Sent:	3/02/2021 9:51:38 PM
Subject:	Fwd: Letter and covering email for Council re DA
Attachments:	BHPS P&C Submission - DA2020_1758.pdf;

Subject: Objection re DA2020/1758 for 11 Lewis Street Balgowlah Heights
Attention: Mr Kent Bull

Dear Mr Bull,

Please find attached a submission on behalf of the Balgowlah Heights Public School Parents and Citizens Association in relation to DA2020/1758 to build a childcare centre at 11 Lewis St, Balgowlah Heights.

Please feel free to contact myself via phone or email, if you have any questions or concerns.

Thank you.

Billie Ristoski, BHPS P&C President
Email: bhpspresident@gmail.com
Phone: 0409 695 800

BALGOWLAH HEIGHTS PUBLIC SCHOOL P & C
9b Lewis St, Balgowlah Heights, NSW 2093

03 February 2021

The Chief Executive Officer and Council Officer Kent Bull
Northern Beaches Council
Administrative Centre
Pittwater Road
DEE WHY NSW 2099

RE: DA2020/1758 - 11 Lewis Street BALGOWLAH HEIGHTS NSW 2093

To the assessing Planner,

As President of the Balgowlah Heights Public School Parents and Citizens Association (BHPS P & C), and on behalf of many concerned parents at the school, I would like to raise some serious issues with the proposed long-day childcare development at #11 Lewis St, Balgowlah Heights. The proposed site is directly adjacent to our primary school.

While there may be perceived complementary aspects of situating a childcare facility next door to a primary school, our Association believes that in this instance the traffic safety risks and disturbance to schoolchildren far outweigh any perceived merits of the development.

The concerns of the P & C are focused on the safety of the children in and around the school. We believe the Development Application may have understated the amount of traffic generated by the proposed development and the adverse impact this will have on both pedestrians and traffic movement.

In our view, the development has not taken enough consideration of the impacts on the pedestrian movements in the vicinity of the site, in direct contravention of RMS Guidance[1] which states "...access to the development and the road system must be designed to minimise conflicts between vehicles and pedestrians". This has not been followed in our view, with a significant point of conflict between vehicles and pedestrians at the access point. The risk of this resulting in a serious incident is high. It is not a risk the P & C is prepared to accept, and neither, we believe, should Northern Beaches Council.

We urge Council to consider the safety of the existing users of the area and the potential impact and consequences of introducing a large number of vehicle movements in direct conflict with the movement of a large number of primary school children and their Carers. Our concerns are outlined in detail below and we would be happy to discuss our assumptions and the issues raised in more detail with Council as required.

I hope you will take our concerns into account when assessing this development application and I will be happy to respond to any questions or provide further information regarding our position.

Regards,

Billie Ristoski, BHPS P & C President
Email: bhpspresident@gmail.com

[1] Guide to Traffic Generating Developments.
Version 2.2 October 2002

Specifically our concerns are:

1. Underestimation of vehicle movements generated by the site

We believe the development application underestimates the number of vehicle movements generated by the proposed development site.

As we understand from the Development Application (DA), the proposed development would comprise 57 children (licenced places) and 11 staff, a total of 68 people using the site daily.

The developer's calculations are based on the trip generation rate of 0.8 trips/licensed place, resulting in 46 vehicle movements in the AM peak. However, the RMS Guide notes that "a trip is defined as a one-way vehicular movement from one point to another excluding the return journey. Therefore, a return trip to / from a land use is counted as two trips". It is unclear how this has been incorporated into the developer's calculations. It is also unclear how account has been taken for the differing land use characteristics and the likely higher trip generation rate for developments in low density residential areas[2].

Our assessment below outlines a more realistic estimation of the amount of traffic generated by the site.

