

RESPONSE TO SUBMISSIONS

CURL CURL NORTH PUBLIC SCHOOL
SSD 17_8310



10 APRIL 2018
PREPARED FOR NSW DEPARTMENT OF EDUCATION



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Project Code	SA6451
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1. INTRODUCTION

1.1. OVERVIEW

This Response to Submissions Report (RtS) has been prepared on behalf of the NSW Department of Education (DoE) to respond to submissions received during the public exhibition of State Signification Development Application (SSDA) 'Curl Curl North Public School' (SSD 16_8310).

The SSDA was on public exhibition from 31 August 2017 until 16 October 2017. During this public exhibition period, twenty submissions were received from the general public and nine submissions were received from government, agencies and organisations comprising:

- NSW Department of Planning and Environment;
- Northern Beaches Council;
- Office of Environment and Heritage;
- NSW Environment Protection Authority;
- Transport for NSW;
- Roads and Maritime Services;
- Sydney Water;
- Curl Curl North Public School P&C Association; and
- Curl Curl Lagoon Friends.

The key matters raised within the submissions relate to:

- Construction impacts;
- Traffic and parking;
- Building bulk and scale;
- Existing and proposed Out of School Hours Service (OOSH); and
- Removal of existing prefabricated classrooms.

1.2. AMENDED PROPOSAL

To respond to the submissions, the proposal for Curl Curl North Public School (the 'School') has been amended. Key design amendments to the proposal are:

- Rearrangement of the proposed school buildings from a U-shape to two separated linear forms along the eastern and western site boundaries;
- Repositioning of the proposed school hall building further north at the site;
- Redesign of Block B to reduce the total height of the southern half of the building to single storey;
- Inclusion of an elevated bridge to directly connect Block A to Block M;
- Internal refurbishment of existing Block M;
- Repositioning of the proposed car park to the southern edge of the site adjoining Abbott Road;
- Enlargement of the proposed OOSH building and school hall to facilitate additional capacity;
- Rearrangement of proposed futsal courts;
- Inclusion of new dedicated pedestrian entry points off Playfair Road; and

- Redesign of associated site landscaping including the relocation of the proposed swale to the centre of the site and new dedicated landscape features.

The amended proposal will provide greater student amenity, reduced visual bulk and greater rationalisation of facilities and services. Further details of the amended proposal are provided within **Section 2** of this RtS and throughout each of the documents provided at **Appendix A – T**.

1.3. REPORT STRUCTURE

This RtS has been structured as follows:

- **Section 1:** Introduction.
- **Section 2:** Overview of the amended proposal.
- **Section 3:** Assessment of the amended proposal.
- **Section 4:** Response to submissions.
- **Section 5:** Conclusion.

1.4. PROJECT TEAM

A range of specialist consultants were engaged to assist in the preparation of this RtS, comprising:

Table 1 – Project Team

Deliverable	Consultant	Appendix
Amended Architectural Plans	TKD Architects	Appendix A
Amended Urban Design Report	TKD Architects	Appendix B
Amended Arborist Report	BLUEGUM	Appendix C
Amended Stage 1 Environmental Site Assessment	Environmental Investigation Services	Appendix D
Amended Remedial Action Plan	Environmental Investigation Services	Appendix E
Amended Integrated Water Management Plan	Woolacotts.	Appendix F
Amended Sediment and Erosion Control Plan	Woolacotts.	Appendix G
Amended Geotechnical and Structural Report	JK Geotechnics	Appendix H
Amended Stormwater Management Report	Woolacotts.	Appendix I
Amended Flood Risk Assessment Report	Woolacotts.	Appendix J
Amended Landscape Plans	Context	Appendix K
Amended Preliminary Construction Management Plan	TKD Architects	Appendix L
Amended Operational Waste Management Plan	Foresight Environmental	Appendix M
Amended Ecological Sustainable Development Report	Umow Lai	Appendix N
Amended Building Code of Australia Report	Design Confidence	Appendix O
Amended Access Design Assessment Report	Design Confidence	Appendix P

Deliverable	Consultant	Appendix
Amended Construction and Operational Noise Report	Wilkinson Murray	Appendix Q
Amended Wind Impact Assessment Report	Vipac	Appendix R
Amended Hydraulic Site Services Availability Statement	AJ Whipps	Appendix S
Amended Traffic Impact Assessment	Traffix	Appendix T

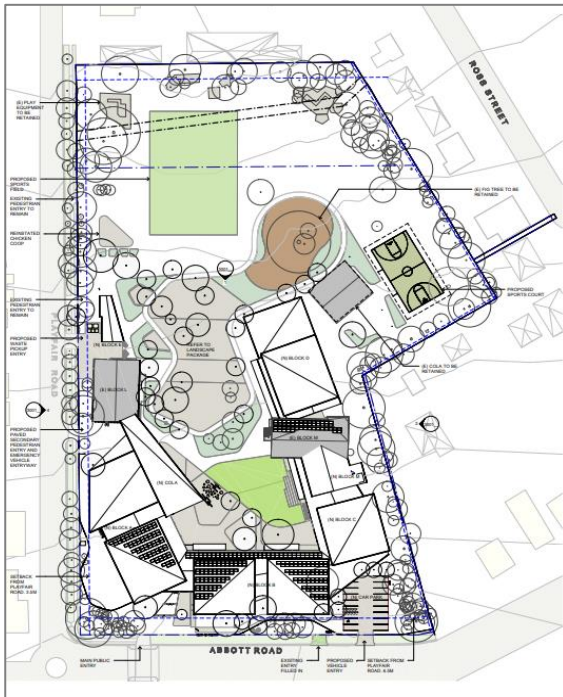
2. AMENDED PROPOSAL

To respond to the submissions, the proposal has been amended:

- Rearrangement of the proposed school buildings from a U-shape to two separated linear forms along the eastern and western site boundaries;
- Repositioning of the proposed school hall building further north at the site;
- Redesign of Block B to reduce the total height of the southern half of the building to single storey;
- Inclusion of an elevated bridge to directly connect Block A to Block M;
- Internal refurbishment of existing Block M;
- Repositioning of the proposed car park to the southern edge of the site adjoining Abbott Road;
- Enlargement of the proposed OOSH building and school hall building to facilitate additional capacity;
- Rearrangement of proposed futsal courts;
- Inclusion of new dedicated pedestrian entry points off Playfair Road; and
- Redesign of associated site landscaping including the relocation of the proposed swale to the centre of the site and new dedicated landscape features.

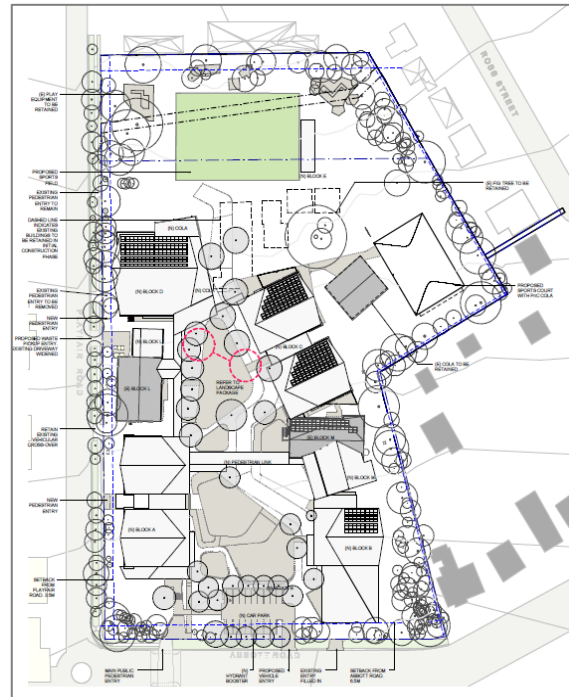
A visual comparison of the original scheme (exhibited from 31 August 2017 until 16 October 2017) and the amended proposal is provided below in **Figure 1 (Picture 1 and Picture 2)**. A 3D perspective of the amended proposal is provided in **Figure 2**.

Figure 1 – Comparison of Original Site Plan (As Exhibited) and Amended Site Plan



Picture 1 – Original Site Plan (As Exhibited)

Source: TKD Architects



Picture 2 – Amended Site Plan

Source: TKD Architects

Figure 2 – Amended Proposal



Source: TKD Architects

2.1. NUMERICAL COMPARISON

A numerical comparison of the original proposal against the amended proposal is provided in **Table 2** below.

Table 2 – Numerical Overview

Component	Original Proposal	Amended Proposal	Change
GFA	6,401.2sqm	6,937.9sqm	Increase
Height (maximum)	11.25m	9.7m	Decrease
Car Parking Spaces	16 (including 1 accessible space)	17 (including 1 accessible space)	Increase
Bicycle Parking Spaces	69	69	No change
Total Student Enrolment (maximum)	1,000	1,000	No change
Additional Students	80	80	No change
Construction Jobs	120 – 125	120 – 125	No change
Operational Staff	76 staff (65 teachers and 11 administration persons)	76 staff (65 teachers and 11 administration persons)	No change
Additional Staff	6	6	No change

3. ASSESSMENT OF THE AMENDED PROPOSAL

On 1 March 2018, an updated Environmental Planning and Assessment Act 1979 (EP&A Act) commenced operations. The updated EP&A Act has been redesigned with the aim of providing a planning system that is simpler, faster and leads to higher quality planning outcomes.

The updated EP&A Act has 10 objects. The objects and a response are provided below. The proposal satisfies the objects of the EP&A Act.

Table 3 – Objects of EP&A Act

Object	Response
a) <i>to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources</i>	The proposal supports the welfare of the community with new school facilities and additional student places for students. The proposal achieves this without impacting State natural and other resources.
b) <i>to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment</i>	The ESD initiatives are imbedded in the project. The floor plate design for the buildings responds to the site's contours, reducing bulk earth works. The narrow floor plate allows solar and ventilation into learning and teaching spaces, reducing reliance on mechanical measures and reducing ongoing operating costs.
c) <i>to promote the orderly and economic use and development of land</i>	The proposal continues the school use, which is the highest and best use of the site.
d) <i>to promote the delivery and maintenance of affordable housing</i>	N/A
e) <i>to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats</i>	No threatened species or ECCs are impacted by the proposal.
f) <i>to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)</i>	The site is not identified as a heritage item. An archival recording of the buildings to be removed is recommended.
g) <i>to promote good design and amenity of the built environment</i>	The proposal has been through an engagement process with the School and broader community to deliver a good quality school. The amenity of adjoining properties has been considered and addressed in the EIS.
h) <i>to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants</i>	Conditions of consent will be adhered to during construction to protect health and safety.
i) <i>to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State</i>	The project is a State development and Department of Education has engaged with State and Local government.
j) <i>to provide increased opportunity for community participation in environmental planning and assessment</i>	The community has been consulted with throughout the project. The community had opportunities to comment on the project. Their comments have been addressed.

Section 4.40 of EP&A Act (previously referred as Section 89H) specifies that for the assessment of a SSDA, the matters referred to within Section 4.15 are to be considered in addition to the matters outlined within the project SEARs.

