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4 September 2018

Aditi Coomar
Social and Other Infrastructure Assessments
Division of Priority Projects Assessment
320 Pitt Street
Sydney NSW 2000

Dear Aditi,

CURL CURL NORTH PUBLIC SCHOOL REDEVELOPMENT (SSD 17_8310) - RESPONSE TO SUBMISSIONS

This Response to Submissions letter (RtS) has been prepared on behalf of the NSW Department of Education (DoE) to respond to the submissions received during the public exhibition of an amended design for Curl Curl North Public School (SSD 16_8310).

The amended design was on public exhibition from 14 June 2018 until 11 July 2018. During this public exhibition period, four submissions were received from the general public and six 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;
- Roads and Maritime Services; and
- Government Architect NSW.

Transport for NSW and Sydney Water did not provide further comments. This is taken as concurrence.

The key matters raised in the submissions relate to staff car parking and proposed extended construction hours. Some minor design modifications were also recommended.

This letter should be read in conjunction with the attached supporting documentation comprising:

- Amended Architectural Plans prepared by TKD Architects (**Appendix A**);
- Amended Landscape Plans prepared by Context (**Appendix B**);
- Amended Workplace Travel Plan prepared by Traffix (**Appendix C**);
- Amended External Road Signage Plan prepared by Traffix (**Appendix D**); and

- Amended Construction Traffic Management Plan prepared by Traffix (**Appendix E**).

1. PROPOSED DESIGN AMENDMENTS

To appropriately respond to key submission items, some minor design changes have been made:

- Revised roof designs for select school buildings;
- Provision of brickwork as an external building material;
 - **Note:** The proposed brickwork is in keeping with the character of the surrounding built and natural environment.
- Provision of 21 on-site car parking spaces (4 additional car parking spaces);
 - **Note:** The proposal does not provide fewer car parking spaces than what is currently provided at the site.
- Revised internal layout of the proposed administration building (Block A), including the provision of an accessible toilet and shower space;
 - **Note:** This space also acts as a staff end-of-trip facility.
- Revised tree selection that incorporates greater local native species throughout the site;
- Provision of outdoor footpaths to connect the futsal fields, open play spaces and school buildings;
- Provision of multiple fauna nests throughout the site; and
- Retention and upgrading of the existing Children's Crossing at Playfair Road to incorporate required W6-3 and W8-22 signs.
 - **Note:** The retention of the existing children's crossing does not result in a loss of proposed drop-off/pick-up spaces (a total of 20 drop-off/pick-up spaces are still proposed).

Further details of the design changes to the amended proposal are provided within **Section 2** of this RtS and throughout each of the accompanying documents provided at **Appendix A to E**.

2. RESPONSE TO SUBMISSIONS

2.1. GOVERNMENT AGENCY AND ORGANISATION SUBMISSIONS

During the public exhibition of the amended SSDA, six 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;

- Roads and Maritime Services; and
- Government Architect NSW.

A response to the comments raised within each government agency and organisation submission has been provided in **Table 1**. While the exact wording of the submissions may not be fully captured, the intent and the issues raised have been identified and addressed.

Table 1 – Government Agency and Organisation Submissions

Issue	Comment	Response	Reference
NSW Department of Planning and Environment:			
1. Car Parking	• The proposal includes 16 car spaces which results in a reduction of 4 car spaces when compared to the existing situation. The proposal however seeks approval for an increase of 6 staff members. The documents do not provide any reason as to why the number of spaces has been reduced on site. There is space within the front setback to accommodate additional parking without impacting on the play areas.	• The proposal has been amended to now incorporate a total of 21 on-site car parking spaces. This is considered acceptable as: – The proposal maintains the existing number of car parking spaces; – Nearby parking that adjoins the Abbott Road Sports Grounds and Curl Curl Sports Centre (see Figure 1) has recently been upgraded to now include dedicated marked parking spaces. A high percentage of these spaces are free during school hours and can be utilised by school staff when required; – The proposal only results in a total increase of 6 staff only; – The car parking rates provided within the 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 schools within NSW states that on-site school	• Refer to amended Architectural Plans at Appendix A.

