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10 June 2021

The General Manager  
Wollondilly Shire Council  
PO Box 21  
Picton NSW 2571

Attention: Mr Michael Buckley

Dear Michael,

## **DA/2020/522/1 - PPSSWC-101 - WILTON PUBLIC SCHOOL: RESPONSE TO COUNCIL**

This letter has been prepared on behalf of NSW Department of Education (DoE) and School Infrastructure NSW (SINSW), the applicant for DA/2020/522/1 - PPSSWC-101 at Wilton Public School. This letter is a response to matters raised by Council in an email to NSW Department of Planning, Industry and Environment (DPIE) dated 4 June 2021 and a further email to Urbis dated 7 June 2021.

Responses to the matters raised by Council are provided in the table below.

<b>COUNCIL COMMENT</b>	<b>APPLICANT RESPONSE</b>
Item 1 - Number of parking spaces generally within the school – noting the school is increasing by 66% and the report confirms they need a total of 87spaces – we need details of how they are to provide 87 spaces within the school grounds given the demands on on-street parking for residents, shops, buses and parent drop off and pick up	Addressed in Attachment A.
Item 2 - It is noted that there is a need to formally increase the parking to accommodate for the increase in students and teachers. Council is of the view that this should be undertaken in conjunction with any changes to the current development approvals and not as a separate development application.	While this may be Council's preference, Clause 36(1)(v) of <i>State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017</i> (Education SEPP) states that a car park that is not more than 1 storey high is development that may be carried out by a public authority without development consent on land within the boundaries of an existing school. There is a lawful planning approval pathway for NSW Department of Education (DoE) to deliver the car park under a separate approval. The car park therefore does not form part of the DA and will be assessed and determined by DoE through

COUNCIL COMMENT	APPLICANT RESPONSE
	<p>a Review of Environmental Factors. Council was notified of the Review of Environmental Factors in September 2020 in accordance with the legislated consultation requirements.</p> <p>The DA has assessed car parking for the master planned school site notwithstanding that the physical works will be undertaken under Clause 36 of the Education SEPP. This ensures that a Council is able to holistically consider car parking notwithstanding it is not the consent authority for the car park works.</p>
Item 3 - Need more detail on how special needs children are to access the school including dedicated vehicle parking	Children in Supported Learning Classes are currently dropped off in the bus zone on Greenbridge Drive (closer to the Supported Learning classrooms) before the buses arrive (morning) and collected before the buses arrive (afternoon). This arrangement will continue.
Item 4 - Parking and access provisions for after school care needs to be demonstrated	Addressed in Attachment A.
Item 5 - What referral has been made to the bus service provider – seems like a lot of kids for 2 bus bays	Addressed in Attachment A.
Item 6 - The applicant will need to implement a community engagement plan pre, during and post development	Noted.
Item 7 - No construction traffic to be parked on street (arrangements will have to be made to park on or off site, on private property)	<p>The Preliminary CMP that was submitted with the DA stated:</p> <p><i>“It is anticipated that the Development Approval will contain conditions that certain reports and payment of fees that must be completed, submitted and approved before works can commence:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Construction Management Plan</i></li> <li>▪ <i>Environment Management Plans</i></li> <li>▪ <i>Erosion and Sediment Control Plan</i></li> <li>▪ <i>Waste Management Plan</i></li> <li>▪ <i>Traffic Management Plan and</i></li> <li>▪ <i>Payment of Long Service Levy and other authority fees”</i></li> </ul>

