



17 July 2018

Ms Rebecca Sommer
Acting Team Leader
School Infrastructure Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Our Ref: 2018/453914

Attn: Ms Aditi Coomar

Dear Ms Sommer

Re: Curl Curl North Public School Redevelopment, Playfair Road North Curl Curl (SSD 8310) Response to Submissions

I refer to your letter dated 12 June 2018 containing details of the proposed amendments to the redevelopment of Curl Curl North Public School.

Council has reviewed the amended documentation and would like to provide the following comments:

Traffic and Parking

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

On-site Parking Provision

The school currently provides 21 onsite parking spaces for staff use. The amended proposal for redevelopment of the school with an additional 80 students and 6 staff includes a proposed reduction in the number of parking spaces to 17 parking spaces (1 additional space than originally proposed).

The amended 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 vehicles. The proposed reduction has relied on a 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 such as carpooling incentives 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 acknowledges the incentive and encouragement methods for the staff and parents to use alternative sustainable transport to and from the school, considerations should be given to the extent of the effectiveness of the proposed methods as a factor to be taken into account in parking provision reduction. As previously identified, the online travel mode questionnaire survey undertaken by TRAFFIX in March 2017 indicated that even with existing limited onsite parking spaces (30% of total staff numbers) and the Active Travel Plan in practice, conducted in collaboration between Council and the school, 92.9% of staff (equal to 65 staff) continue to drive to school.

Further to this, based on the parking provision proposed, secure on-site parking for only 22% of the anticipated total staff numbers will be available which equates to approximately 78% of staff being required to use on street parking within the surrounding road network or alternative transport methods which is considered unrealistic.

The results of the Parking Occupancy Survey undertaken by Traffix indicate that the majority of unrestricted parking spaces on Playfair Road and Abbott Road at the school frontages 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 spread into the surrounding local residential streets.

The Department of Education (DoE) guidelines 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. Given that there are opportunities for provision of further parking spaces within the school site area which do not impact on school infrastructure and will result in little to no material impact on planting and open space areas within the site, the provision of more adequate onsite parking spaces in excess of the current provision is considered feasible and a necessary inclusion for a redevelopment of this scale.

Council Recommendation

Provision of additional parking be incorporated adjacent to the eastern side of the building Block B where up to at least an additional 20 parking spaces could be accommodated while still maintaining an acceptable landscaped buffer with the adjoining property.

Pedestrian crossing facilities in Playfair Road:

The proposed removal of the existing Children's crossing on Playfair Road adjacent to the main school entry is to be replaced with an additional drop-off and pick-up zone.

Council's previous recommendations in relation to the provision of additional pedestrian crossing facilities such as a pedestrian refuge island is required to be installed 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 have not been incorporated and are still relevant.

Footpath and bicycle routes:

The amended proposal maintains the existing provision of pedestrian access on Ross Street. It is a recommendation by Council that the construction of a footpath along Ross

Street be undertaken as part of the schools redevelopment to connect the school's pedestrian access with Pitt Road and Spring Road.

The proposal places a significant reliance on the uptake by staff, students and parents of alternative travel methods outlined within the Green Travel Plan which encourages the use of the Bicycle routes within the Bike Plan to minimise the impact on the area and reduce the parking provision required on the site.

These bicycle route connections to the school have not been implemented and will be constructed as per the priority scheme set by Northern Beaches Council. To enable Council to implement the bike route connections to the school concurrently with the completion of the redevelopment, it is highly recommended that the Department of Education contribute to the construction of a shared path on Playfair Road at the frontage of the school as well as an on-road cycle route on the Abbott Road frontage in order for this alternative travel plan to hold any weight for its implementation to be effectively applied in practice.

Stormwater Assets

The Woolacotts stormwater management report has addressed the previous concerns raised in relation to the impacts of upstream overland flow on the redevelopment and stormwater discharge points.

The Woolacotts stormwater management report details two constructed overland flow paths through the site which are appropriately landscaped and achieve depth versus velocity requirements in accordance the Floodplain Development Manual.

The 750 mm Council pipeline that runs adjacent to the north eastern boundary was not located by survey however relevant conditions to locate the pipeline and compliance with Councils Water Management Policy, specifically in regards to building over or adjacent to Council pipelines and easements have been included.

Flooding and Water Quality

No objections are raised to the amended proposal in relation to flooding or water quality subject to the inclusion of specific conditions of consent in relation to these issues.

