherwise, would often leave their position to care for their children. As such, it is expected that many of the children enrolled within the ELC will have parents who are staff members of the College, and this is reflected in the survey undertaken by the College (refer to Appendix B of the TIA).</p> <p>As such, the traffic and parking impact from the proposed ELC is expected to be minor and Stantec agrees with Council's notion that this will also reduce the parking demand in the Centenary Car Park as staff who will enroll their children in the ELC could park in their allocated spaces within the campus and walk their children to the ELC without needing to use the Centenary Car Park. However, the ELC will be open to wider community and it is difficult to forecast how many staff members will enroll their children in the ELC in the future. As such, the TIA assessed the traffic and parking impacts based on the worst-case scenario (all children enrolled in the ELC do not have parents who are staff members of the College) and concluded that the impact will be minor to the existing conditions.</p>
	<p><b>Part 9.3 SIDRA Assessment</b></p> <p>The intersection of Avon Road /Pymble Avenue/Everton Road should have also been considered and assessed in the Signalised &amp; unsignalised Intersection Design and Research Aid (SIDRA assessment, particularly since there is a key pedestrian crossing and commuter drop-off/pick up areas in close proximity to the intersection. Also, consideration should be given to assessing impacts to the route between the site and the traffic signals on Pacific Highway and Beechworth Road (i.e. Avon Road/Arilla Road/Mayfield Avenue/Allawah Road/Beechworth Road), which has experienced gradual</p>	<p>The roundabout between Avon Road/ Everton Road/ Pymble Avenue has been modelled using SIDRA 9.0.</p> <p>Due to the Covid-19 pandemic and the Omicron variant which resulted in many people working from home and the school summer holiday period, collecting traffic counts at the roundabout was not considered appropriate as it would not reflect normal school peak conditions. As such, similarly to the assessment of the signalised intersections along Pacific Highway, the modelling had to rely on</p>



**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p>increases in traffic volumes over the years partly as a result of traffic movements from PLC.</p>	<p>historical data gathered in 2012. In order to baseline the growth in traffic since 2012, an assessment of the historical data available from TfNSW's Traffic Volume Viewer was undertaken. The assessment looked at four counters around the College as shown in the figure below. The historical average daily traffic volumes are summarised in Table 1. The comparison only assessed average daily traffic volume data from 2012 to 2019 as this would represent the pre-Covid trend in traffic.</p> <p>See <b>Attachment D1</b> for the SIDRA Modelling results.</p> <p>Based on the available data, there is no evidence to suggest that background traffic along the major roads, surrounding the College have been growing over time. Nevertheless, a 1% background traffic growth has been applied to the 2012 AM and PM peak traffic volumes which results in the following turning volumes at the roundabout and provides a base case for the SIDRA modelling.</p> <p>The SIDRA results indicate that the forecasted traffic generated from the ELC will have minor impact to the existing conditions of the roundabout with Level of Service (LoS) maintained and minor increments in average delays.</p> <p>Stantec does not believe that SIDRA modelling is necessary to assess the impacts that the additional traffic generated by the proposed ELC will have on the intersections along the route between the College and the signalised intersection between Pacific Highway and Beechworth Road (i.e. via Arilla Road, Mayfield Avenue and Allawah Road).</p>



