

Lindfield Learning Village Phase 2 and 3 – amended proposal

Ku-ring-gai Council submission

Biodiversity Impacts

The Addendum Biodiversity Assessment Report (BAR) fails to address the impacts of the proposed APZ within the adjacent Lane Cove National Park. This is clearly evident within:

- States “The SSD does not seek approval for vegetation management outside the site boundary. Any vegetation management outside the site boundary is the subject of separate approval” pg 5; and
- Figure 1.5: Stage 2 and 3 Proposed development footprint – which does not show impact of APZ proposed within the National Park.
- Section 2.4 – “Onsite APZ management was assessed in the Stage 1 BAR (Ecoplanning 2018), and offsite APZ management will be addressed in an REF (Ecoplanning 2019).”

From Council’s interpretation of this BAR, it appears that both the Stage 1 BAR (Ecoplanning 2018) and this Addendum BAR fails to address - mitigate and offset all of the biodiversity impacts of the proposal. Assessment of impacts for an APZ (particularly within an area of biodiversity protection) resultant from a new private development assessed under State Significant Development (SSD) should not be deferred to an assessment under Part 5 of the EP&A Act through a Review of Environmental Factors. Such separation clearly fails to enable assessment and offsetting of cumulative overall impacts from the proposal.

Flooding and Stormwater

Council is satisfied that an appropriately qualified hydraulic engineer will be consulted in the design and planning of the stormwater treatment system, as Council still has concerns regarding the lack of area for the required swale and rain garden treatment area.

At a minimum, the school must be provided with an approved operation and maintenance schedule for any water urban sensitive design components or other stormwater treatment measures. It is recommended that the recently released Stormwater NSW 'Guidelines for the Maintenance of Stormwater Treatment Measures (January 2020)' be used.

Council would also appreciate being able to comment on any future flooding and stormwater treatment plans for the site.

Bushfire

A preliminary perusal by Council's Bushfire Technical Officer of the modelling software (Firewind) used by Stephen Grubits & Associates for the Bushfire Radiation Assessment Report found that the parameters used in the radiant heat modelling were simplistic – and would not parallel the many biophysical and environmental variables that determine heat fluxes during the course of a short-run bushfire event. The Bushfire Technical Officer would prefer that Fireline Intensity modelling, or a modelling suite incorporating more dynamic variables would result in heat flux outcomes represented by bushfire attack.

The attached research modelling paper (Penney and Richardson, 2019) provides details of the variables used to calculate radiant heat from the dynamic variables in a bushfire event. If such a methodology could also be used to determine and compare radiant heat flux (with results from the Bushfire Radiation Assessment Report), he would be satisfied that due diligence would have been undertaken with respect to this reporting.

Transport / Traffic

6.1 School travel plan

In response to Council's comments regarding future car mode share for staff, the Transport Response to Submissions (TRS) notes that Schools Infrastructure propose that a more substantial set of items be actioned and submitted prior to occupational certification. While stronger measures are supported, these will need to be reviewed to ensure they are able to realistically achieve the planned 42% mode share by car (for staff) anticipated in Phase 3.

After hours parking

In Council's previous submission, it was noted that the Greenhalgh Auditorium, lecture theatres and gymnasium would be used by external visitors after school hours, and that users of these facilities may park in the spaces provided within the Learning Village which have been vacated by teaching staff and employees. This approach is supported, and Council would like to reiterate the possibility extend the utilisation of these after-hours parking spaces to benefit the wider community, including users of the Blair Wark Community Centre and Charles Bean Oval (where it does not conflict with the auditorium, lecture theatre or gymnasium use).

Council would like to further engage with DEC and Lindfield Learning Village as soon as possible, to come to an agreement for wider community access to the car park during out-of-school hours, by the completion of Phase 2 works.

6.2.1 Footpath upgrades on the local road network

This section of the TRS discusses walking routes to school, and considers the 2km walking catchment (see diagram below, extracted from the TRS).

