

**URBIS**

# **SUPPLEMENTARY RESPONSE TO SUBMISSIONS**

Exhibited Phases 2 & 3 Lindfield  
Learning Village SSD 8114

Prepared for

**NSW DEPARTMENT OF EDUCATION**

26 August 2020



**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

Associate Director     Alaine Roff  
Senior Consultant     Erin Dethridge  
Project Code           P0009040  
Report Number         DRAFT

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

© Urbis Pty Ltd  
50 105 256 228

All Rights Reserved. No material may be reproduced without prior permission.

You must read the important disclaimer appearing within the body of this report.

**urbis.com.au**

URBIS  
SSD8114\_SUPPLEMENTARY RESPONSE TO SUBMISSION\_ PHASES 2 AND 3  
LL EDITS

# CONTENTS

<b>1.</b>	<b>Introduction .....</b>	<b>3</b>
1.1.	Overview .....	3
1.1.	Project Milestones.....	3
1.2.	Report Structure.....	4
<b>2.</b>	<b>Overview of Exhibited Project .....</b>	<b>5</b>
2.1.	Phases 2 and 3 .....	5
<b>3.</b>	<b>Consultation .....</b>	<b>7</b>
3.1.	Agency Consultation .....	7
3.2.	Community Consultation.....	7
3.2.1.	Ongoing Consultation .....	7
<b>4.</b>	<b>Response to Submissions .....</b>	<b>9</b>
4.1.	Agency Submissions.....	9
4.2.	Organisations and Public Submissions .....	9
	<b>Conclusion .....</b>	<b>1</b>
	<b>Disclaimer.....</b>	<b>2</b>

## FIGURES

Figure 1 – Revised vehicle access arrangements from Eton Road .....	6
---	---

# 1. INTRODUCTION

## 1.1. OVERVIEW

This Supplementary Response to Submissions Report (Supplementary RtS) has been prepared for School Infrastructure NSW (SINSW) acting on behalf of the Department of Education (the Applicant) and addresses the matters raised by agencies and the community during the re-exhibition of Phases 2(b) and 3 of the Lindfield Learning Village (SSD 8114).

The Phases 2(b) and 3 Response to Submissions Report dated June 2020 (June 2020 RtS) was on public exhibition between 14-28 July 2020. During this period, submissions were received from the following government agencies and local council:

- Department of Planning and Environment (DPIE)
- Ku-ring-gai Council (Council)
- Transport for NSW (TfNSW)
- NSW Rural Fire Service (RFS)
- NSW Environment Protection Authority (EPA)
- Heritage NSW

In addition, six submissions were received from members of the community.

The specialist consultant team has considered the key issues raised in the submissions and have undertaken further investigation, assessment and engagement with the relevant agencies to ensure the proposal will not have any unreasonable or significant noise, traffic and environmental impacts on adjoining and surrounding properties or the public domain. The content contained in this Supplementary RtS and the earlier RtS reports (September 2019 and June 2020) demonstrate that the proposal balances environmental impact with community benefit and should be approved.

## 1.1. PROJECT MILESTONES

To provide clarity given the history of the SSD and multiple responses to submissions prepared on behalf of the Applicant, **Table 1** includes a summary of the key project milestones to date.

Table 1 – Project Milestones

Document	Date
Environmental Impact Statement – Phases 1, 2 and 3	8 June 2017
Response to Submissions - Phases 1, 2 and 3	14 June 2018
Supplementary Response to Submissions – Phase 1	30 August 2018
Partial consent of SSD 8114 granted for Phase 1	24 October 2018
Response to Submissions – Phases 2 and 3	16 September 2019
Modification to SSD 8114 approved to allow temporary increase of 35 students in Phase 1	15 January 2020
Response to Submissions – Exhibited Phases 2(b) and 3	June 2020
Supplementary Response to Submissions – Re-Exhibited Phases 2(b) and 3	August 2020

## 1.2. REPORT STRUCTURE

This RtS has been structured as follows:

- **Section 1:** Introduction
- **Section 2:** Project Background
- **Section 3:** Overview of Submissions Received
- **Section 4:** Response to Submissions
- **Section 5:** Conclusion

This RtS should be read in conjunction with the documentation outlined in **Table 2**.

Table 2 – Supporting Documentation

<b>Deliverable</b>	<b>Consultant</b>	<b>Appendix</b>
Demolition plans for concrete wall adjacent to the spiral stair	Design Inc	Appendix A
Revised Landscape Plans	Design Inc	Appendix B
Typical Cross Sections and Elevated Road Structural Plan for Extended Driveway	Birzulus	Appendix C
Usable Play Drawing	Design Inc	Appendix D
Transport Response to Submissions	Arup	Appendix E
Built Heritage Response to Submissions	Urbis Pty	Appendix F
Revised Noise Impact Assessment	White Noise	Appendix G
Revised Bushfire Hazard Assessment & Fire Engineering Brief	Blackash	Appendix H

## 2. OVERVIEW OF PROJECT

### 2.1. EXHIBITED PHASES 2(B) AND 3

Phases 2(b) and 3 of the proposal was initially on public exhibition between 22 November and 18 December 2019. During this period, submissions were received from government agencies, Ku-ring-gai Council and the community.

The key issue raised in the submissions was the loop road proposed down Dunstan Grove. The loop road was to keep all bus and car queues contained within the site, operating in a simple one-way system during the school morning and afternoon peak. Concerns were raised regarding traffic volumes, road safety and noise impacts for Dunstan Grove residents.

The submissions received from DPIE, TfNSW, Council and the community called for the review of the proposed loop road and consideration of alternative access arrangements that do not require access from Dunstan Grove. The project team undertook a road safety audit of the loop road and considered alternatives for access, including consideration of the options put forward by the Dunstan Grove Owners Committee.

Phases 2(b) and 3 were subsequently amended to include an alternative access arrangement that will utilise an extended driveway within the eastern portion of the site from Eton Road (refer **Figure 1**). The main entry driveway from Eton Road will be realigned to have priority rather than Dunstan Grove. This recognises that the main flow of traffic is for the entry and exit to the school. To facilitate this, the existing car turnaround will be expanded for a bus turnaround (30m diameter) to enable buses to use the upper car park as a bus zone. Car traffic would continue through the turnaround area to the drop off and pick up (DOPU) area to the south of the school. This area has space for 10 cars to operate independently with two lanes of traffic provided for passing manoeuvres. The DOPU area will only be open for use during school drop-off and pick-up times.

Amended Phases 2(b) and 3 of the development as re-exhibited in July 2020 are summarised as follows:

#### Phase 2(b)

- Works to accommodate 1,050 students (including the approved 350 in Phase 1 and 35 in the modification to Phase 1).
- Repurposing of the Phase 1 area.
- Extended driveway within the eastern portion of the site from Eton Road for fire and emergency vehicles, buses and drop off and pick up vehicles. The revised access arrangements maintain perimeter access for fire and emergency vehicles by way of a fire trail linking the new extended driveway to Dunstan Grove.