COUNCIL COMMENT	APPLICANT RESPONSE
	<p>The Draft Conditions of Consent do not seek to impose a condition for a construction management plan (CMP) or construction traffic management plan (CTMP).</p> <p>DoE as the applicant would accept a condition of consent requiring a CMP and CTMP to be prepared and submitted to Council prior to a Crown Certificate being issued. The contractor will be engaged by then and the CMP and CTMP will detail in full their management measures.</p>
Item 8 - Construction traffic/interaction to be outside school pick up and drop off times	<p>Noted.</p> <p>DoE as the applicant would accept a condition of consent stating that there is to be no construction traffic movement during school drop off and pick up times, unless otherwise managed appropriately through the CMP.</p>
Item 9 - Any proposed changes to current traffic management (ie parking restrictions) will require Local Traffic Management approval. <u>It's noted that the proposed changes do not facilitate any employee parking by Council.</u>	<p>Noted.</p> <p>Comment underlined is not relevant.</p>
Item 10 - The provision of parking for construction workers and the like. To assist in this matter there is vacant land across the road from the school (south) at No. 30 Greenbridge Drive, which is in the ownership of Bradcorp Wilton Park Pty Ltd. This land can possibly be made available to the school on a temporary basis during the building phase for construction workers parking and possibly deliveries. If the school were successful in securing this land, this can also be included within the Construction Management Plan.	<p>Noted.</p> <p>DoE as the applicant would accept a condition of consent stating that the applicant is to explore using land at No. 30 Greenbridge Drive for construction vehicle parking. If the applicant is able to secure this land, it must be included within the CMP.</p> <p>We would welcome Council's understanding as to how this temporary use would not require development consent. DoE cannot afford further delays to construction.</p>

All matters raised by Council have been appropriately addressed through the development application assessment process and this letter. Should new or amended conditions be made to the draft set of conditions, Council is to provide a copy to the applicant for comment.

There should be no reason for Council to further delay the finalisation of its assessment report and for the assessment report to be forwarded to The Planning Panel for determination of the DA. We note the Panel's instruction to Council to urgently resolve these matters and finalise the assessment.



DoE is open to meeting with Council to discuss its responses and expeditiously resolve all matters. However, this must occur this week, without further delay. Please do not hesitate to contact me to discuss.

Kind regards,

A handwritten signature in blue ink that reads "Alaine Roff". The signature is fluid and cursive, with the first name "Alaine" and the last name "Roff" clearly distinguishable.

Alaine Roff  
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## ATTACHMENT A

## 1. Wilton Public School - Response to Council RFI Items

### 1.1 Item 1

*Number of parking spaces generally within the school – noting the school is increasing by 66% and the report confirms they need a total of 87 spaces – we need details of how they are to provide 87 spaces within the school grounds given the demands on on-street parking for residents, shops, buses and parent drop off and pick up*

The TIA prepared for DA outlines the following DCP parking requirements per the Wollondilly DCP (2016):

- School (no students over 16 years of age): 1 car space per full-time equivalent (FTE) staff  
1 car parking space per 100 students

Therefore, the proposed 750 students and 70 full-time equivalent (FTE) staff, will require a **total of 78 car parking spaces (not 87 spaces)**.

However, the **proposed parking provision of 47 spaces** (whilst lower than the DCP requirement) has been justified based on:

- The Department of Education's parking policy stipulates that "A school is not obliged to provide parking on site to anyone at any time." In light of this policy, the DET is not obligated to provide on-site parking to staff. Notwithstanding, SINSW has proposed to increase the capacity of the existing staff car park to facilitate the growth in staff associated with the School expansion.
- Operational strategies can be implemented to manage the onsite parking, such as allocating some bays for carpooling and establishing onsite parking priority for staff utilising sustainable travel initiatives.
- Consideration is given to the site constraint with bush land on the north west side of the School footprint. Removal of the bush land will be required to cater for any further extension of the car park. As it is also understood that the School is situated within conservation bushland and the retention of existing trees would be an added ecological benefit.
- The parking occupancy surveys conducted over the course of a typical school day indicates that the majority of nearby local streets have at least 50% spare capacity to accommodate the shortfall.
- Furthermore, the staff travel mode surveys indicate that approximately 67% of the surveyed staff park within the school grounds which equates to a total of 47 staff. This demand for off-street parking is met by the total overall car parking provision of 47 spaces.
- We are currently in discussions with the School Principal and as part of this process, we are preparing the Green Travel Plan. We are assessing ways to improve the use of alternative transport modes (eg: walking, cycling and public transport) and will be making recommendations for additional bus services and improvements to the pedestrian & cycling infrastructure, which will provide alternative travel options to single car use.

