

## Aditi Coomar

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**From:** Phillip Lane <Phillip.Lane@northernbeaches.nsw.gov.au>  
**Sent:** Thursday, 19 October 2017 3:56 PM  
**To:** Aditi Coomar  
**Cc:** Steven Findlay  
**Subject:** Comments & Recommendations on SS8310-Curl Curl North Public School  
**Attachments:** PLM Notes - PLM2017 0001 - Por 271 Playfair Road NORTH CURL CURL NSW 20....pdf; Final Northern Beaches Council WSUD Technical Guide & Music Modelling Gu....pdf

Hi Aditi,

Thank you for the opportunity to make comments and recommendations to the proposed Redevelopment of Curl Curl North Public School from Council.

It is noted that a Prelodgement Meeting (PLM2017/0001) was undertaken with Council on 7 February 2017 (see attached).

Please see the following comments from Councils Departments:

### **Traffic and Parking**

The proposal is for redevelopment of North Curl Curl Public School with the number of students increased from 920 to 1000. The staff number will be increased from 70 to 76.

#### **Parking provision:**

The school currently provides 21 onsite parking spaces for the staff use. The proposed redevelopment of the school with additional 80 students and 6 staff has proposed to reduce the number of parking spaces to 16 parking spaces.

The traffic report prepared by Traffix indicates that while the council requirements for the proposed redevelopment of the school is the provision of 76 parking spaces (the rate of 1 space / staff member), the Department of Education (DoE) has its own set of guidelines in the relation to provision of parking requiring the on school site parking to be kept to a minimum.

Justifications have been provided that limiting the parking provision has the potential to reduce trip rates by private vehicle. The proposed reduction has relied on the Workplace Travel Plan(WTP) and Active Travel Guide ATG) to be issued to the staff to promote the use of alternative sustainable transport options, as well as Initiatives to be implemented for staff whereby off-street parking spaces are only available for vehicles transporting two (2) or more staff to work.

While Council acknowledge the incentive and encouragement methods for the staff and parents to use the alternative sustainable transport to and from the school, considerations should be given to the extent of the effectivity of the proposed methods as an factor to be taken into account in parking provision reduction. In this regards, it should be noted that the result of the online travel mode questionnaire survey undertaken by TRAFFIX in March 2017 indicates that even having in place the existing limited onsite parking spaces (30% of total staff number) and the Active Travel Plan which has been conducted in collaboration between Council and the school, still 92.9% of staff (equal to 65 staff) drive to school.

The results of Parking Occupancy Survey undertaken by Traffix indicate that currently majority of the unrestricted parking spaces on Playfair Road and Abbott Road at the school frontage are occupied by the school's staff. Given the proposed extension to the pickup and drop off area on Playfair Road reducing the

parking availability outside the school for the staff use, as well as the proposed increase in the number of staff, the staff parking on street will be further impact the local residents.

The Department of Education (DoE) guideline requires the on-site parking spaces to be kept to a minimum to ensure that the available site area for teaching, learning and play is maximised, to enable community use and to encourage the use of sustainable means of transport to and from the school. In review of the above and also given that there are opportunities for provision of further parking spaces within the school's site area, the provision of adequate onsite parking spaces in compliance with the Council requirements is considered feasible and necessary.

### **Pedestrian crossing facilities in Playfair Road:**

It is proposed to remove the existing Children's crossing on Playfair Road. The traffic report indicates that the Children's Crossing location is not within pedestrian desire lines because pedestrians coming from all directions of the school do not need to cross at Children's Crossing's current location because the desired walking route will be crossing at the junction of Abbott Road and Playfair Road and junction of Pitt Road and Playfair Road.

Despite the need of the alternative pedestrian crossing facilities as a replacement for the proposed removal of the Children's crossing on Playfair Road as noted in the traffic report, no pedestrian crossing facilities have been proposed on this street. The provision of pedestrian crossing facilities such as pedestrian refuge island is required at the pedestrian desire lines on Playfair Road at the intersections with Pitt Street on northern side and at Abbott Road on the southern side.

