

18 February 2019

Mr Jason Maslen
Senior Planning Officer
Social and Other Infrastructure Assessments
Priority Projects
Department of Planning and Environment

Dear Jason,

SSD 8574 -ALTERATIONS AND ADDITIONS TO WAITARA PUBLIC SCHOOL AT 48 -58 MYRA STREET, WAHROONGA

I refer to the above development and the Department of Planning letter dated 7 May 2018 that provided advice on the Response to Submissions that had been received to the project as well as providing advice on the Departments preliminary assessment of the application. This letter also responds to subsequent commentary that has been received from both Department of Planning Staff and the Government Architects Office.

This letter has been prepared on behalf of TSA who are the proponents for the project and are acting for the Department of Education.

Exhibition of the proposal concluded on 27 April 2018, with 12 submissions being received from surrounding residents and 8 submissions received from agencies the application was referred to. The 8 submissions received from agencies to the Waitara Public School redevelopment were:

- Government Architect;
- Hornsby Shire Council;
- NSW EPA;
- Office of Environment and Heritage (Environmental Branch);
- Roads and Maritime Services;
- Sydney Water;
- Transport for NSW; and
- Office of Environment and Heritage (Heritage Branch);

This letter should be read in conjunction with the revised/ supplementary plans and reports that are attached to this letter and are outlined in the table on the following page.

APPENDIX	CONTENT	PREPARED BY
Appendix A	Elevation sketch re-design	NBRS Architects
Appendix B	Flora and Fauna Assessment	Niche Environment and Heritage
Appendix C	Heritage Letter	Heritage 21
Appendix D	Construction Traffic Management Plan	GHD
Appendix E	Green Travel plan	The Transport Planning Partnership
Appendix F	Road Safety Audit	The Transport Planning Partnership
Appendix G	Updated Traffic Impact Assessment	GHD
Appendix H	Schematic Design Report	GHD
Appendix I	Updated Landscaping Plans	GHD
Appendix J	Updated Architectural Plans	GHD
Appendix K	Arborist Report for Expanded Carpark	Birds Tree Consultancy
Appendix L	Services Delivery Plan	TSA
Appendix M	Contamination Letter	JBS & G
Appendix N	Built Form and Urban Design Report	GHD Woodhead
Appendix O	Confidential Waitara Public School Business Case	Education NSW
Appendix P	Educational Principles	Waitara Public School
Appendix Q	Functional Design Brief	GHD
Appendix R	Concept Design Report	GHD
Appendix S	NBRS Architecture Response to GA Office feedback	NBRS Architecture
Appendix T	Aboriginal Cultural Heritage Assessment Report	Cultural Heritage Connections
Appendix U	Revised Construction Management Plan	GHD
Appendix V	Revised Waste Management Plan	GHD
Appendix W	Revised Arborist Report	Birds Tree Consultancy

1. Scope of Proposal

As the expanded Waitara Public School project is urgently needed and in order to allow the expanded school to open in time for the commencement of the 2020 school year, the scope of this development application has been reduced.

Demolition of Buildings H, I, J K, G, F and the COLA located between buildings F and J will now occur via a Complying Development Certificate. Updated architectural plans (appendix J) illustrate this.

The original EIS also made reference to electronic signage, however none is proposed under this application, which includes identification signage positioned on the new building only. The identification signage is illustrated on updated plans in Appendix J.

2. Existing School

It is noted that due to the significant increase in population within the school's catchment, that the school's enrolment for 2018 is now 932 students. It is anticipated that the school's population will continue to increase, with additional demountable classrooms required should the proposal not go ahead.

At the time of preparing the EIS submitted with the as lodged application, the student population was 760.

To assist with understanding the revised proposal sections 1.3 (summary of the proposal) and 3.1 of the EIS are replaced with the following commentary.

2.1 Updated Summary of The Proposal

The school currently has an existing student population of 932 and this application seeks approval to increase the capacity of the school by providing a permanent teaching space for 1000 students which complies with the Design Principles of the 2017 Education SEPP

The specific elements that this State Significant Development Application now seeks approval for include:

- Removal of 22 trees;
- Removal of 4 demountable classrooms and 1 Modular design range building containing 2 classrooms;
- Demolition of Building A;
- Retention of four buildings on the site being Building E (Library), Building M (5 x home base rooms), Building C (2 x home base rooms) and Building L (toilets);
- Construction of a three - four storey learning centre that will contain:
 - 38 teaching spaces;
 - 3 Special Programme Rooms;
 - Group learning spaces;
 - Additional Library Space;
 - Canteen;
 - Multi-purpose Hall;



- Office and Administration Space;
 - Amenities for students and staff;
 - Storage Rooms;
 - Uniform store; and
 - OSHC accommodation.
-
- Placement of 234 solar panels on the roof of the Learning Centre;
 - Provision of additional landscaping on the site including the planting of 52 trees;
 - Refurbishment of playgrounds;
 - Retention of a 12-space carpark;
 - Provision of an additional carpark containing 12 further spaces (total 24 spaces on site); and
 - Retention of bicycle rack accommodation for 46 bicycles.

This Response to Submissions notes the formal removal of the following from the proposal:

- Demolition of Buildings H, I, J K, G, F and the COLA located between buildings F and J

Architectural plans for the school are contained in Appendix J.

2.2 UPDATED PROJECT OVERVIEW

This revised State Significant Development Application proposes major alterations and additions to Waitara Public School.

Works for the project include:

- Removal of 22 trees;
- Removal of 4 demountable classrooms and 1 Modular design range building containing 2 classrooms;
- Demolition of Building A;
- Retention of four buildings on the site being Building E (Library), Building M (5 x home base rooms), Building C (2 x home base rooms) and Building L (toilets);
- Construction of a three - four storey centrally air-conditioned learning centre that will contain:
 - 38 new teaching spaces;
 - 3 Special Programme Rooms;
 - Group learning spaces;
 - Additional Library Space;
 - Canteen;
 - Multi-purpose Hall;
 - Office and Administration Space;
 - Amenities for students and staff;
 - Storage Rooms;
 - Uniform store; and
 - OSHC accommodation.

- Placement of 234 solar panels on the roof of the Learning Centre;
- Provision of additional landscaping on the site including the planting of 52 trees; and
- Refurbishment of playgrounds;

It is noted that the following will remain on the site:

- Retention of three buildings on the site being Building E (Library), Building M (5 x home base rooms) and Building L (toilets)
- Retention of 12 space carpark;
- Provision of an additional carpark containing 12 further spaces (total 24 spaces on site); and
- Retention of bicycle rack accommodation for 128 bicycles.

This Response to Submissions notes the formal removal of the following from the proposal:

- Demolition of Buildings H, I, J K, G, F and the COLA located between buildings F and J

It is noted that the school will continue operating whilst the new facilities are provided and that to facilitate a local development application (DA/966/2017) was approved by Hornsby Shire Council on 27 November 2017 for the temporary provision of 30 portables on the site accommodating 29 teaching spaces, a canteen and additional toilet facilities whilst demolition and construction works occur associated with this application. Installation of these portables has now occurred.

2.3 CLARIFICATION OF PROPOSAL

It is noted that as a result of the continual growth of the school since preparation of the as lodged EIS that there are inconsistencies between the reports in respect of the scope of the proposal the following table clarifies this aspect.

Clarification	Current Numeric
Construction jobs / operational jobs created as a result of the proposed development	88 construction jobs and 10 operational jobs – teachers and teaching support
Existing and proposed teacher numbers	At the start of the 2019 school year the school will have 39 teachers. After completion of the development the school will have 42 teachers
Existing and proposed student numbers	At the end of the 2018 school year there were 932 students although this is expected to increase at the start of Day 1 Term 1 2019 as the school is continually growing, capacity will be increased to 1000 as a result of the proposal.

Existing and proposed advertising sign	<p>The school currently has two signs along the Edgeworth David frontage of the site. These signs are retained.</p> <p>Identification signage will also be provided on the new building.</p> <p>The identification signage is illustrated on updated plans in Appendix J.</p>
Trees to be removed and retained	<p>The site currently contains 121 trees. Approval is sought for the removal of 22 trees as part of the revised application.</p> <p>It is also noted that the landscaped setting of the site will be improved with 52 new trees being planted as part of this proposal.</p>
Proposed Gross Floor Area	<p>The gross floor area of the new learning centre will be 4455.79m².</p> <p>Taking into account existing buildings that are to be retained the school buildings will have a total gross floor area of 6084.77m².</p>

2.4 REVISED CONSTRUCTION IMPACTS AND MITIGATION MEASURES

Following revision of the proposal to remove demolition of Buildings H, I, J K, G, F and the COLA located between buildings F and J which will now be processed under a Compliant Development Certificate, the original construction impact and mitigation measures included in the EIS have been amended as per below:

Revised construction impacts and mitigation measures	Adequate Mitigation provided
<u>Landscape and Trees</u> 3 additional trees will require removal as a result of revisions made to the existing EIS in response to Council comments that additional parking spaces should be provided. The existing carpark spaces will require the removal of three trees, however it is considered that this is offset by the planting of 52 trees as part of the proposal.	Yes
<u>Heritage</u> Prior to the demolition of Building A and in response to Council comments, a Salvage Schedule will be undertaken to understand whether any of the existing building material can be reused to provide an appropriate interpretation device.	Yes
<u>Biodiversity</u> No new impacts or mitigation measures are proposed	Yes
<u>Erosion and sedimentation</u> No new impacts or mitigation measures are proposed	Yes
<u>Water Quality and Drainage</u> No new impacts or mitigation measures are proposed	Yes
<u>Air Quality</u> No new impacts or mitigation measures are proposed	Yes
<u>Construction Noise and Vibration</u> Additional work to increase the number of carparking spaces are not anticipated to have an impact on overall noise levels as work would require minimal plant and equipment and be undertaken concurrently with landscaping work. No new impacts or mitigation measures are proposed	Yes
<u>Waste Management</u> No new impacts or mitigation measures are proposed	Yes
<u>Contamination</u> No new impacts or mitigation measures are proposed	Yes
<u>Utilities and Services</u> No new impacts or mitigation measures are proposed	Yes
<u>Roads</u> No new impacts or mitigation measures are proposed	Yes
<u>Traffic and Site Access</u> No new impacts or mitigation measures are proposed	Yes
<u>Amenity Impacts</u> No new impacts or mitigation measures are proposed	Yes

3. Key Agency Responses

This letter now discusses the clarifications sought by government agencies following a review of the lodged information. The Department of Planning in its letter dated 7 May 2018 outlines the following key issues to be addressed:

Key Issues	DOE Response
<p>Aboriginal Cultural Heritage</p> <p><i>The submitted Aboriginal Archaeological Impact Assessment report does not meet the requirements for Aboriginal cultural heritage consultation nor does it satisfy the definition of an Aboriginal Cultural Heritage Assessment as defined in the OEH Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage.</i></p> <p><i>The Response to Submissions (RtS) is to include an assessment of Aboriginal Cultural Heritage in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011) and Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW).</i></p>	<p>An Aboriginal Cultural Heritage Assessment Report has now been prepared in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011) and Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW). (Appendix U)</p>
<p>Parking</p> <p><i>The proposal includes the retention of 12 existing car parking spaces on the site, which is fewer than required by the Hornsby Development Control Plan (1 space per full time teacher). The Environmental Impact Statement (EIS) and Traffic Impact Assessment (TIA) reports state that the shortfall is addressed by inferring that up to 20 teachers use active/public transport, the site is well serviced by public transport, teachers can car share/pool or park on the adjoining road network.</i></p> <p><i>The Department notes that consideration has been given to the Educational Facilities Standards and Guidelines (EFSG). The Department of Education's website states that the "EFSG is not developed to be a minimum standard or an indication of entitlement". The Department considers that insufficient justification has been provided for the shortfall of parking provided on the site.</i></p> <p><i>The Department requires adequate onsite car parking to be provided or suitable alternate arrangements be provided. It is considered that relying on on-street car parking or inferring the use of public/active transport is not a suitable alternative arrangement given the existing restrictions and limitations (including narrow local roads) and the additional overall shortfall of 10 spaces generated by the development.</i></p>	<p>This letter is accompanied by revised plans that increase on-site teacher parking from 12 to 24. This will reduce demand for on-street parking.</p> <p>The school currently has 39 teachers and with the increase in student numbers to 1000 will have 42 full time teachers. This leads for a DCP requirement of 42 on site spaces.</p> <p>A survey of existing staff conducted as part of the Green Travel Plan (appendix E) indicates that 95% of staff currently travel by car to work.</p> <p>The Green travel Plan sets out methods to encourage additional staff to utilise more sustainable travel methods for their journey to and from work.</p> <p>The successful implementation of this plan would result in more staff walking, cycling or catching public transport to work. This will result in additional on-site parking spaces not being required.</p> <p>Further additional parking spaces beyond the additional 12 proposed would lead to a further loss of vegetation as well as the reduction in</p>

The RtS should provide justification demonstrating why additional carparking spaces cannot be physically located on site.

Should it be adequately demonstrated that additional parking cannot be provided on site, an updated TIA report and supporting plans are to be provided as part of the RtS demonstrating adequate legal parking provisions or alternate parking measures and/or sustainable transport measures are provided and managed as part of the project to cater for the demand generated by the development.

The RtS is to also include accurate mode share data which demonstrates the existing modal split for teachers travelling to and from the school.

Road Safety Audit

A road safety audit should be undertaken for all operational aspects of the school including servicing arrangements.

Biodiversity

It is noted that there are discrepancies within the Arborist Report and the Flora and Fauna Assessment regarding the identification of trees being retained, removed, the types/degree of protection for subject trees. These discrepancies are to be clarified within the RtS.