Contaminated Land

The amended Environmental Site Assessment prepared by Environmental Investigation Services dated 10 May 2018 includes specific recommendations to address contamination identified on the site.

Council expects that these recommendations will be fully complied with and that a Stage 2 Detailed Site Investigation and Stage 3 Site Remediation Action Plan will be undertaken in accordance with the Contaminated Land Management Act (1997).

Landscaping

The amended Landscape Plan has been reviewed in detail. While 61 trees out of a total of 275 are proposed for removal to facilitate the proposal, the majority of existing trees (214 trees) will be retained around the perimeter of the site. It is noted however that approximately 35 of the trees listed for retention are in fact outside the school boundary.

The retention of the Moreton Bay Fig Tree within the northern end of the site is noted and supported.

The population of existing trees being retained will provide an adequate buffer and screening for adjoining residents and will assist with integrating the development into the local landscape character.

It is noted there are native trees and vegetation including a 10 metre wide 'vegetated swale' proposed throughout the site. More details regarding the number of proposed tree plantings and vegetation are required for a more detailed assessment and this information has been included within the recommended conditions.

To compensate for tree canopy loss, it is recommended that additional tree plantings, particularly within the northern part of the site be incorporated around the proposed Sports Courts and Bush Play. For example, an isolated stand of shade trees with the open area could be implemented and the perimeter vegetative buffer could be embellished.

Given the internal layout of active and passive play areas, path connections between the two (2) proposed futsal courts, existing play spaces and school buildings should be incorporated as part of the landscape design.

Planning

Clause 4.3 Height of Buildings (WLEP 2011) – Building Bulk (WDCP 2011)

It is noted that the maximum building height has been reduced from 11.25m to 9.8m (15.3% variation) which occurs in Block B at its highest point and in other parts of the proposed new building elements. An assessment against the objectives of the development standard has been provided within a Clause 4.6 variation submitted with the amended proposal.

The proposed height breach is supported under the circumstances as the amended built form presents a more characteristic scale with the surrounding low density residential development. Further, other changes to the proposal including an increase in the building setback from Playfair Road from 3.5m to 8.44m have reduced concerns relating to bulk and scale.

While a Preliminary Construction Management Plan has been provided with the amended proposal, it is expected that a more robust and detailed Construction Management Plan be provided by the construction company undertaking the works which specifically addresses noise, dust, student and public safety, management of construction traffic movements, security and amenity during construction. This Detailed Construction Management Plan should be finalised and distributed to the school, surrounding residents and Council prior to any works commencing on the site.

Parking Facilities

The proposed on-site parking of 17 spaces is highly inadequate and the substantive reliance of on-street parking and parking within nearby Council carparks and public reserves is not supported.

The standard practice by the Department of Education to continue this policy has been noted at Manly Vale and Harbord Public Schools via more recent applications. The practice of staff parking on surrounding suburban streets is not supported as it results in reduced parking for 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.

Council supports development which will result in 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 appropriately designed to meet future demands of the facility and is consistent with any other type of development of this scale. We encourage your review of the above comments and recommendations. Attached are Council's recommended conditions.

Conditions

The following conditions are recommended as necessary on this development :

Parking

1. 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

Pedestrian and Bicycle infrastructure

2. The provision of pedestrian crossing facilities such as pedestrian refuge island on Playfair Road at the intersections with Pitt Road on the northern side and at Abbott Road on the southern side.

Reason: To ensure pedestrian safety around school

3. Footpaths 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

4. 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 Department of Education.

Reason: To provide a safe bicycle connection to the school

Landscaping

5. Planting Plan: The Planting Palette Plan is to be updated to include quantities of proposed trees and shrubs and their locations. The use of *Corymbia citriodora* (Lemon Scented Gum) should be replaced with a locally native such as *Eucalyptus haemastoma* (Scribbly Gum) or similar.

Accessibility: Footpath connections between the proposed futsal courts, open play spaces and school buildings should be incorporated.

The final landscape design and construction should be undertaken in coordination with the project Arborist to ensure the extent of tree impacts is tolerable.

Reason: To ensure that the landscape treatments are installed to provide landscape amenity

Engineering

6. Structures Located Adjacent to 750mm Council Pipeline

All structures are to be located clear of Council's 750mm pipeline. Footings of any structure adjacent to an easement or pipeline are to be designed in accordance with Council's Water Management Policy; (in particular Section 6 - Building Over or Adjacent to Constructed Council Drainage Systems and Easements Technical Specification). Any proposed landscaping within a Council easement or over a drainage system is to consist of ground cover or turf only.