### **Footpath and bicycle routes:**

The proposal includes the provision of pedestrian access on Ross Street. The construction of footpath along Ross Street is to be undertaken by the school to connect the school's pedestrian access to Pitt Road and Spring Road.

Also as part of the Green Traven Plan, it is proposed to encourage additional cycling trips to and from the school using the Bicycle routes as proposed in the Bike Plan to minimise the impact on the area and reduce the parking provision on the school site. It should be noted that the bicycle route connections to the school to have not been implemented and will be constructed as per the priority scheme in the LGA. To enable Council to implement the bike route connections to the school and, the school is required to contribute by construction of shared path on Playfair Road at the frontage of the school as well as on-road cycle rout on Abbott Road at the school frontage.

### **Conclusion:**

In review of the above, Council will support the proposed redevelopment of North Curl Curl Public School subject to the following conditions:

- The provision of 76 parking spaces for staff parking in compliance with the Council requirements.

Reason: To minimise the impact on the area and local residents

- The provision of pedestrian crossing facilities such as pedestrian refuge island is required at the pedestrian desire lines on Playfair Road at the intersections with Pitt Street on northern side and at Abbott Road on the southern side.

Reason: To ensure pedestrian safety around school

- Footpath is to be constructed along Ross Street connecting the school's pedestrian access to Pitt Road and Spring Road.

Reason: to ensure Pedestrian Safety around school

- A shared path along Playfair Road at the frontage of the school and on-road cycle route on Abbott Road at the school frontage is required to be implemented by the school.

Reason: To provide a safe bicycle connection to the school

### **Stormwater Quality Management**

The Stormwater Management and Integrated Water Cycle Management Plan do not acknowledge the pollution reduction targets as provided in Council's Water Management Policy. In addition, no attempt has been made to model the effectiveness of the proposed treatment system.

As such the application is considered to be deficient. It is recommended that the Stormwater Management and Integrated Water Cycle Management Plans be updated to address clause C4 – Stormwater Management of the Warringah DCP 2011 and Council's Water Management Policy.

The Plans must include the following information:

- Proposed development – Describe the proposed development at the site, including site boundaries, proposed land uses.
- Catchment analysis plan – clearly showing the surface type (roof, road, landscape, forest etc.) and the total areas. This must be consistent with the land use nodes within the MUSIC Model.
- Water conservation – Demonstrate how the potable water conservation targets in section 7.1 of the Water Management Policy. For residential developments this may be in the form of a BASIX Certificate. Rainwater reuse is strongly recommended to be incorporated into the development which will also have a positive impact on water quality and reduce off site discharge.
- Stormwater quality – Demonstrate how the General Stormwater Quality Requirements in Table 4, Section 7.1 of the Water Management Policy will be met, including the location, size and configuration of stormwater treatment measures proposed for the development. Council's preference is for the use of natural systems (raingardens, bio retention etc.) as they promote infiltration, provide amenity and environmental services rather than proprietary devices.
- MUSIC model - prepared in accordance with Council's WSUD Technical Guidelines (attached) unless alternative modelling parameters are justified on the basis of local studies. Details of the modelling of those elements, parameters and assumptions used. All MUSIC data files must be provided to Council.
- Integration with the urban design – Identify how the treatment measures will integrate with the development layout and the surrounding area such as the use of bio retention within the carpark areas etc.