The Flora and Flora report identifies that a single tree hollow in a large Angophora costata is to be retained (Plate 4). It is recommended that the Arborist report tree removal plan in the RtS is updated to be consistent and reflect this recommendation.

Site Contamination

The submitted Preliminary Site Investigation Report is based on soil sampling that was undertaken below recommended levels. The site investigation is to be consistent with the processes outlined in State Environmental Planning Policy 55 - Remediation of Land to assess the suitability of the land and identify any remediation required in relation to the proposed use.

Should it be required that a Remediation Action Plan (RAP) be prepared, this should be included as part of the RtS.

outdoor play space for students.

It is considered that the provision of 12 additional spaces in conjunction with the implementation of a Green Travel Plan for staff ensures that adequate parking is provided for staff that choose to drive to the site.

A road safety audit has been prepared for the school and considers servicing. The report identifies existing risks in the current road network, with mitigation options provided in the TIA report which may wish to be considered as conditions of approval.

Both reports have been refined and are consistent with regards to recommendations.

This Angophora is now recommended for retention.

Section 13 of the SEARS for this project required an assessment of any soil and groundwater contamination and demonstration that the site is suitable for the proposed use in accordance with SEPP 55.

The SEARs indicate that the relevant guideline is:

Managing Land Contamination: Planning Guidelines
– SEPP Remediation of Land (DUAP).

Section 3.2.1 of this guides states that:

The potential for contamination is often linked to past uses of land and a good early indicator of possible uses is land zoning. Contamination is more likely to have occurred if the land is currently, or was previously, zoned for industrial, agricultural or defence purposes. The following is a brief checklist

for doing an initial evaluation. • Is the planning authority aware of any previous investigations about contamination on the land? What were the results, including any previous initial evaluations?

• Do existing records held by the planning authority show that an activity listed in Table 1 has ever been approved on the subject land? (The use of records held by other authorities or libraries is not required for an initial evaluation.) • Was the subject land at any time zoned for industrial, agricultural or defence purposes?

Is the subject land currently used for an activity listed in Table 1?

• To the planning authority's knowledge was, or is, the subject land regulated through licensing or other mechanisms in relation to any activity listed in Table 1?

• Are there any land use restrictions on the subject land relating to possible contamination, such as notices issued by the EPA or other regulatory authority?

• Does a site inspection conducted by the planning authority [optional] suggest that the site may have been associated with any activities listed in Table 1.

• Is the planning authority aware of information concerning contamination impacts on land immediately adjacent to the subject land which could affect the subject land?

The submitted contamination report prepared by JBS&G conducts these tests and was satisfied that the development site does not contain any of these triggers and identifies that the site has been used for residential or educational purposes since 1894.

Table 1 of the Guidelines (reproduced below) list activities that may have caused contamination.

Table 1. Some Activities that may Cause Contamination

- acid/alkali plant and formulation
- agricultural/horticultural activities
- airports
- asbestos production and disposal
- chemicals manufacture and formulation
- defence works
- drum re-conditioning works
- dry cleaning establishments
- electrical manufacturing (transformers)
- electroplating and heat treatment premises
- engine works
- explosives industry
- gas works
- iron and steel works
- landfill sites
- metal treatment

- mining and extractive industries
- oil production and storage
- paint formulation and manufacture
- pesticide manufacture and formulation
- power stations
- railway yards
- scrap yards
- service stations
- sheep and cattle dips
- smelting and refining
- tanning and associated trades
- waste storage and treatment
- wood preservation

The guidelines then state at section 3.3.1

Instances where no further information is Required:

If, after carrying out an initial evaluation, none of the enquiries suggest that the land might be contaminated or that further enquiry is warranted, the planning process should proceed in the normal way.

As outlined above the JBS&G report concludes that the above enquires did not lead to an indication that the site may be contaminated.

Notwithstanding this and based on the precautionary principle and noting that soil testing was being conducted to assist with Geotechnical investigations to assist with the detailed structural design of the school buildings, soil sampling was conducted from 8 cores.

Testing from these 8 cores confirmed that the site was not considered to be contaminated. The Contamination report concludes that any soil removed from the site would appropriately be classified as General Solid Waste.

Given the above, it is not considered that an expanded phase 1 contamination report with additional soil sampling is warranted. It is considered that the provision of SEPP 55 have been satisfied and that the Department of Planning can be satisfied based on the existing report that has gone above and beyond the minimum requirements to assess whether the site has the potential to be contaminated.

4. Other Matters for Consideration

This letter now discusses the clarifications sought by the Department of Planning in Attachment B of their letter dated 7 May 2018. These clarifications are addressed in the following table:

Other Matters for Consideration	DOE Response
Construction Pedestrian and Traffic Management It is recommended that a draft Construction Pedestrian and Traffic Management Plan (CPTMP) be prepared as part of the RtS.	A Construction Management Plan has been prepared by GHD (Appendix D)
Urban Design and Built Form The RtS is to address the deficiencies with the application raised in the Government Architect NSW's submission including but not limited to, the preparation of an urban design and built form report and consideration of the appropriateness of the scale of the development noting the intended use of the building (primary school children) and built form characteristics of the surrounding locality	<p>The expansion of the Waitara Public school has been subject to extensive Design and Built form analysis.</p> <p>Consideration of the location and height of the proposed new buildings was the subject of design analysis by the project team.</p> <p>A key driver for the redevelopment of the site was a desire to maintain adequate open play space for students noting the modest size of the site.</p> <p>The three to four storey nature of the building is considered to be compatible with the predominant one -two storey built form in the immediate locality, particularly noting the high of the church building opposite the site, noting that the height limit on the neighbouring shopping centre, that is within the immediate visual catchment of the site at 71 – 77 Edgeworth David Avenue is 17.5m and further that the Waitara High Density Precinct boundary is within 70m of the site.</p> <p>Given this and noting the variety of heights within the precinct, it is considered that the proposed 3 -4 storey school buildings are consistent and compatible with the variety of height forms in the immediate vicinity of the site.</p> <p>A Schematic Design Report for the proposal has been provided which provides greater detail of the design strategy for the expanded school. (Appendix H)</p>
Green Travel Plan and Bicycle Parking A Green Travel Plan (GTP) is to be provided as part of the RtS and must include detailed site- specific measures that will be implemented to promote and maximise the use of more sustainable travel modes and should include: site audit and data collection to establish base line data; objectives and targets (i.e. site-	A Green Travel Plan accompanies this resubmission (Appendix E)

specific, measurable, achievable and timeframes for implementation) to define the direction and purpose of the GTP;

- o actions to help achieve the objectives, including incentives for using sustainable transport modes;
- o measures to promote and support the implementation of the plan, including financial and human resource requirements;

and

- o a process for monitoring and review that allows for the effectiveness of the GTP to be measured.

The discrepancies between the EIS and Traffic Impact Assessment report regarding the provisions of bicycle parking facilities on site is to be clarified as part of the RtS.

It is confirmed that the development will provide 23 bike racks that can accommodate 46 bicycles.

Landscaping

Consideration should be given to providing a greater level of landscaping along the boundaries of the site, in particular at the corner of Edgeworth David Avenue and Myra Street.

This should include fencing options (materials, alternative boundary treatments and landscaped setbacks around fencing).

The existing fencing around the site is proposed to be maintained. The majority of landscaping around the intersection of Edgeworth David Avenue and Myra Street is also proposed to be retained. This landscaping is considered appropriate and will assist in providing filtered views towards the building.

Further, a landscape design has been produced for the proposal which seeks to maximise available play space to provide a minimum of 10m² per student.

Service Vehicle Management Plan

A Service Vehicle Management Plan is to be included in the RtS.

Service Vehicle Access to the site is currently provided to the site from Highlands Avenue. This access point is maintained as a result of the school expansion.

A Service Vehicle Management plan accompanies this response to submissions. (Refer Appendix M)

5. Response to Public Submissions

The following table addresses the 12 submissions that were received in response to the advertising of the proposal.

PUBLIC SUBMISSION RESPONSE TABLE	
Submitter and Issue	Response
<p>1. Bruce Elson of Waitara</p> <p>a. The proposed new four storey building is not located in the most suitable position on the school site.</p> <p>b. As an ex-pupil, late 1940s to 50s, I, like two other residents in Palmerston Road (both ex-pupils), were always under the impression the original weatherboard building was Heritage Listed and could not be demolished. The building was opened in 1927. If the building is not Heritage Listed it should be.</p> <p>c. Traffic Problems</p> <p>i. The No Right Turn from Edgeworth David Avenue into Jubilee Street has not been thought through. Stage Two of Hornsby Ku-ring-gai Hospital will commence in the not too far distant future (12 months) and the main entrance of the hospital will be in Derby Road not Palmerston Road. Motorists from Wahroonga/St Ives will turn right from Edgeworth David Avenue into Jubilee Street and straight into Derby Road to the new main entrance of the hospital. If the No Right Turn at Jubilee Street is put in place motorists will need to go through the Edgeworth David Avenue/Myra Street intersection, turn right into Palmerston Road then turn right into Burdett Street then left into Derby Road. Someone did not think this idea through properly.</p> <p>ii. The one lane each way proposal on Edgeworth David Avenue is totally ridiculous. Currently the traffic coming from Hornsby to St Ives is banked up at Wentworth Avenue waiting to get through three sets of traffic lights with two lanes of traffic on both sides of Edgeworth David Avenue. One lane each way will see the traffic up to Westfield Shopping Centre (page 11 at section 2.10 of GHDs Traffic Report)</p> <p>iii. I note on page 37 of clause 4.5.1 that outputs indicate that the Edgeworth David Avenue/Myra Street intersection will perform unsatisfactorily. It does now. What will be done to correct this problem?</p>	<p>The location of the proposed 4 storey learning centre maximises open space provisioning for students on the site whilst minimising its impacts on low density residential properties that adjoin the site.</p> <p>The buildings on the site are not heritage listed. Elements of the fabric of these buildings are to be salvaged and incorporated into the site to assist with students interpreting the history of the school from its opening in the 1920's to present.</p> <p>Works associated with Hornsby Hospital are outside the scope of the project. The expansion of the school is to cater for the increased population that has predominantly resulted from the redevelopment of the Waitara precinct. The provision of an expanded school will assist with catering for local students, many of whom are able to walk to the school.</p> <p>These works are proposed by Hornsby Council and the proponent is unaware of the background to these proposed works.</p> <p>As outlined in the updated traffic impact assessment report <i>the SIDRA modelling indicates that the traffic associated with the proposed expansion of Waitara Public School would have a negligible impact on the</i></p>

iv. I also note on page 11 clause 2.10, it is recommended that another pedestrian crossing be installed in Myra Street. I assume this will be traffic light controlled. This will cause additional traffic holdups. There is a pedestrian crossing in Myra Street now. Why do we need another one?

School Parking – as part of this new school building project, two “drop off” lanes should be constructed on school property. One in Myra Street and one in Edgeworth David Avenue. vi. Currently I see parents parking in the shopping centre car park waiting to pick up children in the afternoon. Why should they park on private property? The shopping centre, in my view, should install a boom gate system.

vii. Where are the construction workers going to park when the demolition takes place and when the new building is being constructed? My experience with the hospital redevelopment is that construction workers will park anywhere. They parked in the specialist doctors’ car parks in Palmerston Road.

viii. Parking around the hospital and the school is a major problem and a solution needs to be found before major projects like stage two at the hospital and the school are commenced. The new hospital car park holds 550 vehicles. The traffic consultants for stage one of the hospital redevelopment advised that approximately 950 car spaces were needed on the surrounding streets after stage one was completed.

Cars are now parked on both sides of Palmerston Road from Edgeworth David Avenue to Burdett Street preventing school pickup in the afternoon in particular. When stage two of the hospital commences 65 car spaces on the hospital site will be removed, only making the parking problems worse.

operation of this intersection.

Additionally, analysis indicates that the school will only generate 58 trips (29 inbound and 29 outbound) in the AM peak hour and 44 trips (22 inbound and 22 outbound) in the PM peak hour.

Given that the expanded school will not unduly reduce service levels at this intersection, no mitigation measures are proposed as part of the project works.

The additional crossing is no longer proposed.

The modified proposal introduces a further 12 parking spaces on the site, which will increase teacher parking spaces to 24. This will likely reduce the use of on-street parking spaces by staff and free up on-street parking to assist with student drop off and collection.

Due to the desire to maintain as much open space for students as possible, the majority of construction will utilise nearby on-street parking. Workers vehicles are required to be parked legally and not on private properties. A contact phone number and email address will be established to allow any concerns about unauthorised parking to be actioned by the builders.

The impacts of hospital parking and overflow parking in surrounding street is not considered to impact on the school, given the separation between the two sites.

The impacts of hospital parking and overflow parking in surrounding street is not considered to impact on the school, given the separation between the two sites.

2. Clemens Overdijk of Wahroonga

I object to the proposal of the expansion of the Waitara Public School.
Building Height:

Following review of the proposal I strongly feel that a 20meter tall / four story building with a raised roof is out of character for the area and will set a precedent for future developments in this residential area.

On-site Parking:

The proposed "status-quo" on the existing 12 on-site parking spaces is deemed insufficient given the number of on-site staff and the proposed increase of on-site staff (teachers and support staff) I note that the Traffic Impact Study (TIS) does not consider any additional support staff that is required to work at the school. The proposal does not adequately address the parking and access arrangements as outlined in the SEAR. Local streets are already inundated with parked cars from Hornsby Hospital.

Traffic Impact Study:

In my view the TIS does not reflect the expected increased vehicle traffic on Myra and Edgeworth David Avenue upon completion of the North Connex, as local streets will be used to "feed into" the new North Connex.