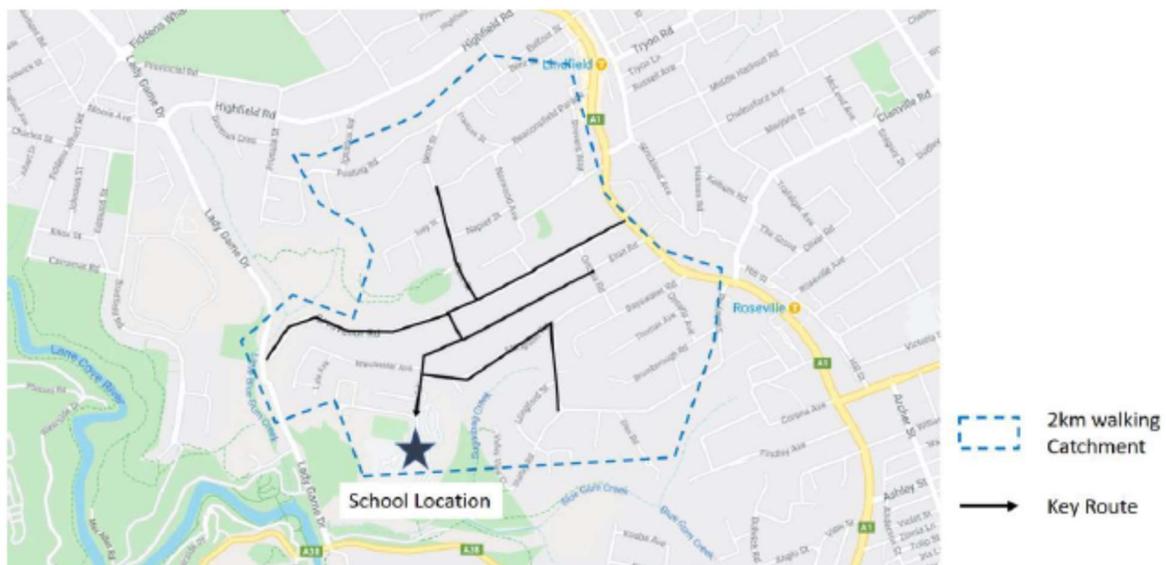
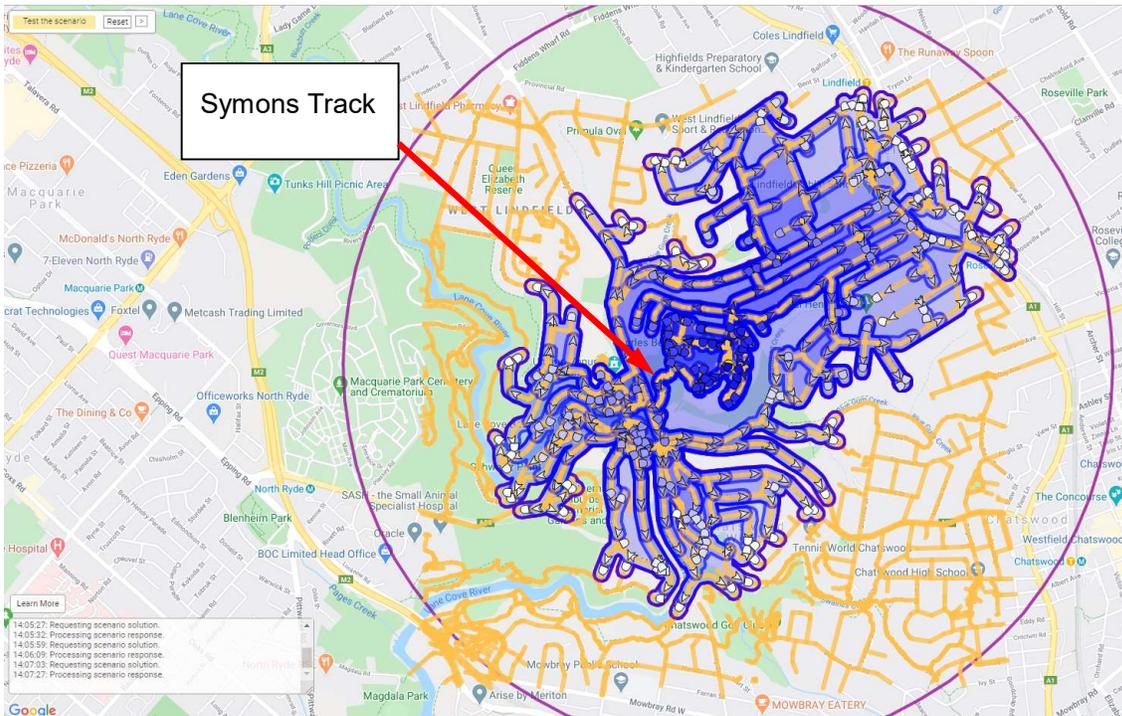


