



Our Lady of the Rosary Primary School, Waitara

For God Alone

10 February 2023

Mr Kevin Kim
Senior Planner
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 Our Lady of the Rosary Catholic Primary School, Waitara

This submission is made by Our Lady of the Rosary Catholic Primary School, Waitara (OLOR) 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 (DPIE) for the opportunity to comment on this significant development proposal and submit our objection to this proposal based on the current information provided in the proposal.

Context of OLOR, Waitara

OLOR is a two-stream primary school, located in the leafy suburban street of Yardley Avenue, Waitara and part of the local community of Hornsby Parish. We have a strong tradition of quality education within a Christ-centred community where Catholic values and traditions have been nurtured for over 120 years. The entrance to our school is located within 200 metres of Barker College.

Our dedicated and enthusiastic staff provide a wide variety of rich learning activities striving for educational excellence in all areas. The school is highly valued by the community, with current enrolments in excess of 340 students and significant growth in enrolment projected over the coming decade.

OLOR is part of Catholic Schools Broken Bay (CSBB), which covers an expansive geographical area which includes the Central Coast and Sydney's Northern Beaches and North Shore.

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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 proposed increase in students' capacity may have a significant impact on the future growth potential of OLOR and hence limit the opportunities for parents to be able to choose Catholic education for their children. The lack of engagement and collaboration has prevented the potential for a coordinated approach to meet demands and growth potential of Barker College, OLOR, and St Leo's Catholic College all located in close proximity to each other.
- The Traffic Impact Assessment completed has not considered the potential growth of the several schools located within close proximity of the site. This is considered a key concern as it will result in greater traffic generation and congestion on the local road network and constrain any future growth of OLOR. As such, this is inequitable.
- The proposed mitigation measures to reduce traffic generation relies on upgrades to nearby intersections which have not been committed to with Transport for NSW. Increased traffic congestion without appropriate mitigation will create safety and access issues. This is particularly pertinent given the age of our students. As a significant number of parents drop off and pick-up students from the school, any increase in congestion, particularly in the intersection of Clarke Road and Unwin Road, will have a significant impact on our school community.
- The Green Travel Plan includes a key action to limit car parking available on the site to better manage traffic impacts. This is considered to have significant adverse impacts to the on-street parking supply and have further flow on effects to the local road network.
- 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 application). The Light of Christ Centre is facility is shared by OLOR, St Leo's Catholic College and CSBB and is used extensively by OLOR during school hours. This is an overall concern as construction is intended to occur over a 6-year period, which will mean ongoing adverse impacts for students, staff and visitors.
- The Social Impact Assessment completed in support of the proposal identifies that the increased traffic and parking challenges 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 OLOR.
- The proposal has not appropriately addressed the flooding context of the site as parts of the site concentrated at the western and southern boundaries where concept approval is sought are identified as land with potential to be inundated by overland flow to a depth greater than 150mm during a 1% Average Exceedance Probability (AEP) flood event under the Hornsby Floodplain Risk Management Plan and Study.

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



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Environmental Impact Statement (EIS): Description of Development; Proposed Student Cap; Height of Buildings

Development description

The definition of development as 'alterations and additions' are 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 in their own right is far from minor 'alterations'.

Student capacity

The proposal seeks to increase the existing cap of total staff and student numbers up to a maximum of 2850 students and 480 (FTE) staff using the campus at any one time. This increased capacity results in a 17% increase (430 additional students) from the approved student capacity of 2,420 (DA/1194/2016). The cumulative impacts of this increase in capacity are concerning, specifically on how it will impact the growth of surrounding schools.

CSBB have projected significant growth over the next 5 years in the region, reflecting the growth projected for the Local Government Area as per demographic projections by the State Government. The 5-year forecasts for OLOR are provided in the table below:

CSBB Forecast Enrolments for next 5 years

	Forecast Enrolments			
	2023	2024	2025	2026
Our Lady of Rosary	370	397	412	440

CSBB have commenced early works to review and analyse their current landholdings to understand future development potential and hence carrying capacity of the site to accommodate the growth projected for students in the LGA. The table below shows the potential for both OLOR and St Leo's Catholic College (both part of CSBB) following a future school master planning exercise and subsequent Development Application to extend the cap on student enrolment numbers.

Catholic Schools NSW Long Term Forecast Enrolments

	Forecast Enrolments		
	2026	2031	2036
Our Lady of Rosary	440	504	498
St Leo's Catholic College	1150	1216	1212
Total	1628	1720	1700

Despite the contents of the EIS submitted in support of the application, we believe the application to NOT be for the 'orderly and economic use of land' as per the Objects of the EP&A Act. This proposal ultimately 'soaks' up the capacity, not only in terms of environmental impacts such as the traffic and transport constraints of the precinct, but also in terms of student enrolments for OLOR.

A key issue from the perspective of OLOR is the lack of engagement by Barker College in considering its proximity to both OLOR and St Leo's Catholic College campuses and their growth needs. As a result, the opportunity for a considered, master plan approach for the entire precinct will be lost should the Department consider approving this plan without adequate engagement and consideration of our sites' context.