The proposal must accommodate an on-site pick-up/drop-off zone to avoid further traffic congestion on Edgeworth David and Myra Street during AM and PM peak, and to offer the suggested 55% of students (who indicated to "park and walk" and "vehicle drop-off") a safe option to meet parents/guardians away from the main road.

The TIS already acknowledged the poor LoS at the intersection of Myra and Edgeworth David Avenue. It also confirmed the long delays for traffic turning

A key driver for the redevelopment of the site was a desire to maintain adequate open play space for students noting the modest size of the site.

The four-storey nature of the building is considered to be compatible with the predominant one -two storey built form in the immediate locality, particularly noting the high of the church building opposite the site, noting that the height limit on the neighbouring shopping centre, that is within the immediate visual catchment of the site at 71 – 77

Edgeworth David Avenue is 17.5m and further that the Waitara High Density Precinct boundary is within 70m of the site.

Given this and noting the variety of heights within the precinct, it is considered that the proposed 4 storey school buildings are consistent and compatible with the variety of height forms in the immediate vicinity of the site.

The modified proposal introduces a further 12 parking spaces on the site, which will increase teacher parking spaces to 24. This will likely reduce the use of on-street parking spaces by staff and free up on-street parking to assist with student drop off and collection.

Previously discussed in this table.

Provision of on-site pick up and drop off on this modest site would reduce outdoor play space for children. The updated Traffic Impact Assessment (appendix G) outlines that is possible to increase the drop off / pick zone along Myra Street to provide additional spaces for vehicles dropping off and collecting students.

Previously discussed in this table.

off Myra and traffic turning into Jubilee Street.

The proposal must include a bus lay-over OFF the main road.

The TIS confirms the lack of dedicated and safe cycleways in the vicinity of Waitara Public School which is a concern given the proposed bike rack facilities at the Public School.

The TIS refers to a single crash involving a pedestrian in the last 5 years. The TIS does not include any further details on vehicle accidents. From personal observation I can confirm a significant number of vehicle accidents on the intersection Edgeworth David / Myra street and Edgeworth David / Jubilee street. Those accidents must be considered in the TIS as it will impact on the safety of students in the area.

The adjacent footpath along these roads / intersection have no safety barriers to protect students and pedestrians from a vehicle crash, especially at the intersection Myra / Edgeworth David and the intersection Edgeworth David / Jubilee street.

Proposed on-site sporting facilities:

In my view the proposed redevelopment of the school grounds does not offer adequate on-site sporting facilities (the proposal includes a soccer field, handball courts and a basketball court). Off-site sporting activities -if applicable- will further increase the movements of students around bus stops.

Reflectivity

The residents along Edgeworth David Avenue are likely to experience nuisance from the reflection off the 205 solar panels facing North.
Has this been considered?

Given that the buses stop infrequently at the site during peak times, it is not considered necessary to relocate the bus stop to Myra Road. The relocation of bus stops would also require the rerouting of local bus services.

As part of Council's on-going cycle way network and provision of cycle friendly roads, additional bike facilities or shared roads will be implemented to facilitate additional older students arriving at the site via bike.

The TIA considers recorded accident history.

The designated school traffic zones in front of the site as well as the signalised traffic intersection of Myra Street and Edgeworth David Avenue assist with ensuring that vehicles are travelling at low speeds during drop off and collection times with the signalised intersection assisting students with safely crossing local roads.

It is anticipated that the majority of children's physical education will occur on site.

Given the location of the solar panels on the roof of the building, they will not be visible from the street and accordingly they will not result in glare to adjoining or nearby residential properties.

3. D Waterworth of Wahroonga

Handwritten letter that raises concerns including:

Traffic Chaos in streets around the school

Previously discussed in this table.

Request Department of planning visit the site at around 9am and then at 3pm to view congestion.

The Traffic engineers who prepared the updated Traffic Impact Assessment (Appendix G) have visited the site during peak conditions.

4. Dora Leung of Waitara

I object to this redevelopment, on the grounds that traffic congestion is already a daily occurrence, during school zones hours, at the intersection of Edgeworth David / Myra Street. Driving down from Hornsby station along Edgeworth David Ave, cars queue up as far back as Sherbrook Road. Parents dropping off/picking up students always slow down to a standstill, to find the nearest spot to park. When this redevelopment starts (demolition trucks etc.) will cause even more congestion and noise, not to mention damage on road surface, I would support such redevelopment ONLY if all traffic activities are limited to Highlands Ave and Oleander Road,

Previously discussed in this table.

Please note: Palmerston Road is already squashed between projects at Hornsby Hospital and Burdette Street, we always face diversion and rough road surface, for the past several months, and completion is nowhere in sight.

5. Julitta Overdijk of Wahroonga

Due to lack of parking and enough arrangements being made increased traffic to the area

Previously discussed in this table.

6. Leland Sanchez of Waitara

Building height non-compliance and alternate site layout The proposed building height greatly exceeds the HLEP 2013 maximum building height limit of 8.5 metres. While this is addressed in the EIS and specifically in the clause 4.6 Exception, the clause 4.6 Exception is mistaken in this regard from two viewpoints. These are that: There is "no public benefit in maintaining the development standard given that the noncompliance has no discernible (effect) upon the public streetscape" (EIS p. 63), and The false belief that the low-density nature of the R2 zone, as per the zone objective in HLEP 2013, will not be affected. A four storey building is not characteristic of a low density residential environment, with its associated 8.5 metre height limit.

The height departure is considered to be in the public interest as it maximises open space availability on the site without unacceptably impacting on adjoining or adjacent low-density properties. The ability for students to access active open spaces as well as the retention of native vegetation on the site is considered to be in the public interest.

In regard to the first point above, there will be a discernible visual impact upon the public streetscape. The location of the 4 storey building close to both the Edgeworth David

The four storey nature of the building is considered to be compatible with the predominant one -two storey built form in the immediate locality, particularly noting the high of the church building opposite the site, noting that the height limit on the neighbouring shopping centre, that is within the immediate visual catchment of the site at 71 – 77 Edgeworth David Avenue is 17.5m and further that the Waitara High Density Precinct boundary is within 70m of the site.

frontage and the Myra Street frontage will be readily visible from these two major public thoroughfares, notwithstanding the retention of the site's perimeter screening trees adjoining the location of the proposed building. If the proposed building were repositioned to then eastern part of the site and somewhat further south of Edgeworth David Avenue (see Attachment 2), i.e. further within the site, but still at the same approximate height, this would allow for:

- Improved screening of the building from both the two subject street frontages and accordingly, less visual impact on the public domain;
- The retention of the same number of the site's trees or even possibly a slightly increased number; and
- The retention of the required maximisation of the school site's open space opportunities.

In other words, the application's proposed variation of the building height limit, is acceptable, but on the proviso that it could be better done, with less public domain impact. Yes, the proposed building would require some redesign as the stepped design may not be as easily accommodated in this alternate location. However, the alternate site location is located well away from the adjoining residential properties in Highland Avenue and Ingalara Avenue, thereby avoiding shadowing effects on these properties and secondly, also offering acoustic screening of the residential properties. In this regard, the preliminary plans prepared by GHDWoodhead (all labelled Option 1 and also exhibited on the Department's website), together with the Site Analysis drawing (01001 revision D) are disappointing. They are intellectually shallow and unimaginative. Unfortunately, the EIS is also lacking in this regard and merely goes through the standard motions of superficially justifying the proposed building height variation. All these mentioned DA submission components fail to examine how the proposed height impact and related suburban character effect could be reduced, i.e., improved upon.

Given this and noting the variety of heights within the precinct, it is considered that the proposed 4 storey school buildings are consistent and compatible with the variety of height forms in the immediate vicinity of the site.

Signage The sign clutter of the school site's splay corner at Edgeworth David Avenue and Myra Street (see photo at Attachment 3) has detracted from the area for many years. This should be addressed as both a design (prevention) challenge and an environmental compliance issue.

The modest signage on this intersection that identifies the schools name and provides limited room for school message is not considered a visual intrusion, but rather assists with way finding and community information.

1 Detrimental Effects on traffic in Edgeworth David Avenue and Myra Street The proposal to increase the on-street parallel (kerbside) parking availability in Edgeworth David Avenue on both sides by removing the existing kerbside lanes from through traffic use is objected to for several reasons: These kerbside lanes are currently heavily used by traffic travelling in both directions, other than when vehicles are parked on the northern side of Edgeworth David Avenue between No 87 Edgeworth David Avenue and Jubilee Street. This represents nothing more than a land grab.

The works proposed to Edgeworth David Avenue are not proposed by the proponent to this application.

A land grab is “the seizing of land by a nation, state, or organization, especially illegally, underhandedly, or unfairly”. More accurately this is a road grab, motivated by the Department of Education’s refusal to use any part of their own site, i.e., the school site for parking and vehicle access, as any standard development would be required to do. If the school site does not have sufficient room for its building and open space requirements, then it should acquire additional adjoining land, rather than make an ambit claim to use other publicly owned land, i.e., the kerbside lanes of Edgeworth David Avenue, for its own use. The GHD Traffic Impact Assessment report dated August 2017 does not clearly explain that this is what the proposed development seeks to do, namely, appropriate land currently used for a needed public purpose – accommodating traffic volumes between Hornsby and areas to the east such as Wahroonga and St Ives, for its own parking use. The Department of Planning and Environment should be aware that a considerable volume of traffic uses Edgeworth David Avenue (and Junction Road, Eastern Road, Burns Road, Killeaton Street, Mona Vale Road) as part of the major route between the upper North Shore and the Northern Beaches and the areas north of Hornsby (Berowra and the Central Coast). This is due partly to the fact that there are no exit ramps on the southern end of the M1 Motorway for traffic to proceed to the Northern Beaches. As a result, a considerable volume of traffic proceeds through Hornsby and Waitara using Edgeworth David Avenue. The current SSD application effectively proposes to ignore this traffic volume and restrict the ability of the traffic to get through.

The result will be that the volume of through traffic will not decrease, but will simply take longer to get from A to B. The recent installation of traffic lights at the intersection of Edgeworth David Avenue and Balmoral Street has also delayed traffic (particularly eastbound traffic) on Edgeworth David Avenue.

While these lights were badly needed for pedestrian safety for the pedestrian route, generally between Waitara train station and Hornsby Ku-ring-Gai Hospital, the effect of the Edgeworth David Avenue/Balmoral Street traffic lights is that eastbound vehicles in Edgeworth David Avenue in the AM and PM peak periods are often backed-up as far as Wentworth Avenue and three changes of the lights are often needed to get through to the Edgeworth David Avenue/Jubilee Street section. A traffic blister or other landscaping measure in the kerbside lane of Edgeworth David Avenue in the vicinity of the former Uniting Church site (corner with Palmerston Road) (now a Tibetan Buddhist facility) will have the further detrimental effect of slowing the movement of vehicles through the two sets of lights (Palmerston Road/Edgeworth David Avenue and Edgeworth David Avenue/Myra

Street).

This matter needs to be re-thought and discussed in detail with the RMS. The Traffic report's proposal to install a set of pedestrian-activated lights in Myra Street, generally in the vicinity of the school's south-west corner, will also slow the movement of traffic on Myra Street. During the PM peak, northbound traffic in Myra Street can often take more than two changes of the lights to get through the Edgeworth David Avenue/Myra Street lights. 4 Section 2.2 of the Traffic Impact Assessment Report (Existing Road Network Characteristics) fails to state which RMS road classification and function level applies to either Edgeworth David Avenue or Myra Street. This is a considerable omission and represents intellectual sloppiness. To remove the proposed development's reliance on appropriating the two kerbside traffic lanes of Edgeworth David Avenue, the Department should require traffic engineers to design and assess the feasibility of providing the following facility:

A one-way access laneway located inside the site's northern boundary, involving minimal tree removal and the provision of safety fencing, for a narrow roadway providing a drop-off and collection opportunity, returning either to Edgeworth David Avenue near, but well before the traffic lights, or proceeding around to the Myra Street frontage. If extending along the Myra Street frontage, the roadway should be located so as to minimise tree removal and land area use, to conserve land for school open space requirements. Pedestrian movements between the footpath and the school site should also be planned in this option. The roadway would only be available during school commencement and finishing periods and not available for public use at any other times.

2. Unresolved conflict between Department of Education Guideline and Hornsby DCP regarding parking provision Neither the Traffic Impact Assessment Report nor the SEE contains any discussion regarding the conflict between the Department of Education's Guideline for no additional parking within school sites and the Hornsby DCP requirement for full-time teacher parking of one space per teacher. One is tempted to conclude that as the Traffic Impact Assessment Report and the SEE were written by consultants engaged by the Department of Education, their inclination is to merely take to side of their client. This is not and never has been how EISs are intended to work.

3. Information on parking requirement I have not been able to find any information in either the Traffic Impact Assessment Report or the EIS where the parking demand for the school (either the present demand or the future demand as the school grows) based on the Hornsby DCP requirement is provided.

Furthermore, I am unable to find any assessment of whether the existing and retained 12 onsite parking spaces meet or fall short of this DCP control.

Finally the comment is made on page 6 of the Traffic Impact Assessment Report (SEARS Transport and Accessibility) that a

The proposal now seeks approval for the provision of an additional 12 parking spaces for staff. This will assist with providing additional on street parking for parents collecting or dropping off children at the school.