Section 4.15 (previously referred as Section 79C) outlines each of the matters the consent authority must also take into consideration when assessing an application (including an SSDA). Each of the matters under Section 4.15 comprise:

(a) *the provisions of:*

(i) *any environmental planning instrument, and*

(ii) *any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and*

(iii) *any development control plan, and*

(iiia) *any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and*

(iv) *the regulations (to the extent that they prescribe matters for the purposes of this paragraph),*

that apply to the land to which the development application relates,

(b) *the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,*

(c) *the suitability of the site for the development,*

(d) *any submissions made in accordance with this Act or the regulations,*

(e) *the public interest.*

The amended proposal has taken into consideration each of the above-mentioned matters referred to within Section 4.15 of the updated EP&A Act. This is detailed within the sections below.

3.1. ENVIRONMENTAL PLANNING INSTRUMENTS

As per the original project SEARs, the amended proposal has been assessed against each relevant environmental planning instrument. Like the original proposal that was placed on public exhibition, the amended proposal complies with each of the relevant controls contained in:

- *State Environmental Planning Policy (State and Regional Development) 2011;*
- *State Environmental Planning Policy (Infrastructure) 2007;*
- *State Environmental Planning Policy 55 – Remediation of Land; and*
- *State Environmental Planning Policy No.64 – Advertising and Signage.*

A detailed assessment of the amended proposal compliance against the relevant controls contained to:

- *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017; and*
- *Warringah Local Environmental Plan 2011*

3.1.1. State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017

Since the public exhibition of the original proposal, *Draft State Environmental Planning Policy (Educational Establishments and Child Care Facilities)* 2017 has been superseded and replaced by *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* (Education SEPP).

Within the Education SEPP, Clause 42 and Schedule 4 are of relevance to the amended proposal. Accordingly, an assessment of the amended proposal against both of these relevant sections has been outlined below.

Clause 42:

As per Clause 42 of the Education SEPP,

“Development consent may be granted for development for the purpose of a school that is State significant development even though the development would contravene a development standard imposed by this or any other environmental planning instrument under which the consent is granted.”

The amended proposal has a maximum height limit of 9.7m. Although this height is significantly lower than the original proposal which had a maximum height of 11.25m, the amended proposal still slightly exceeds the 8.5m height limit that applies to the site. Accordingly, Clause 42 of the Education SEPP is to be taken into consideration by the consent authority. Justification for the minor height exceedance has also been provided within **Section 3.1.2.1**.

Schedule 4:

Schedule 4 of the Education SEPP outlines each of the seven design quality principles that must be taken into consideration when designing schools. Accordingly, the amended proposal has been specifically designed to successfully respond to each of these design quality principles.

A detailed analysis of each of the ways in which the proposal specifically responds to each design quality principle has been detailed by TKD Architects within the amended Urban Design Report at **Appendix B**.

3.1.2. Warringah Local Environmental Plan 2011

The *Warringah Local Environmental Plan 2011* (WLEP) is the principal environmental planning instrument governing development at the site. An assessment of the amended proposal against the relevant controls of the WLEP has been undertaken in the subsections below.

Land Use:

The site is zoned R2 Low Density Residential. Within this zone, ‘educational establishments’ (a school), an ancillary Out of School Hours Service and ‘building identification signs’ are permitted with consent. Each component of the amended proposal is therefore permitted with consent at the site.

Height of Buildings:

The site has a maximum building height control of 8.5m. The amended proposal has a maximum building height of 9.8m, which is 1.45m less than the original proposal that had a maximum building height of 11.25m. Despite this, the reduced 9.8m height limit is considered non-compliant under the WLEP.

As per Clause 42 of the Education SEPP (highlighted in **Section 3.1.1** above), development consent may still be granted by the DPE for the proposal, despite the non-compliant building height. Notwithstanding this, a Clause 4.6 Variation has still been prepared to justify the necessity of the proposed height breach. This Clause 4.6 Variation has been provided in **Section 3.1.2.1**.

Floor Space Ratio:

No Floor Space Ratio (FSR) control applies to the site.

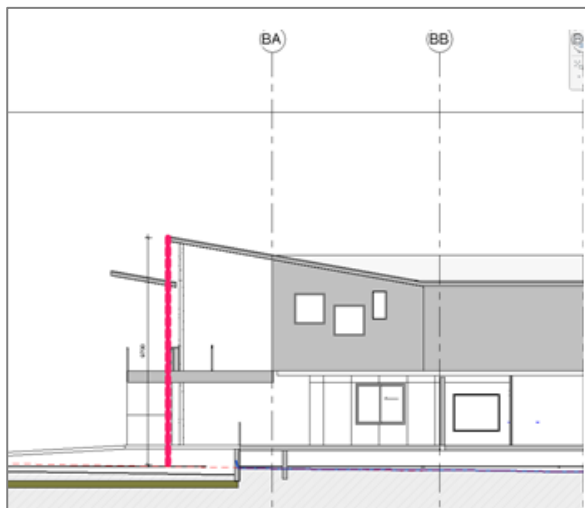
3.1.2.1. Clause 4.6 – Exemptions to Development Standards

Clause 4.6 of the WLEP provides flexibility to vary a development standard where it can be demonstrated that the development standard is unreasonable or unnecessary in the circumstances of the case and where there are sufficient environmental grounds to justify the departure.

Proposed Variation:

Pursuant to Clause 4.3 of the WLEP a maximum height limit of 8.5m applies to the site. The maximum height of the amended School proposal is 9.8m, which affects Block B at the area identified in **Figure 3**. Other parts of the proposed School buildings also slightly exceed the maximum building height control.

Figure 3 – Maximum Height of Building Location



Picture 3 – Section Detailing Maximum Height

Source: TKD Architects



Picture 4 – Floor Plan Detailing Maximum Height

Source: TKD Architects

Clause 4.6 Assessment:

A comprehensive assessment of the request to vary the Height of Building development standard in accordance with Clause 4.6 of WLEP is provided. Detailed consideration has been given to the following guides and matters when providing this Clause 4.6 assessment:

- *Varying development standards: A Guide*, prepared by the Department of Planning and Infrastructure dated August 2011.
- Relevant planning principles and judgements issued by the Land and Environment Court for:
 - *Wehbe v Pittwater* [2007] NSWLEC 827; and
 - *Four2Five Pty Ltd v Ashfield Council* [2015] NSWLEC.

Detailed responses are provided to the questions required to be addressed within the above documents.

1. Is the planning control a development standard?

The maximum Height of Building control prescribed under Clause 4.3 of the WLEP is a development standard capable of being varied under Clause 4.6 of the WLEP.

2. Is the development standard excluded from the operation of Clause 4.6?

The proposed variation to the Height of Building standard is not excluded from the operation of Clause 4.6 of the WLEP.

3. Is compliance with the development standard unreasonable or unnecessary in the circumstances of the case?

Compliance with the Height of Building development standard within the WLEP would be unreasonable and unnecessary having regard to the circumstances of the case. Each of the matters listed within the 'five-part test' outlined in *Wehbe v Pittwater* [2007] NSWLEC 827 and *Varying development standards: A Guide* is listed and responded to as follows:

- *The objectives of the standard are changed notwithstanding non-compliance with the standard:*

Table 4 provides a comprehensive assessment of the way in which the proposed development has responded to each of the relevant objectives for Height of Building as prescribed within Clause 4.3(1) of the WLEP.

Table 4 – Objectives of Clause 4.3(1) Height of Buildings WLEP Assessment

Objective	Assessment
<i>To ensure that buildings are compatible with the height and scale of surrounding and nearby development</i>	The amended proposal is two storeys, which is compatible with the height of the surrounding development. The height maintains the low-density character of the area. The additional height is a result of the sloping topography and the need to provide spaces with appropriate floor to ceiling building heights.
<i>To minimise visual impact, disruption of views, loss of privacy and loss of solar access</i>	The amended proposal will ensure: • There is a minimal visual impact when viewed from the surrounding public domain; • View lines towards the adjoining sports fields and Curl Curl Lagoon are increasingly maintained; • Privacy impacts are not generally generated; and • Overshadowing impacts are minimal.
<i>To minimise any adverse impact of development on the scenic quality of Warringah's coastal and bush environments</i>	The proposal will not impact the coastal scenic quality or bush environment.
<i>To manage the visual impact of development when viewed from public places such as parks and reserves, roads and community facilities</i>	The amended proposal is not of an unsightly bulk, scale or form when viewed from the surrounding public domain. The amended proposal is in keeping with the two storey character of the area.

- *The underlying objective or purpose of the standard is not relevant to the development and therefore compliance is unnecessary:*

The amended proposal has addressed the listed objectives for the Height of Building development standard as outlined within **Table 4** above.

- *The underlying object or purpose would be defeated or thwarted if compliance was required and therefore compliance is unreasonable:*

The above consideration is not relevant to the circumstances of this case.

- *The development standard has been virtually abandoned or destroyed by the Council's own actions in granting consents departing from the standard and hence compliance with the standard is unnecessary and unreasonable:*

The above consideration is not relevant to the circumstances of this case.

- *The compliance with development standard is unreasonable or inappropriate due to existing use of land and current environmental character of the particular parcel of land. That is, the particular parcel of land should not have been included in the zone:*

The above consideration is not relevant to the circumstances of this case.

Overall, it is considered that the proposed variation to the maximum building height standard will facilitate the delivery of a School that appropriately responds to the sites topography and avoids

unacceptable impacts on adjoining properties. Strict compliance in this case is therefore considered unreasonable and unnecessary.

4. Are there sufficient environmental planning grounds to justify contravening the development standard?

There are sufficient environmental planning grounds to justify the proposed variation to the development standard. These include:

- The proposal appropriately responds to the sites sloping topography;
- The proposal complies with the aims and objectives of the WLEP, including the general aims of the policy, the objectives for the R2 zone and the specific objectives of the Height of Building development standard;
- The proposal is not of an unsightly bulk, scale or form when viewed from the surrounding public domain;
- There are minimal overshadowing impacts generated by the non-compliant building components. Further, these overshadowing impacts are also less than what was originally generated by the original proposal placed on public exhibition;
- There are generally no privacy impacts generated by the non-compliant building components; and
- The amended proposal complements the surrounding built form and character of North Curl Curl.

Based on the above, it is considered appropriate to relax the strict application of the development standard, as the proposal will not result in an undesirable outcome. Further, the amended proposal has a maximum height that is 1.45m less than the original proposal which had a maximum building height of 11.25m.

5. Will the proposed development be in the public interest because it is consistent with the objectives of the particular standard and objectives for development within the zone in which the development is to be carried out?

The amended proposal is considered to be generally consistent with the objectives listed within the WLEP for Height of Buildings as previously outlined within **Table 3**. The proposal is also consistent with the relevant land-use objectives for R2 zoned land as listed within the WLEP. This has been outlined in within **Table 5**.

