

28 March 2019

219030

Karen Harragon
Director
Social and Other Infrastructure Assessments
Priority Projects
Department of Planning and Environment
320 Pitt Street, Sydney, NSW, 2001

Attention: Prity Cleary (Senior Planner)

Dear Ms Cleary,

RE: PICTON HIGH SCHOOL REDEVELOPMENT (SSD 8640) SECTION 4.55 MODIFICATION 1 RESPONSE TO SUBMISSIONS

The notification of the Modification for the Picton High School Redevelopment (SSD 8640) ended on 1 March 2019. One submission from Wollondilly Shire Council was received by the Department of Planning and Environment (DPE) during notification of the project.

This letter sets out the proponent's response to the additional information requested by the DPE in your letter dated 8 March 2019. This response should be read in conjunction with the following documents:

- Architectural plans prepared by BLP (**Attachment A**);
- Arboricultural Impact Statement prepared by Horticultural Management Services (**Attachment B**);
- Biodiversity Statement prepared by Ecoplaning (**Attachment C**);
- Tree Size Specification & Formal Softscape Areas plan prepared by Arcadia (**Attachment D**);
- Revised ESD Report prepared by Northrop (**Attachment E**);
- Draft Construction Traffic and Pedestrian Management Sub-Plan prepared by Stantec (**Attachment F**); and
- Response to Council Concerns with the Site and Work Practices prepared by Ethos Urban (**Attachment G**).

1.0 DPE's Matters to be Addressed

A full response to each of the matters raised by the DPE is provided below.

1.1 Signage

The DPE notes that the dimensions/details of the two signs proposed to be installed are provided with the application, however, no dimensioned plans corresponding to these dimensions/details have been submitted.

Architectural plans detailing dimensions and details of the proposed signs have been prepared by BLP and are available at **Attachment A**. An elevation of the proposed signage including dimensions as replicated from the plans is shown below in **Figure 1**.

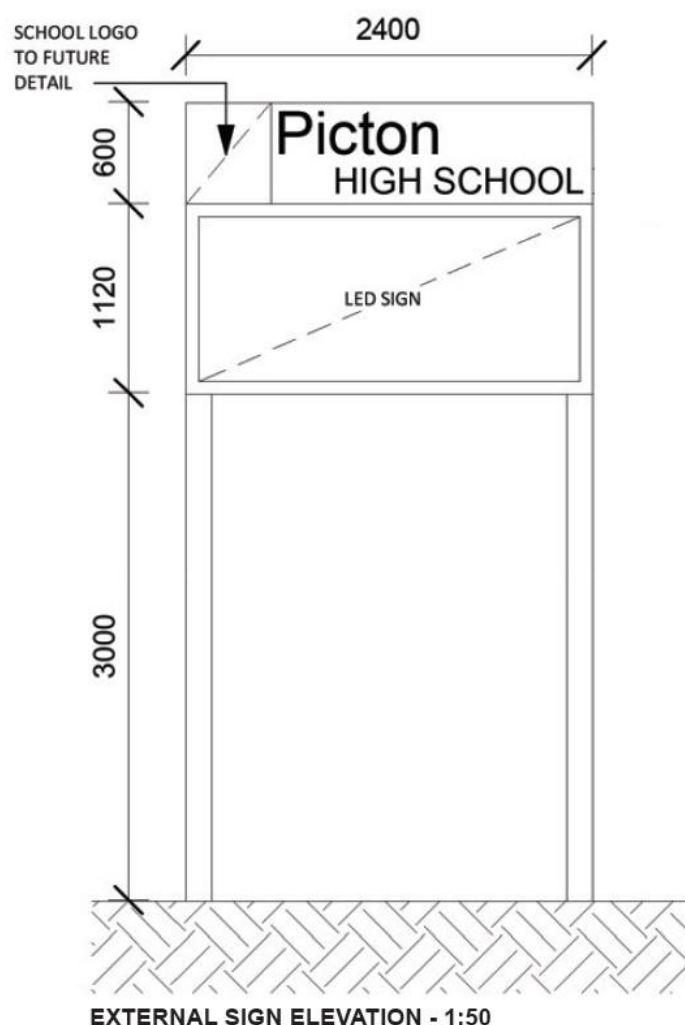


Figure 1 External sign elevation

Source: BLP

1.2 Tree Removal

Four separate matters relating to tree removal have been raised by the DPE and are responded to in detail below.