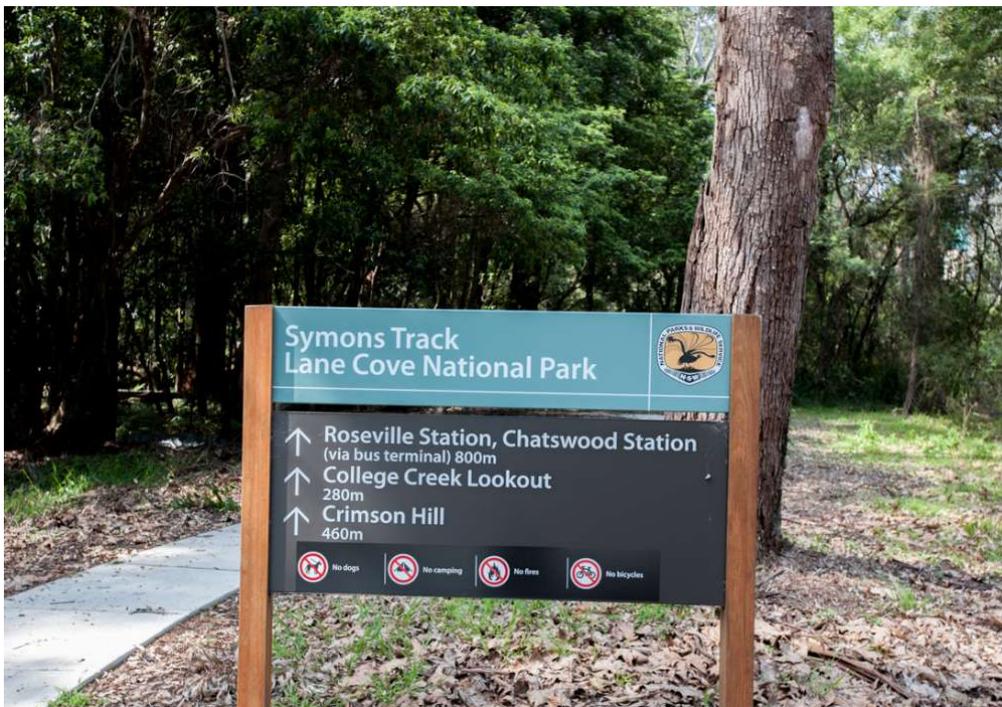
Figure 10: Walking routes

The walking catchment is heavily biased to the north of the school site, due to missing links to the south. However, there appears to be the potential to link to the southern part of the catchment –

see plan below indicating the extent of the 2km walking catchment, using the Pedcatch tool (not considering gradients):



This tool identifies Symons Track as a key link from the school southerly to Lady Game Drive, which then provides walking connections to the southern parts of West Lindfield and to Chatswood West. As part of this assessment, there were no investigations carried out to assess the suitability of this track for students, although images on Google Maps indicate the presence of a formalised/established National Parks trail from Lady Game Drive leading to the Crimson Hill development (adjacent to the school):



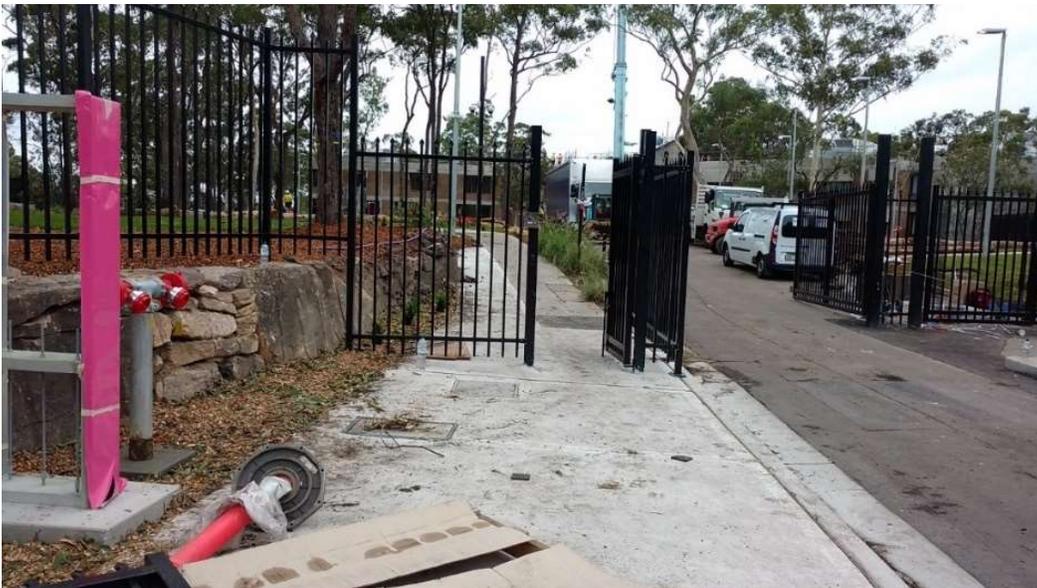
Investigations should be undertaken to assess the track's suitability, as upgrading it/incorporating it into the school's pedestrian access routes would potentially add a substantial area into the school's walking catchment.

