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Ku·ring·gai Council

Contact: Bonnie Yue

17th May 2022

Director Social and Infrastructure Assessments,
Planning and Assessment, Department of Planning,
Industry and Environment,
Locked Bag 5022, Parramatta NSW 2124

Dear Nahid,

Council has reviewed the amendments for Application No. SSD-17424905 (Pymble Ladies Collage – Grey House Precinct) at 20 Avon Road, Pymble. This objection is in addition to the submission opposing the Grey House Precinct development submitted by Ku-ring-gai Council on 6th December 2021.

1. Height and bulk of the building

The latest plans provide minor increase to the scallop atrium depth at Level 4, recessed the north-eastern (side) elevation of Level 4 and some architectural relief to the south-eastern (rear) and north- eastern (side) façade of the building, which is commendable. However, the proposed amendments provide minimal changes to the overall mass of the building and no legitimate improvements to the south-eastern elevation to address the building height and bulk impact to the immediately adjoining 1-2 storey dwelling houses within the R2 Low Density Residential zone. It is noted that an extra awning has been introduced to the southern side at Level 2 which will add further bulk to the building. The proposed development is inconsistent with the building line of the adjacent buildings (John Reid Building and Jeanette Buckham PE Centre), which have greater setbacks from the south-eastern boundary. The proposed large building set amongst adjacent smaller dwellings within the R2 zone is 'out of scale' and does not meet Principle 7 (aesthetics) of the State Environmental Planning Policy (Transport and Infrastructure) 2021 as it does not have good proportions and a balanced composition with the adjoining properties.

Principle 1 (context, built form and landscape) under State Environmental Planning Policy (Transport and Infrastructure) 2021 states that "*Landscape should be integrated into the design of school developments to enhance on-site amenity, contribute to the streetscape and mitigate negative impacts on neighbouring sites*." The development relies upon proposed landscaping along the south-eastern boundary to mitigate the substantial difference in scale between the proposed 5 storey building and adjacent 1-2 storey dwelling houses. The proposed landscape area along the south-eastern boundary is unlikely to contain sufficient space and provide appropriate growing conditions for the provision of large canopy trees. To achieve the design principles the built form must be of good design that mitigates the impacts of development, landscaping cannot be relied on because trees and vegetation grows, dies and changes over time whereas the built form remains for the life of the development. The revised plans fail to demonstrate compliance with Principle 1 of the SEPP and the concerns raised in the previous objection remain.

It is recommended that consideration be given to the relocating the top two or three levels of the building (Level 02, 03 and 04) towards the north-west and increasing the set back from the south-eastern (rear) boundary to minimise the visual bulk of the development as viewed from the adjoining dwelling houses, as shown in **Figure 1** below.

***Figure 1**: Area indicated as red should be relocated toward to north-western side of the building.*

2. Ecologically Sustainable Development

Any approval should include a condition requiring the use of the Green Star scheme for the design, construction and operation of the development.

3. Traffic and parking

MATTERS RAISED	COUNCIL COMMENTS / REQUESTS	APPLICANT'S RESPONSE	Council comments
Traffic and parking	Part 4.2 Crash History Unclear why the crash history on Avon Road and intersection Avon/Pymble/Everton was not considered	According to the Centre for Road Safety "Crash and casualty statistics – LGA Review" there are no reported crashes on that specific intersection that are within the database available to the public. See Figure 1 below for the most recent mapping of the area. Stantec note that crashes not included in TfNSW's data may be due to the following reasons: - Crashes were not reported to the police - Did not involve at least one person being injured, killed or at least one motor vehicle being towed away.	Council's recorded crash history aligns with the applicant's response and indicates there were no reported crashes at the intersection of Avon Rd/Pymble Ave/Everton Rd, and at the pedestrian crossing to the north west in the most recent 5 years of available data.