#### Phase 3

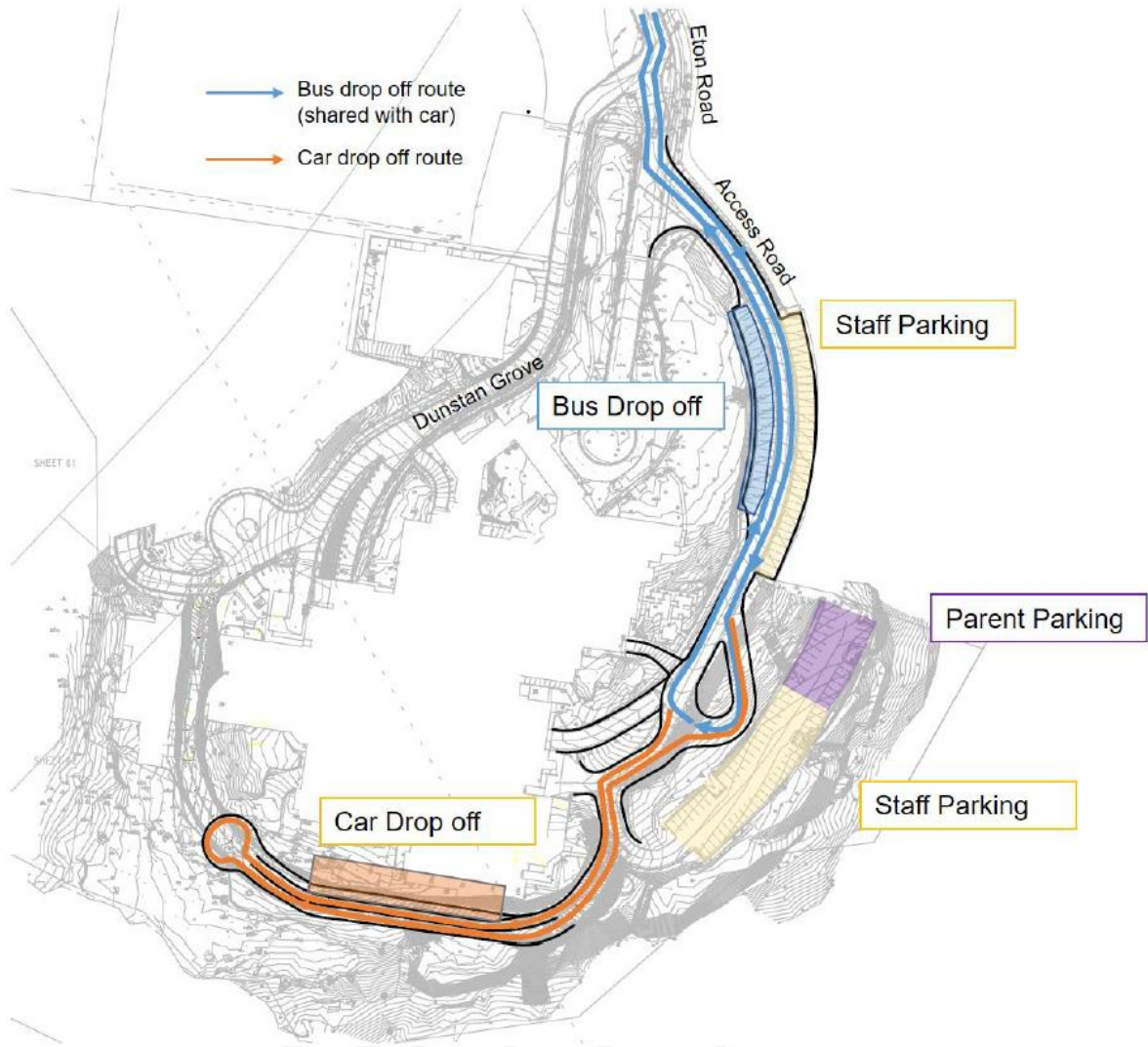
- Works to accommodate an additional 950 students in the western wing of the building.

Phase 2(b) and Phase 3 will likely be constructed at the same time under one contract. They are separated in this RtS to allow flexibility.

Vegetation management will be required to achieve the necessary APZ. The SSD does not seek approval for vegetation management outside the site boundary. A construction easement agreement has been finalised between SINSW and NSW National Parks and Wildlife Services (NPWS) to manage the proposed APZ to the south of the site.

This Supplementary RtS does not involve any further amendments to the development proposed as part of Phases 2(b) and 3.

Figure 1 – Revised vehicle access arrangements from Eton Road





## 3. FURTHER CONSULTATION

### 3.1. AGENCY CONSULTATION

A summary of the consultation undertaken with agencies following the lodgement of the June 2020 RtS for Phases 2 and 3 of the development is provided in **Table 3**.

Table 3 – Summary of Agency Consultation

Date	Attendees	Consultation Format	Issues Discussed
12 August 2020	DPIE and Project Team	Meeting	Overview of submissions received and approach to responses.
17 August 2020	EPA and White Noise	Meeting	Proposed approach to EPA submission and additional noise assessment required.
17 August 2020	Council and Project Team	Meeting	Exclusive use of Charles Bean Oval consistent with the existing arrangements.
18 August 2020	Council and Project Team	Meeting	Upgrades to Abingdon Road and Eton Road footpaths and safe crossings.
18 August 2020	DPIE, RFS and Project Team	Meeting	Proposed approach to address RFS submission. Confirmation that the proposal involves a performance-based approach to bushfire management strategy

### 3.2. COMMUNITY CONSULTATION

A summary of the consultation undertaken with the community since the preparation of the June 2020 RtS is provided in **Table 4**.

Table 4 – Summary of Community Consultation

Date	Type	Detail of Activity
9 June 2020	Letter	Letter sent to Dunstan Grove Executive Committee regarding maintenance of APZs.
1 July 2020	Site visit	A meeting was held on site with a representative from the Dunstan Grove Executive Committee and the Crimson Hill Executive Committee to discuss APZs.

#### 3.2.1. Ongoing Consultation

SINSW has a Community Engagement Plan for the Lindfield Learning Village project. The objectives of this plan are to:

- Promote the benefits of the project
- Build key schools community stakeholder relationships and maintain goodwill with impacted communities
- Manage community expectations and build trust by delivering on our commitments
- Provide timely information to impacted stakeholders, schools and broader communities
- Address and correct misinformation in the public domain

- Reduce the risk of project delays caused by negative third-party intervention
- Leave a positive legacy in each community

The Community Engagement Plan includes a Three-Month Lookahead (Communications Implementation Plan) which ensures key stakeholders are informed of construction activities and that any risks associated with construction are mitigated. It focuses on activities up to three months in advance and will be updated regularly.

In relation to community consultation during the construction phase, the Project Team adheres to mandatory notification periods and issues effective communications prior to noisy works. Past written notifications have been both emailed and letterbox dropped to adjacent neighbours. These notifications outline the need for the works and the timeframes.

The Community Engagement Plan will be updated once a building contractor has been appointed, to ensure it is aligned with the builder's construction management plan.

In conjunction with the lodgement of this Supplementary RtS for Phases 2(b) and 3, further community engagement will occur including:

- Community newsletters distributed via a letterbox drop to surrounding residents
- SINSW Project website - including FAQs
- Project email address and phone number

## 4. RESPONSE TO SUBMISSIONS

During the public exhibition of the June 2020 RtS, government agencies, Council, key infrastructure stakeholders and the community were invited to make written submissions on the Project to DPIE.

Five submissions were received from agencies and six submissions from members of the public.

### 4.1. AGENCY SUBMISSIONS

Agency submissions have been received from:

- DPIE
- Council
- EPA
- TfNSW
- RFS
- Heritage NSW.

A response to matters raised by the government agencies is provided in **Table 5**.

### 4.2. ORGANISATIONS AND PUBLIC SUBMISSIONS

An assessment of each community submission received during the exhibition period was undertaken, with each submission individually reviewed to understand the issues raised.

The community submissions were categorised according to key issues, being:

- Traffic congestion
- Inadequate and illegal car parking
- Noise associated with the extended driveway
- Bushfire risk

A response to matters raised by the government agencies is provided in **Table 6**.