Issue	Comment	Response	Reference
		parking should be minimal. – Providing excessive on-site car parking is highly unsustainable both in the short and long-term 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; and ▪ It is counterproductive to the Green Travel Plan and Workplace Travel Plan that have been developed for the proposal, which shows that car dependency will reduce overtime. ▪ It will reduce play space available for students, which is a higher priority. ▪ The Department of Education priorities children over cars and seeks as much as possible to minimise this conflict on site. – To encourage travel to the site by walking and cycling, the school will provide end of trip facilities for staff and additional bike parking.	

Issue	Comment	Response	Reference
Figure 1 – Surrounding Dedicated Car Parking (Note: Carparking Highlighted in Red)			
			
Source: Nearmap			
2. Bicycle Parking	The proposal states that 69 bicycle parking spaces are provided. However, only 35 are identified on the site plan.	- All 35 bicycle racks identified on the architectural plans can accommodate 2 bicycles each (as per the manufacturers specifications – 'CORA Bike Rack Pty Ltd'). Accordingly, up to 70 bicycles can be accommodated at the site. - End of trip facilities will be provided for staff to encourage bicycle travel. These are not detailed in the plans but should be conditioned in the consent.	N/A
3. Workplace Travel Plan	The Workplace Travel Plan (WTP) states that the implementation of the plan would result in reduction of private vehicle dependency by 5%. The timeframe within which this can be achieved has not been mentioned. Further, the reduction of 5% would still	- An amended Workplace Travel Plan (WTP) has been prepared by Traffix and is attached at Appendix C. The amended WTP incorporates each of these requested comments. - There is no reduction in car parking on site.	Refer to amended WTP at Appendix C.

Issue	Comment	Response	Reference
	impact on the on-street parking areas available around the site. The submitted WTP does not include: – Objectives and targets that are site specific and measurable to define the direction and purpose of the WTP; – Timings within which the objectives can be achieved and further private vehicle dependency reduced to justify the shortfall of parking within the site; – Measures to promote and support the implementation of the plan; and – The process for monitoring and reviewing.	• Bicycle parking and end of trip facilities are an important component of the WTP, which are provided in the proposal.	
Northern Beaches Council:			
4. Car Parking	• 76 staff car parking spaces should be provided in compliance with the Council requirements. • It is recommended that additional parking be incorporated adjacent to the eastern side of building Block B where up to at least 20 additional parking spaces could be accommodated while still maintaining an acceptable landscaped buffer with the adjoining property.	• See car parking comments provided for issue 1 within Table 1 of this RtS letter. • Additional car parking spaces cannot be provided adjacent to the eastern side of building Block B as: – It is considered a potential hazard to allow cars to be parked in close proximity to multiple homebase buildings; – This area of the site contains a significant number of established trees that would need to be removed to facilitate parking in this area; and	• Refer to issue 1 within Table 1 of this RtS letter.

Issue	Comment	Response	Reference
		– Removal of these trees would affect the amenity of neighbouring properties. – This area of the site provides significant permeable surfaces to assist with stormwater management and flooding.	
5. Pedestrian Crossing Facilities	• Pedestrian crossing facilities such as a pedestrian refuge island on Playfair Road at the intersections with Pitt Road on the northern side and at Abbott Road on the southern side should be incorporated.	• As identified within Section 4.7 of the original EIS and Section 4 of the original RtS, DoE does not pay any S7.11 contributions. This includes any contribution towards local roads, car parking, open spaces, recreation, community facilities and plan administration. • DoE is already proposing to invest a significant amount of government funds to redevelop the School to benefit Council and the wider community. Accordingly, it is requested that Council assist the DoE by undertaking these works themselves.	• Refer to Section 4.7 of original EIS and Section 4 of original RtS.
6. Footpath along Ross Street	• Footpaths should be constructed along Ross Street to connect the school's pedestrian access to Pitt Road and Spring Road.	• See contributions comment provided for issue 5 within Table 1 of this RtS letter.	• Refer to Section 4.7 of original EIS and Section 4 of original RtS.
7. Bike Paths	• A shared path along Playfair Road at the frontage of the school and an on-road cycle route on Abbott Road at the school frontage is required to be	• See contributions comment provided for issue 5 in Table 1 of this RtS letter.	• Refer to Section 4.7 of original EIS and