<p>Travel Plan may be required ... including allocating parking spaces to teachers that (sic – should be who) car share.</p> <p>Without any information regarding the adequacy or otherwise of the on-site parking and teacher numbers (present and future), there can be no certainty that the preparation of a Travel Plan in this regard would have any relevance.</p> <p>4. Pennant Hills Road and Marsden Road intersection (section 4.5.1, page 37) The relevance of this to the Waitara School site is not clear. Unfortunately, this reflects the superficiality of the approach to the exercise.</p>	<p>Think Planners apologises for any confusion this incorrect reference created.</p>
<p>7. Leone of Hornsby</p> <p>This school is crowded now with cars everywhere at drop off and pick up times. How much better will it be with 1,000 children in a high rise. Is the school going to provide internal drop off and pick up areas?</p>	
<p>8. Susan Strom of Wahroonga</p> <p>I strongly object to the increase in height and capacity of Waitara Public School. Where are the 1,000 cars going to park as the mothers/fathers arrive to drop and pick up children?</p> <p>The traffic in Myra Street in the afternoons and mornings is already impossible during school zone times. I turn from Myra into Edgeworth David, then turn into Jubilee to come home. I have to wait up to 5 or 6 changes of the lights to turn into Edgeworth David now as parking and crossing parents reduce the street to one lane. What is it going to be like when 1,000 children attend the school?</p> <p>This is a very high traffic area as commuters use this road to come home, to go to Hornsby and through to northern areas.</p> <p>Next, I strongly object to the removal of the beautiful mature trees on the property. How come it is not OK for me to remove mature native trees but it is for governments?</p> <p>I would guess as with all other developments that there will be no onsite parking other than for teachers. WE LIVE IN A CAR SOCIETY, a thing that governments and councils forget. If this has to be, then incorporate a large turning circle and parking for parents to pick up etc. inside the school grounds. Put a second lane onto Edgeworth David outside the school to accommodate busses.</p>	

I do not want parents parking in Collings Street to pick up children. Collings Street is already used for the residents of Jubilee Street to store their vehicles leaving nowhere for visitors to my house to park. We also have a retirement village opposite the school that has many visitors. The area will simply become impossible. We bought in this area because it was quiet with easy parking....not anymore.

I STRONGLY object to an increase in capacity, height and the removal of trees.

The updated Traffic Impact Assessment indicates that a survey of existing students revealed that the approximately 36% of students walked to and from school. The Green Travel plan (Appendix E) aims to encourage more students and staff to utilise walking or public transport to the school.

9. Y Hew of Wahroonga

Appendix Q Traffic Report of the SSD Application paragraph 1.3 Study Limitations & Assumption is poorly represented that "no site inspection was undertaken and relying on study involving desktop assessment only". I live on Highlands Avenue since 2006 and is witnessing daily congestion of traffic in that residential street during morning and afternoon drop-off and pick-up time. Often, I need to wait to get out of my driveway and navigate the single car traffic in and out. So how can a DA application be based on desktop review without proper inspection and witnessing the heavy traffic congestion.

The updated Traffic Impact Assessment (appendix G) involved a site inspection by the engineers.

2. The increase in student in-take from 760 to 1000 and additional teachers who choose to commute by cars will lead to traffic compounding without doubt to Highlands avenue/Oleander intersection.

Discussed previously in this table.

3. The SSD application make no proposal to consider closing off from the intersection of Highlands Avenue and Oleander street to the school gate and accessible only to resident/teachers and service vehicles during school days period except weekends/public holidays. This will enhance the safety of pedestrians and resident in that section of the street.

The Green travel Plan seeks to increase the number of students that walk to the site from the current 38% that walk currently,

4. The department of Education should build additional new school elsewhere to house the student growth and not "leached" on an existing school already on "tiny" land and create compounding traffic leading to potential accident, noise, pollution and poor streetscape. 5. The SSD application reported that safety is not an issue arising from the past five years is "rubbish" as no one can state such a claim as accident arising from more traffic will increase irrespective of the

The updated Traffic Impact Assessment outlines that the local road network has the capacity to cater for the minor increase in traffic that will result from the expanded school.

event in the past.

10. Anonymous of Wahroonga

The proposal does not address the safety in design elements for this development which are vitally important in considering the ongoing operations of the school and the implementation and delivery of a major construction project.

- The proposal Construction Plan has significant omissions for a development of this kind and there is no detail for the site access and safety plan and implementation plan.

The proposal does not address the adequacy of the school on-site parking provisions and does not provide a detailed parking report. The EIS suggestion to retain (and not expand) the existing parking for twelve vehicles does not comply with the LEP requirement for one car space per fulltime teacher, nor what should be provided for new school infrastructure. It does not address the impacts on the amenity and safety for the expanded school in the local streets. The new development is intended to have 42 teachers (a 31% increase) and a total of 60 staff, which is an average of one car space per 5 staff members. Such provision for a substantially new piece of public infrastructure is inadequate and well short of what the LEP requires. The use of street parking by staff is a cause of inconvenience to local residents, mainly in Highlands Avenue. The street is relatively narrow, and with personnel from the school presently parking on both sides of the street it allows little space for local residents to safely access and egress their properties, little room to safely turn vehicles and in no way facilitates adequate and safe access for other vehicles serving the school via Highlands Avenue. Vehicles parked in close proximity to the school on both sides of Highlands Avenue reduces visibility and results in an increased safety risk for residents accessing and egressing their properties, parents and children walking along the nature strip and/ or path and teachers entering/ leaving their vehicles and the school site. The proposal needs to address these issues and the extent of the increased safety risks and how these risks will be controlled with greater demands for parking in Highlands Avenue.

- The proposal needs to address in more detail the waste management requirements and the timing and frequency of the waste removal. Given that the proposal intends the continued use of Highlands Avenue for these service vehicles, as property
- RESPONSE TO DEPARTMENT OF PLANNING LETTER
SSD NO. 8574 -WAITARA PUBLIC SCHOOL EXPANSION
PAGE 25

A preliminary Construction Management Plan accompanies this response to submissions and outlines how the construction phase will appropriately ensure the safety of pedestrians, school students and vehicles utilising the road network whilst construction is occurring.

Discussed previously in this table.

Given the likely volume of waste and recyclables generated by the school it is anticipated that collections would generally occur twice a week. Collections will not occur

owners we would like to understand precisely what plans will be in place and how the number and frequency of waste vehicles will be minimised.	during the morning or afternoon peaks for the school.
<ul style="list-style-type: none"> • The proposal makes estimates of the increased traffic for vehicle pick-up/ drop-offs using a ratio derived from a historical survey at a point in time. Observations of the traffic in Myra Street at the morning drop-off time demonstrate that it is very congested and there is extensive queuing of traffic. With no segregated drop off/ pick up zones in place, the safety of parents and children entering and leaving their vehicles with the oncoming traffic next to their vehicles for both sides of Myra Street needs detailed risk assessment and consideration of appropriate and effective risk control strategies. The proposal does not address these risks, nor make any recommendations for improved safety and risk control measures, such as a dedicated widened area for pick up and set down. • The proposal documentation plan has no detail on construction vehicle movements and access and how it will integrate with the operating school, school traffic and parking demands not to mention local traffic. <p>The proposal has no detail for the building site logistics demands, the construction parking requirements and the storage of materials and management of waste. It is a concern that the EIS suggests that Highlands Avenue can be used as a thoroughfare. It is unsafe for heavy vehicles and any increase in traffic volume. Safety risks will increase significantly for all users of Highlands Avenue if construction traffic, particularly heavy and long vehicles are to use Highlands Avenue. It would be more appropriate to have a temporary driveway from the main roads for this purpose to avoid impacting existing requirements and usage of this street.</p>	Discussed previously in this table.
<ul style="list-style-type: none"> • The proposal does not include a risk assessment of the construction activities both within and outside the school grounds and how these will be controlled. Neither does the proposal contain a construction programme detailing the staging of the works, the major construction activities and milestones and how the construction challenges will be addressed. 	The preliminary Construction Traffic Management Plan (appendix D) indicates that the majority of construction access will occur from Myra Street.
<ul style="list-style-type: none"> • The proposal includes use of the school grounds out of hours up to 10pm for both school and non-school groups. This is unacceptable for local residents and the proposal does not provide any detail as to what kinds of activities will occur and how they will minimize the impact on the local amenity of the residential areas and the quiet enjoyment for the residents. School Buildings: 	The school is currently utilised after hours for community uses and these uses are proposed to continue. It is not the intention of the school that the buildings be used for events such as 21 st birthday parties. All requests for use of the school buildings by community organisations will be considered by the school management

	and will have regards to the potential impact on surrounding low density residential properties.
<ul style="list-style-type: none"> • The impact of the excessive height and bulk of the proposed new building has not been addressed, with a significant change in scale (more than doubling the main building height) and the visibility of the building to the adjacent residences and the impact on the residential streetscape. Road and Traffic Changes: 	Discussed previously in this table.
<ul style="list-style-type: none"> • The report states proposed traffic calming measures including single lanes on Edgeworth David Ave and no right turn into Jubilee Avenue. These measures will substantially increase congestion and result in an increased queuing and blocking of the Palmerston Road intersection. These measures will increase safety risks and the risks of accidents and reduce the amenity of the local area. 	Discussed previously in this table.
<ul style="list-style-type: none"> • Greenfield School Site: • The short comings of the proposal which include significant design and regulatory compromises demonstrate the need for an entirely new school campus. The report does not adequately consider nor address the feasibility and need for a new school campus. The opportunity and need for a state-of-the-art school which addresses the future needs of the increasing population in the area, with optimal transport and public transport access for all school users is not considered. Land acquisitions opportunities for new infrastructure should be given top priority with the substantial increases in population that have already occurred and will continue to occur for the foreseeable future. 	Discussed previously in this table.

11. Anonymous of Warriewood

The SSD application is non-compliant on grounds of Biodiversity since the proponent's Ecologist Consultant, Luke Baker of Niche Environment and Heritage (Niche) has failed to prepare a report pursuant the Framework for Biodiversity Assessment.

No compensatory measures have been provided (eg replanting).

*Niche has produced a short, incomplete report that fails to recognise the high likelihood of the Grey-headed Flying-fox (*Pteropus poliocephalus*) (vulnerable under the Threatened Species Conservation Act 1995 (now Biodiversity Conservation Act 2016) which will forage on the fruit and flowers of many of the trees proposed for removal (eg *Eleaocarpus reticulatus*, *Pittosporum undulatum*, *Callistemon* spp, *Lophostemon confertus*, and is often found in the locality (see NSW Wildlife Atlas). These trees are important in this part of Hornsby Local Government Area which as a whole has lost a significant proportion of its canopy trees in the last decade.*

Niche have incorrectly identified the likelihood of this species as "None" when it should state "Likely" and be adequately assessed of impact, at the very least through preparation of an Assessment of Significance pursuant 5A of the Environmental Planning and Assessment Act 1979. This is a blatant omission and needs to be rectified in a new FBA report.

*The same issue applies for the Powerful Owl (*Ninox strenua*) listed as vulnerable under the TSC Act/BC Act. This Owl is known to hunt for possums and birds in the locality (see NSW Wildlife Atlas) and is likely to utilise the school grounds for foraging purposes. Niche have incorrectly identified the likelihood of this species as "None" when it should state "Likely" and be adequately assessed of impact, at the very least through preparation of an Assessment of*

An updated Flora and Fauna Assessment accompanies this response to submissions. (Appendix B). This clarifies tree retention within the site and further addresses the fauna species outlined in this objection.

The report concludes that the development will not have an unacceptable impact on native flora or fauna.

Significance pursuant 5A of the Environmental Planning and Assessment Act 1979. This is a blatant omission and needs to be rectified in a new FBA report.

*The same issue applies to the Eastern Bent-wing Bat (*Miniopterus schreibersii oceanensis*) listed as vulnerable under the TSC Act/BC Act. This bat is known to forage around trees in the local area and is likely to roost in the crevices of buildings and in drains. There has been no mention of this, instead Niche have incorrectly identified the likelihood of this species as "None" when it should state "Likely" and be adequately assessed of impact, at the very least through preparation of an Assessment of Significance pursuant 5A of the Environmental Planning and Assessment Act 1979. This is a blatant omission and needs to be rectified in a new FBA report.*

In the absence of an adequate Biodiversity Assessment, as an expert is this matter with knowledge of the Study Area, I object to this project until a satisfactory Biodiversity Assessment can be produced that adequately addresses the omissions listed above.

12. Anonymous of Wahroonga

As a parent and grandparent I believe that most people would not send their infants/primary school child to a school that has 1000 pupils.

It is simply not appropriate for children in that age group. If there are really that number of children in the catchment of Waitara Public School, and I doubt it, land should be acquired elsewhere and a new, smaller school built and a stop should be put on out-of-area children being enrolled. Also other schools in the region could be enlarged to accommodate a few more children.

Given the development that has occurred within the catchment of many public schools throughout Sydney, it is not uncommon for schools to accommodate 1000 students. The facilities on this site including the school hall, library and canteen are designed to cater for 1000 students.

The Department of Education considers that providing a school which caters for up to 1000 students, including providing 38 Homebase's and 10m2 play space per student, will provide an appropriate learning space for children of primary school age. The capacity of the school is in accordance with Department of Education policy for Primary Schools, with larger primary schools catering for up to 1,200 students in response to growth within the specific catchment area.

The proposal for the expanded Waitara Public School is in accordance with the Educational Facilities Standards and Guidelines and the

	General Education Principles of the 2017 Education SEPP, and therefore is deemed appropriate.
	Sending students to other schools in the district would likely increase traffic and reduce the ability of students to walk to school.
As a resident of the area, the surrounding streets are simply not adequate to increase traffic in and out any more and such a project would result in exacerbating an already difficult situation. The safety of the children would be seriously jeopardised as a result. The streets around are already quite unsafe because of the expanded traffic volume generated by the Hornsby Hospital redevelopment.	Discussed previously in this table.
Also, a four storey building is completely out of character with the surrounding developments.	Discussed previously in this table.
I would emphatically ask that this application be rejected and a more appropriate solution found	Discussed previously in this table.