Table 5 - Response to Agency Submissions

<b>Department of Planning and Environment</b>			
<b>A.</b>	<b>Noise Impacts</b>	<b>Response</b>	<b>Refer to</b>
A1	Procedures used to derive Project Noise Trigger Levels (PNTLs) used by the consultant	Refer to EPA comments	N/A
A2	The need for community consultation in the construction noise mitigation strategy.	Refer to EPA comments	N/A
A3	The need for an in-depth assessment as to the likely scope and severity of noise control measures required for mechanical plant.	Refer to EPA comments	N/A
A4	The supplementary RtS/amended proposal does not include an assessment of the changed impacts from the revised on-site traffic arrangements against the NPfl criteria.	Refer to EPA comments	N/A
A5	Assessment of off-site impacts from internal noise activity and cumulative noise levels.	Refer to EPA comments	N/A
A6	Confirmation that the increased outdoor play areas have been considered in the revised noise impact assessment.	Refer to EPA comments	N/A
<b>B.</b>	<b>Road and Safety</b>		
B1	<p>The RtS must provide an updated road safety audit report and construction management plan that includes consideration of the potential operational conflicts for the following areas (but not limited to):</p> <ul style="list-style-type: none"> <li>- the operation of the existing Phase 1 parking and pick-up and drop-off facilities during the construction of the loop road and other construction activities.</li> <li>- potential safety risks and hazards caused by the active play space linemarking on the area to be used for parent pick-up and drop-off at the end of the loop road (as detailed in landscape plan LA-2-0006).</li> </ul>	<p>A road safety audit was completed on the concept design. The issues raised in the audit were noted and mitigations incorporated into the ongoing detailed design process. Management mitigations for the active play space and drop off pick (DOPU) dual use have been developed to mitigate these hazards. This audit report is included in the revised Traffic Response.</p>	Refer <b>Appendix E</b> - Transport Response.

<b>Department of Planning and Environment</b>			
<b>C1</b>	<b>Further Detailed Plans and Information</b>		
C1	The RtS must provide detailed design plans of the demolition of the concrete wall adjacent to the spiral stair as also identified in Ku-ring-gai Council's (Council) submission.	Demolition drawings of the wall section adjacent to the spiral stair have been prepared by DesignInc and accompany this Supplementary RtS.	Refer <b>Appendix A</b> – Demolition Drawings
C2	Cross sections and elevations of the amended loop road design must be provided as part of the RtS.	The Civil Plans include a Typical Cross Sections (C.228) and Elevated Road Structural Plan (C.300), which accompany the Supplementary RtS. These drawings demonstrate the typical road sections profiles used at different intervals and how it impacts the site.	Refer <b>Appendix C</b> – Civil Drawings
C3	The RtS must also include confirmation for the use of Charles Bean oval; whether it is remaining as originally proposed or if an alternate option is to be utilised to facilitate access by additional students.	The school currently has use of Charles Bean oval from 9am - 4pm on school days. This access is critical to the school's ability to deliver the Sport and Physical Education curriculum. Phases 2 and 3 of the school intend to maintain this exclusive use of Charles Bean Oval given there is no alternate facility on site. SINSW and Council are currently in discussions regarding an extension of the lease to continue use of the oval.	N/A
C4	The RtS must also confirm the minimum provisions of open play space within the site per student during each phase (for each age group).	Drawing No. P19-006-LA-DA-Plan-Usable Play Drawing accompanies the Supplementary RtS and details the minimum provision of open space within the site per student during each phase. The EFSG rate of 10sqm per student applies to both primary and secondary students and therefore the rate has not been broken down by age group.  The northern playground area (Phase 1) will be used by the younger children in K – Year 1 as it provides a safe and better supervised play space. This area can accommodate a maximum 460 students, which would cover the K-Year 1 students.	Refer <b>Appendix D</b> – Usable Play Drawing

**Department of Planning and Environment**

		<p>The southern playground spaces would be used by the older primary and secondary students (with the option to use some of the terrace areas as well). The southern play spaces would be very difficult to zone by age group as this is a single open play space.</p> <p>Notwithstanding this, we confirm that 27,145sqm is provided for the 2000 students proposed (including use of Charles Ban Oval).</p> <p>This satisfies the Educational Facilities Standards and Guidelines which DoE use to guide the design of schools.</p>	
C5	<p>The RTS must identify where children will be required and permitted to congregate within the school grounds after arrival and before school commences, noting the limitations of being able to accommodate all students within the front grassed area.</p>	<p>There are three main entries to the school on Level 5, Level 4 and Level 2. The Level 4 and 5 entries will be used by staff and students arriving by bus, the Level 2 entry will be used by students arriving by car. This separation will reduce the requirement for a large area for all students to congregate in the morning.</p> <p>In terms of where students will congregate in the morning before school commences, the Phase 1 play space to the north would be used by the primary school students, with the southern COLA and terraces used by the secondary school students. There will also be large areas of the internal school spaces available. Currently the foyer area, cafe and Phase 1 play space are used by students, with supervision commencing at 8.20am. Supervision of the relevant areas will continue for Phases 2 and 3.</p>	N/A

<b>EPA</b>			
<b>A.</b>	<b>Derived Project Noise Trigger Levels (PNTLs)</b>	<b>Response</b>	<b>Refer to</b>
A1	<p>The PANLs contained with Table 4 of the revised NIA have not been correctly determined as per the procedure in Section 2.4 of the Noise Policy for Industry (EPA, 2017) (NPfI). The Table 4 figures are the ‘Recommended Amenity Noise Levels’ from Table 2.2 of the NPfI, however the procedure for determining the PANL requires several more steps. The PANLs presented within Table 4 – which in turn determine the PNTLs for the project – are considered too high.</p> <p>The calculations used to determine PANLs should be corrected. If not, then sufficient justification should be provided as to why the ‘Recommended Amenity Noise Levels’ have been used in lieu of complete application of the NPfI procedure. As this will likely modify the PNTLs, the EPA would expect that all other calculations relating to acceptable noise levels at the receiver locations will also require modification, including those from the use of the extended driveway and the use of the internal spaces within the development.</p>	<p>The previously conducted site wide Lindfield Learning Village, Noise Impact Assessment conducted by Acoustic Logic Consultancy (ref: 20160433.2/0303A/R6/HP) and dated 13/6/2018 was undertaken in accordance with the EPA’s Industrial Noise Policy. Since the initial drafting of the Noise Impact Assessment in June 2017, the EPA has adopted a new Noise Policy for Industry (October 2017).</p> <p>The revised report includes an assessment with the current requirements of the EPA’s Noise Policy for Industry which results in slightly lower project trigger noise levels.</p>	Refer to Section 5.2 of Revised Noise Impact Assessment – <b>Appendix G</b>
<b>B.</b>	<b>Community Consultation</b>		
B1	<p>The EPA notes that a quantitative assessment of noise levels from construction has now been included in the revised NIA (Table 16). However, the mitigation strategy shown within Section 7.4 of the assessment does not contain adequate planning for community consultation and communication. This is important for this development due to the proximity of the receivers and the likelihood of those receivers being “noise affected” and/or “highly noise affected”.</p>	<p>Further information regarding the community consultation and communication during the construction phase of the project has been included in the revised Noise Impact Assessment.</p> <p>It is anticipated that, should consent be granted, the Construction Noise and Vibration Management Plan be developed in consultation with the community. This requirement should form part of a condition of consent, a requirement supported by DoE.</p>	Refer to Section 7.6 of Revised Noise Impact Assessment – <b>Appendix G</b>
<b>C.</b>	<b>Mechanical Plant</b>		
C1	<p>The EPA acknowledges that the design of the mechanical plant may not yet be advanced enough to predict noise levels. However, an in-depth</p>	<p>Whilst the specific mechanical plant has not yet been selected for the project, a further assessment of the</p>	Refer to Section 6.1 of Revised