<b>TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION</b>		
<b>MATTERS RAISED</b>	<b>COMMENTS / REQUESTS</b>	<b>FORMAL RESPONSE</b>
		<p>Since right turn into Beechworth Road from Pacific Highway is currently not allowed, the only trips that are expected to use this route are outbound vehicles travelling towards the north. When analysing the postcode data received by PLC, approximately 35% of existing students live to the north of the College and may use this route. The ELC is estimated to generate 72 trips in the AM peak and 63 trips in the PM peak (based on RMS trip rates). This will equate to approximately additional 25 trips in the AM peak and 22 trips in the PM peak possibly utilising this route.</p> <p>It is noted that this estimation is considered to be conservative approach since the primary intention of the ELC is to provide an on-campus early learning/ child care centre for the staff members and allow the College to retain valuable staff members who would otherwise find it difficult to return to work after maternal/ parental leave. As such, in reality these trips are expected to be lower than what has been estimated.</p> <p>Nevertheless, an additional 25 vehicles are expected to have minor impact to the existing roadway conditions along this route. The ELC will be opening from 7am each morning, with drop-off occurring between 7am-9am and peak pick-up occurring between 4:30pm-6:30pm. As such, these additional 25 trips will most likely be spread across the drop-off and pick-up periods and unlikely to be arriving/ departing all at the same time. This is typical traffic behaviour with long day care centres.</p>
	<p><b>10.0 Recommendations to reduce impact on Pymble Avenue</b> <i>“Install gate at Grey House Walk which can only be opened using a keycard, which can be distributed to local students (College to determine definition of ‘local’ students). This will reduce College traffic along Pymble Avenue;”</i></p>	<p>Currently, students require permits to enter/ exit via the Grey House Walk with staff monitoring the gate. Following the College’s co-curricular activities, the Grey House Walk is shut at 6:00pm. At times,</p>



TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION		
MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p>The recommendation to install a gate at the entry to Grey House Walk, with keycard entry to local students may discourage some students from walking to school that way.</p>	<p>the College has accommodated local families for events such as theatre events and other performances.</p> <p>The intention of the Grey House Walk is to be used by local students who live along Pymble Avenue, not by the whole College.</p> <p>This in turn, will reduce the number of students using the entrance and deter parents/ guardians from dropping off and picking up students along Pymble Avenue.</p> <p>All ELC parents will be given access remote for the boom gate, which will allow access into the restricted parking area within the Centenary Car Park.</p>
	<p><i>“Work closely with Ku-ring-gai Council to implement timed parking along Pymble Avenue, with exception to permit holders. Permits can be made available to residents;”</i></p> <p><i>It should be noted that Council has a policy not to enter into Resident Parking Schemes or issue Resident Parking Permits.</i></p> <p><i>The recommendation that Council consider timed parking restrictions on Pymble Ave near Grey House Walk with permits for residents is not supported by Council’s Traffic and Transport Team. This would encourage parents to use this area for drop-off/pick-up instead of the designated car park within the school grounds.</i></p>	<p>Noted. This has been removed from the recommendations list (<b>Attachment D1</b>).</p>
	<p><i>“Investigate feasibility of providing remote drop-off and pick-up area (e.g. nearby park).”</i></p> <p><i>With regard to a remote pick-up/drop-off area, Council staff would require more information regarding possible locations to determine whether it would be feasible. There is also a possible issue with quarantining parking for the college in an area that is nowhere near the college.</i></p>	<p>Noted. This is to recommend that ongoing collaboration should take place between the College and Ku-ring-gai Council to reduce the school’s traffic impact on the immediate surrounding road network.</p> <p>Further investigation and assessment would need to occur outside of this SSDA. This SSDA pertains to the proposed Grey House Precinct which will have minor impact to the existing traffic and parking conditions.</p>



**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p><i>"It is noted that to reduce overall traffic and parking impact in the long term, students and staff will need to make greater use of sustainable travel options (public and active transport). Measures to achieve this are discussed in the Green Travel Plan"</i></p> <p>The ability for students to use active transport (cycling) is currently impacted by the fact that the College does not permit students to cycle to/from the College campus for safety reasons. In reality though, the Road Rules state that children aged up to 16 years (i.e. the majority of students at PLC) are permitted to ride bicycles on footpaths, which are generally separated from traffic lanes on roads.</p> <p>The Green Travel Plan sets targets for travel modes, with the objective to reduce the number of private vehicle trips and increase the uptake of alternative modes of transportation. One of the short term targets is to increase the use of public and active transport by students by 1% per year (i.e. increase public and active transport usage to approximately 30% of travel mode). To facilitate this, consideration should also be given to reviewing bicycle parking and bicycle support facilities (showers/change rooms/lockers etc) provision for students in this proposal, to encourage uptake of cycling. Also, a review of the access points into the site and the obstacles to cycling and walking (e.g. stairs, squeeze points etc) should be undertaken, so as not to discourage walking or cycling for students living within walking or cycling range from the school.</p>	<p>It is noted that the College has made arrangements with Council to allow drop-off and pick-up to occur on the other side of the rail line, along Grandview Street, which has proven to alleviate some traffic along Livingstone Avenue, Everton Street and Avon Road.</p> <p>Noted. The Green Travel Plan has been amended to include implementation strategies to increase the use of active transportation by students. Refer to Section 7.3.1 of the GTP (<b>Attachment D2</b>).</p>



TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION		
MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	With regard to improving footpaths, pedestrian facilities and cycling facilities around the college, these would be prioritised along with cycling and pedestrian facilities throughout the LGA.	
<b>Green Travel Plan</b>	<p><b>7.1 Travel Plan Committee</b></p> <p>The Green Travel Plan has only recommended a Travel Plan Co-ordinator and a Bus Co-ordinator be key roles within the school Travel Plan Committee.</p> <p>Council's Road Safety Officer suggested that an Active Travel Co-ordinator is also a key role as they would be responsible for creating/implementing/monitoring/evaluating Active Travel Programs encouraging increased walking/cycling/scootering to and from school.</p>	An Active Travel Co-Ordinator role has been considered. This has been added as a key role within the Travel Plan Committee. Refer to Section 7.1 of the GTP ( <b>Attachment D2</b> ).
	<p><b>6.0 Target Travel Mode</b></p> <p><i>"Students "Increase the use of private Bus Services by 1% per year..."</i></p> <p>The school should consider investing more heavily in this area and 1% of the school population per year is not meaningful or impactful.</p> <p>It equates to 22 students in a school population of 2259 students plus 400 staff. This percentage should be reviewed/increased.</p>	<p>It is noted that this is for the short-term (first 3 years of implementation) target which is to increase private bus usage to approximately 15% of the total travel mode) which is currently at 10-11% of the school population. This equates to an additional 66 students utilising the private bus services.</p> <p>Nevertheless, the targets have been reviewed updated to be more ambitious. Refer to Section 6.0 of the GTP (<b>Attachment D2</b>).</p>
	<p><b>7.3 Recommended Initiatives</b></p> <p>The targets lacking in any reasonable level of ambition. More definitive actions are necessary, better bench marking/ timeline requires more detail. Without target dates reasonable and meaningful outcomes will not be achieved.</p> <p>Consideration in the table must include: <b>Implement on-going school Active Travel initiatives/programs</b></p>	Noted. These have been included in Section 7.3.1 of the GTP ( <b>Attachment D2</b> ).