Issue	Comment	Response	Reference
	implemented by the Department of Education.		Section 4 of original RtS.
8. Landscaping	- The Planting Palette Plan within the Landscape Plan Set should be updated to include quantities of proposed trees and shrubs and their locations. - The proposed use of <i>Corymbia citriodora</i> (Lemon Scented Gum) should be replaced with a locally native such as <i>Eucalyptus haemastoma</i> (Scribbly Gum) or similar. - Footpath connections between the proposed futsal courts, open play spaces and school buildings should be incorporated.	- The amended Landscape Plans at Appendix B now incorporate a Planting Zone Plan and a tree planting quantity list. - The originally proposed <i>Corymbia citriodora</i> (Lemon Scented Gum) will be replaced with the locally native species of <i>Eucalyptus haemastoma</i> (Scribbly Gum). - These species are appropriate for the school use. - The proposal has been amended to now incorporate footpaths that connect to the futsal fields, open play spaces and school buildings.	Refer to amended Landscape Plans at Appendix B.
Office of Environment and Heritage:			
9. Landscaping	- Trees removed from the site should be replaced by advanced, local provenance species from the relevant native vegetation community. - Landscape areas should be planted with a diversity of local provenance species from the relevant native vegetation community.	The amended proposal includes a revised tree selection that incorporates greater local native species. This will increasingly beautify the site and provide suitable tree cover for future students, parents and staff.	Refer to amended Landscape Plans at Appendix B.
10. Salvage Native Trees	Native trees to be removed from the site should be salvaged including tree trunks (greater	Opportunities to incorporate salvaged tree trunks either on-site or off-site will be	N/A

Issue	Comment	Response	Reference
	than approximately 25-30cm in diameter and 3m in length).	investigated at the detailed design phase.	
11. Nest Boxes	Artificial nest boxes which are suitable to native fauna likely to use the site should be installed at the site.	The proposal has been amended to incorporate suitable artificial nest boxes throughout the site.	Refer to amended Landscape Plans at Appendix B.
NSW Environment Protection Authority:			
12. Proposed Construction Hours	The proposed extended working hours on Saturday are not supported.	- The proposed construction hours have been amended. Consent is now sought for the following construction hours: - Monday to Friday: 7:00am to 6:00pm - Saturday: 8:00am to 3:30pm (not 5:00pm) - No work on Sundays or Public Holidays - Consent is sought for a 3:30pm finish on Saturdays, as: - This provides an incentive for more contractors to work on Saturday, as these hours are more worthwhile (particularly for workers coming from afar to access the site); - This will speed up construction, which will ultimately reduce the longevity of each construction impact. - Appropriate mitigation measures will be put in place to ensure the proposed extended few hours do not result in significant adverse impacts. These measures could include:	N/A

