



10 February 2023

Mr Kevin Kim  
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NSW Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Kevin

**SSD-31822612: Alterations and Additions to Barker College  
Written Submission on behalf of Catholic Schools Broken Bay**

This submission is made by Catholic Schools Broken Bay (**CSBB**) in relation to the State Significant Development Application (SSD-3182212) for Alterations and Additions to Barker College. As a major stakeholder in the Hornsby area, we thank the Department of Planning Industry and Environment for the opportunity to comment on this significant development proposal.

**Context of The Light of Christ Centre**

CSBB is a system serving 44 Catholic Schools with around 17,000 students from Kindergarten to Year 12 covering an expansive geographical area which includes the Central Coast and Sydney's Northern Beaches and North Shore. CSBB operate *The Light of Christ Centre*, which has its main entrance/access at the end of Yardley Avenue, approximately 150m from Barker College Unwin Road/Clarke Road boundary. Both St Leo's Catholic College and Our Lady of the Rosary Catholic School are part of CSBB. It is understood that each of the two schools will provide written submissions. Hence the focus of this submission relates to impact on the operation of The Light of Christ Centre.

The Light of Christ Centre was built in 2011. Currently the facility is shared by St Leo's Catholic College, Our Lady of The Rosary Primary School and Catholic Schools Broken Bay. Under the BER (Building the Education Revolution), the facility is available for the schools and community use.

In addition to the schools, long term users include Hornsby Ku-Ring-Gai Spiders Basketball Association, Miss Rhythmic Gymnastics Club and Little Kickers North Shore. All are youth based organisations requiring parents to drop off and collect participating young children. The facility is also used extensively by CSBB, Hornsby Cathedral Parish and the Diocese of Broken Bay.

### **Overview of Concerns**

The applicant's Environmental Impact Assessment and supporting documents have been reviewed. In summary we object and raise concern for the following key matters:

- The nature of the proposal does not reflect the definition of development as 'alterations and additions' as it relates to the construction of a new Co-curricular Performing Arts and Exam Centre, new maintenance building and Aquatic and Tennis Centre. These are considered substantial developments that will result in a significant change and impact to the surrounding area. It is misleading to describe the development as such.
- The parking analysis has not included an assessment of parking associated with the recreational sport and performing art facilities proposed. It is assumed that these facilities will also include opportunities for the public (as per existing arrangements) and attract an increased number of visitors at a given time. Therefore, a further parking analysis assessing the parking supply during special events and times outside of normal school hours needs to be completed.
- Construction is planned across a 6-year period which is considered a prolonged timeframe that will impact surrounding properties. The preliminary construction management plan notes that no parking for workers will be provided with restrictions on available staff parking. This is a major concern as it will likely reduce the number of street parking available, result in traffic delays and adversely impact the road network.
- The Acoustic Assessment noted overall noise exceedance will occur during the proposed construction works for The Light of Christ Centre (referred to as "St Leo's Catholic College Recreational Centre" in Barker College's submission). This is an overall concern as construction is intended to occur over a 6-year period, which will have adverse ongoing impacts for all users of The Light of Christ Centre.
- The Social Impact Assessment completed in support of the proposal identifies that the increased traffic and parking challenged associated with the increase in students and staff numbers will have a medium negative impact on surrounding residents' way of life and ability to access service and facilities. This is considered to consequently impact the CSBB sites.

It is therefore requested that the following comments are considered in the assessment of the application.

### **Development description**

The definition of development as 'alterations and additions' is misleading. The proposal is for concept approval that includes the following key works (amongst other things):

- a) A Co-curricular Performing Arts and Exams Centre building and associated basement parking on the south-western corner of Unwin Road and Clarke Road (subject to a further detailed approval)
- b) A new maintenance building and associated parking to the south of the Co-curricular Performing Arts and Exam Centre building (subject to a further detailed approval)



- c) An Aquatic and Tennis Centre incorporating an indoor pool and roof-top tennis courts and associated basement parking on the north-western corner of Unwin Road and Clarke Road (subject to a further detailed approval)

The \$121m investment into the campus for a number of significant buildings is far from minor 'alterations' to the school.

