

2 November 2015

Our Ref: 14-170 AK

David Booth

Woollahra Council
536 New South Head Road,
Double Bay, NSW, 2028

Dear David,

RE: BELLEVUE HILL PUBLIC SCHOOL (DA REF: DA315/2015) (JRPP REF: 2015SYE080 DA)

City Plan Strategy and Development acts on behalf of the Department of Education and Communities (DEC), the proponent for the above application.

The subject application will be considered at the Joint Regional Planning Panel (Sydney East) on 4 November 2015.

We have reviewed Council's assessment report and note that Council has recommended refusal of the development.

As your report notes, this DA cannot be refused except by the Minister. We will be making representations to the JRPP that it not recommend refusal to the Minister and instead grants conditional approval.

Should the JRPP be prepared to grant consent it will also be necessary for it to obtain the approval of the DEC as the applicant (or the Minister) to impose conditions on that consent.

Without pre-empting any decision of the JRPP, we wish to advise Council of conditions that the Department would approve to be imposed should consent be granted.

These conditions include Council's draft conditions submitted to the JRPP except where amended as indicated in this advice. They also include additional conditions proposed by DEC in a genuine effort to address the reasons for refusal outlined in your report. The proposed "approved" conditions are attached to this submission, however, we also wish to briefly explain the reason for some of the conditions that respond to Council's reasons for refusal.

Traffic and Car Parking

After consultation with both DEC and the Principal of the Bellevue Hill Public School, we have been informed that the existing student population of the school is more than indicated in the DA documentation and upon which the traffic report was based. Presently the school has 620 enrolled students. This is an additional 70 students when compared to the previous estimate of 550 students which was based on the school's 2014 calendar.

As a result, the traffic queuing impacts associated with an additional 380 students (rather than 450) are less than previously estimated. Once the proposed recommendations (as outlined below) such as the green travel plan are introduced, the queuing associated is forecast to remain the same as the current 32 queuing cars (within the access road opposite the school and along Birriga Road). This is further explained in the letter of advice from EMM traffic consultants, attached to this letter.

At the JRPP briefing on 2 September 2015, the JRPP requested that consideration be given to whether the development could incorporate a temporary internal drop off/pick up zone to accommodate the potential increase in demand as a result of the school's upgrade.

Whilst DEC policy is not to allow vehicles to mix with primary school students, in response this request, an analysis of potential options was undertaken. Due to the constrained nature of the site, none of the options could be justified on various bases, including:

- The proposed areas would occupy a large portion of the school grounds, creating significant safety issues for the school's students;
- Difficult to manage, permanent structures and fences would be required, ultimately reducing the school's play areas;
- Impact on tree roots, therefore additional trees may require removal;
- Basement access/parking would impact on the feasibility of this project. This would result in excessive costs;
- A redesign of the proposed new building would be required under some options, ultimately delaying the delivery of the development;
- Vehicular entry and exit points would occupy the school's main pedestrian access points; and
- Exits for the internal area would be required on the existing busy road creating further potential conflict points.

Due to safety concerns, the loss of play areas and other reasons described above, internal car access cannot be justified, especially considering potential traffic impacts are limited to less than 2% of the entire day.

The main priority of DEC is to ensure there is sufficient capacity in the local public education system to support the long term population growth of Sydney's eastern suburbs, where land availability is limited. This is supported by DEC's Educational Facilities Standards and Guidelines (EFSG), which is the principal development guide for public schools.

The below extract is from the EFSG on providing car parking within school grounds.

"In order to ensure that the available site area for teaching, learning and play is maximised, to enable community use and to encourage the use of sustainable means of transport to and from the school, on school site parking should be kept to a minimum".

As acknowledged in Council's report, Clause 32(3) the State Environmental Planning Policy (Infrastructure) 2007, states that if there is an inconsistency between the Department of Education and Training's Educational Facilities Standards and Guidelines, (previously known as the School Facilities Standards) and a provision of a development control plan, the standard prevails to the extent of the inconsistency.

The subject development is compliant with this guideline. It maximises the limited space available within the school grounds for crucial open space, playgrounds and educational facilities for the primary school students, by minimising onsite parking.

Consistent with the EFSG, this proposal seeks *"to encourage the use of sustainable means of transport to and from the school"*, through effective demand and operational management.

Also, with the implementation of the proposed conditions of consent (as attached and below) an internal drop off/pick up zone is not considered necessary to deal with the additional student numbers.

As below, it is considered that the first 3 conditions will satisfactorily manage the projected increase in demands. However the remaining conditions are proposed as advisory notes on any consent, to further improve drop off and pick up conditions in the medium to longer term. If any or all of these latter options do not eventuate for any reason however, it will not impact on the ability to manage the traffic generation from the proposed development.

