

Our Reference: PF: 5007.190P2  
Your reference: SSD 8640

Mr Andrew Beattie  
School Infrastructure Assessments  
Department of Planning and Environment  
320 Pitt Street,  
SYDNEY NSW 2000

14 June 2018

Andrew,

**PICTON HIGH SCHOOL REDEVELOPMENT  
480 ARGYLE STREET, PICTON (SSD 8640)**

Council acknowledges the submission of the State Significant Development (SSD) and welcomes the opportunity to provide comments on the SDD, which both the Department of Education and Planning and Environment should take into account when assessment the SSD.

Council is supportive of the project, considering the School is currently the only public high school in the Wollondilly Shire LGA. As a result of increased demand lead by nearby residential release areas lacking in infrastructure, the school is in need of improvement to cater for increased capacity from 1,500 to 2,000 pupils, teaching facilities and space.

Please be advised that Council at its meeting of 21 May 2018 discussed the development proposal and foreshadowed the following issues that the NSW government should take into consideration.

1. *"Adequate parking is provided for teachers and students.*
2. *Air conditioning is provided in all class rooms and the hall (as per previous NOM).*
3. *Solar panelling be considered for the project.*
4. *Water reuse tanks be considered for the project.*
5. *The upgrades allow joint use for the community, particularly for the hall, library and playing fields.*
6. *The footpath be expanded on both sides of Argyle St between Wonga Road and Henry St for safety reasons.*
7. *A footpath be built along Wonga Road on the school side for safety reasons.*
8. *Adequate parking spots be allowed for buses.*
9. *A pedestrian or School crossing be installed on Argyle St.*
10. *That due to the fact that Picton High School has the largest amount of students who catch a bus in the State. The Department of Education financially contribute to the building of a cycleway to Tahmoor.*
11. *Council again stresses the importance of upgrading the intersection of Wonga Road and Remembrance Drive."*

**Traffic and Infrastructure Comments**

1. Council has from the outset of discussions with Mace, raised concerns as to the potential impacts from the school on the local road network and the level of detail lacking within the early draft Traffic Assessment Report. In Council's opinion this has led to the need for traffic control measures at the intersection of Argyle Street and Wonga Road. The details submitted with the SEARS clearly shows the intersection performance drops from a LOS B to a LOS F due to the development and this is likely to occur during the temporary school to be accessed

from Wonga Rd as well as the ultimate development. As such this intersection needs to be addressed as a first stage of the project. Council would consider traffic lights or a round-a-bout installed at no cost to Council at this intersection.

2. Council is extremely concerned with the strategy of reliance on on-street parking and the need for pedestrian movements to access the school including safe connections across Argyle St, for which the proponents state is to be upgraded to 4 lanes. Council require detail of pedestrian connectivity including safe access across and alongside Argyle St given the applicants dependency on street parking. This would likely include the need to signalise the bus bay exit or a stand-alone 'pelican crossing'
3. The intention of a round-a-bout at the end of the reconstructed Wonga Road is also taken to be constructed at no cost to Council, and Council in-principal provide no objection to this roundabout and associated land being transferred to Council.
4. Council does not support the transfer of the Argyle St Bus Bay to Council and would also prefer to see the transfer of Road Reserve at the northern section of Argyle Street to the ownership of the Department of Education.
5. That the submission provided by the RMS emailed the Department of Planning dated 12 June 2018 be considered with a view to resolve traffic and mitigation measures for the local road network.

Furthermore to the above, there are a number of comments to be made against the Environment Impact Statement, outlined below.

Volume 1  
Section 4.7

- Commentary refers to 'pedestrian crossings', although detail commentary and sketches refers to pedestrian refuges.

Section 4.9

- We note the comments about the boundary adjustment enabling the dedication of the entire bus bay to Council. Throughout the discussions between Council and the Dept, at no time was this agreed to and Council's concerns with this bus bay remains – the bay would need to be built in accordance with Council Specifications and a detailed traffic assessment and road safety audit carried out reviewing the risk to vehicles and pedestrians.

Section 6.3 (& Appendix H & L – Vol 2)  
Appendix H

- We note that despite consistent requests from Council and RMS, a traffic impact assessment was not forthcoming and has only been seen with the formal SEARS package.

Section 1.

- TDG refers to Council's Development Contributions Plan and Argyle St being upgraded to a 4 lane road, which mitigates any increase in school traffic. We note that the contributions plan is from 2011 and is currently under review – the traffic assessment done, by TDG for Council, for the review indicates no need to upgrade the road to 4 lanes. No comments seen of how pedestrians are to be safely catered for crossing the road across four lanes and further to concerns raised from Section 4.9 of Vol 1 (see above).

Section 4.

- Council and RMS have previously expressed concern at the background traffic surveys given the date taken was at the very end of the school term and likely not indicative of normal traffic movements. The further survey was carried out during the Xmas school holidays further raising concerns at the appropriateness of the survey
- Commentary confirming that the existing car parking of 113 spaces is well utilised at 92%, which raises concerns that ultimately only 135 spots are to be provided (yet the school is doubling). This places extra pressure on the on-street parking which is Council's infrastructure, for which TDG are suggesting requires 4 lanes of live traffic – which will remove on-street parking.