5.1 Alternative access design – extended driveway

The amended proposal no longer utilises the loop road. Revised car and bus access are proposed to be accommodated within the eastern portion of the site. This addresses previous issues raised relating to traffic volumes and queues on Dunstan Grove, and impacts to adjoining residents in the Crimson Hill development.

6.2 Pedestrian and cycling

In Council's feedback to the Response to Submissions, it was identified that at the main school gate, the path is >2m wide, but the gate opening in the perimeter fence is only half that (see image below), which would obstruct pedestrian and bicycle flow particularly in Phases 2 and 3.



It was suggested that this gate opening would need to be operable on both sides so as to accommodate the full width of the footpath. As there was no acknowledgement of this in the TRS, it is raised again here for attention.

6.3.2 School bus demand

The TRS notes that the school has been in discussions with Transdev and Transport for NSW regarding future bus transport needs, and that school enrolment waiting list was provided to Transport for NSW for bus transport planning purposes. This is encouraging, however occupational certification for Phases 2 and 3 should be conditional on the appropriate bus services having been allocated.

Right turn bay on Pacific Highway at Grosvenor Road

In Council's previous submission, it was noted that the extension of the right turn bay on Pacific Highway at Grosvenor Road from 70m to 120m was supported.

However, there were questions to the rationale behind the optional extension of the right turn bay to 170m is unclear, with concern that it would impact on future options for improvements at the intersection of Pacific Highway and Strickland Avenue. It was suggested that further advice be obtained from Transport for NSW, but this does not appear to have been addressed.

Heritage

Item 2: Loss of Vegetation

Council previously stated that the ongoing loss of vegetation for (non-emergency) vehicle access is not supported from a heritage perspective. The proponent has responded at length, identifying some heritage impact with the clearing of vegetation however pointing to almost 30 years of traffic issues with the continued educational use of the precinct, which was acknowledged by Council in the 1984 CMP for the site. The proponent has suggested incorporation of a Condition of Consent, which requires demonstrated investigation of the site for further tree planting in conjunction with the RFS, within six weeks of occupation. Although the relatively substantial removal of vegetation is very unfortunate from a heritage perspective, the proposal is put forward as part of a much wider project, which enables the longevity of the State Heritage Item through its ongoing use as an educational precinct. Key to the heritage assessment is that, the overall proposal is aligned with the significance and intent of the originally intended function of the precinct. No further comments are made in this regard.

Item 3: Partial Demolition of Link for Loop Road

Council previously suggested that the loss of moderate fabric to allow for emergency access was preferable to further loss of trees and intrusion in the bushland setting. The proponent has confirmed that this demolition of this relatively small amount of fabric will allow access by emergency vehicles presumably relieving some impacts on the established vegetation.

Item 7: Demolition of level 4 courtyard zone slab

Council previously suggested that the 'glass flooring is the preferred option for the treatment of the new opening' in the level 4 slab. This area of demolition has now been omitted from the proposal.

Item 8: Alterations to COLA

Council previously specified that 'tonal variants of the natural bushland setting' were preferable in relation to the COLA. The proponent has suggested that the COLA has been designed so as not to be 'insubstantial' in relation to the brutalist building, which is reasonable from a heritage perspective. The revised colour palette incorporates more natural hues, which are more consistent with the setting yet promote variation. This component of the proposal is acceptable.

Item 1 (interiors): Demolition of wall adjacent to spiral stair

Council previously did not support the removal of the concrete wall adjacent to the spiral stair. The proponent has suggested that the degree of demolition has been reduced by 50% as the area adjacent to the staircase would be retained with the opening affecting only the area to the north. It is suggested that the detailed drawings of this area be provided to Heritage Council and Ku-ring-gai Council for review prior to the commencement of works on site.