		Council will need to provide more detailed crash data if they would like it included in the TIA. *To be noted: Crash data was collected from 2016-2020	
	Part 9.3 SIDRA Assessment The intersection of Avon Road /Pymble Avenue/Everton Road should have also been considered and assessed in the Signalised & 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 increases in traffic volumes over the years partly as a result of traffic movements from PLC.	The roundabout between Avon Road/ Everton Road/ Pymble Avenue has been modelled using SIDRA 9.0. 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 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. See Attachment D1 for the SIDRA Modelling results. 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	The results of the SIDRA Modelling for the intersection of Avon Road /Pymble Avenue/Everton Road is noted. Council records from 2016 (provided to the applicant) indicate that weekday peak hour traffic flows in Arilla Road were an average of 510vph during the morning peak and 340vph during the school afternoon peak, and are likely to be indicative of traffic flows along the Arilla Road, Mayfield Avenue and Allawah Road route. These are already higher than the

		which results in the following turning volumes at the roundabout and provides a base case for the SIDRA modelling. 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. 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. 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. 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	RMS Environmental Capacity Performance Standard for a local road. Additional 25 trips in the AM peak and 22 trips in the PM peak by the proposal equates to an average of 1 additional trip every 2 minutes in the am peak and every 3 minutes in the pm peak. While this in itself is not a significant increase, in the context of the existing traffic flows along the Arilla Road, Mayfield Avenue and Allawah Road route will add to the perception of reduced amenity for residents. 85% vehicle speeds of 53 km/h were recorded in 2016 which is close to the 50km/h speed limit, and while there are some basic traffic calming facilities at the ends of Arilla Road (pavement bars to define the centre line) there are no other facilities along the Arilla Road, Mayfield Avenue and Allawah Road route. Based on the RMS Environmental capacity performance standards, there is probably already the need to consider traffic calming facilities along the Arilla Road, Mayfield Avenue and Allawah Road route (subject to resident consultation) to offset the effects of school activity on these residential streets. For traffic calming measures, the proponent should carry out investigations and prepare a concept traffic calming scheme for the roads mentioned above (by suitably qualified traffic engineering consultants) and submit it to consent authority as part of the application. Any approval should include a condition that the proponent shall seek Traffic Committee approval for the scheme, and once approved Council would do the

		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. 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.	consultation with residents (which may then require amendments to the plan by the applicant depending on the responses/ feedback). The proponent would pay the relevant fees for reporting and processing through the Traffic Committee. Once approval from the Traffic Committee/Council has been obtained, then the proponent would be required to obtain Roads Act approval for the works (paying the relevant assessment/approval fees as well). Once Roads Act approval has been given, the applicant can commence construction in accordance with the conditions of the Roads Act approval.

4. Landscape design

The previous landscape comments regarding site wide planting and consideration for opportunities to retain trees, distribution of tree planting within the precinct and issues of proposed tree planting and viability largely remain. It is noted the revised landscape plans are conceptual and do not detail proposed species.

The increase in width in some of the landscape areas adjacent the access road along the southern elevation is noted, however depending on species and locations it is still questionable whether there is sufficient space and setback from structures for the viability in the long term of large indigenous canopy trees. The general comments regarding this issue still apply.

The change indicated from Corymbia citriodora to Backhousia citriodora is noted. The width of this area is increased and is considered to be adequate, the issue of limb drop is unlikely to be a problem for this species unlike the former species.

The setback of the Catalpa buffer planting from the building is noted however the width of this area has not increased and therefore these medium to large trees are now closer to existing paved areas and Goodlet house, creating similar issues to those noted above regarding insufficient landscape area to accommodate tall canopy trees.

Conclusion

Council objects to the proposal as the concerns that were identified in the submission dated 6 December 2021 remain significantly unresolved. Council reiterates that the following impacts and concerns were identified and remain:

1. Height and bulk of the building
2. Ecologically Sustainable Development
3. Traffic and parking
4. Landscape design

If you have any questions in relation to this submission please contact me on 9424 0000.

Regards

Bonnie Yue
Senior Assessment Officer
Ku-ring-gai Council