The proposed conditions, as attached, cover the following key areas:

For immediate implementation:

- Green Travel Plan - develop and promote a green travel plan, encouraging students, guardians and staff members to use alternative modes of transportation. Additional initiatives such as encouraging each family to walk to school at least one day a week, students with guardians riding bicycles and also carpooling will also be investigated and encouraged where possible;
- Operational Plan of Management - this plan will describe in detail how the morning and afternoon drop off/pick up periods will be safely managed, through appropriate staff allocations and safety procedures. It will also investigate the following solutions such as:
 - Doubling the amount of traffic wardens who place the students into cars;
 - The implementation of new technology. New smart phone apps have been developed such as "Pik My Kid", which can give teachers a visual representation of which student's parents are next in the car line. Such applications can be implemented by the school to develop a more effective pick up system.
 - Introduce new educational programs for guardians dropping off/picking up students. Such programs will outline road and parking rules and will be a pre-requisite for parents of all new students before enrolment at the school is accepted;
 - Investigate the potential to create different pick up locations around the school for different year groups;

- Potential to stagger the dismissal times into three groups Kindergarten, Year 1-2 and Year 3-6.
- End of journey facilities - additional facilities such as showers and lockers will be provided for staff, to encourage walking and cycling to work;

For investigation and potential future implementation:

- Time Limited Parking - in consultation with Council, 5 minute parking could be introduced surrounding the school during drop off and pick up times. This approach has been successfully implemented at the nearby Double Bay Public School;
- Additional Bus Services - DEC will work with the relevant government agencies with a view to provide additional bus services to further reduce private vehicle demand;
- Potential School Bus Services - DEC will consider the feasibility of organising bus services for transporting students to designated pick up/drop off locations away from the school grounds. These buses would enable 200 future students to travel by bus which would equate to an additional 28% reduction in the maximum access and parking demand for the school, during the afternoon peak period. Four bus destinations will be investigated, including;
 - Rose Bay/Vaucluse (North);
 - Randwick/Maroubra (South);
 - Bondi/Bronte (East); and
 - Alexandria (West).
- Closed Tram Lane - DEC will work with the relevant government agencies to confirm the viability of reopening the closed tram lane to all traffic;
- Upgrading surrounding road network - DEC will work with the relevant government agencies to confirm the viability of reinstating 2 lanes uphill to the section of Birriga Road between Banksia Street and the School Access Road; and
- DEC will liaise with the Council on a potential review of 90 degree angle parking - the introduction of time limited parking along the 90 degree angle parking opposite the school.

Trees

The JRPP also suggested in the briefing session that DEC and Council discuss the tree removal and pruning required to accommodate the new school building.

After a careful review of the new building's footprint, we can confirm that DEC no longer requires removal of the two "Hills Weeping Fig" trees within the northern part of the school site. These trees will however require pruning to accommodate the new school building and a redesign of the "amphitheatre" to ensure their preservation. Plans for the redesigned amphitheatre and an updated arborist report have been attached to this letter.

Conditions of consent in relation to this and offset planting are proposed to be modified accordingly in the attached conditions of consent.

Heritage

Council requested, on 9 September 2015, additional heritage information including an Archaeological Assessment. We understand Council requested this assessment because the Heritage Assessment, which was provided with the development application, mentioned that remains of a Headmaster's cottage had been found on the site.

The Heritage report does however identify that the original headmaster's cottage was located in the southern portion of the school which is currently used as a garden and is not in the vicinity of the proposed new school building. A further archaeological assessment is therefore not considered necessary at this stage. However, to ensure that the development will not impact on the potential historical significance of the site, we recommend an additional condition to be included within any consent, as detailed in the attached amended conditions.

Stormwater

In regard to the stormwater requirements for the new school building, we consider that the conditions indicated in the attached will address any concerns Council may have.

Weekend Markets

After school hours, activities such as weekend markets were suggested in the SEE only to indicate the types of uses that could potentially take place on the site, in order to enable the school to contribute to the social and recreational facilities activities available to the local community. If this idea is further developed and proceeds in the future, further information will be provided to Council via a separate application, if necessary.

Draft Conditions

DEC have reviewed the draft conditions of consent provided by Council. In addition to the recommendations as outlined above in this letter, DEC approves the proposed conditions subject to a relatively small number of modifications. The attached draft conditions highlight the proposed amendments that DEC is willing to approve.

The subject proposal is essential to ensure sufficient public educational facilities are available to satisfy the forecast long term growth in demand for this subregion.

We will be pleased to discuss the above with Council in preparation for the JRPP meeting on 4 November 2015. If you have any questions please feel free to contact the undersigned on (02) 8270 3523.

Yours Sincerely,



David Ryan
Executive Director

CC: Angela Kenna

JRPP Secretariat

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