Table 5 – Assessment of R2 Zone Objectives

Objectives	Assessment
<i>To provide for the housing needs of the community within a low density residential environment.</i>	N/A
<i>To enable other land uses that provide facilities or services to meet the day to day needs of residents.</i>	The amended proposal for the redeveloped School will satisfy the educational, OOSH and recreational needs of current and future students in the area. It will also provide significant employment opportunities.
<i>To ensure that low density residential environments are characterised by landscaped settings that are in harmony with the natural environment of Warringah.</i>	The amended proposal for the redeveloped School is two storeys in scale, which is in keeping with the predominate scale of surrounding residential development. The pitched roofs for the School buildings also complement the surrounding built form which is predominantly characteristic of houses with pitched and hipped roofs. The proposal also provides a significant landscape concept that complements the specific character of nearby Curl Curl lagoon.

Overall, the amended proposal is considered in the public interest as the development is consistent with the

objectives for the Height of Building development standard and the land use objectives for R2 zone land as prescribed by the WLEP.

6. Would non-compliance with the development standard raise any matter of significance for state or regional environmental planning?

Given that the non-compliance affects a SSDA, it is of significance to the DPE. However, the proposed non-compliance is minor and less than the original proposal placed on public exhibition (8.9m down from 11.25m). Further, it has been demonstrated that the proposed variation is appropriate based on the specific circumstances of the case. This includes compliance with various State environmental planning instruments relevant to the amended proposal comprising:

- *State Environmental Planning Policy (State and Regional Development) 2011;*
- *State Environmental Planning Policy (Infrastructure) 2007;*
- *State Environmental Planning Policy 55 – Remediation of Land;*
- *State Environmental Planning Policy No.64 – Advertising and Signage;* and
- *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017.*

It is considered unlikely that an approval of the proposed 8.9m maximum height would result in an unacceptable precedent for the assessment of other proposals.

7. Is there a public benefit of maintaining the development standard?

There is no public benefit in maintaining strict compliance with the development standard. There are no unreasonable impacts that will result from the variation to the maximum Height of Building standard and compliance with the development standard would reduce the ability to provide effective educational floor space that has appropriate floor to ceiling building heights. Accordingly, a variation to the development standard will allow the amended proposal to be developed at the site, which will provide the following community benefits:

- Replacement of aged school infrastructure with new state-of-the-art educational facilities;
- Increased student capacity needed to cater for the increased number of students in the area;
- Increased visual improvements for the site and surrounding locality by removing demountables;
- Increased outdoor play area and connectivity within the site;
- Increased provision of plantings and green spaces throughout the site; and
- Provision of a range of school facilities that can be utilised by the surrounding community (including sports courts and hall).

As per Clause 42 of the Education SEPP, development consent may still be granted by the DPE for the proposal, despite the non-compliant building height. Notwithstanding this, by considering the detailed assessment above, it is considered that the proposed variation to the Height of Building development standard is considered appropriate and can be supported under the provisions of Clause 4.6 of the WLEP.

3.2. DEVELOPMENT CONTROL PLAN

The *Warringah Development Control Plan 2011* (WDCP) provides detailed controls for specific developments types and locations. Most controls in the WDCP relate to character, streetscape and public domain works. Under Clause 11 of *State Environmental Planning Policy (State and Regional Development) 2011*, the application of Development Control Plans is excluded when assessing SSDA projects. Notwithstanding this, the WDCP has been considered.

The amended proposal generally complies with each of the controls within the WDCP, excluding controls relating to on-site parking. Proposed on-site parking has been discussed in detail at comment 7 within **Table 5** and the amended Traffic Impact Assessment at **Appendix T**.

3.3. LIKELY IMPACTS OF THE DEVELOPMENT

3.3.1. Built Form and Urban Design

As per the amended Urban Design Report at **Appendix B**, the amended proposal incorporates the following built form and urban design principles:

- The School buildings are now located to the perimeter of the site (arranged in two separated linear forms), which provides a visual and acoustic buffer to the school's play areas;
- Block B that was originally proposed directly fronting Abbott Road has been repositioned to the eastern edge of the site. This has opened up the Abbott Road frontage and subsequently reduced the proposal's overall visual impact;
- The School buildings are primarily two storeys in scale (with a max height of 9.7m), which is in keeping with the predominant scale of surrounding development. Accordingly, the proposed amended design is significantly lower than the original proposal submitted, which had a maximum building height of 11.25m;
- Block A and repositioned Block B have an increased setback from Abbott Road. This setback incorporates a range of trees and plantings which provides increased permeable surfaces at the site and a visual barrier of high amenity for staff, students, neighbours and passers-by;
- The built form is broken into smaller components to allow permeability between buildings for pedestrians, natural light and ventilation; and
- The amended proposal has been designed to ensure that there is clear delineation between the public face of the school, the zones available for community use and zones for the exclusive use of enrolled students and staff.

The amended built form provides a significantly reduced visual bulk from Abbott Road and better integrates with the overall surrounding character. The design ensures existing view lines towards the adjoining sports field and Curl Curl Lagoon is maintained. The amended built form is appropriate and should be supported.

3.3.2. Overshadowing

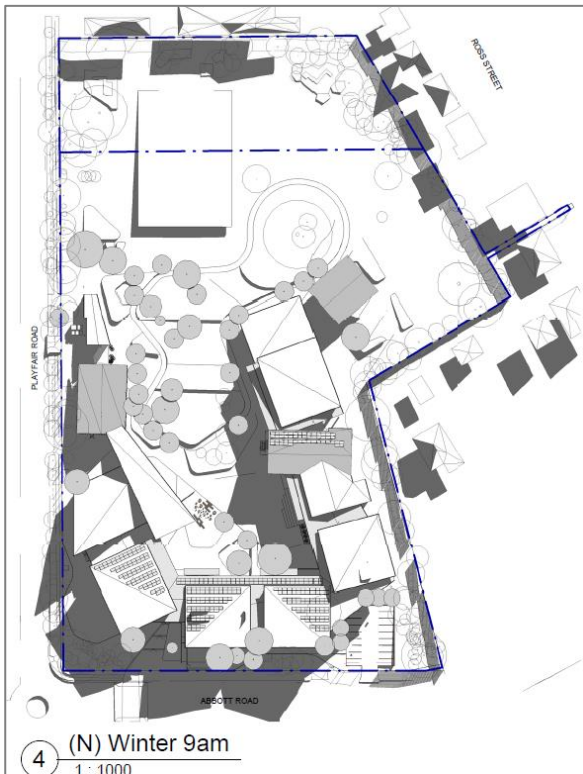
Amended shadow diagrams have been prepared for 9am, 12pm and 3pm during the winter solstice and are included as part of the amended Architectural Plans at **Appendix A**.

The shadow diagrams demonstrate that the amended proposal will provide a greater outcome and less overshadowing impacts on neighbouring properties and the public domain than the original proposal:

- At 9am overshadowing of the footpath and Abbott Road is reduced. A small section of the footpath will be overshadowed but much less than the original proposal.
- At midday overshadowing of the footpath and Abbott Road is reduced. A small section of the footpath will be overshadowed but much less than the original proposal. Internal overshadowing of the school grounds is also reduced.
- At 3pm there is minimal overshadowing of the footpath along Abbott Road. The amended proposal reduces the overshadowing on the residential properties to the east. In fact, the amended proposal has a similar level of shadowing when compared to the existing development. the overshadowing is primarily caused by the existing timber fence and vegetation, which is being retained.

The amended proposal improves on the original proposal and has a similar level of impact as the existing situation at 3pm. Refer to **Figure 4**, **Figure 5** and **Figure 6** for a comparison of shadows.

Figure 4 – Winter Solstice 9am Comparison

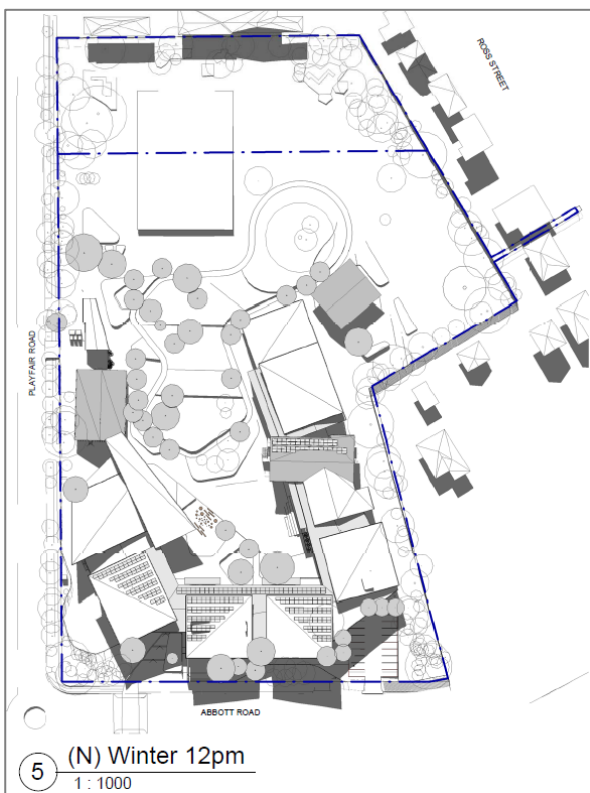


Picture 5 – Original Proposal



Picture 6 – Amended Proposal

Figure 5 – Winter Solstice 12pm Comparison



Picture 7 – Original Proposal



Picture 8 – Amended Proposal

Figure 6 – Winter Solstice 3pm Comparison



Picture 9 – Original Proposal



Picture 10 – Amended Proposal

3.3.3. Privacy

The amended proposal has been appropriately designed to prevent adverse privacy impacts on surrounding residents and future students as:

- The amended proposal locates a building closer to the dwellings to the east where there was previously a car park. The building is 1-2 storeys and not likely to impact privacy. The two storey portion is 14m from the eastern boundary and the one storey portion is 25m, providing generous setback to the neighbour. Trees will provide visual privacy;
- As originally proposed the layout of the northern edge of the site is to be retained and will not contain new School buildings that have the potential to cause onlooking into neighbouring properties;
- Block I and multiple demountable structures are still proposed to be removed from the site and replaced with a sports court;
- Significant tall trees contained to the north, north-east, east, and western site boundaries are proposed to be retained. These trees screen the proposal from adjoining residents and prevent onlooking into and from the site;
- Playfair Road to the west ensures that there is sufficient separation distance between the School and neighbouring residential properties;
- The proposed structures achieve the minimum setback controls; and
- The school will continue to generally operate during standard school hours, when most residents are at work. This will ensure privacy is maintained during the early morning, evenings and at night.

The amended proposal is appropriate in terms of visual privacy. Acoustic privacy impacts will be managed via the recommendations of Wilkinson Murray and the conditions of consent.

3.3.4. Wind

A revised Wind Impact Assessment Report has been prepared by Vipac and is attached at **Appendix R**. The Report provides an assessment of the likely wind conditions that would be experienced at ground level and at the level 1 walkway areas for the amended design.