Vehicle movements at access point

Applying the calculation rates used by RMS to the specific characteristics of the proposed development site, we have made the following estimates for the morning peak:

Staff

	Assumption	Source
Number of staff	11	Development application
Assumed trip generation (morning peak)	10	Traffic assessment, aligned with assumed parking provision for staff

Children

	Assumption	Source
Number of children	57	Development application
Number of children assumed to access site via vehicle	93%	The mean proportions of children transported to each centre type by car was 94% for the pre-schools, 93% for the long day-care and 75% for the before/after school care.[3]
Assumed number of children per vehicle	1.32	Average children per delivery = 1.32[4]
Inbound trips generated by children	40	Calculation
Outbound trips generated by children	40	Calculation – assumed all vehicles leave site following drop off

Total peak vehicle movements at access point = 90 (10 staff inbound + 40 children inbound + 40 children outbound)

This is shown below in Figure 1.

[2] ROADS AND MARITIME SERVICES VALIDATION TRIP GENERATION SURVEYS CHILD CARE CENTRE, 2015

[3] Guide to Traffic Generating Developments. Version 2.2 October 2002

[4] ROADS AND MARITIME SERVICES VALIDATION TRIP GENERATION SURVEYS CHILD CARE CENTRE, 2015

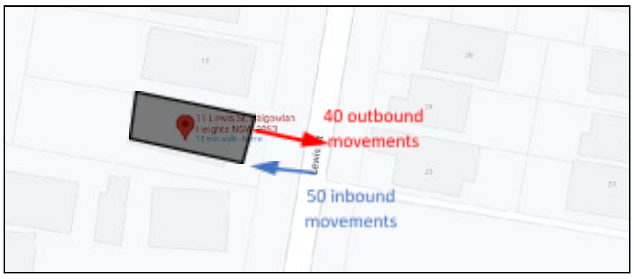

Figure 1 Morning peak vehicle movements

Additional traffic on surrounding network

Based on the above estimation of trip generation, it is assumed that the proposed development will have a greater impact on the surrounding network than presented in the traffic assessment. Specifically, 50 'inbound' trips in the morning peak (10 staff + 40 children) and 40 'outbound' trips (children only), as shown in Figure 1. This calculation is significantly in excess of the 46 vehicle movements estimated as part of the development application.

The traffic assessment assumes that 10% of children attending the proposed childcare facility have siblings attending Balgowlah Heights Public School, consequently reducing the 'additional' traffic generated by the proposed development, as these vehicles would already be using the network to access the school. Based on this assumption, this would result in 46 inbound trips (10 staff + 36 children) and 36 outbound trips (children only). As shown below in Figure 2.

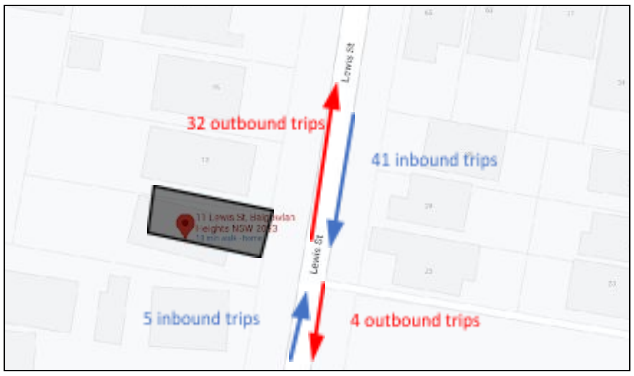

Figure 2 Morning Peak additional traffic on surrounding road network

This calculation is still in excess of the estimated vehicle movements (and associated calculations on the intersection) estimated as part of the development application.

Additionally, it is noted that the developer has not considered the changes to the bus services in the area which came into effect on 20 December 2020[5] (three days after the assessment report was published). Contrary to the information provided in the assessment report, the area is no longer served by bus routes 132 and 171x, and now served by route 162. The new route no longer provides direct access to either Warringah Mall or the city. While not a significant consideration for the development, it is likely this will impact upon mode choices for staff, and further increase the reliance on private vehicles and may affect assumptions around number of staff vehicles.

2. No consideration given to vehicle/pedestrian conflict at the site access point

[5] https://transportnsw.info/news/2020/northern-beaches-lower-north-shore-bus-service-improvements

The traffic assessment submitted as part of the development application provides no consideration of, nor mitigants for, the high level of conflict between vehicles accessing the site and pedestrians - noting that many of the pedestrian movements are made by primary-school aged children and their younger siblings - walking along Lewis St. This is a significant safety risk.