#### Section 8.

- The SIDRA results are assumed to be for the post construction development and not during the construction – modelling of the 'temporary school' access from Wonga Rd should be assessed and likely result in similar performance to the Wonga/Argyle St intersection, post development, which is shown to go to LOS F. As such the roundabout (or other upgrade such a signals) will need to be constructed prior to access requirements from Wonga Rd commencing.

#### Section 8.5

- Further to comments above, there are no confirmed or immediate proposal to upgrade Argyle St to 4 lanes by 2028 and this appears to be at odds with Councils most recent modelling performed by TDG (which will be pursued by Council as a separate exercise)

#### Section 11.5

- Council notes the Dept Policy for on-site parking but it notes 'parking should be kept to a minimum', which would take into context the availability of on-street parking. Given the surveys done at dates unlikely to be normal (refer above), and in spite of the high utilisation of existing parking, a unknown loss of on-street parking from the modifications proposed in front of the school for access and egress, yet a doubling of school numbers plus a potential need for additional lanes on Argyle St, it is unclear how the applicant proposes to cater for increased parking or safe pedestrian movements

#### Section 11.8

- Reference made to a travel management plan which seems to be replicated in the Conclusions as a 'Green Travel Plan' – seems very noble yet no detail – and the impact assessment clearly states numerous times that existing active transport use is low and unexpected to change

#### Appendix L

- References are made for the need for a Construction Traffic Management Plan – yet the Plan supplied has no detail to review. There is no investigations or findings detailed in the report or how it arrived at the recommendations made. Councils previous comments still stand on how the works will impact on the broader transport network and how this is to be managed with details traffic movement and control planning

### **Council Environment Comments**

#### Arboricultural and Tree Management Plan

Council carried out an inspection of the High School site in reference to the Arboricultural and Tree Management Plan (Appendix BB).

Prior to the inspection we read the Tree Identification Assessment Summary, the plan layout for the new buildings (page 67) and Figure 5 (page 49) which shows the location of trees identified to be removed.

The Tree Identification Assessment Summary lists 78 trees for removal. We believe the DA approval should be on the basis of minimizing the removal of trees on the site.

Recognising the importance of trees for the school community and broader community should be emphasised.

Council recommend that the following listed trees NOT be removed:

- Tree 14 Himalayan Cedar at the front of the site. Council disagrees with the "Low" rating in relation to Landscape/ Visual Significance. The tree is prominent in the location for persons living near and passing the site. It appears to be one of the oldest trees on the site and has cultural significance as part of the memorial garden;
- Council does not support the removal of trees 46 to 53 which are outside the new building zone;

- If an apparently enlarged sports field greyed out on page 67 is not part of the DA we query the need to remove trees 68 to 73;
- Council also queries the need to remove tree 65.

Council recommends the removal of weed trees in the agricultural zone area, namely the camphor laurel, willow and privet.

The loss of native trees on Council land at the proposed Wonga Street turning area should be minimal.

We would appreciate the opportunity to comment on the draft Landscape Management Plan. Council notes that 45 trees are listed to be *"replaced in the landscape upon completion"*. Council assumes this means within the landscape of the school site and would fully support this replacement of native trees with similar native trees, preferably with some mature stock.

We believe there should be no net reduction on the overall school tree canopy, i.e. replacement of all removed trees. We note that the report on page 2 refers to some out-of-date legislation.

#### General Feedback

- The land area immediately beyond the back school boundary fence is unremediated landfill. This proposal in respect of access during and after construction would place more people in the area than is currently the situation.
- The Acoustic Assessment noise mitigation measures need to consider the impact of the development on the Animal Shelter.

#### **Resident Submission**

The following submission was tabled to Council by Jan and Yvonne Visser from 35 Stilton Lane, Picton, located west of the school. Their comments are reproduced below;

*"A few weeks ago we were informed about the new proposed development plans for Picton High School and we strongly object for this to happen, main reason the enormous and lengthy disruption for the students, teachers and staff. Perhaps Years?"*

*There could be a better option. Our neighbour Mr. Alen Kent from "Stilton Farm" proposed already for many years a development plans for approval by Wollondilly Council which would incorporate land for a new High School the land is 173 Ha in size*

*Here an article in local paper:*

<https://www.camdenadvertiser.com.au/story/4891956/hospital-and-school-proposed-for-picton/>

*We have been living right opposite on top of the hill overlooking the High School for more than 40 years. Three of our children were students at the school.*

*We feel the upheaval by demolition of buildings in successive stages with noise and dust and finding alternative classrooms will be highly disruptive for 1200 students and in future finding more car parking spaces for planned 2000 students which now already is inadequate as it is. All this could be accommodated at the new site!*

*We suggest the best spot would be only 1 km away at Argyle Street (Remembrance Drive) corner Stilton Lane Picton This land is very slightly sloping and flood free with nice surroundings.*

*Another advantage is this rural land has been undermined for coal by Tahmoor Mine and would not have much affect for subsidence as in future will be the case for the present site at now Picton High School.*

*Presently there are not many homes at this location which would object to building a new High School there*

*As attachment we provided a map from Google at this location with and overlay of Camden High School as indication. This school was newly completed also on rural land a few years ago. We want the best and cost effective solution for a brand new Picton High School?"*

For further enquiries relating to the development proposal, please contact Michael Buckley, Team Leader Development Assessment on 4677 9614.

Yours faithfully,



Chris Stewart

**DIRECTOR PLANNING**