Department of Planning and Environment



Our ref: St Luke's Grammar School - Senior School Campus and Sports Centre (SSD-10291)

Mrs Jane Hughes Business Manager St Luke's Grammar School 210 Headland Road Dee Why NSW 2099

2 June 2022

Subject: Request for Additional Information

Dear Mrs Hughes,

The Department has received comments from Transport for NSW (TfNSW) in response to the supplementary response to submissions (SRtS) documentation dated 17 May 2022 for the above application.

The Department notes that TfNSW raises strong concerns regarding the use of the driveway on Harbord Road (for the 800 Pittwater Road site) as an access point to the student drop off/pick up zone, particularly in relation to its proximity to the nearby major intersection.

TfNSW have also advised that student carparking on this site (for Year 12) is not be supported. This site should exclusively be used for parking by community/school parents or users outside the core school hours, and as school staff parking during core school hours in order to reduce the use of the driveway during peak school hours in the morning and afternoon.

TfNSW suggest that the drop-off/pick-up zone should be relocated to the existing kiss and drop areas within Headland Road and Tango Avenue. In this regard, TfNSW have requested that a Plan of Management for this drop-off/pick-up zone (noting its intensification) be prepared and submitted to TfNSW and Northern Beaches Council for review and endorsement, prior to submission to the Department for consideration as part of the determination of the SSD application.

The comments from TfNSW are attached to this letter.

The Department agrees with TfNSW comments with regard to the concerns with the dropoff/pick-up zone entrance driveway being within 800 Pittwater Road and also with TfNSW concerns with the overall intensification of vehicle movement within the peak school associated with the proposed Senior School Campus and the proposed changed behaviour of drivers accessing the site at the existing 800 Pittwater Road driveway location.

However, the Department raises concerns regarding the potential intensification of the existing drop-off/pick-up zone on Headland Road and Tango Avenue, as suggested by TfNSW.

The existing drop-off/pick-up zone is not considered to have capacity to accommodate these additional kiss and drop activities associated with the senior school and the use of this area for the future senior students would also significantly increase student pedestrian movements along Headland Road.

Additionally, the Department notes that the Work Travel Plan submitted with the RtS targets that only 2% of the Year 12 (senior school students) would drive to school in future, which equates to 12 car spaces. However, the proposal includes an excessive 82 car parking spaces for the Year 12 students across the three sites, which contradicts the future modal split targets and encourages more students to drive resulting in additional traffic generation and potentially unsafe operations at the 800 Pittwater Road site.

In the light of the above observations and comments from TfNSW, the Department requires the Applicant to provide a drop-off/pick-up zone for the senior school students within the Sports Centre (224 Headland Road) in lieu of the 39 car spaces allocated for Year 12 students.

224 Headland Road would be linked to 800 Pittwater Road internally and options for internal student movements from the drop-off/pick-up zone to the 800 Pittwater Road should be provided. The car parking within 224 Headland Road could still be used by community users of school users for sporting facilities, outside the core school hours. A shared arrangement of this car parking area would provide a desired outcome for the development and align with the Work Travel Plan.

In summary, the Department cannot progress with the assessment of the application in its current form. The following revisions and additional documentation is required unless the following information is submitted:

- drop-off/pick-up activities and Year 12 student car parking being removed from the Senior School Campus, and associated documentation such as revised plans being provided.
- fully detailed and dimensioned options of alternate drop-off/pick-up facilities within 224 Headland Road, as detailed in the above paragraphs. Parking and kiss and drop shall be prepared to meet relevant Australian standards with suitable separated pedestrian walkways between the kiss and drop area to building entrances to sure that pedestrians do not have to cross vehicle paths of travel after students leave the car located in the kiss and drop space.
- a revised Traffic and Parking Assessment Report providing an assessment of impacts of additional traffic flows on Harbord Road/Headland Road on the surrounding road network including intersections as a result of the relocated kiss and drop zone for the senior school.
- an Operational Plan of Management for Stage 1, 2 and 3 of the proposal, specifically targeting but not limited to the management of drop-off/pick-up zones, student

movements across the three sites, potential conflicts between tenancy vehicles and parking and student and staff movements (pedestrian and vehicle) .

- details of pedestrian paths through the 800 Pittwater Road siter demonstrating children (both for school and community use) can walk safely within the site clear of all conflicts with vehicle movements, especially during Stage 2 when Officeworks would be in operation.
- a layout of the drop-off/pick-up area and carpark within 224 Headland Road, being fully compliant with the relevant Australian Standards.
- an adequate turning circle or manoeuvring area for drop off/pick-up at the Sports Centre to ensure students do not need to walk within the path of vehicles, either forward or reversing.
- a Road Safety audit for the Sports Centre particularly in relation to the revised driveway, car parking and the existing driveway crossing conflicts with the other user 222 Headland Road North Curl Curl.
- a copy of the easement for 224/222 Headland Road, confirming that the Applicant has the legal right to access the shared driveway in all circumstances, including land owner's consent if vehicles pass over land not owned by the applicant.
- a revised Plan of Management considering the impacts and management measures for the proposed community use of the two sites.

You are requested to provide the information, or notify that the information will not be provided, to the Department by Thursday 30 June 2022. If you cannot meet this deadline or do not intend to provide the additional information, please advise the Department via the NSW planning portal.

If you have any questions, please contact Jasmine Tranquille, on 9274 6596 at Jasmine.Tranquille@planning.nsw.gov.au.

Yours sincerely,

Karen Harragon Director, Social Infrastructure Assessments

as delegate of the Planning Secretary