6. Response to Agency Submissions

Part 3 of this letter addresses the key issues raised by both the Department of Planning and Agency Submissions. The following table addresses remaining issues.

AGENCY RESPONSE TABLE	
Issue	Response
<p>1 Government Architect NSW</p> <p>The demolition of existing demountable classrooms and replacement with permanent school facilities is supported. The mitigation of northern sun exposure, retention of several mature existing trees, retention of existing car parking numbers, the inclusion of photovoltaics, and the retention of bicycle racks are commended.</p> <p>However, in the absence of an explanation or description of options, the strategy of consolidating so much program into a single, very large floor plate building on a significant corner in a conservation areas is questioned. The building's deep floor plate limits access to natural sunlight and results in ventilation strategies which are considered unacceptable.</p> <p>The current proposal raises several issues regarding, building height, bulk and mass along Edgeworth David Avenue; the approach to security fences, which has resulted in a continuous boundary edge fence and poor streetscape presentation; the demolition of existing building stock of character; the removal of mature trees, lack of tree shade canopy and student wait-area shade generally, and the lack of variety in outdoor play or learning spaces.</p> <p>Note: there was no urban design or built form report with the submitted materials to assist in understanding the design intent, process, or rationale, which limited the scope for review. The advice within this letter is prepared on the basis of the submitted documents. It is unclear if the proposal has been undertaken in accordance with the requirements of the NSW Department of Education's Education Facilities Standards and Guidelines or the Design Quality Principles in the 2017</p>	<p>A detailed response is provided at the end of this table. This table provides a summary response.</p> <p>These comments are noted.</p> <p>The Schematic Design review that was prepared for the site outlines the design strategy for the expansion of the school. (Appendix H)</p> <p>The siting of the new building was subject to a detailed design review. Although the site is technically within a Heritage Conservation area, the heritage significance of the conservation area is more associated with detached residential dwellings within the residential streets rather than the school buildings itself.</p>

Education SEPP.

Based on the drawings submitted, our recommendations are as follows:

*Consider breaking down the bulk and mass of the building.

The buildings are considered to incorporate appropriate vertical and horizontal elements to assist with breaking up the massing of the buildings. This in conjunction with the landscaping strip between the new campus building and Edgeworth David Avenue will assist with breaking up the massing of the building when viewed from the public domain.

*Holistically reconsider the approach to security and fencing across the site, including building locations.

The fencing on the site is existing and this application seeks to retain the existing fencing. Accordingly, revised fencing is not part of this project.

*Consider retaining Building A for adaptive re-use.

During the design evolution of the project, consideration was given to the retention of Building A. It was considered more appropriate to provide additional outdoor space for students. To assist with the, heritage interpretation of Building A, a heritage courtyard is proposed.

*Include covered areas for protection from sun and rain at entry or bus stops.

Existing vegetation provides sun protection is the waiting area fronting Myra Street.

*Provide different play spaces or a variety of outdoor learning environments.

The landscape plan outlines that different areas for playing and outdoor learning are provided including a Covered Learning Area, garden and play equipment.

*Provide environmental performance indicators and assessments.

The Ecologically Sustainable Development report submitted with the EIS is considered to appropriately outline sustainability measures incorporated into the project.

*Integration between landscape design and building, to improve outdoor learning

The landscape architects worked closely with the architects to ensure

opportunities, and improve public domain.

*Retain further existing mature trees wherever possible and plant a minimum of one new tree for any tree lost.

*Review shade generally, notably the student wait-area.

*Reconsider the provision and location of student toilet facilities or evidence that the proposed provision is acceptable.

*Consider public art strategies to create identity and local context.

*Identify and incorporate opportunities for integrating Aboriginal culture and heritage including wayfinding, signage or room naming, materials and colour selection, public art, placemaking, and 'welcome to country' at the entry.

*Consider indigenous landscaping to promote better understanding of Bush tucker, Aboriginal seasonal changes, and the interdependencies of flora and fauna with a responsibility/duty of care for the environment.

The following additional information is requested:

*A Design Report regarding Design Quality Principles in the 2017 Education SEPP – explaining the design intent, design thinking and pedagogical approach, and the requirements in the SEARs regarding (but not limited to) built form, urban design, design quality, service integration, view loss, out- of-school hours activity, transport

an appropriate outdoor learning area is provided as part of the alterations to the school.

The development seeks approval to remove 22 trees, however 52 trees are proposed to be planted to assist with enhancing the landscaped setting of the site.

The Schematic Design review considered the provision of shade throughout the site. It is considered that appropriate shaded areas are provided within the school.

The provision of student toilets within the new school building immediately adjacent to class rooms as well as the retention of the Block L that contains amenities for students will ensure the adequate provision of student toilets. Toilet provision is in accordance with Education Facility and Standard Guide utilised by the DOE.

The proponent can incorporate public art strategies into the development and it is requested that conditions be imposed to reinforce this. This arts plan could also look at incorporating opportunities for recognising Aboriginal Culture.

There is opportunity within the proposed herb garden to incorporate some aboriginal bush tucker plants. As part of the school syllabus, this opportunity could be undertaken by teachers and students.

Section 5.1.7 of the EIS specifically addresses the design quality principles and GHD have prepared a separate document.

and accessibility, proposed and future development impact, ESD principles, biodiversity and heritage.

*More detailed drawings with greater legibility, referencing and detail are required, specifically streetscape elevations and site plan.

*Develop a Landscape Plan to indicate differentiation between outdoor learning spaces and circulation, and open space landscaping, use and circulation.

*Provide a master plan showing future growth strategy.

*Provide drawings to indicate flexible classroom layouts, demonstrating the pedagogical approach and how each typical classroom accommodates natural light and ventilation strategies.

*Indicate the location of staff End of Trip facilities.

*A Conservation Management Plan should be provided to explain demolition approach and site strategy.

*Address community objections raised regarding tree replanting, loss of habitat and tree canopy

*Provide site plan in context to indicate the

The submitted plans are considered to appropriately outline how the development relates to the street with the site plan outlining the proposed siting of buildings on the site.

Appendix F of the submitted EIS outlines the landscaping intent of the site.

The DOE typically considers that the maximum desired capacity of a primary school is 1000 students. Given that this development seeks to provide capacity for 1000 students, this development represents the ultimate development proposed for this site.

The Schematic Design Review (appendix H) illustrates various options for home room layouts. The architectural plans illustrate the option proceeded with.

Appendix A of the EIS illustrates the end of trip facilities with two separated unisex showers being provided for staff on the ground floor of the new learning cluster.

Appendix H of the EIS outlines why demolition of some of the older buildings on the site is appropriate from a heritage perspective.

A revised arborist and ecologist report accompanies this resubmission. (Appendices A and B)

Appendix A and D of the EIS contains a site plan. The Schematic

<p>layout of student pick-up/drop-off zones, bus stops, foot paths, gates, and cycleways.</p> <p>*Provide detail on safe walking approach, modal share, bicycle use, and strategies to promote active transport use.</p> <p>*Site plan and operational statement demonstrating the after-hours and community use strategy.</p> <p>*Detailed annotated wall sections at 1:20 scale that demonstrate typical cladding, window and door details, including materials and general construction quality.</p> <p>*A summary record of consultation with the school community and education specialist.</p> <p>*A physical material samples board (no larger than A3) with correct proportional representation of internal and external materials and, generally, more information on material intent across the project.</p> <p>REVIEW This review is conducted in relation to GANSW's Better Placed: An integrated design policy for the built environment of NSW and the Design Guide for Schools.</p> <p>Context, built form and landscape It is commended that the existing demountable classrooms are to be demolished and replaced with permanent school facilities. The 4-storey building is significantly setback from the site boundary. This limits its presence but also increases the amount of security fencing along streets. It is not clear whether the space between the buildings and the fence will be accessible or useable by students. The fence itself presents an unwelcoming and poorly conceived address to the school and a very poor streetscape outcome. The approach to security and fencing should be holistically reconsidered across the site. Soft landscaping strategies are not well</p>	<p>Design Report contains additional context information.</p> <p>The updated Traffic Impact Assessment and the Green Travel Management Plan outline this information.</p> <p>Sections 3.4 and 5.3.6 of the submitted EIS outline the after-hours and community use strategy for the site.</p> <p>The Schematic Design Report contains additional context information. (Appendix H)</p> <p>The Schematic Design Report contains details of consultation with the school community. (Appendix H)</p> <p>Architectural drawings submitted with the EIS appropriately indicate the proposed materials including colour throughout the project. Refer to Drawing 21-26108-WA-SD-AR-0001 Revision E.</p> <p>Many of these comments have been previously discussed in this table. Where relevant additional comments are provided below.</p> <p>The space between the building and Edgeworth David Avenue may be utilised by teachers occasionally as outdoor teaching space but would be out of bounds during recess and lunch breaks for students.</p>
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defined or documented. Clarification is required as to the extent of tree canopy along Edgeworth David Avenue following the removal of a significant number of existing trees with replanting mostly occurring away from learning spaces. The bulk and scale of the building should be reconsidered. The materials built form and composition could be more in-keeping and responsive to the context, neighbourhood character and heritage.

Community objections raise concerns on this matter and should be addressed. Sight lines and vistas to vicinity heritage items, such as Uniting Church and Brierdence, to the treescape from the surrounding context are obscured and should be considered. Consideration should be made to provide presence on the corner of Edgeworth David Avenue and Myra Street to address the heritage features on adjacent corners of the intersection. Presently, the building addresses the corner with an access stair.

It is unclear whether options were explored for retaining existing heritage buildings, notably Building A – a 1939 brick building of character. The rationale for retaining this building's footprint as a 'Heritage Courtyard' is undetermined. The adaptive re-use of this building for appropriate programs may benefit the overall siting of school uses. Alternatively, the building materials could also be re-used on site. A Conservation Management Plan that considers local heritage items both on the school site and in the local neighbourhood, should be provided.

The spatial planning of the Special Programs is not ideally located along Edgeworth David Avenue due to acoustic issues and it is unclear whether there is adequate shading on the northern aspect. Accessibility to the special programs in existing building (Building C) should be determined and illustrated.

In consultation with the local Aboriginal community, the proponent should identify and incorporate opportunities for integrating Aboriginal culture and heritage into the design including wayfinding, signage or room naming, materials and colour selection, public art, placemaking, and 'welcome to Country' at the entry.

The proposed building provides a clear address for the school and a sympathetic presence given the 'broken' nature of the intersection. The access stair that provides a required egress path and a link for teachers from their staff room and doubles as sun protection from the west.

A Heritage report submitted with the EIS reviewed the building stock on this school campus and the relevant heritage listings and has formed the view that the loss of buildings A is acceptable provided that the project adequately documents the buildings creating a record of them.

A supplementary heritage report has accompanied this resubmission and recommends undertaking a salvage schedule and provide interpretation devices. (Appendix C)

Building C is an existing building that is not altered by the proposal.

The future arts plan will consider whether recognition of aboriginal culture can be appropriately incorporated into the arts theme for the site. A condition of consent could be imposed to reflect this.

Sustainable, efficient and durable

The northern aspect has adequate louvre shade to learning environments, but these are not required on the southern elevation. The intent of the blue coloured fibre-cement façade treatment is unclear. It does not provide shade and is an aesthetic device that could be more integrated into the fenestration/shading devices. The photovoltaics are supported but reflectivity issues raised via community objection have not been demonstrated.

There is an over-reliance on mechanical systems as opposed to natural ventilation strategies. Consideration should be made for lifespan running costs, maintenance and user comfort in such environments. It is unclear how the school will be resilient and adaptable or how it will evolve over time to meet future requirements.

A community objection raised issues on biodiversity, citing the Biodiversity Assessment. Addressing the issues raised regarding compensatory measures for tree replanting, loss of habitat and tree canopy should be considered.

Due to building siting, there is a significant amount of tree removal without replanting. This reduces the amount of tree canopy cover and effects biodiversity and flora and fauna – as noted in an objection.

There is concerns regarding tree verdancy and canopy, as well as curtilage between 4-storey new build and remaining tree groups.

Clarification is required regarding cycle access, footpaths, and End of Trip facilities. Confirmation is required for staff End of Trip facilities and their location on plan noted. The proposal should be supported by sustainable transport initiatives, e.g. bus and pedestrian networks. It is unclear how the school will function with public transport, regarding the broader context. Attention to the transport mode share and formalised car-pooling strategies is also required. Public transport zones should be clearly identified on drawings.

Accessible and inclusive

The proposal includes one lift, which is

Given the location of the solar panels on the roof of the building, they will not be visible from the street and accordingly they will not result in glare to adjoining or nearby residential properties.

The building was originally designed as a naturally ventilated building however given its proximity to a major collector road and to provide an appropriate learning environment throughout the day and to maximise thermal comfort this building is to be fully air-conditioned. A central plant system has been nominated to provide longest plant life and to minimise running costs.

Discussed previously

Discussed previously

Discussed previously

Discussed Previously

The lift is deliberately centrally located to facilitate ease of

located centrally to the main building. However, this is not immediately associated to the main public entry, which would provide more equitable access to people with differing needs and capabilities. School identity signage is part of the building at the Myra St entrance but provides limited wayfinding assistance.

There is little announcement or presence to the street at the Edgeworth/Myera St intersection. Overall there is a lack of clarity in wayfinding at the entry points for community users.