1.2.1 Updated Arboricultural Impact Assessment Report

The DPE has requested an updated Arboricultural Impact Assessment report for the proposed removal of seven additional trees. The Arboricultural Impact Assessment submitted for the SSD 8640 Application and Addendum Report associated with the Response to Submissions assessed the trees identified to be removed under this proposal. Whilst these trees were assessed for removal, the Tree Retention and Removal Strategy plan approved under SSD 8640 did not capture the removal of these additional trees.

The assessment of the proposed trees to be removed has been replicated in **Table 1** below. For clarity, a consolidated Arboricultural Impact Statement in relation to the trees proposed to be removed is provided at **Attachment B**. This revision will result in a total of 99 trees proposed to be removed under the redevelopment, with 116 trees proposed to replace those removed.

Table 1 Arboricultural Assessment of trees proposed to be removed

Tree Number	Tree Species	Height	DBH @1.4m	SRZ Required	TPZ Required	Tree Age • Young • Semi Mature • Mature • Over Mature	Tree Health • Good • Fair • Poor • Dead	Tree Structure • Good • Fair • Poor	SULE Rating	Ecological Significance • High • Moderate • Low • Nil	Landscape/ Visual Significance • High • Moderate • Low • Nil	Tree to be Retained and Arborist Comments • Yes • No
46	Spotted Gum <i>Corymbia maculata</i>	16m	320mm	N/A	N/A	Mature	Good	Good	3	Low	Low	No, the tree is required to be removed as its location within the scope of works and replaced in the landscape upon completion
47	Spotted Gum <i>Corymbia maculata</i>	16m	340mm	N/A	N/A	Mature	Good	Good	3	Low	Low	No, the tree is required to be removed as its location within the scope of works and replaced in the landscape upon completion
48	Spotted Gum <i>Corymbia maculata</i>	16m	340mm	N/A	N/A	Mature	Good	Good	3	Low	Low	No, the tree is required to be removed as its location within the scope of works and replaced in the landscape upon completion
49	Lemon-scented gum <i>Eucalyptis citriodora</i>	15m	490mm	N/A	N/A	Mature	Good	Good	3	Low	Low	No, the tree is required to be removed as its location within the scope of works and replaced in the landscape upon completion
66	Southern Blue Gum <i>Eucalyptus bicostata</i>	9m	550mm	N/A	N/A	Mature	Fair	Fair	4	Low to Moderate	Low	No, the tree is required to be removed as its location within the scope of works and replaced in the landscape upon completion
79	Spotted Gum <i>Corymbia maculata</i>	15m	500mm	N/A	N/A	Mature	Good	Good	3	Nil	Low	No, the tree is required to be removed as its location within the scope of works and replaced in the landscape upon completion
80	Jacaranda <i>Jacaranda mimosifolia</i>	9m	390mm	N/A	N/A	Mature	Good	Good	3	Nil	Low	No, the tree is required to be removed as its location within the scope of works and replaced in the landscape upon completion

Source: Horticultural Management Services

1.2.2 Updated Biodiversity Assessment Report

The DPE has requested an updated Biodiversity Assessment Report to be submitted for the proposed removal of additional vegetation.

The Biodiversity Assessment Report submitted with SSD 8640 included within its methodology that the assessment and Biodiversity credit calculation is based on development area and is not based on counting the number of trees proposed to be removed for the development. The proposed tree removal under this application is within an area that was previously factored into the biodiversity assessment.

On this basis, the total amount of biodiversity credits required to offset the removal of native vegetation on site remains unchanged from the previous assessment at 10 credits.

A statement from Ecoplanning confirming the previous assessment remains unchanged as a result of the proposed tree removal is provided at **Attachment C**.

1.2.3 Revised Tree Size Specification & Formal Softscape Areas plan

The DPE has requested a revised 'Tree Size Specification & Formal Softscape Areas' plan is to be submitted reflecting the removal of the additional trees and relocation of four proposed trees.

The updated plan is provided at **Attachment D**.

1.2.4 Tree Retention and Removal Strategy Clarification

The DPE is requesting clarification for a tree on the southern side of the main building which is proposed to be removed under the Tree Retention and Removal Strategy submitted with the Section 4.55 Application.

We confirm the tree, which is identified as Tree 66 in the Arboricultural reports, is proposed to be removed under this application. The removal of this tree is required following further consideration of the construction impacts of the redevelopment. Its removal is not specifically triggered by works proposed as part of the Section 4.55 Application.

As shown in **Table 1** and **Attachment B**, an Arboricultural assessment has been undertaken for the removal of the tree. As explained in **Section 1.2.2**, this will not affect the biodiversity assessment undertaken for the project.