<b>EPA</b>	assessment should be made as to the likely scope and severity of the noise control measures required, given that the noise from the development is already likely to be at or just below the PNTLs without the inclusion of mechanical plant noise. It is considered that the design of the mechanical plant mitigation will be important and should be based upon any revision to the PNTLs derived from a correct application of the NPfl.	potential noise associated with the likely mechanical plant has been provided in the revised Noise Impact Assessment.	Noise Impact Assessment – <b>Appendix G</b>
<b>D.</b>	<b>On-site Traffic Noise Impacts</b>		
D1	The EPA acknowledges that the loop road entering off Dunstan Avenue is no longer proposed and is to be replaced with an “extended driveway with bus turnaround and new car pick up road” on the eastern side of the site (supplementary RtS, Table 5). The supplementary RtS report does not include an assessment of the revised on-site traffic arrangements against the NPfl criteria, which was included in the White Noise Acoustic report dated 20 November 2019 (submitted as Appendix I to the original RtS). On-site traffic movements remain relevant for assessment against the requirements contained in the NPfl. The noise levels contained within Table 7 of the RtS acoustic report (White Noise, 20.11.19) indicate that the use of the loop road would be noncompliant with the PNTLs derived from the NPfl. As such, an assessment of reasonable and feasible mitigation measures is required.	The Noise Assessment of the extended driveway has been amended to ensure consistency with the earlier Noise Impact Assessment from November 2019 and includes an assessment of the on-site traffic arrangements against the EPA criteria.	Refer to Section 6.7 of Revised Noise Impact Assessment – <b>Appendix G</b>
<b>E.</b>	<b>Internal Noise Assessment &amp; Phase 1 Cumulative Noise Levels</b>		
E1	There is no quantitative assessment of noise from the internal spaces of the school presented within the report. There are details within Section 6.5 of the revised NIA outlining the nominal performance requirements of the façades, however there is no assessment of whether existing façades are meeting the nominated requirements. The noise reduction performance of the existing façades should be determined through detailed inspection and /or field acoustic testing. The areas listed within the report, including the auditorium, squash courts, woodworking and performing arts room will all have significant potential to	The Noise Impact Assessment has been revised to include a cumulative assessment of noise from the site and includes the cumulative impact of Phases 1, 2 and 3.	Refer to Section 6.6 of Revised Noise Impact Assessment – <b>Appendix G</b>



EPA	<p>contribute to the overall noise level from the development. A quantitative assessment of these spaces is required to be undertaken, including predicted internal source noise levels within relevant internal spaces at the school, and predicted noise levels at the receivers. This assessment is required to determine whether existing building facades will require upgrades to meet acceptable off-site noise levels.</p> <p>In addition to the above, all noise predictions made within the revised NIA for Phase 2 and 3 are to include the cumulative impact of Phase 1, 2 and 3.</p>		
<b>F.</b>	<b>Outdoor Play</b>		
E1	<p>There is no quantitative assessment of noise from the internal spaces of the school presented within the report. There are details within Section 6.5 of the revised NIA outlining the nominal performance requirements of the façades, however there is no assessment of whether existing façades are meeting the nominated requirements. The noise reduction performance of the existing façades should be determined through detailed inspection and /or field acoustic testing.</p> <p>The areas listed within the report, including the auditorium, squash courts, woodworking and performing arts room will all have significant potential to contribute to the overall noise level from the development. A quantitative assessment of these spaces is required to be undertaken, including predicted internal source noise levels within relevant internal spaces at the school, and predicted noise levels at the receivers. This assessment is required to determine whether existing building facades will require upgrades to meet acceptable off-site noise levels.</p> <p>In addition to the above, all noise predictions made within the revised NIA for Phase 2 and 3 are to include the cumulative impact of Phase 1, 2 and 3.</p>	<p>The Noise Impact Assessment has been revised to include a cumulative assessment of noise from the site and includes the cumulative impact of Phases 1, 2 and 3.</p> <p>All internal areas of the Lindfield Learning Village will be located within the building envelope including a closable external façade with a minimum acoustic performance of Rw 30 which includes 6.38mm laminated glazing (or greater) and solid leigh weight or concrete building elements. The existing building fabric includes a construction equivalent to the performance detailed above.</p> <p>The existing building facades do not need to be upgraded to meet acceptable off-site noise levels based on the existing glassing including minimum 6.38mm laminated glass.</p> <p>The potentially high noise generating sources within the building including the music and drama theatres are located without external opening to the external environment.</p>	<p>Refer to Section 6.6 of Revised Noise Impact Assessment – <b>Appendix G</b></p>

RFS			
A.	Review of Detailed Radiant Heat Modelling	Response	Refer to
A1	<p>The NSW RFS undertook an assessment of the proposed design to determine consistency with PBP.</p> <p>It was found that the design complied with PBP for Special Fire Protection Purpose Developments with the exception of providing the APZs as described above.</p> <p>Although PBP is used as the set of requirements for bush fire protection in the vast majority of situations, section 100B of the Rural Fires Act does not require compliance with PBP. The criteria in section 100B consists of providing standards of bush fire protection which the Commissioner of the RFS considers to be necessary for the protection of persons and property from bush fires.</p> <p>Accordingly, reliance on fire engineering to assess and demonstrate adequacy and appropriateness of life safety and building protection provisioning for this project is considered to be needed.</p> <p>If the methodologies, acceptance criteria and outcomes are acceptable then the NSW RFS would have no objections to the project proceeding on that basis.</p>	<p>A Fire Engineering process was followed because the deemed to satisfy requirement of 10kW of radiant heat could not initially be provided at the building façade.</p> <p>Section 8.1 of the <i>Bushfire Hazard Assessment and a Bushfire Design Brief</i> states that the report is a performance based report:</p> <p>This document incorporates the requirements for a Bushfire Hazard Assessment and a Bushfire Design Brief (BDB) – to demonstrate the performance-based solution for LLV.</p> <p>The conclusion of the Bushfire Report notes that "The design team has worked with a range of stakeholder's to provide a best practice performance based solution for Phase 2 and 3." It is clear that the application is performance based.</p> <p>The opportunity to undertake a performance-based report is available due to the application being accepted as infill development. Importantly, Section 9.3 of the Bushfire Report states the agreement reached with the RFS that the site is infill development:</p> <p>At a meeting on Friday 31 May 2018 the RFS agreed to the LLV being treated as SFPP Infill development.</p> <p>This laid the foundation for a performance based solution being utilised for the calculation of the radiant heat levels on the building facades. The infill development provisions within Planning for Bushfire Protection 2006 and 2019 recognise the constraints associated with existing development and provide a framework for performance-based assessments.</p>	<p>Refer to previously submitted Bushfire Hazard Assessment and a Bushfire Design Brief</p>

RFS			
B. Review of Detailed Radiant Heat Modelling			
B1	The basis for using reduced fire temperatures for radiant heat flux modelling needs to be established, demonstrated and documented to be appropriate.	The flame temperature at different heights is calculated using the correlation derived by B. Mike in 2010 for dry eucalypt fires, in order to develop a more precise flame temperature than an average temperature across an entire flame height. The basis and its justification is described in Section 7.4 of the SGA Report 2018/321 R5.0. This basis is considered appropriate as it was developed for free-burning turbulent flames involving comparable fuel loads (NSW bush), and the data showed no strong deviation bias and was hence considered a good representation of realistic temperatures.	Refer to Fire Bushfire Design Engineering Report – <b>Appendix G</b>
B2	Flame length should be addressed as to whether flames would be expected to impinge on building elements.	The flame height was 43 m from base to tip. The closest APZ distance was 42.7 m, where the flaming region however, would start at the base on an ~11 m escarpment, leaving the school exposed to less than 32 m of flame height at that point. Therefore, flame impingement was considered unlikely.	Refer to Fire Bushfire Design Engineering Report – <b>Appendix G</b>
B3	Should flame lengths indicate impingement on building elements then the design needs to accommodate this issue.	Flame impingement is considered unlikely, nevertheless, all elevations are constructed to BAL-FZ, which is intended to withstand direct flame impingement.	Refer to Fire Bushfire Design Engineering Report – <b>Appendix G</b>
B4	The radiant heat loads on buildings need to represent all exposures and should include Long Sections 1 to 11.	All elevations are BAL-FZ so onerous heat fluxes greater than 40 kW/m <sup>2</sup> have been designed for. The flame width used to model radiative heat flux to the school in SGA Report 2018/321 R5.0 from any point is 100 m wide (which is often wider than the width of bush that that particular	Refer to Fire Bushfire Design Engineering Report – <b>Appendix G</b>

**RFS**

point is exposed to, or, within a 100 m snapshot, part of the exposure involves bush that is farther away than actually modelled). Beyond 100 m width, it is considered that little additional contribution to heat fluxes is made at the receiving point (the school building).