Vipac's assessment found that wind conditions within the grounds of the proposed School would be suitable:

- At ground level footpath areas (for walking);
- At building entrance areas (for standing);
- At outdoor seating areas (for sitting);
- At ground and level 1 student walkway areas (for standing); and
- At ground level outdoor amenity areas (for standing).

The findings have not changed from the original proposal. Recommended design treatments include incorporating additional landscaping, such as a tree, to help mitigate wind. These recommendations have been or can be incorporated into the final School design.

3.3.5. Noise

The amended proposal does not alter the findings and conclusion of the Construction and Operational Noise Report. A revised report is provided at **Appendix Q**.

3.3.6. Flooding

Woolacotts Consulting Engineers has reviewed the amended proposal and revised the Flood Risk Assessment Report (**Appendix J**). The site is affected by 1 in 100 year ARI flooding (to RL 3.7m AHD). The southern end of the site is also located within a medium flood risk precinct.

To mitigate against potential flooding impacts, various project-specific mitigation measures are recommended by Woolacotts, including:

- *Proposed structure FFL ranges from a minimum of 5.90m AHD. This is above the minimum requirement of the PMF level at 5.70m AHD.*
- *Flood proofing of all structural components to the PMF level 5.70m AHD. We note that all services (including electrical and mechanical) are required to be either flood proofed or else raised above at or above the PMF level.*
- *The types of materials to be used to ensure the structural integrity of the building and potential risk of damage in the event of a flood due to floodwaters and debris must be considered in the structural design. Robust concrete and masonry structural elements will be adopted for the framing at the lower levels of the building.*
- *The development will not increase flood levels as there will be no reduction in flood storage under the FPL of 4.20m AHD.*
- *The Flood Evacuation Plan outlines reliable access/ egress for pedestrians during the PMF event. Refer Section 4.0 for further detail.*
- *Proposed storage areas must be above the FPL of 4.20m AHD.*
- *Proposed carpark level at RL 4.75. This is above the FPL of 4.20m AHD.*
- *Appropriate stormwater quality and erosion control measures inclusive of grassed swales and silt fences to ensure environmental protection.*

These measures satisfy the objectives in the Northern Beaches Council PLM documentation, the Warringah Local Environmental Plan 2011 and Section E11 – Flood Prone Land of the Warringah Development Control Plan 2011.

3.3.7. Temporary Demountable Structures

To accommodate the students and staff of the School while construction of the amended proposal occurs (if approved), a Review of Environmental Factors (REF) was prepared on 25 September 2017 to relocate and install multiple single-storey temporary demountable structures at the northern end of the site. Specifically, the REF proposed to:

- Relocate 10 existing temporary demountable classrooms and 2 existing toilet demountables;
- Install 7 new temporary demountables comprising 2 staff demountables, 3 single demountables and 2 double homebase demountables;
- Install temporary construction fencing; and
- Remove 2 trees from the site.

An REF was prepared to carry out these works, as under Clause 36(a)(ii) of *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017*,

(a) construction, operation or maintenance, more than 5 metres from any property boundary with land in a residential zone and more than 1 metre from any property boundary with land in any other zone, of:

(ii) a portable classroom (including a modular or prefabricated classroom) that is not more than 1 storey high, or

is permitted without consent and therefore does not require development consent. Accordingly, these works have been carried out at the site under the REF in preparation for construction.

3.4. SUITABILITY OF THE SITE

The proposed amendments to the original proposal do not result in any changes that would affect the suitability of the site to accommodate the development. The proposal will ensure that the educational use that currently exists at the site continues into the future.

The amended proposal is permissible with consent and will lead to the development of a new School that has as greater positive impact on the surrounding built and natural environment. Accordingly, the amended proposal does not create an undesirable precedent and is considered highly suitable for the site.

The amended proposal is also deemed highly suitable for the site, as its development at the site is in accordance with several new strategic planning policies that relate to the site and its surrounds. This is outlined within **Section 3.4.1** below.

3.4.1. Strategic Planning Context

Since the public exhibition of the original proposal, various new strategic plans for Sydney have been implemented. Specifically,

- 'A Plan for Growing Sydney' has been superseded and replaced by 'A Metropolis of Three Cities'; and
- The 'Draft North District Plan' has been superseded and replaced by the 'North District Plan'.

Accordingly, an assessment of the amended proposal against the relevant goals and directions contained within 'A Metropolis of Three Cities' and the 'North District Plan' is discussed within the subsections below.

A Metropolis of Three Cities:

Released in March 2018, A Metropolis of Three Cities (the 'Strategy') includes a range of objectives, directions and actions that aim to support the strategic growth of Sydney into the future. Development of the amended proposal at the site will aid in satisfying three key objectives contained to the Strategy, comprising:

- *Objective 3 – Infrastructure adapts to meet future needs & Objective 6 – Services and infrastructure meet communities changing needs:*
The amended proposal will deliver a new School that contains additional capacity and a range of new innovative state-of-the-art facilities, services and spaces that appropriately respond to the changing needs of future students and staff.

- *Objective 25 – The coast and waterways are protected and healthier:*
The amended proposal contains a range of permeable surfaces and suitable drainage infrastructure to ensure water runoff from the site into nearby Curl Curl Lagoon is reduced. This will allow Curl Curl Lagoon to become healthier so it can support a range of flora and fauna species into the future.

The amended proposal will deliver a sustainable School development that will make a valued contribution to economic growth in Sydney and provide increased learning and employment opportunities into the future.

North District Plan:

Released in March 2018, the North District Plan includes a range of priorities and actions that aim to appropriately support the strategic growth of Sydney's North District. The North District Plan identifies the following:

- An extra 21,900 students will need to be accommodated in both government and nongovernment schools in the North District by 2036, representing a 20 per cent increase;
- The largest projected growth in school-aged children within the North District is expected in the Ryde, Ku-ring-gai and Northern Beaches LGAs; and
- The design and management of schools should encourage the implementation of shared-use agreements to increasingly create inclusive neighbourhoods.

In response, the amended proposal seeks to provide a redeveloped School with state-of-the-art facilities for North Curl Curl that will increase student capacity to cater for future population growth. The amended proposal has also been designed to allow for the joint-use of school facilities (including the gym and hall) between the school and surrounding community.

3.5. SUBMISSIONS

Each of the submissions received for the original proposal during the public exhibition period from 31 August 2017 until 16 October 2017 have been considered and addressed within **Section 4** of this RtS report.

Notwithstanding this, it is understood that SSD 16_8310 will need to be renotified to publically exhibit the amended proposal. Each of the submissions that are obtained for the amended proposal will be considered and addressed within an additional RtS report to be submitted to the DPE.

3.6. PUBLIC INTEREST

The amended proposal is considered in the public interest because:

- The amended proposal provides a greater overall outcome that has reduced environmental impacts;
- The amended proposal positively responds to the site conditions and surrounding built and natural character of North Curl Curl; and
- Construction of the amended proposal is vital to ensuring:
 - Enrolment pressure is taken off the existing School which is currently exceeding design capacity;
 - All demountable classrooms are removed from the site;
 - New state of the art facilities and spaces are provided to future students and teachers; and
 - Enrolment pressure is taken off surrounding primary schools currently exceeding design capacity.

4. RESPONSE TO SUBMISSIONS

The SSDA was placed on public exhibition from 31 August 2017 until 16 October 2017. During this period, various government agencies and members of the community were invited to make written submissions on the project. From this, a total of 28 submissions were received during the SSDA exhibition period. Of these submissions, nine were received from government, agencies and organisations, and twenty were received from members of the public.

4.1. GOVERNMENT, AGENCY AND ORGANISATION SUBMISSIONS

Government, agency and organisation submissions were received from:

- NSW Department of Planning and Environment (DPE);
- Northern Beaches Council (Council);
- Office of Environment and Heritage (OEH).
- NSW Environment Protection Authority (EPA);
- Transport for NSW (TfNSW);
- Roads and Maritime Services (RMS);
- Sydney Water;
- Curl Curl North Public School P&C Association; and
- Curl Curl Lagoon Friends.

A response to the comments raised within each government, agency and organisation submission has been provided within **Table 5** on the following pages. While the exact wording of the submissions may not be captured, the intent and the issues raised have been identified and addressed.

4.2. PUBLIC SUBMISSIONS

Each of the public submissions were reviewed and grouped accordingly. Key issues raised within the public submissions relate to:

- Construction impacts (comprising noise, dust, vibration and construction traffic impacts);
- Demolition of existing prefabricated classrooms at the site;
- Air conditioning;
- Tree protection/ tree loss;
- Asbestos removal;
- Potential runoff to Curl Curl Lagoon;
- Proposed futsal courts;
- Proposed construction hours; and
- Proposed boundary fence.

The majority of the issues raised with the public submissions are similar to those mentioned within each of the government, agency and organisation submissions; particularly those within the 'Curl Curl North Public School P&C Association' submission and the 'Curl Curl Lagoon Friends' submission.

A response to each grouped issue (including grouped issues not mentioned above) has been provided within **Table 6** on the following pages. While the exact wording of the submissions may not be captured, the intent and the issues raised have been identified and addressed.

Table 6 – Response to Government, Agency and Organisation Submissions

Issue	Comment	DoE Response	Reference
NSW Department of Planning and Environment:			
1. Construction Management	The application does not include details of the management of the School during on-site construction activities, particularly regarding construction traffic and noise and the impact of the construction and remediation works on the daily use of the site.	The amended Preliminary Construction Management Plan at Appendix L identifies a range of environmental management procedures that will be incorporated during construction to minimise potential construction impacts on school students, teachers, surrounding neighbours and the surrounding natural environment.	Refer to amended Preliminary Construction Management Plan at Appendix L .
2. Construction Schedule	The application does not include details of the construction timing and the schedule of works.	The amended Preliminary Construction Management Plan at Appendix L includes details of anticipated construction timing and schedule of works.	Refer to amended Preliminary Construction Management Plan at Appendix L .
3. Passive Surveillance Opportunities	The setbacks between buildings and the site boundaries are accessible by the children, however these areas do not have any opportunities for passive surveillance.	- The areas between the proposed School buildings and the site boundaries have opportunities for passive surveillance. - On the eastern side of the site, adjoining properties (including some that are two stories) will be able to view these areas of the site. The school buildings also contain windows, allowing students and teachers to look into these areas of the site to provide passive surveillance. - On the western side of the site, the existing low-scale fence is to be maintained. This will allow passers-by and properties along Playfair Road to easily view these areas of the site. The school buildings also contain windows, allowing students and teachers to look into these areas of the site.	Refer to amended Architectural Plans at Appendix A .