**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p>In the table, there is a lack of detailed College-led active travel initiatives/programs regarding pedestrian/bike/scooter programs that could be implemented at the school. Raising road safety awareness, providing a TAG and only participating in one off events is not a sustainable way to increase regular active transport to and from school. There is no mention of community walking, buses, incentivised student walking programs, weekly class/grade pedometer challenges, external providers implementing road safety courses etc. These should be included in this section.</p> <p>The expertise and knowledge regarding these programs should be driven/conducted by the school's Active Travel Co-ordinator.</p>	
<p><b>Landscape design report and Landscape package</b></p>	<p>The landscape report does not provide site wide details of the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage to contribute to objectives to increase urban tree canopy cover.</p> <p>The landscape package and arborist assessment do not provide evidence that opportunities to retain significant trees have been explored and/or informs the plan. Tree removal to accommodate the development footprint results in the removal of almost all trees within this area.</p> <p>The proposal includes the removal of 29 of 30 trees including 2 trees (410 &amp; 411) Eucalyptus microcorys, Tallowood, of high retention value, as they are in excess of 20m in height. Thirteen trees rated as having moderate retention value including a number of large and mature trees in excess of 15m tall (Trees 48 &amp; 50), Eucalyptus microcorys, Tallowood in excess of 20m, Trees 400, 401, 404, 406 Quercus palustris, Pin Oak, Trees 392 and 393 Liquidambar styraciflua, Tree 50 Casuarina cunninghamiana are also to be removed.</p>	<p>It is to be noted that the site planting is limited to the Grey House Precinct as this is the extent of the proposed development. The proposed tree planting species and locations have been based off the wider tree master plan for the campus as well as site conditions and functions (screening, re-forestation, shade). The proposed tree planting achieves 28% canopy cover with the use of non-native trees to ensure adequate solar access during the winter months.</p> <p>The trees that have been selected to be removed are considered highly necessary for the structure and building footprint of the proposal. It is to be noted that only the trees that will have extensive damage due to the proposal, cannot have a suitable tree protection zone established or will hinder the construction of the building all together, will be removed.</p> <p>There will be replacement tree planting to offset some of the trees lost on site. The landscape documentation specifies the re-use of the</p>





**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p>These trees form an extensive canopied area within the current precinct. No specific discussion has been provided in relation to evidence that opportunities to retain significant trees have been explored and/or informs the plan either for the current precinct or within the larger property area.</p> <p>New trees proposed as replacement include 4 tall locally occurring native trees <i>Eucalyptus pilularis</i>, <i>Eucalyptus saligna</i>, <i>Syncarpia glomulifera</i>, and 4 <i>Corymbia citriodora</i> a non-locally occurring native tree.</p> <p>Thirteen medium sized exotic trees (<i>Jarcaranda</i>, <i>Liriodendron</i> and <i>Harphephyllum</i>, <i>Zelkova</i> sp.), 3 medium sized native trees (<i>Glochidion ferdinandii</i>) and 7 small native trees (<i>Elaeocarpus reticulatus</i> and <i>Angophora hispida</i>) are proposed.</p> <p>Tree replenishment is supported, however the trees are located to the edge of the development footprint to the west, south and north, rather than being more evenly distributed as occurs at present. While the replacement species are appropriate in a general sense and will grow in this environment, the location and/or space provided for some of these trees is not considered to be satisfactory in relation to the long term sustainability of this planting. For example, the proposed 4 x <i>Corymbia citriodora</i> (Lemon Scented Gum) are located in what appears to be a narrow landscape strip adjacent the western edge of the site and minimally offset from the ELC play area and nearby aquatic/sports centre. These are large smooth barked <i>Eucalyptus</i> that require a substantial area for growth. The space provided is not satisfactory for this species. Further, smooth barked species such as this have a propensity for branch drop and are not suitable over a children’s play area once mature.</p>	<p>timber from removed trees as furniture, edging and play elements within the proposed landscape design.</p> <p>The current tree planting schedule attempts to replace the lost trees as well as provide suitable screening for the visual impact issues and privacy concerns that are currently put forward by residents.</p> <p>The wider campus masterplan includes a constraints map of the entirety of the school site. This plan outlines the Grey House Precinct as a suitable spot to reduce the loss of biodiversity as compared to the rest of the whole site.</p> <p>The tree removal is to be offset with tree replacement planting through the already established campus wide tree planting strategy which has already seen the planting of 50 trees over the last 12 months. In addition to this the school and Oculus are undertaking a landscape master planning process to establish the long term tree planting strategy.</p> <p>New trees proposed as replacement include 5 tall locally occurring native trees <i>Eucalyptus pilularis</i>, <i>Eucalyptus saligna</i>, <i>Syncarpia glomulifera</i>, and 4 <i>Backhousia citriodora</i> a non-locally occurring native tree.</p> <p>This species has been changed to <i>Backhousia citradora</i> – (Lemon Cented Myrtle) in Tender design and planting bed has been increased along the ELC edge to ensure adequate soil volume for tree planting.</p>