## **1.2 Item 2**

*It is noted that there is a need to formally increase the parking to accommodate for the increase in students and teachers. Council is of the view that this should be undertaken in conjunction with any changes to the current development approvals and not as a separate development application.*

Refer to Urbis Covering Letter.

## **1.3 Item 3**

*Need more detail on how special needs children are to access the school including dedicated vehicle parking/access*

No specific allocation for special needs students was assessed as part of the TIA. As outlined below, the pick-up/drop-off bays have been provided and specific spaces can be allocated dependent on the numbers required.

### **1.3.1 Existing On-street Parking Controls**

Dedicated pick-up and drop-off zones are provided along two frontages of the School being Greenbridge Drive and Kenniff Street. The existing on-street parking controls on Kenniff Street and Greenbridge Drive are illustrated in Figure 1.

Currently, P5-minute parking (total 13 spaces) is provided on the eastern side of Kenniff Street and along the northern side of Greenbridge Drive. It is noted that the current on-street parking controls on Kenniff Street appear to have been updated to "P5-minute; 8am-9:30am and 2:30pm-4pm; School Days" since the Traffic Impact Assessment was previously issued on 25<sup>th</sup> March 2020. It is noted that the five on-street spaces at the northern end of Kenniff Street was previously unrestricted at the time the Traffic Impact Assessment was prepared.

There is also 1/2P Parking provided along the southern side of Greenbridge Drive between the standard School Zone times "8am-9:30am and 2:30pm-4pm; School Days". This 30-minute time restriction allows parents to pick-up/drop-off younger students who may require someone to escort them to and from the school grounds.



Figure 1 - Existing On-street Parking Restrictions (as at 8<sup>th</sup> Dec 2020)

### 1.3.2 Proposed Amendments to On-street Parking Controls

As outlined in Section 9.1 of the Traffic Impact Assessment, the following changes to the on-street parking controls are requested:

- Kenniff Street** – implementation of 2P parking along the eastern side of Kenniff Street for visitor use. The existing P5-minute restriction is proposed to be converted to a combination of “P5-minute 8am-9:30am; 2:30pm-4pm; School Days” and “2P 9:30am-2:30pm; School Days”. This will allow visitors to utilise these spaces during the school day outside the hours of pick-up/drop-off operation. The two-hour time limit will facilitate turnover of these parking spaces and discourage long-term parkers from using the pick-up/drop-off zone during the morning and afternoon school peaks.
- Greenbridge Drive** – no changes to the existing on-street parking controls are proposed.

The proposed amendments are shown in Figure 2.





Figure 2 – Proposed On-street Parking Restrictions

## 1.4 Item 4

*Parking and access provisions for after school care needs to be demonstrated*

No specific assessment for after school care was undertaken as part of the TIA. The proposed changes to the parking restrictions itemised in Section 1.3.2 could be amended to extend the pick-up/drop-off time to cover the before and after-school care operation times (subject to Council approval).

## 1.5 Item 5

*What referral has been made to the bus service provider – seems like a lot of kids for 2 bus bays*

In accordance with the student travel information collected through the online travel mode surveys, travel by bus accounted for 11% of the existing travel mode share. Based on the current student population of 450 students, this equates to approximately 50 students travelling by bus. With the increase in student capacity to 750 students, this will potentially generate an increased demand for bus services with 83 students opting to travel by bus, assuming the existing mode share remains constant.

Following this, the net increase in demand for bus services is anticipated to be 33 additional students travelling by bus. The option of exploring the provision of an additional bus service in the morning and afternoon periods to accommodate the additional demand may be investigated between SINSW and Picton Buslines.

It is noted that as there are currently two bus bays situated in front of Wilton Public School and the fact that there is only one bus scheduled to arrive at the school at any one time (i.e. one service in the morning and one service in the afternoon), the provision of additional bus bays would not be warranted. Should additional bus services be introduced in the future, the services may be scheduled such that the buses are staggered to maximise utilisation of the existing bus bays and to ensure no more than two buses arrive at the school at any one time.

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**Document Control:** Prepared by *HL/SW* on *7 June 2021*. Reviewed by *SW* on *7 June 2021*.

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