Issue	Comment	DoE Response	Reference
4. Future Expansion Opportunities	Further information should be provided about flexibility in the layout of the classrooms and provisions to expand to include future population of the area.	- The proposed school buildings have been consolidated into two fingers along the eastern and western site boundaries. This has resulted in large areas of open space provided at the northern end and centre of the site. These areas are easily capable of accommodating future school buildings. - If car dependence to access the site is reduced in the future, the proposed on-site carpark fronting Abbott Road could be removed and replaced by an additional school building that would have a limited impact on neighbouring properties. - The proposed school hall has been designed to be of a size that greatly exceeds the minimum size that is required under the EFSG. Accordingly, the school hall is capable of easily accommodating a larger school population into the future.	Refer to amended Architectural Plans at Appendix A.
5. Plans	The survey plan and the site plans should be updated to include the current location of the dwelling at No. 60 Abbott Road. The shadow diagrams and all architectural plans are also to be updated to include the correct location of the adjoining dwelling.	- Amended Architectural Plans (including amended site plans and shadow diagrams) that include the dwelling at 60 Abbott Road, North Curl Curl have been provided at Appendix A. - The original survey plan submitted as part of the EIS submission already identifies the dwelling at 60 Abbott Road, North Curl Curl.	Refer to amended Architectural Plans at Appendix A.
6. Plans	The stormwater plans and the Tree Location Plan are not consistent with the architectural plans and are required to be amended to identify the correct location and layout of the buildings as well as the overland flow paths.	The amended Stormwater Plans at Appendix I and the amended Tree Location Plan included as part of the amended Arborist Report at Appendix C are consistent with the amended Architectural Plans.	Refer to amended Stormwater Plans at Appendix I and amended Arborist Report at Appendix C.

Issue	Comment	DoE Response	Reference
7. Parking	Adequate on-site car parking is required to be provided as part of the project to cater for the demand generated by the development and to minimise the likely significant use of private vehicle journeys-to-work and associated detrimental off-site parking and traffic conflict.	- A total of 17 car parking spaces (including 1 accessible space) are proposed to be provided on-site. This is considered acceptable due to the following: - The proposal only results in a total increase of 6 staff; - The car parking rates provided within the Warringah Development Control Plan 2011 (WDCP) are not to be relied upon as: - The WDCP is not a statutory requirement as specified by the project SEARs; and - The Education Facilities Standards and Guidelines (EFSG) which are relied upon when designing new/upgraded Schools within NSW states that on-site school parking should be kept to a minimum. - Providing additional on-site car parking is considered highly unsustainable both in the short and long-term future as: - It will greatly incentivise the use of private vehicles to access the site, which will inevitably increase congestion, pollution and noise on surrounding residential streets; - It will discourage staff members from accessing the site by walking, cycling or catching public transport; - It is counterproductive to the Green Travel Plan and Workplace Travel Plan that have been developed for the proposal; and - Additional on-site car parking would require the removal of proposed open spaces, permeable surfaces and school infrastructure.	Refer to amended Traffic Impact Assessment at Appendix T .

Issue	Comment	DoE Response	Reference
		– 69 bicycle spaces and staff changerooms are to be provided on-site, increasing opportunities to ride to the School; and – Surveys conducted by Traffix have confirmed that there is extensive parking capacity within the surrounding locality that can support the School. Accordingly, the construction of additional parking on-site is considered to be a waste of money, space and resources. To ensure a sustainable outcome is realised, the use of existing underutilised resources should be encouraged.	
8. Workplace Travel Plan	• A revised Workplace Travel Plan (WTP) is required that details site-specific measures that will be implemented to promote and maximise the use of more sustainable travel modes and 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, including incentives for using sustainable transport modes; • Measures to promote and support the implementation of the plan; and • A process for monitoring and review that allows for the effectiveness of the WTP to be measured.	• A Workplace Travel Plan has been developed and is included as part of the amended Traffic Impact Assessment at Appendix T. • To provide detailed analysis of future travel modes of staff of the school and targets, significant input would be required from the facility operator. It is envisaged that the DPE would condition the development to provide an Operational Traffic Management Plan (OTMP) which is developed by a qualified Traffic Engineer in conjunction with input from the School's Principal. An OTMP would be required to be submitted to Council at the CC stage.	Refer to amended Traffic Impact Assessment at Appendix T .
9. Bicycle Paths and Footpaths	• An analysis of the existing bicycle paths and footpaths should be provided.	• The amended Traffic Impact Assessment included at Appendix T incorporates comments on adjacent paths.	Refer to amended Traffic Impact Assessment at Appendix T .
10. Acoustic Report	• The Acoustic Assessment Report is to be revised in accordance with the <i>Interim Construction Noise Guidelines</i> to	• The amended Construction and Operational Noise Report at Appendix Q assesses the impacts of	Refer to amended Construction and

Issue	Comment	DoE Response	Reference
	ascertain the impact of construction noise and vibration on the amenity of users within the site, and to provide appropriate mitigation measures.	construction noise and vibrations on the amenity of future users at the site and provides appropriate mitigation measures in response.	Operational Noise Report at Appendix Q .
11. After-Hours Shared-Use of Facilities	- The submitted Constructional and Operational Noise Report states that the sporting fields on the northern part of the site would be utilised for activities on the weekends and the school hall is to be used after hours. This would not be ancillary to the school operation and may result in potential adverse noise impact on the locality during the weekend. - Further, the activities would also generate traffic and no provisions for additional parking has been provided on the site. The EIS should include assessment of the details of such uses having regard to a schedule of such events, probable times and extent of use. A strategy of how to secure different parts of the site to enable shared use should also be provided.	- A schedule of the existing and proposed school and community use of school facilities at the School is outlined within Table 7 at Section 4.3 of this RtS report. A strategy to secure different parts of the site during the shared-use of facilities will be developed in detail by the School. - As identified within Table 7, the proposed school use and sharing of school facilities with the community is no different to what is currently provided at the existing School. Accordingly, no additional adverse impacts (including acoustic and traffic) will be generated.	Refer to Table 7 within Section 4.3 of this RtS Report.
12. OOSH	- The submitted plans do not indicate the location of the proposed OOSH and does not assess any noise impact on the adjoining residents due to the operation of the OOSH between 6:30am and 7pm. - The Constructional and Operational Noise Report should be amended to include the details of the OOSH and predict the probable impacts on the noise sensitive receivers adjoining the site and on the opposite side of Playfair Road.	- The amended Architectural Plans at Appendix A identify the proposed location of the OOSH service. Specifically, it is located within Block L at the western edge of the site fronting Playfair Road. - The amended Construction and Operational Noise Report at Appendix Q includes details of the proposed OOSH. Noise emissions generated by the OOSH are predicted to comply with the relevant criteria.	Refer to amended Architectural Plans at Appendix A and amended Construction and Operational Noise Report at Appendix Q .
13. Accessibility	Access to the new classrooms on the north-eastern side is through the existing building M which is proposed to be renovated. However, building M is not accessible or equitable and a direct connection between the northern block and the	The proposed amended scheme provided within the amended Architectural Plans at Appendix A provides a building layout which is highly accessible and equitable for all. As part of this, the	Refer to amended Architectural Plans at Appendix A and amended

Issue	Comment	DoE Response	Reference
	rest of the building has not been proposed. Details of such connection at both levels is required.	design now incorporates an elevated pedestrian bridge that connects Block A to Block M. This is highlighted within the amended Access Design Assessment Report included at Appendix P.	Access Design Assessment Report at Appendix P .
14. After Hours Construction Works	The submitted EIS does not clearly provide any details of proposed after-hours construction works. Details of any such works or where such works may be required and associated impacts must be provided to enable assessment in this regard.	- Development consent is sought for the following construction hours: 7.00 am to 6.00 pm Monday to Friday; 8.00 am to 5.00 pm Saturday; and - No work on Sundays or gazetted public holidays - The proposed extended work hours will occur during sports that will be undertaken on the adjoining sports fields. Accordingly, additional acoustic impacts caused by construction will be significantly 'washed out' by sports noises. Notwithstanding this, the recommendations provided within the amended Construction and Operational Noise Report at Appendix Q will be enforced to ensure acoustic impacts are significantly reduced. - Wilkinson Murray have confirmed that the Noise Management Plan recommended to be provided for extended hours on Saturday does not form part of this RtS and will be provided at a later date by the appointed contractor.	Refer to amended Preliminary Construction Management Plan at Appendix L and amended Construction and Operational Noise Report at Appendix Q .
15. Stormwater Works	Whilst the Arborist Report indicates that stormwater pipes are to be routed outside the Tree Protection Zones (TPZ), the	The amended Arborist Report at Appendix C has been updated to discuss the impacts of	Refer to amended Arborist Report at Appendix C .

Issue	Comment	DoE Response	Reference
	stormwater plans show that pipes, the grass swale (on the western boundary) and pits being constructed within the Structural Root Zones (SRZ) of trees along the periphery of the site. The Arborist Report is to be amended to include of such works, potential impacts on trees and any proposed mitigation measures.	stormwater pipes, pit installation and electrical services trenching on the SRZ of existing trees at the site. A range of recommendations have also been provided to mitigate against identified potential adverse impacts.	
16. Signage	The EIS states that two signs are proposed. However, the plans/elevations do not include any details or location of the signage on Playfair Road. Details of such signs are to be provided to enable assessment.	The amended Architectural Plans at Appendix A include details of the proposed 'Curl Curl North Public School' signage to be incorporated into the amended proposal.	Refer to amended Architectural Plans at Appendix A .
Northern Beaches Council:			
17. Parking	76 car parking spaces should be provided for staff parking in compliance with Councils requirements.	See parking comments provided for issue 7.	Refer to amended Traffic Impact Assessment at Appendix T .
18. Pedestrian Crossing Facilities	The provision of pedestrian crossing facilities such as a pedestrian refuge island is required at the pedestrian desire lines of Playfair Road at the intersections with Pitt Street on the northern side and at Abbott Road on the southern side.	- As identified within Section 4.7 of the EIS included as part of the original SSDA submission, the DoE does not pay S7.11 contributions. This includes any contributions towards local roads, car parking, open space and recreation, community facilities and plan administration. - Given that the DoE is already investing a significant amount of government funds to redevelop the School to benefit Council and the wider community, it is requested that Council	Refer to Section 4.7 of EIS included as part of original SSDA submission.

Issue	Comment	DoE Response	Reference
		undertakes these surrounding public domain works themselves.	
19. Footpath and Bicycle Routes	- A footpath is to be constructed along Ross street by the DoE to connect the schools proposed pedestrian access on Ross Street to Pitt Road and Spring Road. - DoE is to construct a shared path on Playfair Road at the frontage of the school as well as an on-road cycle route on Abbott Road at the school frontage.	See contribution comments provided for issue 18.	Refer to Section 4.7 of EIS included as part of original SSDA submission.
20. Stormwater Quality Management	Both the Stormwater Management Plan and the Integrated Water Cycle Management Plan should be updated to address Clause C4 – Stormwater Management of the Warringah Development Control Plan 2011 and Council's Water Management Policy.	The amended Stormwater Management Plan at Appendix I and the amended Integrated Water Management Plan at Appendix F have both been updated to address the Warringah Development Control Plan 2011.	Refer to amended Stormwater Management Plan at Appendix I and amended Integrated Water Management Plan at Appendix F .
21. Contaminated Lands	The Environmental Site Assessment should be updated to address Councils contaminated lands comments as provided within the pre-DA meeting.	- Councils contaminated lands comments that were provided in the pre-DA meeting are as follows: <i>A Preliminary Site Contamination Assessment is to be submitted with the application. Testing for asbestos contained materials is to be undertaken and the results and any required measures included in the report to ensure that the land is safe in terms of public health and the use as an educational establishment.</i> - The report satisfies the above pre-DA comment as Environmental Investigation Services tested for asbestos and stated within the amended Environmental Site Assessment at Appendix D that the site can be made suitable for the proposed	Refer to amended Environmental Site Assessment at Appendix D .