Issue	Comment	Response	Reference
		– Hand held tools between 1.00pm-3.30pm. – No heavy machinery between 1.00pm-3.30pm. – No delivers between 1.00pm-3.30pm. These can be conditioned in the consent.	
13. Waste Collection Services	• A revised condition that prescribes the operating times of waste collection being restricted to between 6:00am and 7:00pm Monday to Friday would not be objected to by the EPA, provided that: – The actual waste collection time is negotiated with the local community, and – In the event of a subsequent noise complaint from any resident likely to be affected by noise emitted during the carrying on of waste collection activities at the school, the operating hours should be reverted back to the period between the hours of 7:30am to 6:00pm Monday to Friday.	• Noted. Can be conditioned.	• N/A
14. Grounds Maintenance	• The proposal to carry out of grounds maintenance using powered equipment on Saturdays from 8:00am to 6:00pm is not supported. The carrying out of grounds maintenance using powered equipment should be carried out between 7.30am and 6:00pm Monday to Friday.	• Ground maintenance from 8.00am to 6.00pm each Saturday is no longer proposed. • However, it is instead proposed to allow grounds maintenance to occur a maximum of 6 times per year on a Saturday. These are required in the event of emergency grounds works or parent working bees, which require no children on site.	• N/A

Issue	Comment	Response	Reference
		Notification of these Saturdays would be issued well in advance to the relevant persons.	
Transport for NSW:			
No comments or objections raised.			
Roads and Maritime Services:			
15. Removal of Children's Crossing from Playfair Road	The proposed removal of the existing Children's Crossing on Playfair Road is subject to approval by the Local Traffic Committee.	- The existing Children's Crossing on Playfair Road is now proposed to be to comply with the relevant standards (incorporating W6-3 and W8-22 signs). This is reflected on the amended External Road Signage Plan attached at Appendix D. - The retention of the existing children's crossing does not result in a loss of proposed drop-off/pick-up spaces (a total of 20 spaces are still proposed).	See amended External Road Signage Plan at Appendix D.
Government Architect NSW:			
16. Bicycle Parking	Confirmation is required on the proposed facilities for bicycle parking. The proposal states that 69 spaces are to be provided, but the drawings do not appear to indicate sufficient space.	See bicycle parking comments provided for issue 2 within Table 1 of this RtS letter.	Refer to issue 2 within Table 1 of this RtS letter.
17. Car Park Design	The design of the car park should be further developed through landscaping and levels to be visually and physically	The proposed on-site staff carpark has been designed to be visually and physically separated from the entry and	Refer to amended Architectural Plans at Appendix A and

Issue	Comment	Response	Reference
	separated from the entry spaces and play spaces. • Efforts should be made to reduce the visual impact of the carpark and to prioritise the pedestrian entry.	play spaces. This has been achieved by: – Incorporating significant landscaping around the proposed on-site carpark and formal school entry; – Raising the play spaces so the carpark is located at a lower level (refer to Landscape Plan L201 for visual understanding); and – Incorporating sandstone barriers between the carpark and play spaces.	amended Landscape Plans at Appendix B.
18. Forms and Detailing	• The forms and detailing of the buildings should be further developed to ensure the project is robust, contextual and human scaled.	• Further detailing of the proposed buildings will occur during the detailed design stage.	• N/A
19. Sustainability	• Further design strategies aimed at providing increased warmth, reduced energy use and other sustainable strategies are encouraged to be incorporated.	• The design includes a range of environmental strategies that are outlined in the ESD Report. A few examples comprise: – Glazing is protected by a mix of fixed awnings, screens and verandahs depending on the orientation; – The building fabric is insulated and JV3 modelling will be conducted to ensure thermal performance of the building fabric; and – The school's existing rainwater tanks are to be re-used, and the landscape strategy retains a large number of significant trees.	• Refer to amended ESD report included with the first RtS package.
Sydney Water: No comments or objections raised.			

2.2. PUBLIC SUBMISSIONS

During the public exhibition of the amended SSDA, four submissions were received from the general public. These comprised:

- Public Submission 1: Eve Clark.
- Public Submission 2: Name Withheld.
- Public Submission 3: Name Withheld.
- Public Submission 4: Peter and Michelle Puhl (on behalf of Eaglemont Planning).

A response to the comments raised within each public submission has been provided within **Table 2**. While the exact wording of the submissions may not be fully captured, the intent and the issues raised have been identified and addressed.