### **Contaminated Lands**

The Environmental Site Assessment has not addressed Council's comments as provided in the Pre-Lodgement Meeting which states:

*The site is adjacent to John Fisher Park which was subject to significant reclamation works between the 1950s to the late 1970s. The reclamation was achieved by uncontrolled filling with both domestic and commercial waste which comprised a mixture of putrescible and non-putrescible waste. The site was rehabilitated for open space land use following a series of civil works in the late 1970s.*

*Council has undertaken landfill gas monitoring as required by the Environmental Management Plan for the site. Monitoring wells in the vicinity have recorded elevated levels of carbon dioxide which have exceeded the relevant trigger levels. Methane levels in these wells have not recorded exceedances however should not be discounted. A map is attached of relevant monitoring well locations and the associated landfill gas readings. A previous version of the Environmental Management Plan is available from the link below, however is currently subject to a review which will be finalised in the near future. We can provide this to the applicant once finalised.*

<http://yoursay.northernbeaches.nsw.gov.au/landfill-assessment-john-fisher-park>

*The applicant is to engage the services of a Contaminated Land specialist to investigate the potential of landfill gas migration into the site and impacts associated with the proposed development in accordance with the Contaminated Lands Management Act 1997.*

It is strongly recommended that the Environmental Site Assessment be updated to address the above.

### **Flooding:**

The subject site is identified as impacted by the Low and Medium Risk Precincts. The proposed development includes the demolition of existing public school buildings and construction of a purpose built educational facility.

The proposed use of the site is classified as vulnerable development.

The Flood Risk Assessment Report dated 20 April 2017 prepared by Woolacotts Consulting Engineers identifies a number of recommendations to ensure that the flood risk to the site is minimised and would comply with Council's LEP and DCP requirements. Provided the development is constructed in accordance with the recommendations from the Flood Risk Assessment Report, Council has no issues with the proposal.

### **Stormwater Assets:**

Council's records indicate a 750mm diameter Council stormwater pipeline traversing down the north eastern boundary of the subject site which has not been identified in the survey or design plans.

The proposed stormwater management plan directs all stormwater from the site to Council's drainage system commencing outside 60 Abbott Road. However this location is not currently an appropriate location to pipe the site drainage due to various issues with the downstream assets and local flooding. As this site is located within the floodplain, no OSD will be imposed which will further put pressure on Council's piped system.

In this regard it is recommended that the site drainage is redirected and connected into Council's drainage system at the corner of Playfair and Abbott roads instead. Any drainage upgrades proposed at the north eastern corner of the site could potentially connect into the 750mm diameter Council stormwater pipeline as previously outlined.

Also as the proposal indicates that several sections of pipeline currently in Council's asset register, are to be removed, works as executed data would be valuable to confirm exactly what has been modified at the end of the works.

### **Development Engineering:**

Comments as requested on the stormwater management plan:

- 1) The stormwater management plans as prepared by Woolacotts which detail building footprints are not consistent with the architectural plans on exhibition. As a result the Hec Ras analysis and cross sections are not correct and the plans detail proposed overland flow path (centrally located) which will be blocked by buildings. The stormwater management plans and proposed stormwater overland flow paths are to be consistent and not conflict with the building footprints as detailed in the architectural plans .
- 2) There is a Council 750mm stormwater line located at the north east corner of the site which is not detailed on the stormwater management plans. As such any construction of buildings near this drainage line is to be in accordance with Councils policy "Building over or adjacent to Constructed Drainage systems and Easements"
- 3) The stormwater management plan indicates freeboards of 200mm above the 1 in 100 year overland flow path levels. Council recommends a minimum of 500mm freeboard to habitable floor levels.

- 4) The proposed western swale runs along a stand of retained trees and the impact of the construction of the grassed swale on the existing tree root systems should be addressed by an arborist.
- 5) Additionally given the volume of flow running through the site a velocity depth analysis is to be undertaken in accordance with the Flood Plain Development manual to ensure the safety of the students in an 100 year ARI storm event.

## **Landscape and Public Domain comments**

### **Public Domain**

The current streetscape character is dominated by open space and landscape. The concept of the new buildings close to Abbott Road creates a built form dominance that is not softened by sufficient green space/landscaping to the front setback of the streetscape.