Issue	Comment	DoE Response	Reference
		educational establishment, provided a range of recommendations within the report are enforced.	
22. Flooding	The proposal must be constructed in accordance with the recommendations of the Flood Risk Assessment Report.	Noted. Can be conditioned.	N/A
23. Stormwater Assets	Council's records indicate a 750mm diameter Council stormwater pipeline traversing down the north eastern boundary of the site which has not been identified in the survey or design plans. Site drainage is recommended to be redirected and connect into Council's drainage system at the corner of Playfair and Abbott roads instead of the existing proposal. Any drainage upgrades proposed at the north eastern corner of the site could potentially connect into the 750mm diameter Council stormwater pipeline.	- The referenced 750mm pipeline or its corresponding pits were not identified on the survey plans by C.M.S Surveyors Pty Limited (DWG Name. 15728detail, Rev 3, dated 04/04/17) or during the undertaken site visit. - The majority of the proposed site will discharge to Council's pit adjacent to the south western corner of the site (the pit located on the corner of Playfair Road and Abbott Road). The remainder of the site will discharge to the site's existing discharge point (the council pit along Abbott Road).	Refer to amended Stormwater Management Report at Appendix I .
24. Public Domain	- The proposed new buildings close to Abbott Road creates a built form dominance that is not softened by sufficient green space/landscaping to the front setback of the street. Accordingly, the development is not considered to integrate with the surrounding landscape character. - The Abbott Road streetscape should be defined by an integration of landscape and built form, hence an increased front setback to Abbott Road would achieve a better outcome.	- The proposal has been amended to ensure the design better integrates with the surrounding built and natural character of North Curl Curl. - See built form comments provided in Section 3.3.1 of this RtS Report.	Refer to amended Architectural Plans at Appendix A and amended Landscape Plans at Appendix K .
25. Landscaping	- Protection of on-site trees is documented; however, no such protections are indicated for the street trees along Playfair Road. - The Arborist Report should be updated to provide a discussion on the impact of proposed overland flow on the retention of	The amended Arborist Report at Appendix C has been updated to recommend a range of measures to protect the street trees located along Playfair Road during construction. This includes locating	Refer to amended Arborist Report at Appendix C .

Issue	Comment	DoE Response	Reference
	existing trees, including if any land modulation will occur to achieve the overland flow.	dedicated tree protection fencing around these trees. The amended Arborist Report has also been updated to assess the impact of proposed overland flow. The Arborist Report concludes that the proposed overland flow swale is clear of the TPZ of existing trees and accordingly, is not expected to result in any impacts. The parts of the overland flow path that intersect a TPZ are to be at existing levels with no earthworks or ground shaping required.	
26. Building and Fire Safety	The proposed development must be design and constructed to meet the requirements of the National Construction Code (BCA).	As identified within the amended BCA Report at Appendix O, the amended development is capable of complying with the relevant BCA standards. Detailed compliance with the BCA will occur during the detailed design stage.	Refer to amended BCA Report at Appendix O .
27. Visual Bulk/ Height of Building	- The visual bulk of Buildings A, B and C may create visual bulk to the streetscapes of Abbott Road, Playfair Road and adjoining properties. It is therefore recommended that suitable materials and plantings are used to screen the buildings and add visual interest. - Given the orientation and location of proposed building M at the site, the proposed height exceedance could be supported.	- The amended proposal has a reduced maximum building height of 9.7m (original proposal had a maximum building height of 11.25m), which significantly reduces the overall proposed visual bulk of the proposal. - The proposed School buildings facing Abbott Road have been further setback to allow for a significant landscape buffer to be provided to increasingly screen the proposal, provide increased permeable surfaces and increased visual interest for staff, students, neighbours and passers-by.	Refer to amended Architectural Plans at Appendix A .

Issue	Comment	DoE Response	Reference
		See built form comments provided in Section 3.3.1 of this RtS Report.	
Office of Environment and Heritage:			
No comments or objections raised.			
NSW Environment Protection Authority:			
28. Soil Contamination	Following the relocation or demolition of any existing structures and in ground utilities, further investigation is to be undertaken of soil contamination within the footprint of those structures and utilities prior to undertaking any construction.	Noted. Can be conditioned.	N/A
29. Site Audit	Engage a site auditor accredited under the <i>Contaminated Land Management Act 1997</i> and provide a Section A site audit statement (SAS) and accompanying site audit report (SAR) prepared following completion of remediation and validation certifying suitability of the development site for the proposed use prior to undertaking any construction.	Noted. Can be conditioned.	N/A
30. Remedial Action Plan	Implement the recommendations of the Remedial Action Plan as conditioned by the accredited site auditor.	Noted. Can be conditioned.	N/A
31. Contamination	Prior to commencing work, prepare and implement an appropriate procedure for identifying and dealing with unexpected finds of site contamination, including asbestos containing materials and lead-based paint.	Noted. Can be conditioned.	N/A
32. Asbestos	Satisfy the requirements of the Protection of the Environment Operation (Waste) Regulation 2014 with particular reference to Part 7 'asbestos wastes'.	Noted. Can be conditioned.	N/A

Issue	Comment	DoE Response	Reference
33. Safework NSW	Consult with Safework NSW concerning the handling of any asbestos waste that may be encountered during the course of the project.	Noted. Can be conditioned.	N/A
34. Construction Hours	- As far as practicable, all demolition, site preparation, bulk earthworks, construction and construction-related activities likely to be audible at any noise sensitive receivers such as surrounding residences are only undertaken during the standard construction hours, being: 7.00 am to 6.00 pm Monday to Friday; 8.00 am to 1.00 pm Saturday; and - No work on Sundays or gazetted public holidays.	- Development consent is sought for the following construction hours: 7.00 am to 6.00 pm Monday to Friday; 8.00 am to 5.00 pm Saturday; and - No work on Sundays or gazetted public holidays - Additional hours are sought on Saturday to reduce construction timeframes and fit in with school holidays. Saturday construction noise will be absorbed by Saturday sport noise.	Refer to amended Preliminary Construction Management Plan at Appendix L and amended Construction and Operational Noise Report at Appendix Q .
35. Intra-day Respite Periods	Schedule intra-day 'respite periods' for construction activities identified in section 4.5 of the Interim Construction Noise Guideline as being particularly annoying to noise sensitive receivers, including surrounding residents.	Noted. Can be conditioned.	N/A
36. Construction Vehicles	Construction vehicles (including concrete agitator trucks) involved in demolition, site preparation, bulk earthworks, construction and construction-related activities must not arrive at the project site or in surrounding residential precincts outside approved construction hours.	Noted. Can be conditioned.	N/A
37. Reversing and Movement Alarms	Consider undertaking a safety risk assessment of site preparation, bulk earth works, construction and construction-related activities to determine whether it is practicable to use audible movement alarms of a type that would minimise the	Noted. Can be conditioned.	N/A

Issue	Comment	DoE Response	Reference
	noise impact on surrounding noise sensitive receivers, without compromising safety.		
38. Dust Control and Management	Minimise dust emissions on the site and prevent dust emissions from the site.	Noted. Can be conditioned.	N/A
39. Construction Waste Control and Management	- All waste generated during the project is to be assessed, classified and managed in accordance with the “Waste Classification Guidelines Part 1: Classifying Waste” (Department of Environment Climate Change and Water, December 2009). - The body of any vehicle or trailer used to transport waste or excavation spoil from the premises must be covered before leaving the premises. - Mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site must be removed before the vehicle, trailer or motorised plant leaves the premises. - Concrete waste and rinse water must not be disposed of on the development site and prevented from entering waters, including any natural or artificial watercourse.	Noted. Can be conditioned.	N/A
40. Background Noise Measurement	- Background noise monitoring was incorrectly undertaken. Accordingly, DoE should either: - Re-measure background noise levels, excluding noise from activities at the existing school, but otherwise representative of noise levels in the area; or - Adopt background noise levels 5dB lower than those proposed, for the purposes of setting noise objectives for the proposed development (i.e. 37dBA daytime; 35dBA evening; 31dBA nighttime).	The amended Construction and Operational Noise Report at Appendix Q has adopted new background noise measurements.	Refer to amended Construction and Operational Noise Report at Appendix Q .

Issue	Comment	DoE Response	Reference
41. 'Out of Hours' Community Use of School Facilities	- The 'futsal' fields and outdoor sports courts are not to be made available for community use: - During week day mornings, - Later than 6.00 pm on week nights, - Other than between the hours of 8.00 am and 6.00 pm on Saturdays, and - During Sundays and public holidays. - Comprehensive noise compliance monitoring is to be undertaken of representative uses of the 'futsal' fields and outdoor sports courts and associated facilities (e.g. parking) outside school hours to demonstrate that the level, nature, quality and character of noise emitted by those uses and the time at which and frequency of those uses would not interfere unreasonably with or be likely to interfere unreasonably with the comfort or repose of persons not on the development site, especially the occupants of nearby residences. - A detailed noise compliance monitoring report is to be submitted with noise measurements reported against relevant noise criteria and the outcomes of appropriate community consultation together with detailed recommendations concerning any additional feasible and reasonable noise mitigation and management measures, including further or more relaxed restrictions on the times at which and the frequency of each type of use of the 'futsal' fields and outdoor sports courts and associated facilities (e.g. parking) outside school hours.	- The proposed futsal fields and outdoor sports courts are to be made available within the hours recommended by the EPA. - The amended Construction and Operational Noise Report at Appendix Q assesses the predicted noise levels for using the futsal fields and outdoor sports courts. Recommendations to reduce overall noise levels generated by their use are also made, which can be addressed by operational management.	Refer to Table 7 within Section 4.3 of this RtS Report and amended Construction and Operational Noise Report at Appendix Q .