**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE				
	<p>Similarly, there is insufficient space provided for the planting of tall trees (Eucalyptus pilularis and E. saligna) in between the southern elevation terrace and the access road. These areas are too narrow (2-2.5m wide) and the trees are too close to the dance break out areas and stair access area link to Grey House Walk. These tall trees would contribute substantially to screening/ softening of the development when viewed from adjacent properties, but require greater setbacks and space taking into account size at maturity.</p> <p>Wider landscape areas should be provided for tall tree planting and greater setback to the southern common boundary to achieve a better landscape outcome in these areas.</p> <p>The exotic planting also to the north of the proposed building of Catalpa is also minimally offset from the proposed building (2 -2.5m) and is not practical for a medium sized tree.</p>	<p>The amended design has significantly increased the landscape planting area to the south of the dance studios as well as significant reduction in the retaining walls required to ensure adequate soil volume is provided for the larger trees.</p> <p>The trees have been be shifted north away from the building to ensure adequate clearance.</p>				
<p><b>10. Environmental Health – noise, lighting, food safety</b></p>	<p>The table below sets out concerns related to noise, lighting and food safety associated with the proposal and considerations to protect residential amenity. Council has received complaints in past years about activities at Pymble Ladies College relating to noise and lighting. The proposed location and uses of this building, in such close proximity to residential properties, is likely to affect residential amenity. If the proposal is to be approved it is requested that conditions be applied to provide effective protection for near-by residents for the on-going use, post issue of the occupation certificate. Some examples of conditions applied by Council for similar uses is included at the end of this document for reference if applicable or helpful for consistency.</p> <table border="1" data-bbox="365 1252 1288 1329"> <thead> <tr> <th data-bbox="365 1252 840 1329"><u>Concern</u></th> <th data-bbox="840 1252 1288 1329"><u>Considerations for impacts/conditions</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="365 1329 840 1329"> </td> <td data-bbox="840 1329 1288 1329"> </td> </tr> </tbody> </table>	<u>Concern</u>	<u>Considerations for impacts/conditions</u>			
<u>Concern</u>	<u>Considerations for impacts/conditions</u>					



**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p><b>Noise – dance studio and hall after standard school hours</b> Council has investigated and confirmed offensive noise levels from the amplified equipment (music/instruction) during operation of the existing dance studio at Pymble Ladies College after standard school hours. The use of the current dance studio regularly exceeds the standard co-curricular hours identified in the EIS with use occurring on Sundays and before 7am and up to 7:30pm weekdays. Council has been provided with a timetable from the school confirming the programmed use of the facility outside of the standard cocurricular hours. The noise impact assessment identifies possible noise impacts for residential occupants from the use of the hall particularly after standard school hours by other users. The consultant has identified noise sources including amplified music and public address systems and provides recommendations for glazing and wall construction.</p>	<p>Conditions are required to protect residential amenity by specifying:</p> <ol style="list-style-type: none"> <li>1. Restricted hours of use for co-curricular purposes.</li> <li>2. Noise levels restriction at the boundary from use of amplified equipment (i.e. no greater than 5dB(A) above the background noise (LA90, 15 min) when measured at the nearest adjoining property boundary).</li> <li>3. Compliance with glazing and external wall construction recommendations identified in noise impact assessment.</li> <li>4. Doors and windows facing the residential premises being closed when in dance studio and hall is in use. Please refer to examples 9,10,16,18 of Council's list of conditions below.</li> </ol> <p>The existing dance studio at the college is considered a temporary solution which this development aims to address. The excessive noise at the site will be reduced due to the extensive soundproofing and purpose-built nature of the dance studios. There will be the important feature of the music switching off when the main doors of the studio are opened which will significantly reduce the level of noise that escapes the centre.</p> <p>The dance studio is considered a co-curricular activity that will operate between the timetabled times that are provided by the school. The recommendations provided, will be included within the proposal in terms of glazing and wall construction to reduce effects for neighbors. The school will abide by any conditions relating to noise generation and restrictions of hours as outlined in the Noise Impact Assessment (<b>Appendix 26</b>) and the Plan of Management (<b>Appendix 32</b>).</p>
	<p><b>Noise – childcare centre</b> Concerns raised about noise from childcare centres when in operation tend to</p>	<p>Conditions are required to protect residential amenity by specifying:</p> <p>There is no proposed use of music or amplified sound equipment in the outdoor play area of the ELC. There will be reduced activities in</p>



TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION			
MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE	
	<p>relate to use of outdoor play areas after 5pm and amplified music.</p>	<ol style="list-style-type: none"> <li>1. Restriction of use of music or amplified sound equipment in the outdoor play area.</li> <li>2. Restrict hours of use of outdoor play area after 5pm.</li> <li>3. Compliance with construction recommendations for barrier to external play area as identified in noise impact statement</li> <li>4. Doors and windows facing the residential premises being closed when in use.</li> </ol>	<p>outdoor areas of the ELC after 5pm which will aim to reduce noise disturbance for neighbors. This can be conditioned accordingly.</p>
	<p><b>Noise – mechanical ventilation and plant</b></p> <p>Sources of mechanical noise for surrounding residents include air conditioners and mechanical exhaust from kitchen, bathrooms and toilets. Council has received complaints in relation to other schools and childcare centres where air conditioners and exhaust systems are left on overnight.</p>	<p>Conditions are required to protect residential amenity by specifying:</p> <ol style="list-style-type: none"> <li>1. An acoustic design report to identify all potential noise sources and provide recommendations for acoustic measures prior to issue of the CC.</li> <li>2. Positioning of condenser and plant in basements</li> <li>3. Specifying hours when equipment is to be turned off</li> <li>4. Noise levels at the boundary and in habitable rooms of residential premises. Please refer to examples 1, 4, 7, 11, 14, 15 and 17 of Council's list of conditions below.</li> </ol>	<p>The Noise Impact Assessment considered noise from all sources for the proposed building and it was considered these could be managed and mitigated appropriately. Mechanical noise will be monitored and the school will abide by any conditions relating to noise generation and restrictions.</p>



**TABLE 1: RESPONSE TO KU-RING-GAI COUNCIL SUBMISSION**

MATTERS RAISED	COMMENTS / REQUESTS	FORMAL RESPONSE
	<p><b>Lighting</b></p> <p>Council has received complaints in relation to light spillage from flood lights installed at the school and also complaints in relation to other schools and childcare centres where internal lighting is left on overnight causing disturbance to residential occupants.</p>	<p>Conditions are required to protect residential amenity by specifying:</p> <ol style="list-style-type: none"> <li>1. Requirements for external lighting on the building to prevent light spill</li> <li>2. Limiting use of internal lighting in the early morning, evening and at night</li> </ol> <p>Please refer to examples 3, 6, 12 and 19 of Council's list of conditions below.</p>
	<p><b>Food Safety - Childcare</b></p> <p>The size of the proposed kitchen for preparation of meals for 90 children does not appear to be sufficient to adequately accommodate the facilities and equipment required. Council's inspection of childcare centres of similar capacity has found that a kitchen with a minimum floor space of 19m<sup>2</sup> is needed to effectively accommodate all the fixtures and fittings including dry food storage, refrigeration and freezer units, bench space for food preparation and plating up, trolleys for distribution of food, commercial dishwasher, separate chemical storage etc</p>	<p>Conditions are required to ensure:</p> <ol style="list-style-type: none"> <li>1. That adequate space is provided for the operation of the kitchen including managing deliveries, storage and preparation</li> <li>2. That the kitchen is compliant with current food standards.</li> <li>3. Odour concerns for surrounding residents are addressed</li> </ol> <p>Please refer to examples 2, 5 and 8 of Council's list of conditions below</p>