Table 2 – Public Submissions

Issue	Comment	Response	Reference
Public Submission 1 (Eve Clark):			
1. Play Space	• The DoE should confirm how much play space has been lost or gained due to the new design.	• The amended scheme provides 12sqm less play space than the original scheme. • Notwithstanding this, the play space proposed to be provided with the amended scheme is better arranged, more functional and will provide greater amenity for all in comparison to the original proposal. It complies with education guidelines. • The amended proposal provides a more attractive swale and increased grassed and active play spaces.	• N/A
Public Submission 2 (Name Withheld):			

Issue	Comment	Response	Reference
2. Proposed Construction Hours	No extended work hours should be carried out.	See construction hours' comments provided for issue 12 within Table 1 of this RtS letter.	Refer to issue 12 within Table 1 of this RtS letter.
3. Noise	The DoE should confirm how locating teaching spaces along the eastern boundary and the hall on Playfair Road addresses potential noise impacts on neighbours.	- Proposed homebase classrooms have been designed with minimal openings to conceal noise and will be used for less hours of the day than other school buildings on-site (i.e. the school hall and OOSH facility). Accordingly, by placing proposed homebase buildings along the eastern boundary of the site, adjoining neighbours will be subject to less after-school hour noise impacts in comparison to a scheme which could have placed buildings along the eastern boundary of the site that contained after-school hour facilities and services. - The proposed school hall has been located near Playfair Road to ensure it is located well away from neighbours to the north, east and south of the site. Neighbours to the west of the school hall will be negligibly impacted as: - Numerous trees that are located at the western edge of the site and along Playfair Road will increasingly screen the school hall; - Playfair Road increasingly separates the site from each	N/A

Issue	Comment	Response	Reference
		of the westerly neighbours; and – The school hall has been specifically designed to ensure it is acoustically treated and spills-out noise in an easterly direction by locating openings along the eastern elevation away from the western neighbours.	
4. Proposed Truck Entry/Exit	• The truck entry and exit point should be from Abbott Road and not Playfair Road due to unreasonable noise impacts on neighbours and safety risks.	• In addition to the Playfair Road truck entry/exit, a truck entry and exit point is now also proposed to be provided via Abbott Road. Given that Abbott Road has a width of more than 10m and two travel and parking lanes, the road is deemed suitable for turning movements in and out of the site. • The Abbott Road entry and exit point will be utilised whenever required to assist with mitigating against adverse construction impacts upon the surrounding locality. • The Abbott Road truck entry and exit point is reflected within the amended Construction Traffic Management Plan attached at Appendix E.	• Refer to amended Construction Traffic Management Plan at Appendix E.
Public Submission 3 (Name Withheld):			
5. Height Limit	• The 8.5m height limit should be maintained.	• The amended scheme has a maximum height of 9.7m, which is 1.55m less than the original scheme which had a maximum height of 11.25m.	• Refer to Clause 4.6 Variation included with

Issue	Comment	Response	Reference
		- Although the amended proposal continues to slightly exceed the maximum building height control that applies to the site, this minor exceedance is deemed acceptable as: - Clause 42 of <i>State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017</i> allows development consent to be granted for the subject school despite it contravening the height of building development standard; - The Clause 4.6 submitted as part of the amended DA concluded that there are no unreasonable impacts that will result from the variation. In addition, compliance with the development standard would reduce the ability to provide effective educational floor space that has appropriate floor to ceiling building heights; and - The amended proposal is in keeping with the two storey character of the area and is not of an unsightly bulk, scale or form when viewed from the surrounding public domain. - In addition, Northern Beaches Council noted within their submission that <i>“the proposed height breach is supported under the circumstances as the amended built form presents a more characteristic scale with the surrounding low density residential development.”</i>	the first RtS package.