Issue	Comment	DoE Response	Reference
42. Mechanical Plant and Equipment	- Provide a comprehensive quantitative assessment of operational noise impacts on surrounding noise sensitive receivers, especially adjoining residences. - Mechanical plant and equipment installed at the development site must not exhibit tonal or other annoying characteristics or generate noise that exceeds 5 dBA above the rating background noise level (day, evening and night) when measured at the western boundary of the development site.	- Refer to amended Construction and Operational Noise Report at Appendix Q for an assessment of potential operational noise impacts on the surrounding locality. - Noted. Can be conditioned.	Refer to amended Construction and Operational Noise Report at Appendix Q .
43. School Bell System	Design, install and operate the school public address/bell system to implement all such other measures as may be necessary to ensure use of that system does not interfere unreasonably with the comfort and repose of occupants of nearby residences.	Noted. Can be conditioned.	N/A
44. Waste Collection	Waste collection services are not to be undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.	- The DoE is seeking a variation to these hours to allow waste collection to occur from 6.00am to 7.00pm Monday to Friday. - This will ensure that waste collection can occur before and/or after students, staff and parents are at the site to reduce the likelihood of potential incidences.	N/A
45. Grounds Maintenance	Grounds maintenance involving the use of powered equipment is not to be undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.	- The DoE is seeking a variation to these hours to allow grounds maintenance involving the use of power equipment to also occur on Saturday from 8:00am to 6:00pm. - This will ensure that any essential maintenance can be undertaken on weekends when students and staff are not using the School. It will also allow for potential working bees to be undertaken on weekends.	N/A

Issue	Comment	DoE Response	Reference
46. Ongoing Waste Management	Identify and implement feasible and reasonable opportunities for the reuse and recycling of waste, including food waste.	All practical efforts will be undertaken to ensure waste is reused and recycled wherever possible in accordance with the amended Operational Waste Management Plan at Appendix M.	Refer to amended Operational Waste Management Plan at Appendix M .
Transport for NSW:			
47. Removal of Children's Crossing	The proposal to remove the children's crossing along Playfair Road would need to be considered by Northern Beaches Council and Roads and Maritime. It is anticipated that any removal of the crossing would require a road safety assessment.	Noted. Can be conditioned.	N/A
48. Pick-up/Drop-off and Bus Zones	- The proposed changes to the primary pedestrian access point on Abbott Road could result in a change to the desired pick-up and drop-off location from Playfair Road. Accordingly, the relation of existing or implementation of additional pick-up/drop-off zones should be considered. - Furthermore, the existing bus zone should be relocated closer to the school frontage, southwards along Playfair Road in proximity to the secondary pedestrian entry (adjacent to the library).	- The bus zone and pick-up/drop-off points to service the School are proposed to remain on Playfair Road. This is because it is not anticipated that there will be a change to the desired pick-up and drop-off location from Playfair Road. This is because a number of new entries into the School are proposed off Playfair Road and students coming from the surrounding locality from the north and west will access the site from Playfair Road. - The existing bus zone is to be maintained to ensure it does not conflict with the existing and proposed drop-off and pick-up points.	Refer to amended Traffic Impact Assessment at Appendix T .
49. Road Safety Evaluation	Prior to the issue of occupation certificate, a Road Safety Evaluation (RSF) shall be undertaken of Playfair Road and Abbott Road that specifically evaluates the conditions during school pick-up/drop-off periods. Appropriate road safety	Noted. Can be conditioned.	N/A

Issue	Comment	DoE Response	Reference
	measures shall be implemented based on the outcomes of the RSE in consultation with Northern Beaches Council.		
Roads and Maritime Services:			
50. Parking	Adequate on-site parking is to be provided on-site.	See parking comments provided for issue 7.	Amended Architectural Plans at Appendix A and amended Traffic Impact Assessment at Appendix T .
Sydney Water:			
51. Building Plan Approval	The approved plans must be submitted to the Sydney Water Tap in online service to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.	Noted. Can be conditioned.	N/A
52. Section 73 Compliance Certificate	A Section 73 Compliance Certificate under the <i>Sydney Water Act 1994</i> must be obtained from Sydney Water.	Noted. Can be conditioned.	N/A
Curl Curl North Public School P&C Association:			
53. Construction Management	The application lacks sufficient detail regarding the proposed mitigation measures that will be implemented during construction to ensure minimal impact to the school students, teachers and surrounding natural environment. The lack of detail makes it very difficult to have any certainty that key construction impacts such as noise, dust, air quality, soil and water management, construction traffic etc. will be effectively	The amended Preliminary Construction Management Plan at Appendix L identifies a range of environmental management procedures that will be incorporated during construction to minimise potential construction impacts on school students, teachers, surrounding neighbours and the surrounding natural environment.	Refer to amended Preliminary Construction Management Plan at Appendix L .

Issue	Comment	DoE Response	Reference
	managed during the proposed 18 months to 2-year construction timeframe.		
54. Fig Tree	The EIS does not detail how a significant Moreton Bay Fig Tree contained within the central area of the school grounds will be protected during construction.	The Moreton Bay Fig Tree is to be retained and will be protected during constructed in accordance with the recommendations provided in the attached amended Arborist Report at Appendix C. This includes placing tree protection fencing around the entire fig tree.	Refer to amended Arborist Report at Appendix C .
55. Hours of work	The question is asked as to why extended working hours are not being sought as a means to minimise impacts upon the students and teaching staff. Extended working hours on Saturdays and scheduling significant works during school holidays should be prioritised to minimise the impact on students.	- Extended work hours on Saturday are proposed (8:00am until 5:00pm). These works will occur during sports that will be undertaken on the adjoining sports fields. Accordingly, additional acoustic impacts caused by construction will be significantly 'washed out' by sports noise. - Extending working hours on Saturday will speed up construction to reduce the longevity of the construction works on students, teachers and surrounding neighbours.	Refer to amended Preliminary Construction Management Plan at Appendix L and amended Construction and Operational Noise Report at Appendix Q .
56. Construction Traffic	The Construction Traffic Management information provided is very brief and fails to identify the significant peak in pedestrian and traffic movements in and around the school during the school drop off (8:30am to 9:15am) and pick up times (2:45pm to 3:20pm).	A Construction Traffic Management Plan will be developed by the appointed contractor. It will implement a range of construction traffic management procedures to minimise potential impacts during school drop off and pick up times.	N/A
57. Incident Management	The application provides no detail regarding how incidents will be managed on site.	The amended Preliminary Construction Management Plan at Appendix L includes details of incident management.	Refer to amended Preliminary Construction Management Plan at Appendix L .

Issue	Comment	DoE Response	Reference
		All incidents and near-misses at the site will be recorded and addressed in accordance with the contractor's health and safety protocols.	
58. OOSH	While the EIS discusses provision of a new OOSH facility at the school, it does not provide sufficient detail regarding how the existing OOSH facility that already operates at the school for up to 160 children will continue to operate safely during the 18 months to 2-year construction period.	- While the new School is under construction, the exiting OOSH will continue to operate as follows: - In Stage 1 of construction, the OOSH will continue to operate in its current location; and - In Stage 2 of construction, the existing hall, canteen and 2 existing demountable will be used for the OOSH. Block L and the Block L extension will be completed during Stage 2. Accordingly, the OOSH will move in at the end of Stage 2 and remain there permanently.	N/A
59. Air Conditioning	The proposal does not provide for any mechanical ventilation (heating or cooling) of the new buildings. Accordingly, further justification should be provided to detail how the new classrooms will be able to achieve and maintain a constant and suitable temperature conducive to learning, particularly during the hotter and colder times of the year.	- The school incorporates a variety of design features that allow for cooling and heating without the use of air-conditioning. These design features comprise: - Incorporating deep verandah spaces to cool air prior to entering each building and external sun shading devices where verandahs are not used; - Incorporating pitched roofs to allow for insulated ceiling voids; - Selecting a low solar absorbent metal roof sheeting colour for the main roof forms (classified as 'Light' under the BCA). - Amending the built form so it is split into two finger shapes, which will allow coastal breezes to flow through the site; and - Incorporating breezeways between each homebase so windows are located on all four sides. In addition to this, each of these windows	N/A

Issue	Comment	DoE Response	Reference
		will be operable and many will incorporate louvres to maximise the openable area. The proposed School design will be tested via JV3 modelling during the detailed design phase, which will inform the exact specification of glass types and insulation types to be utilised to ensure thermal comfort without air conditioning.	
Curl Curl Lagoon Friends:			
60. Hard Surfaces	The proposal results in an apparent increase in hard surfaces within the school grounds. Consideration should be given to provide alternative surfaces to paving and AstroTurf that allow for better absorption of rainfall and filtration of soluble pollutants.	- The amended landscape concept for the site included at Appendix K provides a variety of permeable surfaces for the School to minimise potential stormwater, drainage and flooding impacts. These surfaces include: - Vegetation swale with rock boulders and plantings through the middle of the site; - A variety of mass plantings, trees and shrubs; and - Large open spaces incorporating natural turf.	Refer to amended Landscape Plans at Appendix K .
61. Tree Preservation	The EIS does not provide detail for how trees identified as high-value in the arborist's report will be protected during demolition and construction.	All trees to be retained at the site will be protected during demolition and construction in accordance with the recommendations provided in the attached amended Arborist Report at Appendix C.	Refer to amended Arborist Report at Appendix C .
62. Traffic Management	Consideration should be given to reducing construction truck activity (vehicles entering/exiting the site) during winter sports season on Saturdays to reduce pedestrian risks and traffic delays.	Construction truck activity should not be reduced on Saturdays during winter sports, as construction activities should be maximised on Saturdays while students, teachers and parents aren't at the site.	N/A

Issue	Comment	DoE Response	Reference
		Construction truck activity will occur in accordance with the Construction Traffic Management Plan to be developed by the appointed contractor.	
63. Heritage	Consideration should be given to how elements of the original prefabricated classrooms at the site can be incorporated into the new design.	The original Heritage Statement included as part of the original SSDA submission concluded that the prefabricated classrooms “<i>do not have architectural characteristics that would warrant listing as heritage items</i>”. Further, incorporating elements of these buildings into the overall design of the School would add significant immediate and on-going costs to the project. Accordingly, this is not being perused.	Refer to original Heritage Statement included as part of the original SSDA submission.
64. Boundary Fence	The construction is a 2.1m high palisade fence at the school boundary is not considered in keeping with the surrounding streetscape. A lower fence should be considered.	The amended proposal seeks to retain the existing low-scale fence that borders the perimeter of the site.	N/A

Table 7 – Response to Public Submissions

Issue	# Submissions	Comment	Response	Reference
1. Construction Impacts	8	Ensure adequate mitigation measures are put in place to minimise against adverse construction impacts (including noise, vibrations, dust and parking)	See construction impacts comments provided for issue 1 in Table 5.	Refer to amended Preliminary Construction Management Plan at Appendix L .
2. Existing Prefabricated Classrooms	7	The prefabricated classrooms are an original element of the school that hold historical value and should be retained or relocated.	See heritage comments provided for issue 63 in Table 5.	Refer to original Heritage Statement included as part of the original SSDA submission.
3. Air Conditioning	7	Air-conditioning should be provided within classrooms at the School to mitigate against hot summers and cold winters.	See air conditioning comments provided for issue 59 in Table 5.	N/A
4. Tree Protection	7	Trees to be maintained at the site should be suitably protected during construction.	See tree protection comments provided for issue 61 in Table 5.	Refer to amended Arborist Report at Appendix C .
5. Asbestos Removal	5	Suitable measures should be implemented to ensure that the removal of asbestos from the site will not adversely impact teachers, students and surrounding neighbours.	Any uncovered asbestos at the site will be appropriately removed in a safe and secure manner. Removal will be undertaken in accordance with the recommendations provided within the Hazardous Building Materials Survey included as part of the original SSDA submission, and the amended Stage 1 Environmental Site Assessment attached at Appendix D.	Refer to original Hazardous Building Materials Survey included as part of the original SSDA submission and amended Stage 1 Environmental Site Assessment at Appendix D .
6. Potential Runoff to Curl Curl Lagoon	5	The proposal results in an apparent increase in hard surfaces within the school grounds. Consideration should be given to provide alternative surfaces that allow for	See hard surfaces comment provided for issue 60 in Table 5.	N/A