Height of Buildings

The Concept Plan proposes a breach of the LEP Height of Building control under the Hornsby LEP.

Whilst acknowledging that statutorily there is no requirement for a cl4.6 to justify the variation of this control – at the very least, the tests contained within cl4.6 provide sound basis to analyse impacts and suitability. The EIS and supporting documentation provides scant analysis of the impacts of the height exceedance.

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 below, OLOR was 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 education providers.

Overall, the lack of opportunity for consultation with OLOR and other CSBB Properties who are key stakeholders in the area fails to appropriately address the SEARS request (22) Engagement. For example, both CSBB campuses are identified as a key neighbouring property in most of the supporting documentation of the EIS, however, no attempt has been made to engage with any of the entities. We are of the opinion that there is a need to understand the growth potential of both OLOR and St Leo's Catholic College to adequately account for impact and suitably plan for the future educational needs of the LGA.

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- The site
- Community catchment

Figure 1: Community catchment for consultation
 Source: Urbis Engagement Outcomes Report – Barker College

Transport & Accessibility Impact Assessment

In review of the Transport and Accessibility Impact Assessment prepared by TTPP, we are concerned about the significant impact that could be created as a result of the proposal. The traffic analysis consider the growth of any of the school campuses in the catchment – a reasonable assumption considering the expected population growth of the Hornsby LGA.

Traffic generation

The report notes that the existing conditions with the proposal will result in:

"a minor impact to traffic, with minor increases to delay. The exception is at the intersection of Clarke Road and College Crescent and the intersection of Pacific Highway and Unwin Road, where there is expected to be an increase in delay by 32 seconds and 13 seconds in the AM peak period respectively while both intersections would operate at LoS E. During the PM peak, there would be an increase to average delay by 9 seconds and the intersection would operate at LoS D. (p. 60)"

When assessing the future traffic conditions, it was reported that:

" The surrounding network would generally operate well by the year 2026, except for the intersections of Pacific Highway – Unwin Road – Romsey Street and Clarke Road –

College Crescent. Both these intersections would be at capacity from background traffic growth alone. Notably, TfNSW's STFM model indicates a growth of 9.1% per annum growth in traffic along Unwin Street which is significant. The development of the site would have a relatively minor impact on the road network compared to background traffic increases". (p. 66)

The report concludes:

" the traffic generated by the proposed school development would have a minor impact to the surrounding road network, relative to the substantial development and growth expected in the area". (p. 78)

These existing and future traffic impacts are considered a concern as it will ultimately result in a significant impact on traffic for the local road network. This has adverse implications for all surrounding properties of the site.

Surrounding traffic generating development and the broader road network

The traffic modelling conducted as part of the assessment does not consider the potential growth of surrounding properties, specifically St Leo's Catholic College (approximately 300m south-east of Barkers College) and OLOR Catholic Primary School (approximately 150m East of Barker College) which are both expected to increase in approved student capacity. The lack of including the anticipated growth of these nearby schools indicate the potential for greater traffic impacts as a result of the proposal.

It is also highlighted that Barker College is surrounded by several traffic generating developments, that attract large congregations of people at a given time. This includes;

- Hornsby South Public School
- Clark Road School
- Hornsby Girls High School
- The Light of Christ Centre
- Our Lady of the Rosary Catholic Primary School
- 3 McAuley Place Catholic Care – Waitara Children's Services and Kate's Place
- 1A Clark Rd (Catholic Care)
- 29-31 Yardley Ave Catholic Care Family Centre & ELC

Despite the recognition of these items above, there is a lack of assessment of the growth potential in capacity in the traffic modelling completed.

Further, the assessment has not considered the likely traffic impact of the proposal during out of school times and after hour events. In particular, the proposal seeks consent for the construction of a Co-curricular Performing Arts and Exam Centre as well as an Aquatics and Tennis Centre. Both these developments are understood to operate and accommodate various activities and events outside of school hours as well as special events that will generate increased traffic.

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)



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

Failure to mitigate traffic congestion present significant safety concerns for our community, particularly given the young age of our students.

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.

Green Travel Plan

A Green Travel prepared by TTPP has been provided in support of the proposal. The EIS notes that:

"The implementation of the Green Travel Plan and Operational Traffic and Access Management Plan will assist in the management of traffic associated with Barker". (p, 17)

The reliance on the Green Travel Plan to manage the traffic impacts of the proposal is concerning as a key action of the plan is to *encourages the limitation of car parking provision on site*. Limiting the use of the car park will likely result in flow on effects to on-street parking surrounding the site.

Further, the Green Travel Plan does not consider the existing and future public transport patronage of students and staff of surrounding educational establishments.

Preliminary Construction Traffic Management Plan

A preliminary Construction Traffic Management Plan (CTMP) has been prepared by TTP. It is noted that construction is expected to commence from mid 2023 with an estimated completed in Quarter 1 2029. This is considered a prolonged period of disruption on the road network.