Further detail is required to demonstrate opportunities for safe walking, cycling and public transport access to and from school. Accessibility to shared facilities after hours for members of the community is unclear. The siting of these programs may preclude direct access and discourage community use. Passive surveillance is possible for the toilet facilities towards the site's southern aspect, it is unclear whether these are to be used for community purposes outside of school hours.

The learning centre toilet facilities are centrally located in the new build. However, access for the homebases at the north-eastern aspect on the upper storeys are a significant distance. It is unclear whether toilet facilities are in the existing building (Building M), this should be demonstrated.

Amenity

The deep floor plan reduces access to sunlight, natural ventilation, and outlook. There is no dual aspect to the classrooms, further precluding access to ventilation and light.

There are currently no identifiable covered areas for protection from sun and rain at entry or bus stops. Shading across the site should be considered.

Given the relatively large site, there is a lack of diverse outdoor spaces to facilitate

movement within the building. The lift is not for Main Public Use and will be predominantly be utilised by mobility challenged staff and students and for goods movement.

Signage associated with wayfinding is scheduled to be development as part of the continued refinement of the scheme and will be installed as development is finalised. A condition of consent could be imposed to ensure that appropriate wayfinding signage is installed.

The updated TIA (Appendix G) outlines opportunities for safe walking to the school, noting that in excess of 30% of students walk to and from the school.

There are toilets located within approximately 30m of the homebases. It is not considered that this is a significant distance for a student to walk to utilise amenities. It is confirmed that Building M contains toilets for students.

The building is to be airconditioned. Sills are set low enough to allow visibility for all students. The building programme has driven the building footprint and the school has full endorsed that planning.

Discussed previously

The site is modest in area. The existing tree canopy is currently used by the school for educational opportunities. The proposed

informal and formal uses. Opportunities could be found in better using the existing tree canopy as learning environments. The proposed campus new building brings together several on-site buildings and is located along Edgeworth David Avenue. Locating the building along this road may lead to acoustic issues and impact on learning environments at upper levels. No detail provided on acoustic performance. It is unclear how the building integrates with or considers the natural environment to enable different play spaces, or opportunities for outdoor learning environments. It also appears there is a lack of variety in COLA currently provided. There does not appear to be any shading to the hardstand basketball court or existing COLA.

Health and Safety

Consideration should be taken into the surrounding traffic impact on Myra and Edgeworth David Avenue, as raised in a community objection. Parking and access were also raised, especially given the Hornsby Hospital redevelopment. Overall, priority should be placed on pedestrian safety and promoting active transport strategies as alternatives to car dependency. Student pick-up/drop-off zones, as well as bus drop-off zones, should be further developed to alleviate congestion at peak times. Strategies to outline how peak time drop-offs will work should be provided. The retention of the existing parking numbers is commended. However, the parking facilities are now significantly removed from the main building and do not consider access for all users. It is unclear where service/emergency vehicles would access the site and how this impacts on daily usage and safety for the school user. The retention of 128 bicycle racks is commended, but it is unclear as to the alternative transport strategies and school objectives regarding active transport.

The distribution of toilet facilities appears inadequate. Travel distances from the main entry to homebases on upper floors are significant.

Whole of Life, flexible, adaptable

The combination of programs and relatively tight internal spatial planning does not consider a whole-of- lifecycle approach

landscaped will enhance opportunities for this to occur.

The building incorporates acoustic absorbing materials and are appropriately setback from boundaries to reduce excessive noise transmission.

The acoustic report (Appendix I) confirms that traffic along Edgeworth David Avenue will not unduly impact on operations within the site.

Noted. An updated Traffic Impact Assessment and Green Traffic Management Plan accompany this resubmission.

Discussed previously

when considering cost for multiple uses, flexibility and change of use over time and should be reviewed. Consideration could also be made to the wider public benefits over time regarding traffic congestion, vicinity heritage items and tree canopy.

Indicative alternative layout plans are required to explain how learning environments can accommodate future teaching approaches. Clarification is required as to how the internal spatial planning relates to or is consistent with current or future intended pedagogical models for the school including evidence of consultation with educators or principals. Quiet spaces and breakout areas have not been provided and would benefit the student cohort. The school's pedagogical approach and how the school will operate or respond to future teaching mode or methods is unclear.

Evidence of any school and community group involvement is required.

Aesthetics

While the materials appear to be robust and durable, it is not clear that there is an aesthetic vision driving the outward appearance of the new building. No design rationale or design process for the formal arrangement of elements, façade composition, the selection of materials, or approach to detailing has been provided. The learning centre should be welcoming to students and the community and have clearly identifiable entry points. The scale of the building is large for such a continuous façade approach. Consider introducing breaks, with a view to potentially establishing greater visual prominence at the corner of Myera St and Edgeworth

The internal design of the new buildings has been carefully considered and refined in conjunction with DOE staff including existing teaching staff.

As outlined in section 4.2 of the EIS, the school's principle is a key member of the Project reference Group.

Section 4.2 and 4.3 of the EIS discuss this.

The use of facilities by the 'community afterhours is at the discretion of the school. This school has a long history of co-operative facility use with the Community and, we understand, plans to continue to do so. However, the school is designed to function to meet the needs of the school as first and highest priority, including site security.

Appendix V of the EIS is the Built form and Urban Design Report that outlines the aesthetic vision and design rationale of the project.

David Avenue and at entries, integrated with a landscape approach to outdoor play and learning, and security. Opportunities for soft landscaping strategies to improve visual amenity along the Myera and Edgeworth David streets should be explored. The long stretches of security fencing to public facing areas does not promote community engagement with the school during out of school hours. The proposal would benefit from integrating service elements with the building design. Opportunity could be made for integrated public art strategies at entries, breakout spaces, informal activity spaces or in landscaped areas – they could optimise civic pride and local identity. It is unclear if any public art strategy is in place.

DESIGN EXCELLENCE PROCESS

A commitment to and investment in design excellence processes should be evidenced. GANSW is not aware of any design excellence process that has been undertaken for this project. The architectural firm is not included on the NSW Government Architect's Pre-Qualification List for Strategy and Design Excellence.

The project has been designed by GHDWoodhead.

GHDWoodhead has now been ranked in the top three architecture practices in Australasia and #55 globally in the World Architecture 100 2018 survey.

Recently GHDWoodhead has and won the design competition for the new dedicated cruise terminal in Newcastle. The practice has also delivered a number of high-profile buildings, workplaces and landscapes across Australia, including the Curtin University Medical School in Perth and Barwon Water Headquarters in Geelong, Victoria.

The design has been subject to a vigorous internal design process as well as a review by registered architects within TSA on behalf of the Department of Education,

3. NSW EPA

1.	<p>(a) <i>the need for a detailed assessment of potential site contamination, including information about groundwater and a detailed assessment of the footprint and surrounds of existing buildings following their demolition;</i></p> <p>(b) <i>demolition/construction phase noise and vibration impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) on noise sensitive receivers such as surrounding residences and the nearby Balmara preschool;</i></p>	<p>Discussed Previously in this response to submissions.</p> <p>A quantitative assessment of the main noise and vibration generating sources during construction and operation has been completed and is included in the Acoustic Report provided with the original submission.</p> <p>The Acoustic Report, provided as Appendix I to the original submission, confirms that SEARS requirements noted in 4.2 of EPA response form part of the Acoustic Assessment (Section 3.1.2).</p> <p>Vibration criteria used to assess potential construction vibration impacts complies with "Assessing Vibration: A Technical Guideline 2006" which notes refers to short-term work (Section 2.5) including construction activities which will occur for the duration of approximately one week. This short-term work definition would apply to construction activities at Waitara, with plant not be anticipated to be in use consistently and items such as compactor and dozer only required for specific short-term construction activities toward completion of construction.</p> <p>The Acoustic Report corresponds with this guideline outlined in Section 2.5, which states: <i>"where work is short-term, feasible and reasonable mitigation measures have been applied and the project has a demonstrated high level of social worth and broad community benefits, then higher vibration levels may apply. In such cases best practice management should be used to reduce values as far as practicable, and a comprehensive community consultation program should be instituted."</i></p>
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As an upgrade of a Public School the proposal has a high level of social worth and community benefits, providing a permanent teaching space and enabling future focused learning to be provided to the increasing Waitara population. In addition, a comprehensive Community Consultation program has been instituted, with monthly Information Booths offering direct communication with the community as the proposal progresses.

For this reason, levels including in "Assessing Vibration: A Technical Guideline 2006" are not referred to in the Acoustic Report, which instead includes a list of reasonable mitigation measures as noted in the extract from Section 2.5.

As previously noted, the team would welcome the inclusion of any additional measures which EPA deem appropriate which could be conditioned as part of the final determination. Vibration Monitoring could be installed on site with trigger levels agreed to provide further confidence around the low levels of continuous vibration which would be caused during construction, and negligible levels during operation.

(c) *demolition/construction phase dust control and management;*

It is considered that the Department of Planning could impose conditions to appropriately regulate construction activities on the site.

(e) *demolition/construction phase erosion and sediment control and management;*

It is considered that the Department of Planning could impose conditions to appropriately regulate construction activities on the site.

(f) *operational noise impacts on noise sensitive receivers (especially surrounding residences on adjoining and adjacent holdings) arising from operational activities such as public address/school bell systems, community use of school facilities, waste collection services and mechanical services (especially air conditioning plant);*

With regards to operational noise, the three scenarios modelled are anticipated to be the loudest and most disruptive activities which will take place during operation. Mitigation measures have been included within the proposal which will work to minimise

	operational noise from within the new building, including glazing treatment for windows and glazed doors, and including a minimum amount of insulation for internal wall and linings. It should be noted that the increase in school capacity as a result of the proposal is not considered to have an impact on operational noise due to the small increase in population that the proposal will facilitate (5% increase in school population). The team would support the inclusion of a condition to prepare an Operational Noise Management Plan prior to the completion of the proposal which could include a noise monitoring program to ensure sound levels do not exceed the Industrial Noise Policy (EPA,2000) noise criteria.
(g) <i>the need to assess feasible and reasonable noise mitigation and management measures (including time restrictions on the use of the facilities proposed to be available for community use) to minimise operational noise impacts on surrounding residences;</i>	A key aim of the 2017 Education and Childcare Centre SEPP is to encourage after hours usage of school sites. The acoustic report indicates that the hall can be utilised until 10pm without unduly impacting on the amenity of surrounding residents, given this the afterhours usage of the site is supported.
(h) <i>practical opportunities to implement water sensitive urban design principles, including stormwater re-use; and</i>	The development incorporates water sensitive urban design and includes stormwater harvesting and reuse.
(i) <i>practical opportunities to minimise consumption of energy generated from non-renewable sources and to implement effective energy efficiency measures.</i>	The development incorporates 234 solar panels of the roof of the main building to minimise the use of energy generated from non-renewable sources.
3. Office of Environment and Heritage (Heritage Division) <i>The subject site is not listed on the SHR. It is a local item within Wairoa North Heritage Conservation Area situated in the</i>	The impact on the contributory heritage items has been appropriately considered in the submitted and supplementary heritage information. (appendix C)

vicinity of numerous local items, all listed on the Hornsby Local Environmental plan 2013. There are no historical archaeological issues identified with this site. A formal comment from the Heritage Council is, therefore, not required.

However, it is recommended that consideration be given to the impact of the proposed development on Wahroonga North Heritage Conservation Area especially the loss of two contributory items and addition of a large scale contemporary building to a locally listed site. Consultation with Hornsby Shire Council on mitigating heritage impacts including design amendments, appropriate interpretation, and landscape and urban design is also recommended.

Please note no further referrals to the Heritage Council are required for this proposal.

4. RMS

Roads and Maritime has reviewed the proposal and raises no objections to the proposed development subject to the following conditions being included in any consent issued by the department:

1. All buildings and structures, together with any improvements integral to the future use of the site are wholly within the freehold property (unlimited in height or depth), along the Edgeworth David Avenue boundary.

All building works are proposed within the site.

2. A Construction Traffic Management Plan detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to Council for approval prior to the issue of a Construction Certificate.

Noted. A preliminary Construction Traffic Management forms part of this resubmission. (Appendix D)

3. A Road Occupancy Licence should be obtained from Transport Management Centre for any works that may impact on nearby traffic signals Edgeworth David Avenue during construction activities.

Noted.

5. Transport for NSW

TfNSW requests that the TIA includes any existing traffic operational and traffic / pedestrian safety issues (if any) and mitigation measures for the identified issues.

An updated TIA accompanies this response to submissions.

A formal road safety audit should be undertaken and included in an updated TIA as part of the response to submissions. This road safety audit needs to be undertaken for all operational aspects of the school including servicing arrangements in accordance with Austroads Guide to Road Safety Audit Part 6: Road Safety Audit by an independent TfNSW accredited road safety auditor. Based on the results of the Road Safety Audit, the TIA needs to include proposed safety measures to improve the safety of school operation.

A formal Road Safety Audit is provided at Appendix F.

TfNSW requests that the applicant needs to demonstrate that:

- The extension of pick up / drop off zone would not have impact on the operation of Edgeworth David Avenue and Myra Street intersection as potential queuing expected to occur to access the pick up / drop off zone; and*
- The proposed pick up / drop off zone would be adequate to cater for the proposed expansion of school.*

Note that any changes to on-street parking provision and management needs to be approved by the local council.

The TIA indicates that the possible extension of the pick up and drop off facility would potentially accommodate an additional 6 vehicles.

TfNSW requests that the applicant be conditioned to prepare a Service Vehicle Management plan that includes the following:

- Details of the type and frequency of service vehicle movements to the site;*
- Safety assessment for the service vehicle movements at the site; and*
- Swept path analysis for the design service vehicle.*

Noted, although service vehicle access is not altered by this expansion of the school.