Issue	# Submissions	Comment	Response	Reference
		better absorption of rainfall and filtration of soluble pollutants		
7. Proposed Futsal Courts	4	The proposed playing fields should be levelled (as they are being constructed on sloping ground) to ensure they are safe and suitable for use by students.	The specific design and specifications of the proposed playing fields will be finalised during the detailed design stage.	N/A
8. Proposed Construction Hours	4	Consider extending hours of work on weekends to reduce impacts on students and staff during the week.	See proposed construction hours' comments provided for issue 14 in Table 5.	Refer to amended Preliminary Construction Management Plan at Appendix L .
9. Proposed Boundary Fence	3	The construction is a 2.1m high palisade fence at the school boundary is not considered in keeping with the surrounding streetscape. A lower fence should be considered.	See boundary fence comments provided for issue 64 in Table 5.	N/A
10. Loss of Trees	3	The proposed design should seek to minimise the loss of existing trees and vegetation at the site; particularly established trees.	- The proposal has been designed to minimise the loss of existing trees and vegetation at the site wherever possible. - As per the amended Landscape Plan at Appendix K, the proposal seeks to incorporate a range of new planting. This will adequately compensate for the loss of existing trees and plants at the site.	Refer to amended Landscape Plan at Appendix K .
11. Height	2	The height of the proposed School buildings is considered to be excessive and not in keeping with the surrounding built form.	See built form comments provided in Section 3.3.1 of this RtS Report.	Refer to amended Architectural Plans at Appendix A .

Issue	# Submissions	Comment	Response	Reference
12. Shared-Use Facilities	2	A lack of details are provided on the proposed shared-use arrangements at the School.	See shared-use facility comments provided for issue 11 within Table 5.	Refer to Table 5 within Section 4.3 of this RtS Report.
13. Parking	2	Suitable parking should be providing on-site for staff	See parking comments provided for issue 7 within Table 5.	Refer to amended Traffic Impact Assessment at Appendix T .
14. OOSH	2	- Further details should be provided about the proposed OOSH, particularly relating to potential noise and parking impacts. - No details are provided as to how the existing OOSH be impacted during redevelopment.	See OOSH comments provided for issue 12 and issue 58 in Table 5.	Refer to amended Architectural Plans at Appendix A and amended Construction and Operational Noise Report at Appendix Q .
15. Vehicular Noise	1	The noise generated by vehicles travelling along surrounding roads will have a negative impact on students and staff at the School.	The amended Construction and Operational Noise Report at Appendix Q has confirmed that the proposal will be suitably designed to ensure external noise sources (includes surrounding vehicles) do not have an adverse impact on internal students and staff.	Refer to amended Construction and Operational Noise Report at Appendix Q .
16. Loss of Views	1	The proposal will cause a loss of views out towards the adjoining sports fields and Curl Curl Lagoon.	The amended built form has been split from a U-shape into two separated linear forms to ensure view lines towards the adjoining sports field and Curl Curl Lagoon are increasingly maintained.	Refer to amended Architectural Plans at Appendix A .
17. Survey Plan	1	The survey plan included as part of the original SSDA submission is not considered to be satisfactory.	Noted. The Survey Plan included as part of the original SSDA submission is considered to be satisfactory.	Refer to original Survey Plan included as part of the original SSDA submission.

Issue	# Submissions	Comment	Response	Reference
18. On-site Car Park	1	Ensure the on-site carpark is adequately screened to reduce advise visual impacts.	As per the amended Landscape Plan included at Appendix K, the proposed on-site carpark is to be adequately screened using a range of trees and plants. This will minimise its visual impact for staff, students, surrounding neighbours and passers-by.	Refer to amended Landscape Plan at Appendix K .
19. Privacy	1	Minimise privacy impacts on adjoining neighbours.	See privacy comments provided in Section 3.3.3 of this RtS Report.	N/A
20. Flora and Fauna Assessment	1	The submitted Flora and Fauna Impact Assessment Report is not considered satisfactory.	Noted. The existing Flora and Fauna Impact Assessment Report that was included as part of the original SSDA is considered satisfactory.	Refer to original Fauna and Fauna Impact Assessment Report included as part of the original SSDA submission.
21. Surrounding Pedestrian Paths/ Landscaping	1	The surrounding pedestrian paths and landscaping should also be upgraded.	See contributions comments provided for issue 18 and issue 19 within Table 5.	N/A

4.3. SCHOOL AND COMMUNITY USE OF SCHOOL FACILITIES

A schedule of the existing and proposed school and community use of school facilities at the School is provided within **Table 7**. As identified, the proposed school use and sharing of school facilities with the community is no different to what is currently provided at the existing School. Accordingly, no additional adverse impacts will generally be generated.

Table 8 – Existing and Proposed School and Community Use of School Facilities

	Existing School				Proposed Re-Developed School			
Activity	Building/ Facility	Weekday/ Weekend	Frequency	Attendance/ Capacity	Building/ Facility	Weekday/ Weekend	Frequency	Attendance/ Capacity
Musical/ Drama Production	Communal Hall	Weekday PM	Twice a year	600 audience + 80 participants	Communal Hall	Weekday PM	Twice a year	600 audience + 80 participants
Presentation Days	Communal Hall	Weekday AM + PM	5-8 per year	200 audience + 400 students	Communal Hall	Weekday AM + PM	5-8 per year	200 audience + 400 students
Year Group Special Presentation	Communal Hall and Library	Weekday	Weekly	400-500	Communal Hall and Library	Weekday	Weekly	400-500
P & C Meeting	Library	Weekday PM	8 per year	30	Library	Weekday PM	8 per year	30
Examinations	Communal Hall and Classrooms	Weekday	8 weeks per year	120	Communal Hall and Classrooms	Weekday	8 weeks per year	120
Community Uses/ Hiring	Communal Hall	Weekdays / Weekends AM + PM	50 per year	10-400 (large groups very rare)	Communal Hall	Weekdays / Weekends AM + PM	50 per year	10-400 (large groups very rare)
Fundraisers	Communal Hall/ COLA	Weekdays AM/ Weekends Midday	8 per year	500-700	Communal Hall/ COLA	Weekdays AM/ Weekends Midday	8 per year	500-700
Project Penguin Expo	Communal Hall	Weekday AM + PM	Once per year	300	Communal Hall	Weekday AM + PM	Once per year	300

	Existing School				Proposed Re-Developed School			
Activity	Building/ Facility	Weekday/ Weekend	Frequency	Attendance/ Capacity	Building/ Facility	Weekday/ Weekend	Frequency	Attendance/ Capacity
Discos	Hall	Weekday PM	3 per year (4 per session)	150-300 per session	Hall	Weekday PM	3 per year (4 per session)	150-300 per session
General School Use (including dance, drama, PE, gymnastics etc.)	Hall	Every day during school term (8am – 3pm)	30 – 500 per year	Use of hall most days for one of these activities	Hall	Every day during school term (8am – 3pm)	30 – 500 per year	Use of hall most days for one of these activities
OOSH	Communal Hall	Weekdays AM + PM	Every day during school term + full weekdays during school holidays	160	Communal Hall	Weekdays AM + PM	Every day during school term + full weekdays during school holidays	160
Sports	N/A	N/A	N/A	N/A	Futsal Fields Outdoor Sport Courts	At times that are not included in the following hours (as per EPA): • During weekday mornings, • Later than 6.00pm on weeknights, • Other than between the hours of 8.00am and	Will vary. Most weekends + some weekdays	Will vary depending on sport.

	Existing School				Proposed Re-Developed School			
Activity	Building/ Facility	Weekday/ Weekend	Frequency	Attendance/ Capacity	Building/ Facility	Weekday/ Weekend	Frequency	Attendance/ Capacity
						6.00pm on Saturdays; and During Sundays and public holidays.		

5. CONCLUSION

This RtS has considered each of the submissions received during the public exhibition of SSD 16_8310. To address various comments raised within the submissions, the proposal has been amended.

The amended proposal will reduce visual bulk and greater rationalisation of facilities and services. The amended proposal is considered suitable for the site and in the public interest because:

- It provides a greater overall outcome that has reduced environmental impacts;
- It positively responds to the site conditions and surrounding built and natural character of North Curl Curl; and
- Construction of the amended proposal is vital to ensuring:
 - Enrolment pressure is taken off the existing School which is currently exceeding design capacity;
 - All demountable classrooms are removed from the site;
 - New state of the art facilities and spaces are provided to future students and teachers; and
 - Enrolment pressure is taken off surrounding primary schools currently exceeding design capacity.

Considering this, the content contained throughout this RtS report and each of the attached supporting documents, the proposal is in the public interest and approval should be granted, subject to appropriate conditions.

DISCLAIMER

This report is dated 28 May 2018 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of NSW Department of Education (**Instructing Party**) for the purpose of Response to Submissions (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A AMENDED ARCHITECTURAL PLANS

APPENDIX B AMENDED URBAN DESIGN REPORT

APPENDIX C

AMENDED ARBORIST REPORT

APPENDIX D

AMENDED STAGE 1 ENVIRONMENTAL SITE ASSESSMENT

APPENDIX E AMENDED REMEDIAL ACTION PLAN

APPENDIX F AMENDED INTEGRATED WATER MANAGEMENT PLAN

APPENDIX G

AMENDED SEDIMENT AND EROSION CONTROL PLAN

APPENDIX H AMENDED GEOTECHNICAL AND STRUCTURAL REPORT

APPENDIX I

AMENDED STORMWATER MANAGEMENT REPORT

APPENDIX J AMENDED FLOOD RISK ASSESSMENT REPORT

APPENDIX K

AMENDED LANDSCAPE PLANS

APPENDIX L AMENDED PRELIMINARY CONSTRUCTION MANAGEMENT PLAN

APPENDIX M

AMENDED OPERATIONAL WASTE MANAGEMENT PLAN

APPENDIX N AMENDED ECOLOGICAL SUSTAINABLE DEVELOPMENT REPORT

APPENDIX 0

AMENDED BUILDING CODE OF AUSTRALIA REPORT

APPENDIX P

AMENDED ACCESS DESIGN ASSESSMENT REPORT

APPENDIX Q

AMENDED CONSTRUCTION AND OPERATIONAL NOISE REPORT

APPENDIX R AMENDED WIND IMPACT ASSESSMENT REPORT

APPENDIX S

AMENDED HYDRAULIC SITE SERVICES AVAILABILITY STATEMENT

APPENDIX T AMENDED TRAFFIC IMPACT ASSESSMENT



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