The development does not integrate with the surrounding landscape character, as presented by the proposed preferred option 1.

The Abbott Road streetscape should be defined by an integration of landscape and built form, hence an increased front setback to Abbott Road would achieve a better outcome.

Active travel opportunities have not been documented, but may well be considered in detail design, including share path connections to residential area and open space networks. Likewise carparking appears to rely on surrounding streets for capacity, and arrival/departure by way of drop-off and pick-up has not been considered by the concept on site, and thus will impact of the surrounding road network.

In general, the design layout appears to close itself off from the Abbott Road streetscape and the surrounding open space network.

### **Landscape**

The intent of the landscape scheme is well considered generally. However, as mentioned, the streetscape presentation to Abbott Road does not deliver the best outcome for site integration.

Protection of on-site existing trees is covered by the concept, however, no such protection is indicated for the street trees along Playfair Road, which provide a valuable streetscape amenity / council asset.

The Arborist report does not provide discussion on the impact of proposed overland flow on the retention of the existing trees, including if any land modulation will occur to achieve the overland flow.

## **Building and Fire Safety**

The only comments relevant to Building and Fire safety is that the proposed development be designed and constructed to meet the requirements of the National Construction Code (BCA).

## **Planning**

### **Clause 4.3 Height of Buildings (WLEP 2011) & Clause D9 – Building Bulk (WDCP 2011)**

The proposed development site is located within a R2 Low Density Residential zone within the Warringah Local Environmental Plan 2011 (WLEP 2011). The height limit within this zone is 8.5m above natural ground level. It is noted that the proposed development has a maximum height of 11.25m, which is 2.75m over this height requirement and represents a 32.3% variation to this control (Clause 4.3 – Height of Buildings).

It is noted that a Clause 4.6 – Exceptions to Development Standards was contained within the Environmental Impact Statement (EIS) lodged with the submission to Council which states the following

*"The site falls 7m from the north to the south. The proposal complies towards the north, and exceeds the height limit at the southern end where the land falls. Due to the sloping topography, the proposal does not comply."*

The site has a height difference from the north to the south (7m), however this is over a significant distance of 220m, which translates to a grade of 3.2%. It is considered that the visual bulk of the Buildings A, B & C may create visual bulk to the streetscapes of Abbott Road and Playfair Road and adjoining properties. It is recommended that suitable materials and planting be used to screen the buildings and add visual interest.

It is noted that Building M exceeds the height control as well, but given it is minor non-compliance, orientation and location on the site it is considered that it could be supported.

### **Clause C3 – Parking Facilities**

The proposed on-site parking of 16 spaces is highly inadequate and the reliance on street parking and parking within nearby Council carparks is not supported. Additionally it considered that the following comments within the EIS are not encouraged: *"Initiatives to encourage the utilisation of empty car parking spaces located on Abbott Road, Playfair Road, Ross Street and Lillie Street."*

**The standard practice by the Department to continue this policy has been noted at Manly Vale and Harbord Public Schools via recent applications. This practice of staff parking on to suburb street is not supported due to the reduced parking to the community, parents of the children attending the school and safety issues not only to the staff members but also students, parents and residents within the vicinity of Curl Curl North Public School.**

**In principal Council supports any development which contributes to the improved facilities for children within the Northern Beaches Council area, however, it is considered that reasonable steps need to be undertaken to ensure the resultant development is consistent with any other type of development of this scale. We encourage you review the above comments and recommendations.**

**Should you have any inquiries please call Phil Lane, Principal Planner on 9942 2316 or email [Phillip.lane@northernbeaches.nsw.gov.au](mailto:Phillip.lane@northernbeaches.nsw.gov.au)**

Regards,

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**From:** Aditi Coomar [<mailto:Aditi.Coomar@planning.nsw.gov.au>]  
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**Subject:** Comments on SS8310-Curl Curl North Public School

Hello Phillip,