**Heritage NSW****A. Link Road**

A1 Further investigation must be undertaken by the Applicant for replacement tree planting within the context of the landscape works at the site to mitigate the removal of the 26 trees associated with the Link Road, an additional 16 trees from the original proposal.

**Response**

Noted. Urbis' previous recommendation to include the below Condition of Consent remains relevant:  
*Within six weeks of occupation of Stages 2(b) and 3, evidence must be provided to DPIE of further investigation undertaken by the Applicant for replacement tree planting within the site (in addition to the three trees proposed under this application). Where investigations conclude that additional tree planting can be accommodated subject to RFS requirements this is to be undertaken as part of the project.*

**Refer to**

Refer **Appendix F**  
- Built Heritage Response.

**B. Landscape Works**

B1 Advice should be sought by a suitable qualified landscape architect to provide input into the landscape works to the southern section of the site to mitigate the intrusion of the link road while introducing a variety of landscape treatments for useable play spaces sympathetic to the original landscape philosophy of Bruce Mackenzie. This should form a condition of consent.

It is confirmed that the landscape design has been developed in conjunction with Urbis as the heritage consultants. Further, DesignInc has been engaged as qualified landscape architects. A treatment of meandering rough finished sandstone wall terraces has been proposed, with native planting in between. The sandstone will weather over time and is

Refer **Appendix F**  
- Built Heritage Response.

Heritage NSW			
		intended to loosely represent a sandstone escarpment.	
<b>C.</b>	<b>Demolition South Façade Level 1</b>		
C1	The removal of brickwork graded high significance should be avoided and the Heritage Council recommendation for condition of consent from the correspondence dated 13 December 2019 (also above) should be included in any condition of consent.	<p>There is a new toilet block proposed in this location. The façade is being altered only to ensure a reasonable level of amenity and functionality in this space. The removal of the brick facade to Level 1 involves only removing every other brick to allow light to enter the new toilet block in this location. The removal of only every other brick would ensure the predominant character is retained and the visual strength of the masonry wall is retained when views from the south.</p> <p>The following Condition of Consent is recommended in the Built Heritage Response:</p> <p><i>Prior to the commencement of demolition of significant heritage fabric on the site the Applicant is to submit construction details (drawings at Scale or 1:10 or 1:20 where appropriate) and demolition methodologies for the below items of works to NSW Heritage Council and Ku-Ring-Gai Council for review and comment:</i></p> <ul style="list-style-type: none"> <li>- <i>Intervention for secondary reception (Level 4)</i></li> <li>- <i>Intervention for removal of concrete wall adjacent to spiral stair (Level 4)</i></li> <li>- <i>Partial demolition of link between Stages 1 and 5 for emergency vehicle access.</i></li> <li>- <i>Partial demolition of south façade (Level 1)</i></li> </ul>	Refer <b>Appendix F</b> - to Built Heritage Response.
<b>D.</b>	<b>Removal of concrete wall adjacent spiral staircase</b>		

**Heritage NSW**

D1	<p>The removal of two portions of concrete wall for increased light penetration will require the removal of a substantial amount of original fabric, identified in the CMP as of high significance. This should be avoided and the Heritage Council recommended condition of consent from the correspondence dated 13 December 2019 (above) be included requiring that an alternative light source is designed</p>	<p>The area in question is an extremely dark spot given in is distanced from any natural light. By removing a portion of the very large concrete wall will allow light to reach into the dark interior and also provide more circulation routes for the large population of children who will congregate in this space.</p> <p>As detailed in the Built Heritage Response, only a single opening is proposed to be removed.</p> <p>The following Condition of Consent is recommended in the Built Heritage Response:</p> <p><i>Prior to the commencement of demolition of significant heritage fabric on the site the Applicant is to submit construction details (drawings at Scale or 1:10 or 1:20 where appropriate) and demolition methodologies for the below items of works to NSW Heritage Council and Ku-Ring-Gai Council for review and comment:</i></p> <ul style="list-style-type: none"> <li>- <i>Intervention for secondary reception (Level 4)</i></li> <li>- <i>Intervention for removal of concrete wall adjacent to spiral stair (Level 4)</i></li> <li>- <i>Partial demolition of link between Stages 1 and 5 for emergency vehicle access.</i></li> <li>- <i>Partial demolition of south façade (Level 1)</i></li> </ul>	<p>Refer <b>Appendix F</b> - Built Heritage Response.</p>
<p><b>Proposed Conditions</b></p>			
E1	<p>All proposed works which have the potential to reduce the internal and external significant fabric of the item must be designed to be reversible.</p>	<p>It is requested that the condition is altered to align with the below:</p> <p><i>B46) Changes which have the potential to reduce the cultural significance of the place should be designed to be reversible.</i></p> <p>The revision will ensure the new development is able to</p>	<p>Refer <b>Appendix F</b> - Built Heritage Response.</p>

Heritage NSW			
		adequately respond to the condition should the works addressed in this Response be approved.	
E2	The condition regarding the schedule of conservation works can be removed but the document must be included in the consent approval information.	Noted	N/A

Ku-ring-gai Council			
A.	Biodiversity	Response	Refer to
A1	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.	<p>The biodiversity impacts of Stage 2 and 3 of the Lindfield Learning Centre have been assessed in accordance with the Framework for Biodiversity Assessment (FBA) as required by the Secretary's Environmental Assessment Requirements (SEARs) issued for the project.</p> <p>Aspects of the project which occur within Lane Cove National Park, limited to establishment of Asset Protection Zones (APZs), are licenced under Section 151 of the <i>National Parks and Wildlife Act 1974</i> (NPW Act). Section 151 of NPW Act allows the Minister to grant a lease or licence of land within a reserve. A licence may only be granted for a purpose specified under s151A of the Act. The purpose of the licence for the project is to enable activities for fire management and is therefore authorised by s151A(a)(v). The licence will facilitate activities which</p>	N/A

**Ku-ring-gai Council**

		<p>manage and abate bushfire risk which assist in the preservation of the natural environment and the cultural and heritage values of Lane Cove National Park. The licence is therefore consistent with the objects of the Act and the management principles set out in the Act. The activity is expressly contemplated by the Lane Cove Plan of Management which provides for fire management activities to be undertaken in the park in collaboration with neighbouring properties. The licence is also compatible with the management values established under the Lane Cove Management Plan. The biodiversity impacts of the proposed activity within Lane Cove National Park have been assessed in accordance with Part 5 of the EP&amp;A Act, as the NSW National Parks and Wildlife Service is both a public authority proponent and the determining authority for the activity.</p> <p>Accordingly, a Flora and Fauna Assessment (Ecoplanning 2019a) and a Review of Environmental Factors (Ecoplanning 2019b) have been prepared which concluded that the proposed works would not have a significant impact on relevant threatened species, populations and ecological communities. It is for the above reasoning that the BDAR is positioned so it only includes impacts on the site and not on the National Park.</p>	
<b>B.</b>	<b>Flooding and Stormwater</b>		
B1	<p>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.</p> <p>At a minimum, the school must be provided with an approved operation</p>	<p>Noted. This comment can be addressed by a Condition of Consent requiring the stormwater management system to be designed by a qualified hydraulic engineer.</p>	N/A