In the traffic assessment report submitted by the developer, the pedestrian counts at the intersection of Lewis and Ernest St indicate a large number of pedestrians crossing the site access point in both morning and evening peaks (96 in the period 8.45 – 9.00 and 168 in the period 15.00-15.15), with 516 pedestrian movements counted across the day. In the morning peak (8.15-9.15), there were 187 pedestrian movements across the access point.

As evidenced by the pedestrian count data, the route past the proposed access point is a vital active transport link to the school, accessed by hundreds of young children and their families who walk to and from school and *Arabanoo*, the before and after school childcare centre (but also those who scoot, cycle and run during holidays and weekends) along the only footpath available on that side of Lewis Street.

There is no alternative for active transport on this portion of Lewis St as the opposite verge does not have a footpath.

Additionally, the school supports five "Walking Bus" routes[6] which promote active transport access to the school. These have been highly patronised since their inception in 2019 and are supported by both Northern Beaches Council and the local Member of State Parliament. Two of the routes pass directly across the access point of the proposed development site.

As described above and shown in Figure 1, it is estimated that 90 vehicle movements will occur across the access point in the morning peak.

The increased number of vehicle movements (approx. 90 times the number of existing vehicle movements, based on a trip generation rate of 0.95) across the access point together with the high number of pedestrian movements results in a high likelihood of a conflict between these two user groups at this point.

3. Impacts of these movements on surrounding streets, including parking and additional traffic generation

The traffic impact assessment underestimates the impact of the traffic generated on the surrounding streets, in terms of pedestrian movements and existing traffic generation.

Impact of pedestrian movements on intersection of Ernest and Lewis Streets

The SIDRA analysis undertaken does not appear to have taken pedestrian movements across Lewis St into account in the calculation of delay measures and associated queue distance. The developer's counts indicate that there are 76 pedestrians crossing Ernest St at Lewis St in the AM peak. This adversely impacts the following movements and affects the functioning of the intersection:

a. South: Lewis St L2 – 62 left turn movements
b. South: Lewis St R2 and T1 – 17 and 72 respectively (as a result of L2 delay)
c. West: Ernest St T1 – 145 through movements
d. West: Ernest St R2 and L2 – 52 and 5 respectively (as a result of T1 delay)

[6] https://balgowlaht-p.schools.nsw.gov.au/supporting-our-students/walking-bus.html

It is unrealistic to exclude this from the intersection analysis and underestimates the traffic impact and congestion associated with this intersection. Anecdotal evidence and experience indicate that the delay associated with left turn movements from Lewis St (south approach) onto Ernest St can often result in vehicle queues back past the access/egress point of the proposed development. A queue distance of 5.4m and average delay of 10.3 seconds is not reflective of the reality experienced every day by users of this intersection. Further the calculated speed values (50.4km/h on Lewis St south approach) are not reflective of the reality and are well in excess of the sign-posted school speed limit (40km/h) indicating a flaw in the modelling or associated assumptions.

The traffic impact assessment has also included no consideration of the pedestrian laneway, running from Radio Ave to Lewis St, between 26 Lewis St and the junior campus of the School This is utilised by many children and their carers to access the Lewis St Western campus. The laneway is directly opposite the access to the proposed development and would result in additional risk to pedestrians in the area.

Impacts on existing traffic congestion

Existing conditions along Lewis St during the morning peak are characterised by congestion and disordered movements due to school traffic and parent behaviour. As evidenced in the many submissions already provided to Council objecting to the development, and anecdotal evidence collected over many years by the School, behaviours exhibited along Lewis St include double parking, near misses, illegal vehicle manoeuvres and incorrect procedures for drop-off. The school currently uses 'Stay Safe Rangers' to monitor behaviour and the P&C has invested significant time in trying to monitor and amend the behaviour.

This existing problem would be further exacerbated by the additional traffic as a result of the proposed development.