It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP), in consultation with Hornsby Shire Council and Roads and Maritime Services, with specific reference to but not limited to:

- Location of the proposed work zone*
- Haulage routes;*
- Construction vehicle access arrangements;*
- Proposed construction hours;*
- Proposed measures to prevent students accessing the construction area;*
- Estimated number of construction vehicle movements;*
- Construction program;*
- Any potential impacts to general traffic, cyclists, pedestrians, students and bus services within the vicinity of the site from construction vehicles during the construction of the proposed works;*
- Cumulative construction impacts of projects within the vicinity of the proposed development; and*
- Proposed mitigation measures. Should any impacts be identified, the duration of the impacts and measures proposed to mitigate any associated general traffic, public transport, pedestrian, students and cyclist impacts should be clearly identified and included in the CPTMP.*

The applicant shall submit a copy of the final plan to Hornsby Shire Council, prior to the commencement of any work on site.

A preliminary construction and traffic management plan accompanies this response to submissions. (Appendix D).

TfNSW requests that the applicant be conditioned to prepare a detailed Green Travel Plan (for staff and students) to encourage active and public transport modes and reduce the reliance on private vehicles.

A Green Traffic Management Plan accompanies this resubmission. (Appendix E)

6. Hornsby Council

Heritage

The proposed height, bulk and scale do not comply with the heritage provisions for development within the Wahroonga (North) HCA. However, it is acknowledged the future expected student growth for the site requires the need for higher density development rather than continuation of the development of the single and two storey buildings.

Noted.

Further acquisition of adjacent land is preferable from a heritage perspective to retain the characteristic low scale building. This option was not presented within the Analysis of Feasible Alternatives (Part 1.5 of the Environmental Impact Statement) and should be investigated to provide sufficient justification to proceed with the current proposal which is inconsistent with the heritage conservation controls for the site.

Given the projects budget, there is no opportunity to explore the acquisition of adjoining properties to facilitate the continued provision of 1 and 2 storey buildings. It is also noted that any acquisition would need to occur within a Heritage Conservation Area.

Should further acquisition of land not be feasible, no objections would be raised to the proposed three (3) to four (4) storey building height on the grounds that it is the only feasible option for future development of the site. In this case, the bulk and scale of the north and west elevations should be reduced by stepping the building in at the top level. This would reduce the level of impact on the visual setting of the new work in the context of the predominantly single storey scale Wahroonga (North) HCA.

The 3 -4 storey form of the building is considered to be compatible given the prevailing heights of buildings in the immediate visual catchment of the site.

Demolition of Buildings A and J are inappropriate having regard to Part 9.3.10 of the HDCP and would have a detrimental impact on the contribution of the Waitara Public School to the HCA. Objections are raised to the demolition of Building J. The new development should be re-sited and designed to ensure retention of Building J. Alternatively, at a minimum Building J should be relocated to another location within the school site.

The building is in below acceptable condition and no longer capable of adequately meeting modern pedagogical needs/methodologies. Building A performs its Admin. role very poorly with inflexible load bearing walls between spaces.

Further articulation should be introduced to reduce the overt building scale in respect to the surrounding low scale built environment. The sky blue square protruding element is an unsympathetic dominant feature which highlights the excessive bulk of the building and should be deleted.

Given the 10m setback to Edgeworth David Avenue and existing landscaping between the building and the street it is not considered that the building will overwhelm the street.

Part 9.3.1 of the HDCP requires new materials to complement the period and style of the conservation area, be compatible to, by not necessarily matching the existing. Exclusive use of PC cladding and introduction of colour (sky blue) would have an adverse visual impact on the collective visual catchment of the building stock of the Wahroonga (North) HCA.

The introduction of a modern building is considered to demonstrate the evolution of the sites use as an educational establishment from the initial days of

The building would visually dominate the corner site as an obtrusive modern architectural expression and provide an inappropriate visual entrance and setting to that of the

surrounding HCA which has traditional materials and finishes of early 20th century character.

European settlement of the area to the present.

Red face-brick should be incorporated as the main external finish with PC cladding of neutral colours restricted for use to feature elements only. No concerns are raised to the use of colorbond metal sheet roofing as it permits the low pitch roof design which reduces the overall height of the building.

Noted

No concerns are raised to the proposed landscaping works. The new surface areas and plantings proposed are appropriate for the intended use of the site and complement the existing native landscaping. Retention of the playing fields is also an appropriate low scale use of the south-west corner of the site bordering onto the local heritage item No. 746 (House) and the residential portion of development with the HCA.

Vegetation

The vegetation on the site is mapped as Sydney Turpentine Ironbark Forest (STIF) which is listed as Critically Endangered under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 and an Endangered Ecological Community under the NSW Threatened Species Conservation Act 1995.

Council's Natural Resources Team advise that the proposal is unlikely to have a significant impact upon species, populations and communities listed under the Biodiversity Conservation Act 2017. However, it is recommended that the Landscape Plan be amended to include additional plantings of locally indigenous Sydney Turpentine Ironbark Forest EEC species (trees, shrubs and groundcovers) to enhance the habitat corridor where it is considered its passive use is unlikely to contradict future child safety concerns. The area of focus would be the northern and eastern boundaries of the site.

An amended landscape plan accompanies this resubmission. This plan provides details of native plantings. (Appendix J)

Traffic and Parking

- The Traffic Impact Assessment (TIA) prepared by GHD states there will be an increase from 32 full time staff to 42 full time staff. The provision of parking for full time staff is 1 parking space per full time teacher in accordance with Hornsby DCP. The TIA has assessed the parking provision for full time staff with a rate of 1 parking space per 3.5 full time teachers using the ratio of existing number of parking spaces and full time teachers. Council does not accept this method of determining the provision of parking and should be calculated in accordance with Hornsby DCP. Provision for 2-3% of the total number of parking spaces to be accessible parking spaces in accordance with Hornsby DCP Table 1C.2.1(f) Accessible Car Parking Provision.*

Parking provision on the site is increased by 12 spaces to 24 as part of this development. This provides for additional staff parking that will reduce for on street parking.

- The TIA suggests, "The school could benefit from pedestrian crossings that exist outside school entrance/exits, on Myra Street and Edgeworth David Avenue." Council has concerns with the traffic flow if a signalised pedestrian crossing is installed at the school gate access on Myra Street due to the close proximity with the existing traffic signal intersection of Edgeworth David Avenue/Myra Street. Council's Traffic and Road Safety Branch suggests a pedestrian crossing facility on Myra Street to be located south towards Park Lane. Any pedestrian crossing facility being proposed in conjunction of the proposed redevelopment of Waitara Public School is subject to relevant RMS warrants.
- Highlands Avenue is currently used as an alternative pickup/drop off operation during school peak periods. Consideration be given to providing formal cul-de-sac bulb at the end of Highlands Avenue (School Staff Car Park Entrance).
- Any classes for students with special needs will require dedicated pick up/drop off parking spaces provided onsite.

The additional pedestrian crossing is no longer proposed

It is considered that there is opportunity for vehicles to turn within Highland Avenue and that the provision of a turning bay would reduce opportunities for additional parking.

There is no current intention for the school to cater for students with Special Needs.

7. Sydney Water

Thank you for notifying Sydney Water of the development application listed above. We have reviewed the application and provide the following information to assist in planning the servicing needs of the proposal, based on the information supplied.

Water

- The existing 150mm watermain fronting the site on Myra Street is available to service the proposed development.

Noted

Wastewater

- The existing 225mm wastewater main crossing Myra Street from the west boundary of the site is available to service the proposed development.

Noted

This advice is not a formal approval of our servicing requirements. Detailed planning and servicing requirements,


including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 compliance certificate, usually following assessment of the development application	Noted. It is anticipated that the department of planning will impose conditions to reinforce this.
<p><i>I refer to your letter dated 26 March 2018 inviting comments on the above State Significant Development application including the Environmental Impact Statement (EIS) for the proposal involving the following works:</i></p> <p><i>demolition of eight buildings in the northern section of the site, two of which originate from the inter-war period;</i></p> <p><i>removal and/or relocation of approximately 16 demountable classrooms;</i></p> <p><i>tree removal to allow for installation of new four-storey infill building in the north- western corner of site; and</i></p> <p><i>landscaping works, including the addition of a 'Heritage Courtyard' feature.</i></p> <p><i>The subject site is not listed on the SHR. It is a local item within Wahroonga North Heritage Conservation Area situated in the vicinity of numerous local items, all listed on the Hornsby Local Environmental plan 2013. There are no historical archaeological issues identified with this site. A formal comment from the Heritage Council is, therefore, not required.</i></p> <p><i>However, it is recommended that consideration be given to the impact of the proposed development on Wahroonga North Heritage Conservation Area especially the loss of two contributory items and addition of a large scale contemporary building to a locally listed site. Consultation with Hornsby Shire Council on mitigating heritage impacts including design amendments, appropriate interpretation, and landscape and urban design is also recommended.</i></p> <p><i>Please note no further referrals to the Heritage Council are required for this proposal.</i></p>	<p>Noted.</p> <p>The loss of contributory items is assessed in the Appendix C. To minimise the impact of the proposal the production of a salvage schedule is recommended prior to the demolition of Building A.</p> <p>Noted.</p>

GOVERNMENT ARCHITECTS DETAILED RESPONSE

As outlined above a detailed response as to how the project is proposed to be further modified to address the opportunities outlined by the Governments architect Office is now provided.

In response to the further comments received from the Governments Architects office on 15 November 2018 a detailed and thorough response on each of the points previously raised in your initial review which we feel have been addressed through the issue of the Schematic Design report; including a revised Urban Design and Built Form Report which explains the design journey which we have been on with Waitara Public School.

Following completion of Schematic Design, the ongoing development of a final design for Waitara Public School was tendered, with the preferred designer



confirmed as NBRS Architecture. NBRS were provided with the original letter from GANSW and have undertaken a review of the design with several revisions made which we feel address comments from GANSW and results in a more favourable design outcome.

The content of this letter responds to points made, either by directing GANSW toward information which has informed the design to date, or to explain the revisions made in respond to GANSW comments. Wherever possible revisions have been made, provided these would not create an operational issue for the Department of Education.

Questioning the strategy of consolidating so much program into a single, very large floor plate.

Waitara Public School is situated within an area of significant growth, with population growth for the Hornsby area anticipated to increase by 16% between 2016- 2036. The Business Case produced for Waitara Public School and provided as Appendix O notes this growth and specific impact on Waitara Public School, concluding that increasing enrolment capacity at Waitara to provide permanent teaching spaces for up to 1000


students will take pressure off other schools in the cluster and respond to the particular local growth demand.

During development of the current project it was noted that Waitara Public School is heavily developed with space-inefficient buildings, with demountable and modular units providing over half of the teaching spaces on site. Many of the existing permanent buildings are in poor condition and do not comply with current access and equity requirements. The school's support facilities were classified as significantly undersized for the school's population and the size of the site was confirmed as relatively small in comparison to other schools, although population is expected to steadily increase.

Using the context of future growth and the current poor condition of the existing buildings the Business Case for the project confirms that an upgrade is required to increase capacity and upgrade the facilities within the existing site to provide new core facilities for 1,000 students and 37 new permanent teaching spaces, removing the existing inefficient permanent and temporary buildings.

In order to produce a series of options for consideration, the Educational Principles for the Waitara Public School upgrade were developed which outline the key objectives for the project (provided as Appendix P). These Educational Principles include providing an environmentally and aesthetically pleasing space, and also offering a diversity of indoor and outdoor spaces which manifest sustainability and enable and enhance community partnerships. These Educational Principles mirror the Design Quality Principles in the 2017 Education SEPP which seek to provide pleasant and engaging spaces that are accessible for a wide range of educational, informal and community activities.

The Educational Principles also note the importance of retaining green space in



response to the Educational Facilities Standards and Guidelines (EFSG) which NSW Department of Education school facilities must comply with. EFSG requirements note that every student must have access to 10m² of play space, outside of the formal learning areas.

When reviewing the size of the site and requirement for 10m² of play space for 1,000 students it became clear that reducing the footprint of the buildings and incorporating a multi-storey solution would be the only way in which this 10m² area could be achieved. This requirement complements the Design Quality Principles in the Education SEPP which notes that landscape should be incorporated into the design of school developments to enhance on-site amenity.

In addition to the importance of retaining open space across the site, the consolidation of teaching spaces into one floor plate enables the upgrade to respond to the Educational Principles developed for Waitara Public School and those developed for


the EFSG which concentrates first and foremost on the needs of learners and learning. Providing new teaching facilities within one floor plate will offer accessible, connected and flexible learning areas which can be accessed in all weathers and promotes learning for students and teachers through collaboration, social interaction and active investigation. The layout of the new building will allow multiple classrooms (homebases) to be combined into group teaching areas, with each learning level organised with a central teaching area which can be formed into distinct learning neighbourhoods. These connected and flexible spaces are linked vertically by the inclusion of an amphitheatre, enabling light to be drawn into the middle of the building whilst providing additional opportunities for large groups of students to be team taught.

More detail on the options considered during design development can be seen in the Functional Design Brief provided as Appendix Q and Concept Design Report provided as Appendix R.

The size of the floor plate questioned by GANSW has been developed in response to the Educational Principles developed for Waitara, and to align with the EFSG requirements for school facilities. The Concept Design Report includes further details of these requirements, with Area Schedules determining the m² which must be achieved for each item across the entire site. Reducing the floor plate of the building would therefore compromise the projects adherence to EFSG requirements and the Educational Principles developed specifically for Waitara Public School; however, the Built Form and Urban Design Report provided as Appendix E details some items which have been incorporated into the design to reduce the visual impact of the overall building mass. Further development of options which could reduce bulk and scale have been provided as Appendix T and we would welcome GANSW's feedback on these options and any others they might like to see considered.