<b>Ku-ring-gai Council</b>			
	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.		
<b>C.</b>	<b>Bushfire</b>		
C1	<p>A preliminary perusal by Council's Bushfire Technical Officer of the modelling software (Firewind) used by Stephen Grubits &amp; 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.</p> <p>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.</p>	<p>The modelling approach was worked through and agreed with RFS. The modelling has been documented and completed as a performance-based approach in line with RFS agreement. The model is not simplistic. The paper noted by Council's Bushfire Officer (Penney and Richardson 2019) relates to fires within the urban context in fragmented environments - otherwise known as short fire run modelling.</p> <p>In discussions with the RFS, Grubits and Blackash, the RFS Short Fire Run methodology was not used as the site did not meet the criteria for use. The modelling that has been undertaken is of a higher order than that proposed by Council. The paper is therefore not relevant.</p>	N/A
<b>D.</b>	<b>Transport and Traffic</b>		
D1	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	The School Travel Plan has been developed in consultation with SINSW and the School Executive. It has been developed to ensure targets are realistic and capture the likely impact of proposed measures. It will undergo a review by consenting authorities to confirm assumptions and measures are suitable. We note that the School Travel Plan	Refer <b>Appendix E</b> - Transport Response.

<b>Ku-ring-gai Council</b>			
	realistically achieve the planned 42% mode share by car (for staff) anticipated in Phase 3.	includes a monitoring strategy allowing the plan, which is a 'living document', to be amended if mode shares targets are not met when the plan is reviewed on a yearly basis.	
D2	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.	<p>Following discussions with George Bounassif, Director Operations at Ku-ring-gai Council, the following response has been received:</p> <p><i>Council has carefully considered the utilisation of its assets in and around Charles Bean Reserve and at this stage does not require the afterhours use of the available parking within the Lindfield Learning Village. Based on this assessment, we wish to retract our feedback relating to section 6.1 – After Hours Parking.</i></p>	N/A
D3	Investigations should be undertaken to assess Symons 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.	Noted, this path has been included in the School Travel Plan.	Refer <b>Appendix E</b> - Transport Response.
D4	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 the previous issues raised relating to traffic volumes and queues on Dunstan Grove, and impacts to adjoining residents in the Crimson Hill development.	Noted	N/A
D5	<p>In Council's feedback to the Response to Submissions, it was identified that at the main school gate, the path is &gt;2m side, but the gate opening in the perimeter fence is only half that, which would obstruct pedestrian and bicycle flow particularly in Phases 2 and 3.</p> <p>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.</p>	The gate at the main school entry will be widened on the drawings to allow for a reduction in the obstruction of pedestrian and bicycle flows.	N/A

<b>Ku-ring-gai Council</b>			
D6	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.	Noted. This is a key part of the School Travel Plan and consultation with Transdev and TfNSW is ongoing. This can be required through a condition of consent.	N/A
D7	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.	The project team has been in consultation with TfNSW on the extension of the right turn bay. The concept design did include consideration of the Strickland Avenue intersection upgrade and this has been documented for Council in the Transport Response.	Refer <b>Appendix E</b> - Transport Response.
<b>E.</b>	<b>Heritage</b>		
E1	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.	Noted. Since the previous Response to Submissions it has been found that 4 additional trees are able to be planted on the site. Updated landscape plans accompany this Supplementary RtS. Notwithstanding this, Urbis' previous recommendation to include the below Condition of Consent remains relevant: <i>Within six weeks of occupation of Stages 2(b) and 3, evidence must be provided to DPIE of further investigation undertaken by the Applicant for replacement tree planting within the site (in addition to the three trees proposed under this application). Where investigations conclude that additional tree planting can be accommodated subject to RFS requirements this is to be undertaken as part of the project.</i>	Refer <b>Appendix B</b> – Revised Landscape Plans and <b>Appendix F</b> - Built Heritage Response.

<b>Ku-ring-gai Council</b>			
E2	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.	Noted	N/A
E3	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.	Noted	N/A
E4	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.	Demolition drawings of the wall section adjacent to the spiral stair have been prepared by DesignInc and accompany the Supplementary RtS. Detailed demolition methodologies can be submitted to the Heritage Council and Ku- Ring-Gai Council prior to this work commencing on site.	Refer <b>Appendix A</b> – Demolition Drawings
E5	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.	Confirmed, Option 3 is the proposed design for the reception window.	N/A
<b>F.</b>	<b>Proposed Heritage Conditions</b>		
F1	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.	Noted. A Condition of Consent is recommended as per the previous comments on this issue.	Refer <b>Appendix F</b> - Built Heritage Response.

## Ku-ring-gai Council

F2	<p>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.</p>	<p>Substantial Archival Recording was undertaken for the entire site in September 2018 prior to the commencement of any works at the site (including the Partial School or tree removal). This report was compiled by professional photographer Alexander Mayes and submitted to DPIE prior to construction of the Partial School.</p> <p>The report was completed to the highest standard and included external images, internal images, black and white images (where detail was best shown in this format) and drone imagery showing the overall form and situation of the building.</p> <p>The archival recording contains well over 1500 photos and was submitted to DPIE as a digital version for practicality. A link to the recording has been issued with this Response to Submissions for the information of Ku-Ring-Gai Council and Heritage Council.</p>	Refer <b>Appendix F</b> - Built Heritage Response.
F3	<p>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.</p>	Noted	N/A
F4	<p>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 &amp; 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</p>	Noted	N/A

**Ku-ring-gai Council**

	<p>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’.</p> <p>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.</p>		
<b>G.</b>	<b>Landscape</b>		
G1	<p>Dwg LA-2-0005: 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>	<p>The label should state - managed land to inner protection zone standards. The combined playground and managed land is an identical situation to stage 1 and allowed according to Blackash. The label has been amended accordingly.</p>	<p>Refer <b>Appendix B</b> – Revised Landscape Plans.</p>
G2	<p>Dwg LA-2-0006 and Dwg LA-2-0007: These drawings have a note saying “In accordance with the Arborist Report tree replenishment is required and close to removed tree locations”. 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>	<p>Due to the condition of the site, nature of the site and the stringent APZ requirements for both inner and outer protection zones, the replenishment of trees on site is a complex issue with many varying factors. These include estimated mature canopy width of existing trees post clearance, ground conditions with rock close to the surface and the fact that the majority of trees have been removed in response to critical infrastructure (extended driveway).</p> <p>There is a recommended condition of consent to review tree replenishment within 6 weeks of occupation of Phases 2b and 3. This is partly in response to the complex nature of the site but also to assess the rate of growth of existing trees post clearance and now in a very different state. The</p>	<p>Refer <b>Appendix B</b> – Revised Landscape Plans.</p>

**Ku-ring-gai Council**

		<p>Project Team has undertaken a preliminary review of possible positions of replacement trees with the bushfire consultant (Blackash) and while it is not possible under the APZ requirements to achieve the replacement numbers suggested by the Project Arborist, it is possible to accommodate 4 additional trees to the south with 3-5m gap between mature canopy widths. In addition, there is an opportunity to accommodate three trees to the east, with a review of the exact location prior to planting around the occupation stage. The three trees are shown on drawing LA-2-0007 but were not labelled 'proposed trees'. This has been updated in the legend of the revised plan.</p>	
G3	<p>Dwg LA-2-0017: 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>	<p>This was an error as only three new trees are proposed to the centre of the loop. The notes on the plans have been amended accordingly.</p>	<p>Refer <b>Appendix B</b> – Revised Landscape Plans.</p>
G4	<p>Dwg LA-2-0008: 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? Must the student drop off by vehicles be so large? The Green Transport Plan 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>	<p>Refer to Transport Response for circulation and swept paths. The student drop-off is the correct size. The circulation paths do not overlap as shown in Appendix A. There is space for safe manoeuvres. The School Travel Plan aims to reduce car mode share to achieve a target of about 25% arrival by car. This still represents a significant amount of cars for this school which has influenced the size of the facility which has been designed to queue without impacting bus turnaround movements.</p>	<p>Refer <b>Appendix B</b> – Revised Landscape Plans and <b>Appendix E</b> - Transport Response.</p>