Based on the assumed traffic distribution[7], 90% of vehicles accessing the site would travel southbound from Ernest St along Lewis St. This would necessitate a right-turn movement across both the north-bound traffic (leaving the 'kiss and drop' zone') and the heavy pedestrian movement south-bound along Lewis St to access the proposed site. Based on calculations above, this would result in 45 right turn movements, shown below in Figure 3.

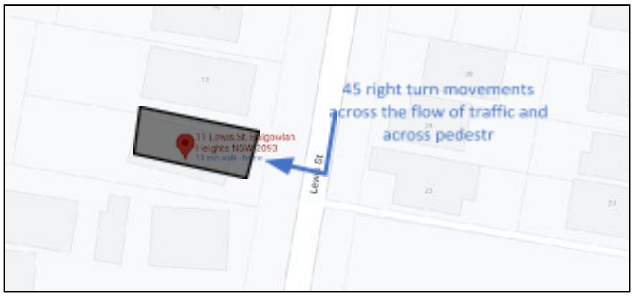

Figure 3 Morning peak site access movements

In an environment of congestion, traffic queues and generally unsafe behaviour, the addition of 45 right turn movements across the general flow of traffic and heavy pedestrian movement is considered to further exacerbate an already unsafe situation.

[7] Traffic and Parking Impact Assessment Report p13

Note that total movements have been used in the calculation, rather than 'additional' traffic generated, as it is assumed that any parents with children at both the proposed centre and Balgowlah Heights Public School would drop their children directly at the childcare centre, rather than utilising the Kiss and Drop zone.

4. Impact of inadequate on-site car park and vehicle management areas

The traffic and parking impact assessment assumes all parking will occur on-site via 16 parking spaces.

The assessment notes that staff may be required to utilise vacant parent spaces for parking and notes that "A plan of management may be required in order to ensure that all visitor car parking spaces are vacant during the parent parking peaks", indicating a risk that the parking provided on-site will not be sufficient for parents and staff. We consider that the potential impact on surrounding on-street parking has not been adequately assessed.

The area is already significantly congested with on-street parking, utilised both by local residents and teachers and staff accessing Balgowlah Heights Public School. Anecdotal evidence suggests that all on-street spaces are regularly full by 8am.

We believe the inadequate parking facilities will lead to daycare parents parking on the street. This will certainly exacerbate the already serious congestion on Lewis Street during school peak times and increase the risk of an accident.

5. Lack of consideration of traffic management issues during demolition and construction

Whilst it is recognised that DA submissions will consider facility design and operational factors such as traffic and waste management, locating such a facility within a residential area and immediately adjacent to a school with its associated pedestrian and vehicular requirements means that the evaluation of the proposed development should also consider the impacts during demolition and construction. This includes removal of waste, the supply of materials and equipment and trade vehicles. This consideration should include the following:

- Construction traffic management plan
- Required construction related infrastructure and zones
- Construction pedestrian management plan

Construction Traffic Control Plan

From the waste management plan it is estimated that approximately 1,930m3 of waste will be removed from the site during excavation and demolition. Of this volume the vast majority will be excavated material (approximately 1,700m3 of material after the pool has been filled in). Assuming a specific gravity of 2.5, this will equate to approximately 5,000t of material, or 150 heavy vehicle movements. The movement of these heavy vehicles should be considered in the traffic management plan, with specific attention to the following:

- Access and egress route of the trucks – Due to the location of the site trucks will be mixing with vehicle traffic accessing the school. The risk of narrow roads being impassable to heavy vehicle traffic and hence blocking traffic requires further assessment.
- Staging areas – A staging area will be required for trucks awaiting loading or unloading. The risk is that the location selected will be directly in front of the school which will be unacceptable due to the risk to children and staff accessing the school.

- Loading and unloading process – The normal process of dump trucks reversing into the site during excavation is once again a serious safety risk across the major pedestrian route taken by schoolchildren and their carers. Furthermore, it is unclear how pedestrian movements will be managed during temporary closures of Lewis St to allow trucks to reverse either into or out of the site. The impact and safety risks caused by this process should be considered especially given the lack of footpath on the opposite side of Lewis St at this location.
- Parking provisions – With such a large construction site, the expected number of workers on site and parking spaces required needs to be identified. During its peak, it is not unreasonable that the construction of the facility will require parking for a minimum of 20 private or trade vehicles before 7.30am.

