



6 February 2017

The Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention Mr David Gibson

Dear Mr Gibson

Re: Ballina High School Redevelopment 37-49 Swift Street, Ballina (SSD 7742)

I refer to your Department's invitation to Ballina Council to comment on the subject application and to provide advice on recommended conditions of consent.

The proposal has now been considered by the Council and the following comments and recommendations are made:

- The redevelopment of Ballina High School is an important local community infrastructure project that is strongly supported by the Council.
- The submitted plans show that the building design and site layout presents as an attractive and workable development and use of the site.
- As the project is a redevelopment of a similar sized secondary school, the Council anticipates that it can be adequately and readily serviced by the essential utilities.
- The Council supports approval being given to the variation of building heights being sought for the development.
- The Council also supports the inclusion of an archival process for documenting the heritage values of the existing school.
- The submitted application proposes a proper and complying approach to affording protection to both the school community and the built assets from the likely impact of flooding. In this regard, any issued development consent should include conditions requiring that the floor levels of any new or relocated buildings being set at minimum levels of 2.6m AHD as proposed.
- The submitted technical reports identify the critical need for a site specific stormwater management plan to be developed and installed and the application proposes to do so. This element should be reinforced by confirmatory conditioning of the consent to require that stormwater management be undertaken in accordance with an approved stormwater management plan that complies with the requirements of the Ballina Shire Development Control Plan 2012.
- Geotechnical considerations have been documented in the application as being another critical element of the proposal. The submitted technical reports identify that the site is characterised by a high water table and aggressive ground conditions that have bearing on the types of footings and piles that will be suitable for the project. In addressing piling, the geotechnical analysis postulates that, with timber being resistant to aggressive ground conditions, timber piles may be the preferable approach for the development to take. This option isn't preferred from a local

community perspective as the geotechnical report also advises that the locality will be susceptible to vibration if driven piles are used.

Additionally, while there has been an acoustic report prepared for the application that addresses noise from the day to day operating of the school, there does not appear to have been any consideration given, to date, to the noise impact of driving piles over a lengthy period on a site surrounded by sensitive receivers. As identified in the acoustic report that has been submitted, there is another school, a significant number of residences, various churches and the Ballina Hospital in the immediate vicinity of the site.

It is therefore considered that any consent should be conditioned to require dilapidation reports for surrounding structures, including infrastructure, and the use of screw piling or the equivalent as the impacts of pile driving haven't been adequately assessed and this construction method may not be suitable for this locality.

- Whilst the servicing and surrounding street system has the capacity to safely handle the traffic generated by the redeveloped school and the future indoor sports and community centre should it proceed, the submitted plans to remove all off-street parking from the site and provide for the school's teacher, student, and visitor parking, set-down and pick-up, entirely within the surrounding streets is unacceptable. The application's proposed approach would create a severe and avoidable impact on the established amenity of residents living in the immediate locality of the school and to the current safety and availability of on-street parking servicing the existing adjacent sports and community facilities.

The Council supports the submission of NSW Roads and Maritime Services dated 31 January 2017 in its entirety and recommends as an essential element that any consent issued be conditioned to require the provision of a minimum of 110 off-street parking spaces for the school (preferably having access from Cherry Street). These spaces should include the provision for weather protected disabled parking in accordance with the Australian standards to assist students, staff and visitors to the school.

Ideally, pick-up and set-down facilities for students should also be provided on-site as opposed to within the street system.

It is a fundamental requirement for new developments, particularly those that have the capacity to increase traffic and parking demand, to make proper provision for off-street parking and, simply, this application doesn't do so.

If you have any enquiries in regard to this matter please contact me on (02) 66 861 254.

Yours faithfully



Rod Willis
Group Manager
Development and Environmental Health



File No: NTH16/00081/02
Your Ref: SSD 7742

The Director
Industry, Key Sites & Priority Projects
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Michelle Niles – Social and Infrastructure Assessments

Dear Sir / Madam,

Ballina High School Redevelopment (SSD 7742) – Response to Notice of Exhibition

I refer to your letter of 12 December 2016 requesting comment from Roads and Maritime Services in relation to the abovementioned State Significant Development.

Roles and Responsibilities

The key interests for Roads and Maritime are the safety and efficiency of the road network, traffic management, the integrity of infrastructure and the integration of land use and transport.

In accordance with Section 7 of the *Roads Act 1993* Ballina Shire Council is the Roads Authority all public roads in the subject area.

Roads and Maritime is given the opportunity to comment under Clause 104 of the *State Environmental Planning Policy (Infrastructure) 2007* as the development is a traffic generating development listed under Schedule 3.