Table 6 - Response to Public Submissions

<b>Public Submissions</b>			
<b>A.</b>	<b>Traffic and Parking</b>	<b>Response</b>	<b>Refer to</b>
A1	There will be a direct impact to traffic, in particular at the intersections of Lady Game Drive/Fullers Road, Lady Game Drive, Ryde Road Pacific Highway and Grosvenor Road	The traffic impact of the development was assessed in the traffic and transport assessment that considered the mode share of arriving students and teachers and applied these to the road network. Modelling was completed at the intersection of Grosvenor and Pacific Highway and at the intersection of Grosvenor Road and Lady Game Drive. This impact has been assessed in that previous report, with subsequent plans developed to increase the likelihood of the mode share targets set in the traffic and transport assessment.	Refer <b>Appendix E</b> - Transport Response.
A2	Car parking - Insufficient car parking in the area, mostly due to high use of the soccer field. There is an existing illegal parking issue with parents and students parking at the nearby residential visitor parking at Tubbs View and also communal parking near the playing field.	Car mode share is targeted for a percentage reduction in the future phases of the school, with a travel access guide developed to explain the best way to get to school for parents and staff. This aims to mitigate the impact of parking outside of the school grounds. More details are provided in the School Travel Plan.	Refer <b>Appendix E</b> - Transport Response.
A3	There is no plan to address the increased traffic. I.e. measures to upgrade the major intersections, provide additional parking, construct a second entrance/exit to the south of the school (alleviate stress off of Eton Road)	The right turn bay into Grosvenor Road from the Pacific Hwy is planned to be upgraded. New footpaths and crossings are proposed to be provided along Abingdon Road and Eton Road.  Car mode share is targeted for a percentage reduction in the future phases of the school, with a travel access guide developed to explain the best way to get to school for parents and staff. This aims to reduce the demand for car-based trips to the school, reducing the need for additional infrastructure. Appropriate and relevant education programs around this will help promote the uptake of other	Refer <b>Appendix E</b> - Transport Response.



<b>Public Submissions</b>			
		transport modes. Noting that this will be a monitored plan to ensure that the mitigation measures are effective. More details are provided in the School Travel Plan. An introduction to this plan is presented in Section 5 of Appendix E.	
A4	Poor traffic and pedestrian management - Speed traps, marked and raised crossings are needed	The pedestrian paths and crossings for the school have been in discussion with SINSW and Council as part of the development of the School Travel Plan. These aim to improve the safe pedestrian routes to the school. More details are provided in the School Travel Plan.	Refer <b>Appendix E</b> - Transport Response.
A5	Fire safety - this is a high risk fire zone. One way out, Eton Road, is not sufficient traffic management. This poses as a risk to people's lives in the event of a bushfire evacuation.	A Bushfire Emergency and Evacuation Plan has been prepared for the future phases of the school taking into consideration the access from Eton Road.	Refer Bushfire Emergency and Evacuation Plan submitted with June 2020 RtS.
A6	Eton Road. One way out. Results in a high volume of traffic and is greatly impacted by the Grosvenor Road/Pacific Highway bottleneck. Better traffic management needed. What are the alternative routes to avoid this traffic?	Car mode share is targeted for a percentage reduction in the future phases of the school, with a travel access guide developed to explain the best way to get to school for parents and staff. This aims to reduce the demand for car-based trips to the school. More details are provided in the School Travel Plan. The intersection of Grosvenor and Pacific Highway is proposed to be upgraded as part of the schoolworks.	
A7	It was noted that some parents will be travelling with the children in the shuttle bus, does that mean more buses will be required? This is another example of shifting the issues around, the bus calculation was based on students use only then other response has noted parent will be travelling with students?	School buses will not allow parents to ride with students and therefore these calculations do not consider them on the bus. The shuttle bus mentioned would be a public bus service which was suggested through consultation with TfNSW.	Refer <b>Appendix E</b> - Transport Response.
A8	Suggested solutions to consider: - Construct second entrance/exit on the southern end of the school - (ie. linking to Millwood Ave) to alleviate the traffic on Eton Road. This will give	The construction of access through the National Park is outside the scope of this SSD application.	N/A

## Public Submissions

	<p>great benefit to people who live on the southern end of the school (eg. Chatswood West, North Ryde). As the result, less buses/cars are required to use Grosvenor Road/Eton Road to enter/exit from the school. The second entrance will provide big benefits as more students will be able to walk to school from Chatswood/Chatswood West.</p> <ul style="list-style-type: none"> <li>- Upgrade intersection Lady Game Drive/Fullers Road, Lady Game Drive, Ryde Road Pacific Highway/Grosvenor Road immediately to relieve the traffic around the area (this is already an existing issue, and will become worse when the school increases the enrolments and residential development around the school is completed)</li> <li>- Provide additional car spaces on the Southern end of the school ( to alleviate the parking issue around Charles Bean Oval</li> <li>- School should only accept enrolment for students live around Lindfield (bounded by South/West of Pacific Highway, East of Ryde Road/Lady Game Drive, North of Millwood Ave) to limit the needs of cars/buses entering the school. (until the traffic issue is addressed)</li> </ul>	<p>The intersection of Lady Game/Fullers Road is outside the scope of this SSD application.</p> <p>Car mode share is targeted for a percentage reduction in the future phases of the school, with a travel access guide developed to explain the best way to get to school for parents and staff. This aims to reduce the demand for car-based trips to the school. More details are provided in the School Travel Plan.</p> <p>The final catchment area is still being determined, however students within the catchment will be given priority to take substantial pressure off existing public schools within the surrounding locality.</p>	
A9	<p>With the increased amount of traffic travelling to school on Eton road, residents trying to get out of their streets to Eton road would be really hard at the peak hours, surprised that the traffic report says that there will be no issue for residents getting in and out from Shout Ridge, Hamilton Corner and Dunstan Grove. How is that possible when you have 300+ cars and 14 buses at peak hours and the only road to get to LLV is through Eton Road? And residents from Shout Ridge, Hamilton Corner and Dunstan Grove all getting in and out on the same and only road ie. Eton Road.</p>	<p>As stated in the traffic and transport assessment, the traffic impact of school traffic is not likely to create issues for nearby residents as the numbers are still low in context to the roadway capacity. additionally, car mode share is targeted for a percentage reduction in the future phases of the school, with a travel access guide developed to explain the best way to get to school for parents and staff. This aims to reduce the demand for car-based trips to the school. More details are provided in the School Travel Plan.</p>	<p>Refer <b>Appendix E</b> - Transport Response.</p>
A10	<p>Illegal parking issue has already been happening with parents and students parking at the nearby residential visitor parking at Tubbs View and also communal parking near the playing field. In some cases, their cars parked there all day. The response mentioned LLV will not provide parking for student so the problem with students parking in the nearby residential visitor parking will surely be happening.</p>	<p>Car mode share is targeted for a percentage reduction in the future phases of the school, with a travel access guide developed to explain the best way to get to school for parents and staff. This aims to mitigate the impact of parking outside of the school grounds. More details are provided in the School Travel Plan.</p>	<p>Refer <b>Appendix E</b> - Transport Response.</p>