Construction infrastructure and zone

Cranage

For construction activities of this scale it is expected that the use of a crane will be required which may require the closure of Lewis St on more than one occasion, severely disrupting access to the school. With the narrow size of the site it is difficult to see how material will be hoisted 20-30m in the air without being transported directly over school children, classrooms and residential houses.

Work Zone

As with any development of this scale, a work zone will need to be established directly in front of No 11. The length of this zone will need to be long enough to enable a concrete truck and a concrete pump to be parked end to end. This zone will therefore likely either impact the driveway of the property at No 13 or will impede on the current area designated for school drop-off and pick-up.

An assessment will also be required to determine whether Lewis St has sufficient width to permit a work zone whilst maintaining two-way traffic.

Pedestrian Management Plan

The western side of Lewis St, at the access point of the proposed development is a major pedestrian thoroughfare and, as mentioned above, will create an unacceptable safety risk due to the significant conflict point of school children crossing heavy vehicle traffic and construction activities.

Typical solutions adopted in this situation are considered unacceptable in this location. The movement of the footpath on the roadway to bypass the site will severely impact traffic flow. The closure of the footpath entirely and forcing pedestrians to use the eastern side of Lewis St (where there is no footpath) will create a situation which will greatly increase the number of students crossing Lewis St in an uncontrolled environment as there are no pedestrian crossings as this point, increasing the risk to pedestrian safety.

6. Impacts on the school during construction

Additional concerns related to the proposed development and its impact on the school environment during construction include those of noise, vibration, and dust. The proposed development directly borders the school and is adjacent to several classrooms, including Year 3 and those utilised by the Learning Support function of the school. The impacts of undertaking a

construction project of this scale, involving significant excavation, are considered unacceptable to these children, and the broader environment of the school. Our specific concerns are outlined below.

Noise

During school hours from 8am to 4:30pm (extend hours from the standard school day of 9am to 3pm due to the numerous extra activities that operate before and after school), it would be extraordinarily disruptive to the learning environment and general wellbeing of the children if there was any noise level more than say the standard traffic noise on Lewis St. Activities such as rock breaking, crane luffing/slewing, heavy machinery used in excavation, jack hammering, concrete pumping, concrete vibration, tree clearing, trucks or machinery reversing, powder actuated tools, or similar would cause noise levels significant enough to make teaching ineffective. Further, sustained noise levels of this nature on young people could lead to permanent ear damage.

Vibration

Any activities that could cause vibrations that translate to school classrooms would be very disruptive. This includes activities expected to be involved in the excavation of a large underground carpark, including rock breaking, trucks moving, jack hammering, mechanical excavation, steel tracked plant. In addition, the close proximity of classrooms to the site, coupled with the age of the buildings, could lead to cracking/damage etc. to school buildings. Any such damage could lead to dangerous situations like falling plaster/ceiling tiles.

Dust

Explosives would be completely unsafe to be used in such close proximity to the school. Excavation of ground, particularly rock, can lead to respiratory problems such as silicosis. Additionally, cutting of concrete, masonry, cement sheets, can also lead to similar dust-related silicosis. Silicosis causes similar damage as asbestosis.

Materials that contain asbestos are likely to be found during demolition of the existing building as it was constructed before 2003 when use of such materials stopped. It would be completely inappropriate for any demolition to commence before a thorough assessment by an Occupational Hygienist was undertaken, with report issued to Council and to the school at least 30 days prior to the demolition. Should anything be identified then the Council and the school should be consulted about the planned removal and an independent consultant (such as JBS&G/GHD) should be engaged by the developer to represent the school to ensure the demolition is conducted safely.

Additionally, all dust-generating activities should have suitable air monitors checked daily and should be wetted down with suitable, dedicated dust-fighting equipment. All trucks should be covered. Suitable wheel washing equipment should be installed inside the site to ensure material is not tracked out on to the road that could then dust up.