Item 2 (interiors): Creation of level 4 reception window

Council previously suggested that Option 3 for the creation of a reception area would have the least impact and could be supported from a heritage perspective. The proponent has not made further comment in relation to this additional window and it is therefore assumed that Option 3 is proposed.

Recommended Heritage Conditions:

1. Design Details

Construction details (Scale 1:10) of new interventions to the heritage fabric as well as the intended process for partial demolition (ensuring protection of all heritage fabric) are to be provided to NSW Heritage Council and Ku-ring-gai Council for review and agreement prior to the commencement of works on site.

Reason: To ensure that the new interventions are designed appropriately within the existing fabric.

2. Archival Recording

Prior to the commencement of any works on site, an archival report has been submitted to Council for approval. The archival report must consist of a photographic record of the affected parts of the precinct (internally and externally) and surrounds. Recording shall be undertaken in accordance with the Guidelines for Photographic Recording of Heritage Sites, Building and Structures prepared by the New South Wales Heritage Office. Information shall be bound in an A4 report format. It shall include copies of black and white photographs, referenced to plans of the affected property. Two (2) copies (one (1) copy to include negatives of photographs) shall be submitted to Council's Heritage Planner, to be held in the local studies collection of Ku-ring-gai Library. A digital record shall also be submitted to Council.

Reason: To ensure accurate recording of places of heritage significance within the Local Government Area.

We would also suggest the following standard conditions during the works, which might overlap with NSW Heritage Council conditions:

3. Archaeology

In accordance with Section 146 of the NSW Heritage Act, during the demolition, excavation or construction works; if any deposits, objects or relics are uncovered; the works are to stop immediately and the NSW Heritage Council notified of the discovery. Depending on the nature of the discovery and advice from the NSW Heritage Council, an application for an excavation permit under Section 140 of the NSW Heritage Act may be required to be made.

Reason: To be consistent with the provisions of the NSW Heritage Act (1977).

4. Indigenous Heritage

This condition is applied in addition to Condition Archaeology (above) to ensure that any objects of potential indigenous significance are protected. Such objects are not specifically protected by the relics provision as outlined by the NSW Heritage Council. The National Parks & Wildlife Act (1974) provides statutory protection for all Aboriginal 'objects' (consisting of any material evidence of the Aboriginal occupation of NSW) under Section 90 of the Act, and for 'Aboriginal Places' (areas of cultural significance to the Aboriginal community) under Section 84. It is an offence to harm either an Aboriginal object or Aboriginal Place in NSW. The Act defines an Aboriginal 'object' as:

'any deposit, object or material evidence (not being a handicraft for sale) relating to indigenous and non-European habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons of non-Aboriginal European extraction, and includes Aboriginal remains'.

Works must be stopped in the instance where there is a suspected discovery of an 'object' in accordance with the above definition and a valid and applicable Aboriginal Heritage Impact Permit be obtained under Section 90 of the NPW Act.

Reason: To be consistent with the provisions of the National Parks & Wildlife Act (1974) and ensure the protection of all objects that are significant.

Landscape

Drawing Number	Comment
Dwg LA-2-0005	<p>Two plans seem to be in contradiction. The “Managed Bushland” shaded area overlaps with the “Active Recreation” shaded area. These use types cannot work be overlapped. An active zone is highly modified and cannot be described as bushland.</p>
Dwg LA-2-0006 and Dwg LA-2-0007	<p>These drawings have a note saying <i>“In accordance with the Arborist Report tree replenishment is required and close to removed tree locations”</i>. It is assumed this means new trees are to be planted in close proximity to areas where trees have been removed. There are no new trees indicated on the drawings, nor are there tree species nominated in the plant schedule for said replacement.</p>
Dwg LA-2-0017	<p>There is a note that says “creating planting pockets on the embankment sufficient to accommodate five new Eucalyptus trees”, yet there are no new trees indicated on the drawings nor are the Eucalyptus species indicated on the plant schedule.</p>
Dwg LA-2-0008	<p>The circulation paths for cars and buses seem to clash in the bus turning area. Is there sufficient space for safe bus manoeuvring and car movement through this space?</p> <p>Must the student drop off by vehicles be so large? The <i>Green Transport Plan</i> should aim at reducing the number of private vehicles dropping children off at school. Consider reducing the extent of hard road pavement so that the turning circle of the car turnaround is aligned with the school entry plaza so that the area of pavement can be rationalised/ reduced.</p>