## Public Submissions

A11	<p>There is currently a major car park problem when there are sports events in the Charles Bean Oval with residents illegally parking in private areas and in construction sites in Roxy Place. This will already get worse when the constructions are completed and closed off for public access. This problem has been highlighted previously and has still not been addressed. Basic solution like having more frequent bus transport (route 565) are still not being considered. Add to this existing mess thousands of students and staff looking for additional car park, we have a disaster. It is not sufficient for the revised Learning Village project proposal to say "We do not intend to use the Charles Bean Oval, therefore it is not our problem". Well it is a problem for the public and the State Govt needs to address this issue before giving a GO AHEAD to this project.</p>	<p>While events at Charles Bean Oval are outside the school's responsibility, car mode share is targeted for a percentage reduction in the future phases of the school, with a travel access guide developed to explain the best way to get to school for parents and staff. This aims to mitigate the impact of parking outside of the school grounds. Additional public route bus services are also recommended. More details are provided in the School Travel Plan.</p>	<p>Refer <b>Appendix E</b> - Transport Response.</p>
A12	<p>Lady Game Road are still in consultation and development or ignored, what would happen if LLV in full operation and the issues mentioned by the communities have happened? Who would be responsible for that? The proposed modification has only moving things around within the LLV site, it does not actually resolve the major issues which is the traffic and transportation arrangement.</p>	<p>The traffic impact of the development was assessed in the traffic and transport assessment that considered the mode share of arriving students and teachers and applied these to the road network. This impact has been assessed in that previous report, with subsequent plans developed to increase the likelihood of the mode share targets set in the traffic and transport assessment. More details are provided in the School Travel Plan.</p>	<p>Refer <b>Appendix E</b> - Transport Response.</p>
A13	<p>Allow different time frames: As about 2000 students enter and leave the school every day, it would be chaotic. And as the drop off would be packed and also parking, we need to minimise the amount of cars coming in and out on just 1 road. One suggestion could be allowing different time frames when dismissing and starting school by at least 10 mins. This should be by stage.</p>	<p>The school is currently running with a junior bell time of 2:50pm and a senior bell time of 3:10pm, which mitigates the departure loading for public transport and cars. School start times remain at 8:50am, however the nature of arrivals mean that these peaks tend to be more spread out.</p>	<p>N/A</p>
A14	<p>Allowing school buses for not just Lindfield Learning Village students: Some students who don't study at Lindfield Learning Village and live on the planned school bus route or near the school might be needing the bus to go to their school such as Chatswood High and Primary students (as your planned bus route stops at Chatswood Interchange, it would be more</p>	<p>School bus routes proposed will be developed in conjunction with TfNSW and the bus operator based on the actual enrolments to LLV. With regards to allowing students from other schools on the school buses, we are not aware of anything preventing this.</p>	<p>N/A</p>

## Public Submissions

	<p>convenient for them) cause they're in an OC or a selective school class. Your bus arrangements also goes around Beaumont Road Public School catchment and would be best if those students can use it too to travel to their school. This would provide convenience for students who live around Killara, Lindfield , Roseville, Chatswood and other suburbs that can take pressure from buses or trains.</p>		
A15	<p>Building the metro: Although costly, it would have benefits. An example would be like Chatswood High and Primary. Both schools add up to at least 2000 students and at least half of the students take the train. However the area is congested, without the train station at the school, it might cause a lot of congestion on Eton Road. The station could be accessible for people who will be wanting to go to Lane Cove National Park. It would take pressure off the T1 line and people living there will probably be catching the metro making it even more convenient when the Sydney Metro Southwest is completed.</p>	<p>This is outside the scope of the current SSDA.</p>	<p>N/A</p>
A16	<p>Provide more parking spaces for other events and for parents who have young kids</p>	<p>Car mode share is targeted for a percentage reduction in the future phases of the school, with a travel access guide developed to explain the best way to get to school for parents and staff. This aim is to mitigate the impact of parking outside of the school grounds. More details are provided in the School Travel Plan.</p>	<p>Refer <b>Appendix E</b> - Transport Response.</p>
A17	<p>Upgrade Lady Game Drive from the A38 route intersection towards the Grosvenor Road Roundabout</p>	<p>The traffic impact of the development was assessed in the traffic and transport assessment that considered the mode share of arriving students and teachers and applied these to the road network. This impact has been assessed in that previous report, with subsequent plans developed to increase the likelihood of the mode share targets set in the traffic and transport assessment. The upgrade of Lady Game Drive from Grosvenor Road to Fullers Road is outside the scope of this application. The intersection is at capacity it was not considered a viable route to access the</p>	<p>Refer <b>Appendix E</b> - Transport Response.</p>

**Public Submissions**

		site. The travel focus for students has been from the north and the east which is reflected in the modelling that was completed.	
A18	No Stopping on Eton Road during school hours from Austral Avenue	Kerbside parking controls are the responsibility of Ku ring gai Council and they will be amended by Council if they see a need.	N/A
<b>B.</b>	<b>Noise Impacts</b>		
B1	The proposed Bus terminal in LLV will now have buses going down the narrow section of Eton Road creating noise for residents at Tubbs View. The revised bus drop off and pick up approach shifts the traffic noise problem from Dunstan Grove (in the previous proposal) to Tubbs View.	The revised Noise Impact Assessment includes an assessment of the proposed traffic movements on the site including the revised scheme with buses using the extended driveway within the eastern portion of the site. Buses are for two peak times during the day and have intermittent impacts only.	Refer <b>Appendix G</b> – Revised Noise Impact Assessment.
<b>C.</b>	<b>Bushfire</b>		
C1	The bush fire evacuation plan seems to assume that people will evacuate by foot to safe areas. This is putting people and kids lives at risk.	The Bushfire Emergency Management and Evacuation Plan provides for a range of evacuation options. Evacuation by foot is one of the options available. The discussions with the RFS required a range of redundancies to be built in. This includes evacuation by foot, closure of the school, evacuation by bus and refuge within the school. The RFS have agreed with the approach and options provided to ensure life safety.	Refer Bushfire Emergency and Evacuation Plan submitted with June 2020 RtS.



# CONCLUSION

This Supplementary RtS has considered the responses received from DPIE, Council, government agencies and the community during the re-exhibition of Phases 2(b) and 3 of SSD 8114 for the Lindfield Learning Village. Further investigations and assessments have been undertaken where appropriate to respond to submissions raised by all stakeholders. Further consultation has also been undertaken with DPIE, RFS, Council and EPA to validate the proposal.

The proposal is considered appropriate for the location and should be supported by the Minister for the following reasons:

- It satisfies the educational needs of students in the area and provides increased employment opportunities. Phases 2(b) and 3 will deliver a school which caters to the remainder of the students to meet the demand for student enrolments in this area.
- It is suitable for the site as evidenced by the site analysis and various site investigations, including bushfire, traffic, access, site contamination, biodiversity and heritage.
- Subject to the various mitigation measures recommended by the specialist consultants, it does not have any unacceptable impacts on adjoining or surrounding properties or the public domain in terms of traffic, heritage, social and environmental impacts.
- Phases 2(b) and 3 of the proposal involve a performance-based approach to bushfire safety in accordance with the recommendations from the RFS and will meet the requirements of Planning for Bushfire Guideline 2006 and 2018.
- The proposed improvements to public transport services to the site, including the dedicated bus turnaround and drop-off area, will reduce dependence on the private car and encourage alternate modes of travel by public transport and walking.
- It will result in a high-quality educational environment for staff and students by:
  - Adopting a collaborative, home base model;
  - Creating adaptable learning spaces that contain state of the art facilities;
  - Providing a range of open spaces for students; and
  - Developing efficient, effective, expressive and environmentally sustainable facilities.
- It will contribute positively to energy efficiency and environmental sustainability. The design has adopted and incorporated many ESD features to reduce energy consumption during the life of the proposal.

The proposal is in the public interest and therefore warrants approval. We therefore request that approval be granted to the proposed development.

# DISCLAIMER

This report is dated 14 August 2020 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Department of Education (**Instructing Party**) for the purpose of Response to Submissions (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.



# APPENDIX A

# APPENDIX