Issue	Comment	Response	Reference
6. Staff Parking	Staff car parking should be addressed more closely, as it has already impacted streets around the school.	See staff parking comments provided for issue 1 and issue 4 within Table 1.	Refer to issue 1 and issue 4 within Table 1 of this RtS.
7. Lighting	School lighting should not be left on at night or illuminate across the street.	Noted. Can be conditioned.	N/A
8. Secondary Entrance	The secondary entrance should not be used for early morning deliveries or as a cleaner entrance. It should be located up at night and not brightly lit.	- The secondary entrance will not be used for early morning deliveries or as a cleaner entrance. - Noted. Can be conditioned.	N/A
9. Proposed Construction Hours	No extended work hours should be carried out.	See construction hours' comments provided for issue 12 within Table 1 of this RtS letter.	Refer to issue 12 within Table 1 of this RtS letter.
Public Submission 4 (Peter and Michelle Puhl – on behalf of Eaglemont Planning):			
10. Proposed Construction Hours	No extended work hours should be carried out on Saturday due to unreasonable traffic, access and parking conflicts with weekend sporting operations at John Fisher Park.	See construction hours' comments provided for issue 12 within Table 1 of this RtS letter.	Refer to issue 12 within Table 1 of this RtS letter.
11. Visual and Acoustic Privacy	Windows on the eastern elevation of buildings adjacent to the eastern boundary should be appropriately treated and/or screen louvres erected to protect the visual and acoustic privacy and amenity of 60 Abbott Road.	- The privacy and amenity of 60 Abbott Road, North Curl Curl will be protected as: - The southern portion of Block B has been reduced in size to now be single storey (was previously 2 storeys); - Block B has been increasingly angled away from the eastern	N/A

Issue	Comment	Response	Reference
		boundary of the site, which has consequentially increased the separation distance between Block B and 60 Abbott Road, North Curl Curl to now be between 20m to 22m; and – An existing high fence and numerous trees that are contained to the eastern edge of the site will increasingly screen the proposal from view when viewed from 60 Abbott Road, North Curl Curl.	
12. Streetscape Presentation/ Setbacks to Abbott Road	• The streetscape presentation and setbacks to Abbott Road are insufficient. A greater landscape setback would soften and enhance the presentation of the development to the street.	• The proposed streetscape presentation and setback to Abbott Road is deemed acceptable as: – A 23m setback is proposed from the Abbott Road site frontage to Block A; – A 6.5m setback is proposed from the Abbott Road site frontage to Block B; – The arrangement of the amended proposal to now incorporate two separated forms along the eastern and western site boundaries means the majority of the Abbott Road frontage is open, which subsequently reduces the proposals overall visual impact; and – A range of existing and proposed trees, plantings and shrubs are located at the Abbott Road site frontage. These will increasingly screen the proposal from view and provide an attractive interface between Abbott Road and the site. • Additional landscaping beyond what is already proposed at the	• N/A

Issue	Comment	Response	Reference
		Abbott Road site frontage cannot be provided, as the majority of this area is proposed to be used to provide additional on-site carparking. This carparking cannot be provided elsewhere at the site.	

3. CONCLUSION

This RtS has considered each of the submissions received during the public exhibition of the amended SSDA for the redevelopment of Curl Curl North Public School. To appropriately respond to each of the key submission items, some minor design changes have been made to the amended proposal.

It is vital that the amended proposal is promptly developed at the site, as this will ensure:

- There is additional student enrolments and staff employment opportunities;
- All demountable classrooms are removed from the site; and
- New state of the art facilities and spaces are provided to future students and teachers.

We trust that the information contained to this additional RtS is sufficient to allow assessment of the application to continue.

Should you have any additional queries, please contact Alaine Roff at (02) 8233-9927 or aroff@urbis.com.au; or Jarred Statham at (02) 8233-7601 or jstatham@urbis.com.au.

Yours sincerely,

A handwritten signature in blue ink, reading "Alaine Roff".

Alaine Roff – Associate Director

A handwritten signature in blue ink, reading "Jarred Statham".

Jarred Statham – Assistant Planner