1.3 Green Star Rating

The DPE has requested that a revised Ecologically Sustainable Development (ESD) Report be submitted in order to consider the request for the development to achieve a 4 Star Green Star rating instead of a 5 Star Green Star Rating.

A revised ESD Report is provided at **Attachment E**.

1.4 Operation of School

This matter was raised in relation to the submission from Wollondilly Shire Council. Council made a number of enquiries in their submission, which are addressed with a response in **Table 2** below. Some matters raised by Council refer to issues surrounding the construction and operation of the Temporary School which is not a relevant matter for consideration under this Section 4.55 Application. Notwithstanding, further detail regarding these matters raised by Council in relation to the Temporary School is provided at **Attachment G**.

Table 2 Response to Council's Submission

Council Comment	Response
Council have requested clarification regarding how the two additional support classrooms will be accessed.	The two new additional support classrooms will be accessible via a landscaped access ramp. They will also be connected to the existing Special Education facilities via an open learning area. As per the BCA Assessment submitted with the Section 4.55 Application, all areas within the subject hub will be accessible for a person with a disability in line with Australian Standards.
Council have stated that as all parking will be on the sealed section of Wonga Road, where there are no footpaths, they are requesting clarification for what is proposed for providing safe access to the school by way of providing footpaths.	141 parking spaces (including 4 accessible parking spaces) are proposed to be provided on site under the redevelopment. The configuration of these spaces is proposed to be amended under this Section 4.55 Application, however, the number of spaces has not changed from the original application, as there is no increase to the student and teacher numbers under this application. These parking areas will have footpaths connecting to all areas of the school. All footpaths will go through the Section 138 Wollondilly Shire Council review and approval.
Council have discussed issues associated with accessing the school from Argyle Street as opposed to Wonga Road. They have stated that more support classrooms will result in more issues for Council to deal with.	Upon completion of the redevelopment, there will be two vehicular access points for Picton High School: primary access via Argyle Street and secondary access via Wonga Road. Students will continue to use the bus facilities provided on Argyle Street, which are to be reconfigured to improve safety as part of the redevelopment. The additional access point on Wonga Road will primarily be for deliveries, waste collections and staff egress. Whilst additional support classrooms are proposed under the Section 4.55 Application, this will not result in any change to the approved student or staff numbers that the school will accommodate. In this regard, no increased demand for parking or pedestrian activity will occur as a result of this application compared to what has been approved. The additional classrooms are required as specialist support unit classrooms require reduced floorspace per square metre than typical classrooms.

As noted by the DPE, further information regarding the current pedestrian movement at the school and details of the post construction operation is required to be submitted. The DPE have stated that this can be supported by the Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) as per the requirement of Condition B17 of the development consent. The CTPMSP is currently in draft form and is submitted at **Attachment F**. This demonstrates that the current pedestrian movement (i.e. during construction) will involve drop off and pick up areas to continue along Argyle Street. There will be a new school access fronting the parents drop off and pick up area. The new school access on Argyle Street and a footpath connection via the northern side of the Hall Building will be provided for access to the school grounds. This will be the main drop off and pick up point.

During the construction of the school and the operations of the Temporary School, a traffic controller / staff will assist in the safety of pedestrian movements at the main access to avoid conflicts with bus and vehicle movements.

Post construction operation pedestrian movement is not detailed in CTPMSP, however, drop off and pick up of students is proposed to continue along Argyle Street as per the assessment under the original SSD Application.

1.4.1 Council Concerns with Site and Work Practices

In addition to the issues presented in **Table 2**, Council have raised a number of issues in relation to site and work practices. These issues are separate to the Section 4.55 application and are not a relevant matter for consideration in the assessment and determination of the Section 4.55 application. The matters raised by Council in this section of their submission are not triggered by any proposed aspect of the Section 4.55 application.

Notwithstanding this, for completeness, a response to each of Council's concerns is provided separately at **Attachment G**. It is noted that these responses are more relevant for the DPE's compliance team and other stakeholders separate to the planning modification assessment team.

2.0 Conclusion

The proponent and the project team have considered Council's submission and the DPE's letter in relation to the notification of the proposal. A considered and detailed response to all submissions has been provided within this letter and accompanying documentation.

We trust that the responses provided above will enable the DPE to finalise their assessment of SSD 8640 Modification 1. Given the environmental planning merits (and the ability to suitably manage and mitigate any potential impacts) and significant public benefits proposed, it is requested that the Minister approve the application.

Should you have any queries about this matter, please do not hesitate to contact Chris or Daniel on the details below.

Yours sincerely,



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