Council's 750mm pipeline located adjacent to the north eastern boundary is to be located by survey undertaken by a registered surveyor and a copy provided to Council prior to the commencement of any works.

Structural details prepared by a suitably qualified Civil Engineer demonstrating building compliance are to be submitted to the Certifying Authority for approval.

Reason: Protection of Council's Infrastructure.

7. Pre-Construction Stormwater Assets Dilapidation Report

Survey a pre-construction / demolition Dilapidation Survey of Council's Stormwater Assets is to be prepared by a suitably qualified person in accordance with Council's Guidelines for Preparing a Dilapidation Survey of Council Stormwater Asset, to record the existing condition of the asset prior to the commencement of works. Council's Guidelines are available at:

<https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/general-information/engineering-specifications/2009084729guidelineforpreparingadilapidationsurveyofcouncilstormwaterassets2.pdf>

A copy of the pre-construction / demolition dilapidation report must be submitted to Council for prior to the commencement of works.

Reason: Protection of Council's Infrastructure

8. Pre-commencement Dilapidation Report

The applicant must prepare and submit a pre-commencement dilapidation report providing an accurate record of the existing condition of adjoining public and private properties and public infrastructure (including roads, gutter, footpaths, etc). A copy of the report must be provided to Council, any other owners of public infrastructure and the owners of adjoining and affected private properties.

Reason: Protection of Council's and Private Party's Infrastructure during construction.

9. Vehicle Crossings Application

An application for Driveway levels shall be made with Council subject to the payment of fee applicable at the time of payment. The fee includes all Council inspections relating to the driveway construction and must be paid. Approval is to be submitted to the Certifying Authority.

Reason: To facilitate suitable vehicular access to private property

10. Stormwater Management

The Stormwater Management system including or proposed overland flow paths is to be designed and constructed in accordance with the stormwater management report and concept drainage layout plans prepared by Woolacotts dated 16 May 2018 (ref 16-258).

Detailed drainage plans are to be prepared by a suitably qualified Civil Engineer, who has membership to the Institution of Engineers Australia, National Professional Engineers Register (NPER Specification), and submitted to the Certifying Authority for approval.

Reason: To ensure appropriate provision for the disposal of storm water and storm water management arising from the development.

11. Vehicle Crossings

The provision of 2 vehicle crossings 4 metres wide in accordance with Northern Beaches Council Drawing No A4-3330/ normal and specifications. An Authorised Vehicle Crossing Contractor shall construct the vehicle crossing and associated works within the road reserve in plain concrete. All redundant laybacks and crossings are to be restored to footpath/grass. Prior to the pouring of concrete, the vehicle crossing is to be inspected by Council and a satisfactory "Vehicle Crossing Inspection" card issued. Details demonstrating compliance are to be submitted to the Certifying Authority.

Reason: To facilitate suitable vehicular access to private property

12. Property Boundary Levels

The property boundary levels shall match the existing levels except where modified for the vehicular crossing. The applicant shall design and construct having regard for the existing levels. No approval is granted for any change to existing property alignment levels to accommodate the development.

Reason: To maintain the existing profile of the nature strip/road reserve

13. Road Reserve

The public footways and roadways adjacent to the site shall be maintained in a safe condition at all times during the course of the work.

Reason: Public Safety.

14. Traffic Control During Road Works

Lighting, fencing, traffic control and advanced warning signs shall be provided for the protection of the works and for the safety and convenience of the public and others in accordance with RMS Traffic Control At Work Sites Manual (<http://www.rms.nsw.gov.au/business-industry/partners-suppliers/documents/technical-manuals/tcws-version-4/tcwsv4i2.pdf>) and to the satisfaction of the Certifying Authority. Traffic movement in both directions on public roads, and vehicular access to private properties is to be maintained at all times during the works

Reason: Public Safety.

15. Progress Certification (Road drainage works)

Written certification is to be provided by a suitably qualified engineer upon completion and/or as and when requested by the Certifying Authority for the following stages of works.

- (a) Silt and sediment control facilities
- (b) Laying of stormwater pipes and construction of pits
- (c) Clean-up of site, and of adjoining Council roadway and drainage system.
(*To be tested by a recognised N.A.T.A. approved laboratory).

Details demonstrating compliance are to be submitted to the Certifying Authority.