Questioning the strategy of placing the new building on a significant corner in a conservation area.

In response to the comments relating the placement of the building within the site, the



building placement has been chosen following a careful and detailed review of several options at master planning stage. Further information on this stage of the project can be seen when reviewing the Functional Design Report, and Concept Design Report, which notes three key areas were identified for building placement, at the south, east and northwest of the site.

The decision to place the building in the north-west area of the site enables the new building to be linked to an existing teaching building, will avoid the removal of trees compared to other options and also enables the new building to act as a screen, reducing vehicular noise from the busy Edgeworth David Avenue for students playing in the south of the site where many mature trees are situated. As confirmed in the Urban Design and Built Form Report, the building is set back from Edgeworth David Avenue by 9.5m and Myra Street by 9m. This enables the retention of many significant mature trees and therefore the future of this conservation area. As noted in the Heritage Report provided as Appendix G, the proposal would retain the greatest possible number of trees whilst enabling the necessary redevelopment and would result in a harmonised, and even, interconnected relationship with the onsite tree group. The placement of the building therefore responds to the Design Quality Principles of the 2017 Education SEPP which seeks to protect the visual qualities of the area and minimise the developments visual impact on those qualities and that natural environment.

The setback and retention of trees would also enable privacy at street level to be maintained, corresponding with Design Quality Principles to consider the amenity of the surrounding community whilst also acting as a noise buffer between the road and open play spaces to ensure a high level of amenity for students.

The buildings deep floor plate limits access to natural sunlight

The initial design for the building was developed in response to EFSG area requirements to provide an appropriately sized building to providing capacity and appropriately sized facilities for 1000 students. Following receipt of GANSW comments NBRS Architects have proposed a number of revisions to the current design, which would improve access to natural sunlight in the building without compromising on the areas required by EFSG. A copy of these updated plans, and a written response from NBRS in relation to this comment is provided as Appendix T.

The deep floor plate responds to the Design Quality Principles of the 2017 Education SEPP for amenity by providing appropriate, efficient indoor learning spaces which provide access to sunlight in accordance with EFSG and Australian Standards.

Ventilation strategies are considered unacceptable

Ventilation strategies for Waitara PS have been developed in response to poor and further declining air quality in the local area, which can be attributed to the following:

- The location of the school at the intersection of two very busy roads which generate both high noise levels and high levels of pollution and dust in the

atmosphere; and

- A new road tunnel, unfiltered exhaust stack which is being constructed within one kilometre of the school.

An air-conditioning system is therefore included as part of the proposal which would enable the building to provide fresh and filtered air throughout the building and enable temperature to be controlled. Although windows can be opened to provide cross-ventilation if required, the ventilation strategy developed corresponds with the Design Quality Principles of the 2017 Education SEPP as appropriate ventilation would be provided with closed windows, providing appropriate noise mitigation to ensure a high level of amenity for occupants despite the location of the building close to two busy roads.

In the recent GANSW review comments were also made on measures which could be taken to improve the design of the proposal. Each of these suggestions was considered and incorporated into the proposal as far as possible. A detailed response to each of the suggestions is included below.

Consider breaking down the bulk and mass of the building

Following receipt of comments, NBRS have undertaken a review of the design and have considered a number of different ways in which the bulk and mass of the building could be addressed. A detailed response to this suggestion is provided in Appendix F. It is considered that these revisions address the aesthetics Design Quality Principle of the 2017 Education SEPP by responding to positive elements from the site and surrounding neighbourhood through the materials and colours chosen for the design.

Holistically reconsider the approach to security and fencing across the site, including building locations

The proposal does not seek approval to install any additional fencing across the site but retains the existing fencing which was installed by the Department of Education, and which responds to the Design Quality Principles of the 2017 Education SEPP by optimising health, safety and security within the school site boundaries. Security would be further enhanced by the proposal through the inclusion of CCTV cameras on the main pedestrian entrance (leading from Myra Street to the reception of the new building), and cameras on the vehicle entrance from Highlands Avenue to the small carpark area.

Consider retaining Building A for adaptive reuse

During the masterplanning for the site, the retention of existing buildings was considered especially in relation to heritage value, with Building A being identified as one of the earliest buildings on the site.

However as noted in the Business Case the existing buildings across the site are in poor condition and do not comply with current access and equity requirements. The requirement to provide 10m² of play space per student also would prevent the retention



of the existing Building A.

Although retention of the building would not be possible without compromising the EFSG requirements, due to the historic value of Building A, and in accordance with the Design Quality Principles of the 2017 Education SEPP which note that schools should respond to heritage within their setting, the removal of Building A would be used to create a heritage garden for the school.

This heritage garden, would further respond to the Design Quality Principles of the 2017 Education SEPP through the inclusion of historical interpretation devices, creating an outdoor learning and play space, whilst responding to the heritage qualities of the site.

Included covered areas for protection from sun and rain at entry or bus stops

The landscape design provided for the proposal as Appendix H notes the shading which will be provided across the site, in accordance with the Design Quality Principles of the 2017 Education SEPP for amenity.

Provide different play spaces or a variety of outdoor learning environments

The landscape design provided for the proposal as Appendix H notes different play spaces and outdoor learning environments which will be provided across the site, in accordance with the Design Quality Principles of the 2017 Education SEPP for amenity.

Provide environmental performance indicators and assessments

As per the Design Quality Principles of the 2017 Education SEPP which seeks to provide a sustainable, efficient and durable design, the new building will include a Building Management System to regulate temperature and CO2 levels. This BMS will also enable rooms to be shut down if they are unoccupied for greater than 10 minutes.

A 70kW roof-top solar power system will be installed on the roof of the building to reduce the buildings requirement on traditional power sources.

Integration between landscape design and building, to improve outdoor learning opportunities and improve public domain

Landscape Plans provided as Appendix H provide detail of the outdoor learning opportunities which would be installed as part of the proposal. This refinement of the landscape area surrounding the new building is possible as the size of the new building enables the removal of several permanent and temporary structures on the site.

Retain further existing mature trees wherever possible, and plant a minimum of one tree for any tree lost

This request from GANSW is noted. An existing Arborist Report provided as part of the SSD documentation notes the removal of trees only where required and the Landscape Plan notes that trees will be replaced on a ratio of 1:1.

The removal of mature trees will also enable the installation of a yarning circle, in accordance with the Design Quality Principles of the 2017 Education SEPP which seeks to enhance Aboriginal Cultural Heritage.

Review shade generally, notably the student wait area

The landscape design provided for the proposal as Appendix H notes the shading which will be provided across the site, in accordance with the Design Quality Principles of the 2017 Education SEPP for amenity.

Reconsider the provision of student toilet facilities or evidence that the proposed provision is acceptable

As noted in the response provided by NBRS as Appendix T and following receipt of comments from GANSW the toilets have been replanned with additional WC's provided to ensure that provision is in accordance with the requirements of EFSG for a school with 1000 students.


Consider public art strategies to create identity and local context

As noted above, the removal of Building A will enable the revisioning of the area into a heritage garden as shown on Appendix H, responding to the Design Quality Principles of the 2017 Education SEPP and providing an opportunity for a variety of heritage and public art strategies to be incorporated if the school wish to explore this further.

Identify and incorporate opportunities for integrating Aboriginal culture and heritage including wayfinding, signage or rooms naming, materials and colour selection, public art, placemaking, and "welcome to country" at the entry

As noted above, the removal of Building A will enable the revisioning of the area into a heritage garden as shown on Appendix H, responding to the Design Quality Principles of the 2017 Education SEPP and providing an opportunity for a variety of heritage and public art strategies to be incorporated if the school wish to explore this further.

Furthermore, the removal of mature trees will enable the installation of a yarning circle, in accordance with the Design Quality Principles of the 2017 Education SEPP which seeks to enhance Aboriginal Cultural Heritage.



As the proposal proceeds, we would look to incorporate further opportunities for integrating Aboriginal culture and heritage into the wayfinding design across the site and would be willing for this to form a condition of approval, enabling further work to be undertaken in accordance with the Aboriginal community.

Consider indigenous landscaping to promote better understanding of Bush tucker, Aboriginal season changes, and the interdependencies of flora and fauna with a responsibility/duty of care for the environment.

The current landscape plan provided as Appendix H provides detail of the planting currently chosen across the site. As the proposal proceeds, we would look to incorporate further opportunities for integrating indigenous landscaping into the final landscaping plan and would be willing for this to form a condition of approval, enabling further work to be undertaken in accordance with the community.



Conclusion

I trust the above in conjunction with the specialist reports that accompany this letter satisfactorily responds to the Department's issues and that any remaining concerns with the project can be conditioned to allow a report recommending approval of the application to be finalised.

Should you require any further information, I can be contacted on 9687 8899 or 0405 530 095.

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Attachment 1: Road Safety Audit Mitigation Measures

Number	Location	Issue	Proposed Mitigation
1	Highlands Avenue	Vehicles who had dropped children off in Highlands Avenue needed to turn around. The width of the road was such that they had to undertake a three-point turn directly outside the school entrance where pedestrians were entering. This could result in conflicts between pedestrians and vehicles	Adult supervisors to assist with marshalling students in proximity to the school entrance and exits.
2	Highlands Avenue	Cars on Highlands Ave were parking over driveways when dropping off. Whilst this is legal it did limit the pull in opportunities for vehicles who would have used the driveways to let opposing vehicles past. This could result in potential vehicle conflicts.	Adult supervisors to assist with marshalling students in proximity to the school entrance and exits.
3	Highlands Avenue	Even though there is a no stopping zone at the end of Highlands Ave, cars were observed to drop children off in the no stopping zone. Apart from being illegal it did result in cars having to stop and wait behind them with potential for rear-end shunts	Adult supervisors to assist with marshalling students in proximity to the school entrance and exits.
4	Highlands Avenue	At 915, a garbage truck reversed the full length of Highlands Avenue between Oleander Road and the end of the cul-de-sac. This could cause potential conflicts with any cars or pedestrians on the road.	Please see Service Delivery Plan for more detail of how service vehicles should be managed around peak periods. School to reiterate this to garbage collection company
5	Highlands Avenue	Whilst there is a sealed footpath on the eastern side of Highlands Avenue, there was no footpath on the western side where many children were observed being dropped off. The condition of the existing verge would present a potential trip hazard	Install sealed 1.2m wide footpath on the western side of Highlands Avenue between Oleander Road and the school.

6	Myra Street	Parents were observed parking in the no parking zone on Myra Street. This would limit the ability of other people to drop off causing frustration which often results in bad decision making/road safety issues	Adult supervisors to assist with marshalling students in proximity to the school entrance and exits. Liaise with Hornsby Council and the NSW police to encourage monitoring of this location during peak school periods.
7	Myra Street	The time taken for some parents to reverse park in Myra Street drop off zone resulted in queuing back to the traffic signals. This could result in the pedestrian arms of the traffic signals being blocked and pedestrians needing to pass through cars parked over the signalised footway	<p>Increasing the "No Parking" zone would be considered as part of the proposal, subject to agreement from Hornsby Council.</p> <p>Installing footpath fencing and shifting drop off is not seen as beneficial as a reduced pick up drop off area could lead to increased queuing on Myra Street.</p> <p>The Green Travel Plan provides some additional actions which would be taken by the school to encourage other methods of transport. School to also issue regular reminders in the newsletter reminding parents about the importance of parking safely when coming to pick up children.</p>
8	Myra Street	Left turn red arrow protection is not provided for pedestrians on the south leg of the Myra Street and Edgeworth David intersection	Introducing a late start green signal to provide additional pedestrian protection would be considered as part of the proposal, subject to agreement from RMS and Hornsby Council
9	Edgeworth David Avenue	Motorists travelling westbound in the kerbside lane of the 2 lanes on Edgeworth David Avenue were observed to merge late on the immediate approach to school buses waiting outside the School (which were noted to wait for up to 10 minutes).	No mitigation measures have been identified
10	Myra Street	Many parents and children were observed crossing Myra Street and Edgeworth David Avenue when the pedestrian man was flashing red. Late crossing pedestrians might conflict with left turning vehicles.	Utilise adult supervisors to marshal students and parents at pedestrian crossings, limiting crossing starts to green signal only

11	Myra Street	The footpath at the intersection of Myra Street and Edgeworth David Avenue is not wide enough to accommodate the high pedestrian demand.	No mitigation measures have been identified
12	Myra Street	The footpath on the eastern side of Myra Street is not wide enough in some locations to contain the pedestrians. This could result in pedestrians walking on the edge of the path/verge with the resulting trip hazards.	Footpath along Myra Street to be widened to provide additional width for pedestrians
13	Myra Street	Due to the lack of pedestrian crossing facilities, pedestrians were observed waiting on the central median. Clearly, this could result in conflicts between pedestrians and vehicles	Encourage students to use lights at Myra Road, Edgeworth Davis to access school.
14	Oleander Road	Oleander Road is quite wide at the intersection with Myra Street. This results in long walk distances for pedestrians and higher traffic speeds for turning vehicles. This could clearly lead to pedestrian/vehicles conflicts	No additional action proposed
15	Myra Street	There was one parking sign on Myra Street telling drivers of the easternmost extent of the zone but there was no corresponding parking zone sign to the west - it appears that it had been removed from an adjacent directional signage pole. This meant that drivers did not fully understand where and where they could not pick up/set down. This could result in driver confusion and bad decision making which could result in road safety issues.	No parking sign to be reinstated, subject to agreement from Hornsby Council