The Preliminary CTMP notes that:

"No on-site construction staff parking will be provided. All construction staff would be advised to utilise public transport when travelling to and from the site". (p.16)

" Staff would also be informed of restricted parking conditions on-site and the surrounding road network. (p.16)"

Given the prolonged period of construction with no parking for construction workers and restricted on-site parking for staff at this time, it is anticipated that a greater up-take of on-street parking will occur. This is concerning as it will likely reduce the number of street parking available, result in traffic delays and cumulatively adversely impact the road network.

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 when working close to the southeastern boundary
Concrete Saw (Demolition only)	43-58	
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	Under 45 dB(A) Noise Management Level
Mobile Crane	31-46*	
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 facility is shared by OLOR, St Leo's Catholic College and CSBB and is used extensively by OLOR during school hours. This is an overall concern as construction is intended to occur over a 6-year period, which will mean ongoing adverse impacts for students, staff and visitors.

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 fall in the assessment.

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Figure 3: Predicted construction noise generation to E1
Source: Acoustic Logic

Social Impact Assessment

In support of the proposal, a social impact assessment was prepared by Urbis. The report identified a **medium negative social impact** of the proposal is:

*"The proposed increase in the student and staff population of Barker College will mean **additional movements to and from the school which may have an impact on the way residents and workers of the streets immediately surrounding the site access their local area**". (p. 15)*

*"The TAIA estimates the **proposal will result in an additional 63 vehicles per hour during the morning peak period and an additional 53 vehicles per hour during the afternoon peak period**. Modelling within the TAIA indicates that the proposal will marginally increase delays to the intersections of Clarke Road – College Crescent and Pacific Highway – Unwin Road. These intersections are expected to be over capacity by the year 2026, even without the added proposal traffic". (p.17).*

*"Based on the above assessment and the findings of the TAIA, **increased traffic and parking challenges associated with the increase in student and staff numbers will likely have a medium negative impact on surrounding residents' way of life and ability to access service and facilities**". (p.17)*

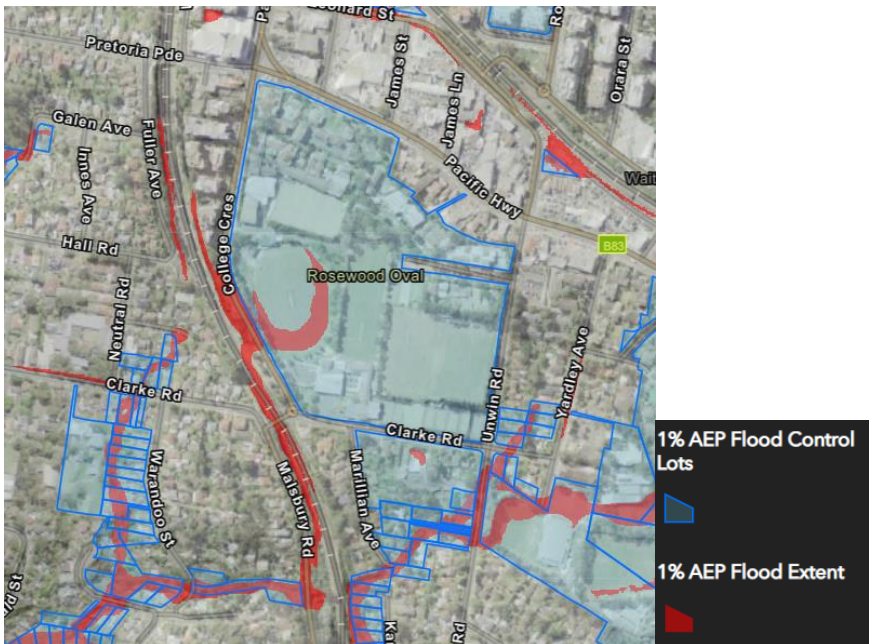
Given these findings, it is expected that the proposal will also result in a negative medium impact to the OLOR.

Hornsby Floodplain Risk Management Study and Plan

Hornsby Shire Council have prepared a Draft Floodplain Risk Management Study and Plan which is currently on exhibition until 31 March 2023. The draft study and plan assessed the flood behaviour and hazards of urban areas across Hornsby LGA. The Study identified 3,872 urban properties that may be affected by overland flow and flooding.

As shown in Figure 4, parts of the subject site concentrated at the western and southern boundaries where concept approval is sought are identified as land with potential to be inundated by overland flow to a depth greater than 150mm during a 1% Average Exceedance Probability (AEP) flood event. Therefore, the site has the potential for upstream flood impacts.

The SSD application has not included a flood or hydrological assessment. The Environmental Impact Statement prepared by Urbis has not appropriately addressed this Study and Plan.



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 relating to the definition of use, consultation with OLOR, increase in capacity of students, traffic generation and parking, safety, acoustics and social impacts of the proposed development 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,

Jacinta Crowe
Principal