(Reason: To ensure compliance of civil works with Council's specification for engineering works

16. Notification of Inspections

Council's Development Engineer is to be given 48 hours notice when the works reach the following stages:

- a) Installation of Silt and Sediment control devices
- b) Prior to backfilling of pipelines

- c) Prior to pouring of stormwater gully pits (if required)
- d) Prior to pouring of kerb and gutter

NOTE: Any inspections carried out by Council do not imply Council approval or acceptance of the work, and do not relieve the developer/applicant from the requirement to provide an engineer's certification. Council approval or acceptance of any stage of the work must be obtained in writing, and will only be issued after completion of the work to the satisfaction of Council and receipt of the required certification

Reason: To ensure new Council infrastructure is constructed to Council's requirements.

17. Stormwater Pipeline Construction

Where connection to Council's nearest stormwater drainage system is required, being councils existing pits in Abbot and Playfair Roads, the applicant shall construct the pipeline in accordance with AUSPEC specification for engineering works (see www.northernbeaches.nsw.gov.au) and shall reconstruct all affected kerb and gutter, bitumen reinstatements, adjust all vehicular crossings for paths, grass verges and household stormwater connections to suit the kerb and gutter levels. All works shall be undertaken at the applicant's cost, and upon completion certified by an appropriately qualified and practicing Civil Engineer. Details demonstrating compliance are to be submitted to the Certifying Authority.

Reason: To ensure compliance of drainage works with Council's specification for engineering works.

18. Civil Works Supervision

All civil works approved in the Construction Certificate are to be supervised by an appropriately qualified and practising Civil Engineer. Details demonstrating compliance are to be submitted to the Certifying Authority.

Reason: To ensure compliance of civil works with Council's specification for engineering works.

19. Reinstatement of Kerb

All redundant laybacks and vehicular crossings shall be reinstated to conventional kerb and gutter, footpath or grassed verge as appropriate with all costs borne by the applicant. Details demonstrating compliance are to be submitted to the Certifying Authority.

Reason: To facilitate the preservation of on street parking spaces

20. Post-Construction Dilapidation Report

A post-construction Dilapidation Survey of Council's Stormwater Assets is to be prepared by a suitably qualified person in accordance with Council's Guidelines for

Preparing a Dilapidation Survey of Council Stormwater Asset in order to determine if the asset has been damaged by the works. Council's Guidelines are available at

<https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/general-information/engineering-specifications/2009084729guidelineforpreparingadilapidationsurveyofcouncilstormwaterassets2.pdf>

The post construction dilapidation report must be submitted to the Council for review and the Principal Certifying Authority prior to the issue of the Occupation Certificate. Any damaged to Council's stormwater infrastructure is to be rectified in accordance with Council's technical specifications prior to the release of the security bond.

Reason: Protection of Council's Infrastructure

21. Post-Construction Road Reserve Dilapidation Report

The applicant must bear the cost of all restoration works to Council's property damaged during the course of this development. All building work must have been carried out in accordance with the provisions of the Building Code of Australia

Note: Where by Council is not the Principal Certifying Authority, Refund of the trust fund deposit will also be dependent upon receipt of a final Occupation Certificate by the Principal Certifying Authority, Post Construction Dilapidation Report and infrastructure inspection by Council.

Reason: To ensure security against possible damage to Council property.

22. Post-Construction Dilapidation Report

The applicant must prepare and submit a post-construction dilapidation report. The report must clearly detail the final condition of all property, infrastructure, natural and man-made features that were originally recorded in the pre-commencement dilapidation report. A copy of the report must be provided to Council, any other owners of public infrastructure and the owners of adjoining and affected private properties

Reason: To ensure security against possible damage to Council and private property.

23. Restoration of Damaged Public Infrastructure

Restoration of all damaged public infrastructure caused as a result of the development to Council's satisfaction. Council's written approval that all restorations have been completed satisfactorily must be obtained and provided to the Certifying Authority.

Reason: To ensure public infrastructure is returned to the state it was in prior to development.

24. Maintenance of water quality control devices.

All water quality control devices are to be maintained in accordance with the Woolacotts Stormwater Management Plan dated 16 May 2018 and the manufacturers specifications.

The stormwater quality objectives are to comply with Councils "water management policy".

Should you require clarification on any of the above, please contact Anna Williams, Manager Development Assessment on 9970 1139.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P. Robinson', with a stylized flourish at the end.

Peter Robinson
Executive Manager Development Assessment