Roads and Maritime Response

The proposed development will impact primarily on the local road network. Review of the Traffic Impact Assessments (TIAs) and the Green Travel Plan (GTP) has raised some issues and it is suggested that the TIA be updated and a Parking Study be undertaken with consideration of the following:

- Traffic projections identified in the TIAs are based on historical data. Given Ballina's status as a developing regional centre it may be more appropriate to consider the traffic modelling undertaken for the Ballina Roads Contribution Plan to inform the adopted future traffic projections.
- The supporting TIAs adopt a traffic generation rate of 0.2 vehicle trips per student. The most recent surveys of vehicle trip generation rates commissioned by Roads and Maritime for NSW secondary schools have identified average trips rates of 0.35 in the am peak and 0.24 in the pm peak.
- The GTP and TIAs identify that between 70-80% of students arrive and depart within a 30 minute period within the morning and afternoon peak periods. The TIAs have averaged traffic counts over the peak hour, which potentially underestimates the peak flow effects and the intensity of subsequent impacts on the safety and efficiency of surrounding streets and intersections.
- The TIAs discount potential traffic impacts on the basis of "pass-by" trips. It is suggested that there will likely be some linked trips via Cherry Streets because of its connection to the population areas to the North-West of Ballina however linked trips originating from other areas would be diverted trips to the school, generating additional vehicle movements on the surrounding streets.

Roads and Maritime Services

- The TIAs have not identified the distribution or route assignment of trips generated by the proposed development. It is difficult to determine the accuracy of identified flows and subsequent impacts at affected intersections.
- The TIAs have not examined the performance of the Martin and Bentinck Street intersection or the Cherry and Bentinck Street intersection. The proposed development will generate peak hour movements through these intersections. Consideration should be given to the adequacy of existing intersection treatments and any improvements required to accommodate post-development flows.
- The median in Swift Street restricts the swept path of buses turning left into Martin Street. Any queuing of right turning traffic from Martin Street to Swift Street is likely to interrupt bus swept paths and result in delay to buses.
- The analysis of the intersection of Martin Street and Swift Street does not appear to consider the downstream effect of parking in Swift Street generated by the St Xavier Francis primary school.
- The proposal seeks to remove all on-site car parking spaces, which will transfer all existing parking demand onto surrounding local streets. The *Interim Guidelines for the Planning and Design of School Traffic and Pedestrian Facilities* recommends the provision of adequate on-site parking and that the design of the school should provide for the appropriate separation of pedestrians and cyclists from vehicular traffic. Further consideration should be given to providing on-site parking to reduce pedestrian activity on surrounding streets and minimise interactions between people and vehicles.
- Roads and Maritime surveys of NSW schools has identified average car parking rates of approximately 0.11 per student. This would equate to an average demand of 110 parking spaces required for the proposed development, which is significantly higher than the 70 spaces identified in the supporting TIAs.
- The supporting TIAs identify the parking capacity on surrounding streets, but not the existing peak hour demand generated by nearby developments. Further assessment is required to determine whether sufficient peak hour capacity will be available to accommodate the cumulative parking demand of existing and proposed development in the area.
- It is unclear if the 10 set down and pick up spaces in Cherry Street will be sufficient to cater for peak demand.
- There are three spaces proposed for people with disabilities and these should be provided at an appropriate location on-site. One space is proposed in the pickup and set down area in Cherry Street whilst the location of the other two spaces is not identified.
- The supporting TIA and Green Travel Plan have not identified or addressed the traffic, parking and road safety impacts of sporting and/or special events likely to occur at the proposed school campus.
- The loading zone accessed from Swift Street is designed so that vehicles will reverse into the loading bay. The loading zone is combined with a student set down area as shown in drawing no. A100 prepared by EJE Architecture. For safety reasons, loading zones, particularly with reversing heavy vehicles should be physically separated from pedestrians.

Observations suggest that vehicle congestion currently occurs at the existing Southern Cross School during peak arrival and departure times. The temporary increase in school population of 395 students will likely increase congestion on surrounding streets with subsequent implications for road safety. It is suggested that a site specific Traffic Management Plan (TMP) be prepared in consultation with council to determine temporary arrangements for car parking, vehicular and pedestrian access and bus pickup/set down. The installation of any regulatory devices will require the endorsement of the Local Traffic Committee and approval by Council before installation.

If you have any further enquiries regarding the above comments please do not hesitate to contact Liz Smith, Manager Land Use Assessment on (02) 6640 1362 or via email at: development.northern@rms.nsw.gov.au

Yours faithfully



Monica Sirol
Network & Safety Manager, Northern Region
31 January 2017

CC: Patrick Knight – Ballina Shire Council