### **Engagement Outcomes Report and consultation**

An Engagement and Outcomes Report prepared by Urbis has been provided in support of the proposal. However, despite falling within the catchment area of consultation as identified in Figure 1, as managers of The Light of Christ Centre, CSBB were not notified or aware of any engagement opportunities. We would have liked the opportunity to provide feedback and comment on the proposal and discuss the opportunity for a master planned approach to the precinct that would cater for all stakeholders.

### **Mitigation measures**

The report provides recommendations to increase the capacity of the Unwin Road approach through upgrading the intersection to mitigate the identified traffic generation associated with the proposed development. However, the report concludes:

***"In the year 2026, this upgrade would not be sufficient to accommodate the background traffic growth, especially along Unwin Street resulting from the proposed NorthConnex project. (p. 75)"***

Another mitigation measure identified included the conversion of the intersection into a controlled roundabout at Malsbury Road and Clarke Road intersection.

There is overall concern that the recommended mitigation measures to minimise traffic impacts generated by the proposal relies on changes to the road network are only recommendations and are not committed with Council or Transport for NSW.

### **Parking**

It is understood that in accordance with the Hornsby DCP parking rates for education establishments a total of 427 parking spaces are required for the proposed development and given that the site currently accommodates 487 parking spaces, no further parking spaces are required and proposed.

However, no assessment on whether these parking numbers are suitable in accommodating the forecasted events and sporting activities associated with the proposal during and out of school hours has been undertaken. It is anticipated that the future Aquatic and Tennis Centre as well as the proposed Performing Arts Centre will require increased parking, of which may result in overflow parking to the street. Therefore, a further parking analysis assessing the parking

supply during special events and times outside of normal school hours needs to be completed.

### Acoustic Assessment

An Acoustic Report has been prepared by Acoustic Logic in support of the proposal. The Light of Christ Centre (referred to as St Leo's Catholic College Recreational Centre) is identified as a nearby sensitive receiver (E1) to the site. In relation to E1, the predicted noise generated during construction is identified in Figure 2 below:

Activity	Predicted Level – dB(A) Leq(15min) (Internal Areas)	Comment
Jackhammer (Demolition only)	47-62	Exceeds 45 dB(A) Noise Management Level
Concrete Saw (Demolition only)	43-58	Exceeds 45 dB(A) Noise Management Level when working close to the southeastern boundary
Machine Mounted Hydraulic Drill (Demolition only)	39-54	
Piling (bored) (Excavation only)	37-52	
Vibratory Roller (Excavation) & Concrete Pump Truck (Construction)	34-49	
Excavator & Trucks	33-48	
Mobile Crane	31-46*	Under 45 dB(A) Noise Management Level
Powered Hand Tools (Electric)	28-43	

**Figure 2: Predicted construction noise generation to E1**

Source: Acoustic Logic

In accordance with Figure 2, noise exceedance will occur during the proposed construction works. The Light of Christ Centre is used extensively both during school hours by two Catholic schools and outside school hours by community groups. This includes HSC examinations. This is an overall concern as construction is intended to occur over a 6-year period, which will mean adverse ongoing impacts for students, staff and visitors of The Light of Christ Centre.

Further, we note that – as per Figure 3 below, noise loggers are not located anywhere proximate the identified 'noise sensitive receivers' of the CBB sites. We believe this is a significant short falling in the assessment.



**Figure 3: Predicted construction noise generation to E1**

*Source: Acoustic Logic*

### **Conclusion**

Thank you again for the opportunity to provide feedback on the State Significant Development Application for Barker College. As addressed above, we have key concerns and trust that these will be addressed as part of the assessment process. As it stands, we object to the proposal currently before the Department.

Kind regards,



Josie Vescio  
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Catholic Schools Broken Bay