

16 April 2019

219030

Carolyn McNally
Secretary
Department of Planning and Environment
320 Pitt St, Sydney, 2000

Attention: Compliance Team, Department of Planning and Environment

Dear Ms McNally,

**RE: PICTON HIGH SCHOOL REDEVELOPMENT (SSD 8640)
RESPONSE TO COUNCIL CONCERNS WITH SITE AND WORK PRACTICES**

This letter has been prepared by Ethos Urban on behalf of School Infrastructure NSW in relation to the Picton High School Redevelopment (SSD 8640).

A Section 4.55 modification application was submitted to the Department of Planning and Environment (DPE) on 1 February 2019. The notification period for the modification ended on 1 March 2019. One submission from Wollondilly Shire Council was received by the DPE during notification of the project.

Council's submission outlined a number of concerns regarding the modification. A response to these concerns has been provided in the Response to Submissions package submitted to the DPE. Council's submission also separately outlined concerns with site and work practices relating to the construction of the school. These issues are separate to the Section 4.55 application and should not be a 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 below at **Table 1**. It is noted that these responses are more relevant for the DPE's compliance team and other stakeholders separate to the planning team.

Table 1 Response to Council's Concern with Site and Work Practices

Council Comment	Response
Agreement was reached by the Local Traffic Committee that the existing gate at the end of the formed section of Wonga Road should be closed as this is access to a paper road. The gate is to be closed in a manner that still allows pedestrian access to the new gates on the school boundary.	The proponent agrees to have this gate closed and locked in a manner that still allows pedestrian access to the new gates on the school boundary.
The existing unformed road is not suitable for all weather access and parking. However, the existing formed section of Wonga Road plus the unformed section immediately between the Pound and the Church will remain open, with parking available on the formed section of road and pedestrian access.	Construction of a formed road to the rear of the school at Wonga Road is approved as part of SSD 8640. Council's concerns regarding the unsuitability of the existing road for all weather access and parking is noted. A formed road will be constructed consistent with the terms of the development consent as soon as practicable.

Council Comment	Response
There is restricted on-street parking available and Council have consistently brought this to the attention of the Department of Education and Training (DET) such that the can plan for the operation of a public school.	141 parking spaces (including 4 accessible parking spaces) are proposed to be provided on site under the redevelopment. This is an increase from the pre-development total of 113 parking spaces on site. On-street parking will be reduced during the construction of the school due to factors including a proposed temporary bus zone. As per the Construction Traffic Management Plan (CTMP), strategies are in place to reduce the demand for on-street parking during the construction period. This includes construction workers arriving and finishing throughout different times of the day, public transport being used to get to and from the site and construction workers being encouraged to car share.
Council has been meeting with the school, the DET and the builders. Council have agreed to provide a two-week grace period before they close the gate to the former waste disposal site, which will provide more time for the DET to come back with a proposal for lease and improving the unformed road behind the school.	On 4 February 2019, Project Representatives were invited to attend an extra-ordinary meeting of the Wollondilly Council Traffic Committee conducted at Picton High School to examine traffic arrangements associated with the Temporary School. On 7 February 2019, the Project was advised by Council staff that Council would be closing the unsealed section of Wonga Road by erecting and locking a gate. On 21 February 2019, Project Representatives were invited to attend a meeting with Wollondilly Council Councillors (including the Mayor and Deputy Mayor) together with the General Manager and senior staff of Wollondilly Council conducted on the unsealed portion of Wonga Road to discuss impacts from closing the road. Council made a verbal offer for the Project to lease the unsealed portion of Wonga Road on the condition that the project decontaminated and improved the road. Council advised that the Project had two weeks to confirm its position and that the gate would remain open during this period. It is understood that this was the first time that Council had advised the school that there was contamination adjoining the school boundary and not some distance away in the old rubbish area. Following advice from Council, the project engaged a Hygienist to conduct soil testing on school property along this boundary. Results were received on 5 March 2019 advising that there were no exceedances identified against the relevant Health Investigation Levels. Following a review of school operations, it was determined that the school did not need access to the unsealed portion of Wonga Road and Council was advised of this on 8 March 2019. Council closed this portion of road on 11 March 2019 after SINSW rejected Council's offer.
More on-street parking will be required to be removed as a part of the DET's development plans and requires the construction of a bus turning facility at the rear of the school.	141 parking spaces (including 4 accessible parking spaces) are proposed to be provided on site under the redevelopment. This is an increase from the pre-development total of 113 parking spaces on site. On-street parking will be reduced during the construction of the school due to factors including a proposed temporary bus zone. As per the Construction Traffic Management Plan (CTMP), strategies are in place to reduce the demand for on-street parking during the construction period. This includes construction workers arriving and finishing throughout different times of the day, public transport being used to get to and from the site and construction workers being encouraged to car share. A roundabout is proposed at the end of Wonga Road to allow buses the ability to turn around. This will be constructed as soon as practicable as buses will be required to manoeuvre without bus turning facilities on Wonga Road prior to its construction.
Further to the traffic and parking issues, Councillors have consistently raised concerns regarding the stripping back of vegetation on the unformed sections of road and into the un-remediated tip, all without approval and in spite of being informed by Council the tip was a no-go zone and that any use of the unformed road reserve would need to be subject of an approval under the Roads Act + the confirmed visual signs of asbestos fragments + the rumour that 'developer' has access to the adjoining site to the south which has been recently stripped and again asbestos fragments seen. It has been highlighted that both EPA and SafeWork NSW should be contacted as a result.	The Temporary School was completed on 21 January 2019 to allow Picton High School Staff to prepare for the commencement of the school year on 29 January 2019. On 31 January 2019, the school advised the Project that a vehicle was stripping vegetation adjacent to the unsealed portion of Wonga Road. Upon investigation, it was determined that the vehicle was from Wollondilly Council and completely unrelated to the project. A photograph of the Wollondilly Council vehicle conducting vegetation clearance is at Figure 1 and Figure 2.

Council Comment	Response
Councillors are very concerned with the traffic issues and have fielded numerous complaints from residents, parents, teachers and the principal and general communications.	Traffic concerns during the construction process of the Picton High School redevelopment have been suitably assessed by the proponent in the Environmental Impact Statement and the DPE in their Assessment Report and specific conditions in the development consent. Provisions in the CTMP are being enacted to reduce the construction impacts as much as practicable. The proponent and contractor is open to a continuing dialogue with Council regarding their concerns in relation to traffic in good faith.



Figure 1 Image of Council vehicle clearing vegetation on Wonga Road



Figure 2 Zoomed image of Figure 1 displaying the Wollondilly Shire Council Logo

We trust that this information provides a suitable response to Council's concerns. Again, we reiterate that the matters raised in this letter are separate to the assessment and determination of the current Section 4.55 modification application. Should you require any further information regarding this matter, please do not hesitate to contact Chris or Daniel at the details below.

Yours sincerely,

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